Boston
Groundwater Trust

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March 19, 2012

Sonal Gandhi, Senior Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Subject: Brigham and Women's Hospital

Dear Ms. Gandhi:

Thanks you for the opportunity to comment on the Draft Project Impact Report for the research building that Brigham and Women's Hospital plans to erect on Parcel C of the Emmanuel College Endowment Campus. The Boston Groundwater Trust was established to monitor groundwater levels in sections of Boston where the integrity of building foundations is threatened by low groundwater levels and to make recommendations for solving the problem. Therefore, my comments are restricted to groundwater related issues.

I am pleased that the proponent has responded to the comments in my January 27, 2012 letter on the Project Notification Form for this project by explicitly acknowledging that the project is located in the Groundwater Conservation Overlay District established under Article 32 of the Zoning Code and committing to strictly meet the standards required of projects in the GCOD. I am pleased that the commitment includes both the recharge requirement and the mandate that the project be designed so that it will have no negative impact on groundwater levels either on site or on adjoining lots. This design commitment, which effects both construction and operational phases, is particularly important because of the substantial amount of below ground level construction planned, including three levels of parking and one level of research support and imaging space. The planned project is located not far from historic structures either known to be or likely to be constructed on wood piling foundations, including the main buildings of both Emmanuel and Simmons Colleges and the Gardner Museum.

The DPIR notes that the foundation system has not yet been designed. It indicates that the project may include an underdrain system. Such a system can lead to a reduction in groundwater levels, particularly if there is a potential path for groundwater that is trapped in the upper aquifer critical to the preservation of wood pilings to drain to the aquifer below. Such a path can be created along the edge of the foundation system or outer walls; the possibility would need to addressed in the engineer's letter certifying no negative impact.

I appreciate the proponent's commitment to monitor groundwater levels before, during, and after construction and to coordinate with the Trust on the program. The readings should be shared with the Authority and the Trust shortly after they are taken; and provision should be made to address any unanticipated reductions in groundwater levels, including, if necessary, suspension of

construction until a cause can be established and addressed.

The proponent has committed to satisfying the requirements of Article 32 prior to the issuance of a Certificate of Consistency for the project. Because the project will not go before the Board of Appeals, it is critical that all protections are in place before construction begins.

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