## Boston Groundwater Trust

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October 12th, 2022

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Sarah Black, Senior Project Manager Boston Planning & Development Agency One City Hall Square Boston, MA 02201-1007

Subject: Parcel 13 Air Rights Project Notification Form Comments

Dear Ms. Black:

Thank you for the opportunity to comment on the Parcel 13 Air Rights Project Notification Form (PNF) located in the Back Bay & Fenway neighborhoods. The Boston Groundwater Trust (BGwT) was established by the Boston City Council 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 limited to groundwater related issues.

The PNF states that the project site is located within the Groundwater Conservation Overlay District (GCOD) as outlined in Article 32 of the City of Boston Zoning Code. The PNF also states that there are limited areas of land on site where the Project will be able to provide groundwater recharge and that stormwater management system for the new building will be designed to capture and store 1.25-inches of runoff over the impervious Project Site area, meeting BWSC and BPDA requirements.



Compliance with the GCOD requires both the installation of a recharge system and a demonstration that the project cannot cause a reduction in groundwater levels on site or on adjoining lots. Before the GCOD zoning approval can be put in place, the proponent must provide the BPDA and the Trust a letter stamped by a professional engineer registered in Massachusetts that details how it will accomplish what is stated in the document and meets the GCOD requirement for no reduction in groundwater levels on site or on adjoining lots.

I look forward to continuing to work with the proponent and the Agency to assure that this project can have only positive impacts on area groundwater levels.

Very truly yours,

Christian Simonelli Executive Director

CC: Kathleen Pederson, BPDA

Maura Zlody, EEOS

