## Boston Groundwater Trust

229 Berkeley St, Fourth Floor, Boston, MA 02116 617.859.8439 www.bostongroundwater.org

March 19th, 2020

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Christian Simonelli

Tim Czerwienski, AICP Project Manager Boston Planning & Development Agency One City Hall Square Boston, MA 02201-1007

Subject: The Pinnacle at Central Wharf Project Notification Form (PNF) Comments

Dear Mr. Czerwienski:

Thank you for the opportunity to comment on the Pinnacle at Central Wharf Project Notification Form (PNF) which is located in Downtown Waterfront District. 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.

While the project is not located within the Article 32 Groundwater Conservation Overlay District (GCOD), it is in an area where existing buildings are supported on wood pilings. As stated in the document and confirmed at the scoping session the proposed foundation construction will be conducted to control and limit potential adverse impacts, especially to adjacent structures and to groundwater levels. The document states that the BPDA also oversees the Smart Utilities Policy for Article 80 Development Review ("SUP"). Since the Project is above the threshold criteria of having at or above 100,000 square feet of floor area, the Project is required to retain the 1.25 inches of rainfall across the portion of the impervious area on-site. The Project will comply with both Article 32 and Article 80 by capturing within a suitably-designed system a volume of rainfall on the lot equivalent to no less than 1.25 inch across that portion of the surface area of the lot to be occupied by the Project.



The Project will result in no negative impact on groundwater levels within the lot in question or adjacent lots, provided that it is performed in compliance with the terms of any (i) dewatering permit and (ii) cooperation agreement entered into by the Proponent and the BPDA, to the extent that such agreement provides standards for groundwater protection during construction.

As stated at the scoping session foundation data for older, wood pile supported structures in the City, is an important piece of information but is limited since most of the original buildings permits do not exist. I was pleased that the proponent committed to working with the BGwT in providing any available foundation data they have complied or will compile on adjacent structures.

I look forward to working 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

