## **BOSTON**

## **GROUNDWATER TRUST**

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September 19, 2003

## **Board of Trustees**

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Paul Chan Edward J. Collins Galen Gilbert Para Jayasinghe Honorable, Michael P. Ross Peter Sherin James W. Stetson Keith Craig Boston Redevelopment Authority One City Hall Square, 9<sup>th</sup> Floor Boston, MA 02201

Re: EOEA #12555

Museum of Fine Arts

FEIR / FPIR

Dear Mr. Craig:

This letter is In response to your request for comments on the proposed Final Environmental Impact Report / Final Project Impact Report for the Museum of Fine Arts Project.

In view of the groundwater sensitivities of this site, we believe a more comprehensive subsurface analysis is critical to understand if there is a source of groundwater depletion on-site or nearby. If this analysis already has been prepared and not here recorded, then it should be made a part of the public record at this time.

We believe that this site is located in close proximity to Boston's historic coastline, which may have passed through the current MFA property. Also there have been indications of lowered groundwater and foundation damage nearby. For the past four years groundwater levels reported by the Boston Groundwater Trust from an observation well on Hemenway Street opposite Fencourt Street and next to the Forsythe Institute parking lot have fluctuated significantly, from a low elevation of 2.93 BCB and most are below 5., which is likely to be an endangerment to wood pile foundations.

The following suggestions are offered for further comment by the proponent in addition to those provisions already proposed:

 For the area surrounding this site, an inventory should be created indicating buildings that may be supported on wood piles and therefore are vulnerable to destabilization resulting from groundwater depletion. This significant risk might be from either future construction procedures or existing leaks in subsurface structures. There have been indications of past damage to nearby buildings owned by Northeastern University and it is also thought that the Isabella Gardner Building may be supported on wood piles.

- 2. A comprehensive assessment of existing groundwater level conditions should be completed in order to properly establish design priorities for potential recharge systems in all of the proposed phases of development, including early ones. Significant fluctuation existing in the water table from factors mentioned in the report such as "the presence of below grade structures and utilities, leakage into or out of utility pipes, (and) building underdrain systems" should be identified as soon as possible.
- Greater emphasis and priority should be established for on-site utilization of storm water run-off and minimization of discharge to the BWSC combined system.
- 4. A system of post construction reporting should be prepared that will verify groundwater protection goals of the development have been achieved and also will suggest any additional mitigation measures necessary. The Owner should provide and maintain a monitoring system for any structure proposed to be built below the naturally occurring groundwater level and, in perpetuity, make quarterly reports available to the City of Boston and the Boston Groundwater Trust.
- Construction-related and other groundwater observation wells should be preserved permanently and dedicated to the City of Boston for monitoring by the Boston Groundwater Trust. We have the impression that a monitoring well became obscured or destroyed a few years ago at the location of the present Japanese Garden near the northwest corner of the West Wing.

We thank you for the opportunity to comment on this development proposal and welcome any questions that require further clarification.

Very truly yours,

Gary L. Saunders

Tim Ian Mitchell