Boston Groundwater Trust

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Elliott Laffer

August 30, 2013

Ms. Casey Hines, Project Manager Boston Redevelopment Authority One City Hall Square Boston, MA 02201-1007

Subject: 80 East Berkeley Street

Dear Ms. Hines:

Thank you for the opportunity to comment on the Project Notification Form for 80 East Berkeley Street. The Boston Groundwater Trust was established to monitor groundwater levels in sections of the City where the integrity of building foundations, particularly those supported on wood pilings, is threatened by low groundwater levels and to make recommendations for solving the problem. Therefore, my comments are restricted to groundwater related issues.

As stated in the PNF, the project is located in the Groundwater Conservation Overlay District established in Article 32 of the Boston Zoning Code. However, the proponent did not detail in the PNF how they plan to meet the requirements imposed in the GCOD. In addition to the mandated recharge system, the proponent is required under Article 32 to provide a certification stamped by a professional engineer registered in Massachusetts showing how the project will not cause a reduction in groundwater levels on site or on adjoining lots. At the scoping session the proponent acknowledged their commitment to meeting the standards required under the GCOD and to provide the stamped certification. As promised at the scoping session, the proponent sent a follow-up letter to the Trust stating how they will comply with Article 32 of the code and will obtain the necessary BWSC approval of the recharge system once it is designed. The proponent also stated in the letter that they will provide the necessary engineering certification. In addition, this language was included in the Development Plan for Planned Development Area No. 95 that was received after the PNF.

As stated in the PNF, the proposed building includes the construction of a two-level underground garage. The excavation for two underground levels will extend substantially below the upper trapped aquifer that is critical to maintaining the integrity of wood pilings. It is critical that no path be created that will allow the water in the upper trapped aquifer (where the wood pilings reside) to drain down into the next aquifer below from which it is separate.

I look forward to working with the proponent and the Authority to assure that the project can have only positive impacts on area groundwater levels.

Very truly yours,

Elliott Laffer Executive Director

Cc: Kathleen Pedersen, BRA

Maura Zlody, BED