

**Boston Water and  
Sewer Commission**



980 Harrison Avenue  
Boston, MA 02119-2540  
617-989-7000

October 19, 2017

Mr. Raul Duverge, Project Manager  
Boston Planning & Development Agency  
One City Hall Square  
Boston, MA 02210

Re: 75-85 Liverpool Street, East Boston  
Small Project Review Application

Dear Mr. Duverge:

The Boston Water and Sewer Commission (Commission) has reviewed the Small Project Review Application (SPRA) for the proposed redevelopment project located at 75-85 Liverpool Street in East Boston. This letter provides the Commission's comments on the SPRA.

The project proposed by Flying Cloud Realty Trust (FCRT), will be built on two parcels of land totaling approximately 8,000 square feet (sf). Presently, the site is occupied by a one-story brick building between two wood frame residential buildings. The project proponent proposes to demolish the existing buildings and construct a mixed use building. The building proposed is five stories in height and will contain approximately 20,181 square feet (sf) of space with twenty-two residential units on the upper floors. The first floor will contain commercial/office space and parking for eleven vehicles. In addition, two commercial parking spaces will be provided for the building.

For water service, the site is served by an 8-inch water main in Liverpool Street. The water mains are part of the Commission's Northern Low Pressure Zone.

For sewer and drain service, the site is served by a 10-inch sanitary sewer and 12-inch storm drain in Liverpool.

Water usage and wastewater generation estimates were not stated in the SPRA.

The Commission has the following comments regarding the proposed project.

General

1. Prior to demolition of any buildings, all water, sewer and storm drain connections to the buildings must be cut and capped at the main pipe in accordance with the Commission's requirements. The proponent must then complete a Termination Verification Approval



Form for a Demolition Permit, available from the Commission and submit the completed form to the City of Boston's Inspectional Services Department before a demolition permit will be issued.

2. All new or relocated water mains, sewers and storm drains must be designed and constructed at FCRT's expense. They must be designed and constructed in conformance with the Commission's design standards, Water Distribution System and Sewer Use Regulations, and Requirements for Site Plans. To assure compliance with the Commission's requirements, the proponent must submit a site plan and a General Service Application to the Commission's Engineering Customer Service Department for review and approval when the design of the new water and wastewater systems and the proposed service connections to those systems is 50 percent complete. The site plan should include the locations of new, relocated and existing water mains, sewers and drains which serve the site, proposed service connections as well as water meter locations.
3. The Department of Environmental Protection (DEP), in cooperation with the Massachusetts Water Resources Authority and its member communities, is implementing a coordinated approach to flow control in the MWRA regional wastewater system, particularly the removal of extraneous clean water (e.g., infiltration/inflow (I/I)) in the system. In April of 2014, the Massachusetts DEP promulgated new regulations regarding wastewater. The Commission has a National Pollutant Discharge Elimination System (NPDES) Permit for its combined sewer overflows and is subject to these new regulations [314 CMR 12.00, section 12.04(2) (d)]. This section requires all new sewer connections with design flows exceeding 15,000 gpd to mitigate the impacts of the development by removing four gallons of infiltration and inflow (I/I) for each new gallon of wastewater flow. In this regard, any new connection or expansion of an existing connection that exceeds 15,000 gallons per day of wastewater shall assist in the I/I reduction effort to ensure that the additional wastewater flows are offset by the removal of I/I. Currently, a minimum ratio of 4:1 for I/I removal to new wastewater flow added is used. The Commission supports the policy, and will require proponent to develop a consistent inflow reduction plan. The 4:1 requirement should be addressed at least 90 days prior to activation of water service and will be based on the estimated sewage generation provided on the project site plan.
4. The design of the project should comply with the City of Boston's Complete Streets Initiative, which requires incorporation of "green infrastructure" into street designs. Green infrastructure includes greenscapes, such as trees, shrubs, grasses and other landscape plantings, as well as rain gardens and vegetative swales, infiltration basins, and paving materials and permeable surfaces. The proponent must develop a maintenance plan for the proposed green infrastructure. For more information on the Complete Streets Initiative see the City's website at <http://bostoncompletestreets.org/>



5. The water use and sewage generation estimates were not provided in the SPRA. The Commission requires that these values be calculated and submitted with the Site Plan.
6. The Commission will require FCRT to undertake all necessary precautions to prevent damage or disruption of the existing active water and sewer lines adjacent to, the project site during construction. As a condition of the site plan approval, the Commission will require FCRT to inspect the existing sewer lines on by CCTV after site construction is complete, to confirm that the lines were not damaged from construction activity.
7. It is FCRT's responsibility to evaluate the capacity of the water, sewer and storm drain systems serving the project site to determine if the systems are adequate to meet future project demands. With the site plan, FCRT must include a detailed capacity analysis for the water, sewer and storm drain systems serving the project site, as well as an analysis of the impacts the proposed project will have on the Commission's water, sewer and storm drainage systems.

#### Water

1. FCRT must provide separate estimates of peak and continuous maximum water demand for residential, commercial, irrigation of landscaped areas, and air-conditioning make-up water for the project with the site plan. Estimates should be based on full-site build-out of the proposed project. FCRT should also provide the methodology used to estimate water demand for the proposed project.
2. FCRT should explore opportunities for implementing water conservation measures in addition to those required by the State Plumbing Code. The use of sensor-operated faucets and toilets in common areas of buildings should be considered.
3. FCRT is required to obtain a Hydrant Permit for use of any hydrant during the construction phase of this project. The water used from the hydrant must be metered. FCRT should contact the Commission's Meter Department for information on and to obtain a Hydrant Permit.
4. The Commission is utilizing a Fixed Radio Meter Reading System to obtain water meter readings. For new water meters, the Commission will provide a Meter Transmitter Unit (MTU) and connect the device to the meter. For information regarding the installation of MTUs, FCRT should contact the Commission's Meter Department.

#### Sewage / Drainage

1. In conjunction with the Site Plan and the General Service Application FCRT will be required to submit a Stormwater Pollution Prevention Plan. The plan must:





- Identify specific best management measures for controlling erosion and preventing the discharge of sediment, contaminated stormwater or construction debris to the Commission's drainage system when construction is underway.
  - Include a site map which shows, at a minimum, existing drainage patterns and areas used for storage or treatment of contaminated soils, groundwater or stormwater, and the location of major control structures or treatment structures to be utilized during the construction.
  - Specifically identify how the project will comply with the Department of Environmental Protection's Performance Standards for Stormwater Management both during construction and after construction is complete.
2. The discharge of dewatering drainage to a sanitary sewer is prohibited by the Commission. FCRT is advised that the discharge of any dewatering drainage to the storm drainage system requires a Drainage Discharge Permit from the Commission. If the dewatering drainage is contaminated with petroleum products, FCRT will be required to obtain a Remediation General Permit from the Environmental Protection Agency (EPA) for the discharge.
  3. FCRT must fully investigate methods for retaining stormwater on-site before the Commission will consider a request to discharge stormwater to the Commission's system. The site plan should indicate how storm drainage from roof drains will be handled and the feasibility of retaining their stormwater discharge on-site. Under no circumstances will stormwater be allowed to discharge to a sanitary sewer.
  4. The Massachusetts Department of Environmental Protection (MassDEP) established Stormwater Management Standards. The standards address water quality, water quantity and recharge. In addition to Commission standards, FCRT will be required to meet MassDEP Stormwater Management Standards.
  5. Sanitary sewage must be kept separate from stormwater and separate sanitary sewer and storm drain service connections must be provided. The Commission requires that existing stormwater and sanitary sewer service connections, which are to be re-used by the proposed project, be dye tested to confirm they are connected to the appropriate system.
  6. The Commission requests that FCRT install a permanent casting stating "Don't Dump: Drains to Boston Harbor" next to any catch basin created or modified as part of this project. FCRT should contact the Commission's Operations Division for information regarding the purchase of the castings.



7. If a cafeteria or food service facility is built as part of this project, grease traps will be required in accordance with the Commission's Sewer Use Regulations. FCRT is advised to consult with the Commission's Operations Department with regards to grease traps.
8. The enclosed floors of a parking garage must drain through oil separators into the sewer system in accordance with the Commission's Sewer Use Regulations. The Commission's Requirements for Site Plans, available by contacting the Engineering Services Department, include requirements for separators.

Thank you for the opportunity to comment on this project.

Yours truly,

John P. Sullivan, P.E.  
Chief Engineer

JPS/rja

cc: B, Goodman, FCRT  
M. Zlody, BED via e-mail  
P. Larocque, BWSC via e-mail



Raul Duverge &lt;raul.duverge@boston.gov&gt;

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**Project Comment Submission: 75-85 Liverpool Street**

1 message

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**kentico@boston.gov** <kentico@boston.gov>

Wed, Sep 27, 2017 at 11:23 AM

To: BRAWebContent@cityofboston.gov, raul.duverge@boston.gov, [REDACTED]  
[REDACTED]

CommentsSubmissionFormID: 2181

Form inserted: 9/27/2017 11:22:53 AM

Form updated: 9/27/2017 11:22:53 AM

Document Name: 75-85 Liverpool Street

Document Name Path: /Development/Development Projects/75-85 Liverpool Street

Origin Page Url: /projects/development-projects/75-85-liverpool-street?utm\_source=Neighborhoods&amp;utm\_campaign=6c8e681a61-75-85\_Liverpool\_Street\_Public\_Meeting\_20170927&amp;utm\_medium=email&amp;utm\_term=0\_bccda74844-6c8e681a61-229507993

First Name: Paul

Last Name: Vignoli Jr

Organization:

Email: [REDACTED]

Street Address: [116 Waldemar Ave](#)

Address Line 2:

City: East Boston

State: MA

Phone: [REDACTED]

Zip: 02128

Opinion: Oppose

Comments: There is not enough off street parking. Eleven spaces is not enough for twenty two apartments and this does not take into account what is needed for the office and retail spaces. Developers who insist that people will not have cars are just lying...period. Transit oriented development as part of the actual train station is the ONLY time car usage is reduced.

PMContact: [raul.duverge@boston.gov](mailto:raul.duverge@boston.gov)

Project ID: 2104



Raul Duverge &lt;raul.duverge@boston.gov&gt;

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**75-85 Liverpool St.**

1 message

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**Marty Velez** [REDACTED]  
To: "Raul.Duverge@Boston.gov" <Raul.Duverge@boston.gov>

Fri, Oct 20, 2017 at 5:08 PM

Mr. Duverge my name is Martin Velez and I reside at 91 Liverpool St. The issues I'm having with this project is that the size of the building is very large compared to the others in the area and there are not enough parking spaces per unit. The majority of the other projects in East Boston have the same number of parking spaces as units and this one is only putting half which is unfair for all the residents in the area. This area is already being affected by large apartment buildings being built who are not providing enough parking spaces for all the units, this one will just add to the problem of parking for the residents. Thank you for your attention to this matter. If you any further questions my number is [REDACTED]



Raul Duverge &lt;raul.duverge@boston.gov&gt;

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## BPRD Comments for 75-85 Liverpool Street, East Boston

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**Carrie Marsh** <carrie.marsh@boston.gov>

Thu, Oct 19, 2017 at 11:05 AM

To: Teresa Polhemus &lt;teresa.polhemus@boston.gov&gt;, Jonathan Greeley &lt;jonathan.greeley@boston.gov&gt;, Raul Duverge &lt;raul.duverge@boston.gov&gt;

Cc: Christopher Cook &lt;christopher.cook@boston.gov&gt;, "Liza Meyer, ASLA" &lt;liza.meyer@boston.gov&gt;

Hello - This email is provided as BPRD's comments for 75-85 Liverpool. Please share it with the proponent, the IAG and the public.

The proposed project is tangential to Veterans Park in East Boston and will require the approval of the Parks Commission prior to the issuance of building permits.

The project's onsite open space is insufficient and will require relief from zoning. The 22 households in the building will rely on public open space to meet their active recreational needs.

Veteran's Park is made up of an assemblage of parcels owned by BPRD and MassDOT. The park is currently underutilized and in need of improvement. It has the potential to serve as a great amenity to the residents of 75-85 Liverpool and the neighborhood as a whole.

BPRD respectfully requests that a community contribution commensurate to the scale of the project be provided towards the creation of a master plan for Veteran's Park, as the first step towards its improvement. Park master plans range from \$25-50,000 depending on scale and detail.

Further, if pets are to be allowed in the building, the proponent should provide a pet recreation space to accommodate the needs of the animals and not impact public open space.

Thank you for your consideration.



**CARRIE MARSH**  
Executive Secretary  
Boston Parks and Recreation Commission  
1010 Massachusetts Avenue, 3rd floor  
Boston, Massachusetts 02118  
617-961-3074 (direct) 617-635-4505 (main)

On Tue, Sep 19, 2017 at 2:45 PM, Raul Duverge <raul.duverge@boston.gov> wrote:

Good Afternoon,

Attached for your review is the Small Project Review Application ("SPRA") for the proposed 75-85 Liverpool Street project in East Boston (the "Proposed Project"), received by the Boston Planning and Development Agency ("BPDA") on September 19, 2017, from Flying Cloud Realty Trust (the "Proponent").

The Proposed Project consists of the demolition of the two existing residential structures and the construction of a five story, approximately 20,181 square foot mixed-use building with approximately 772 square feet of commercial/office space space, 22 residential rental units, and 11 off-street parking spaces





Raul Duverge &lt;raul.duverge@boston.gov&gt;

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**75-85 Liverpool Street**

1 message

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**Luke Bowen** [REDACTED]  
To: Raul.Duverge@boston.gov

Mon, Oct 9, 2017 at 9:41 PM

Hello Raul,

My name is Luke Bowen and I live at [28 Maverick Street](#) in East Boston. I am writing in support of Ben Goodman's proposed project at [75-85 Liverpool Street](#) in East Boston.

I've lived in this neighborhood for over a decade and believe Ben's developments add value to the area. Additionally, parking has become horrendous due to new projects with inadequate parking spaces. While others ignore the need for parking and the fact that many people, myself included, need their vehicles for work, Ben continues to provide parking with his units.

Feel free to contact me if you have any questions.

Luke Bowen  
[REDACTED]




Raul Duverge &lt;raul.duverge@boston.gov&gt;

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**75-85 Liverpool Street Support Letter**

1 message

**David Shulman** 

Fri, Oct 6, 2017 at 1:08 PM

To: "Raul.Duverge@Boston.gov" &lt;Raul.Duverge@boston.gov&gt;

Raul Duverge

Boston Planning &amp; Development Agency

Raul.Duverge@Boston.gov



Mr. Duverge,

I was sorry to miss the meeting on October 4<sup>th</sup>. I'm writing in support of the proposed project at 75-85 Liverpool Street. I own property at 111 – 113, 121-123 and 150 Liverpool Street. Ben Goodman and his team at fast forwards realty are known to take care of their properties and are good to their tenants. I have no reservations about supporting this project.

Sincerely,

David Shulman

Environmental Technology Center

PO Box 423

East Boston, MA 02128



www.TECHCTR.com



Raul Duverge <raul.duverge@boston.gov>

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## 75-85 Liverpool Street Project

1 message

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**Christopher Lento** [REDACTED]  
To: Raul.Duverge@boston.gov

Wed, Oct 4, 2017 at 10:29 AM

Raul,

My name is Chris Lento, I own a number of three families in East Boston. I will not be able to attend tonight's meeting on the 78-85 Liverpool street project but wanted to lend my full support for this project. I feel that the scale of the project is very appropriate for the area, and will be a vast improvement over the existing structures.

Thank you for your time,

Chris