

Boston Groundwater Trust

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September 26, 2013

Mr. John FitzGerald, Senior Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Subject: Boston Garden Site PNF

Dear Mr. FitzGerald:

Thank you for the opportunity to comment on the Project Notification Form for the Boston Garden site. The Boston Groundwater Trust was established by the Boston City Council to monitor groundwater levels in areas of Boston where the integrity of building foundations, especially those supported by wood pilings, is threatened by low groundwater problems and to make recommendations for solving the problem. Therefore, my comments are limited to groundwater related issues.

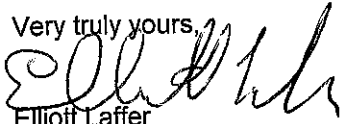
As noted in the PNF, the project is located outside the Groundwater Conservation Overlay District established under Article 32 of the Zoning Code. However, Causeway Street, the southern edge of the project, also forms the boundary of the GCOD and, as also acknowledged in the PNF, there are buildings in the Bulfinch Triangle area that are supported on wood pilings. If proper precautions are not taken, the project's planned 65 foot deep excavation could lead to serious groundwater level reductions in the Bulfinch Triangle. Therefore, the project should conform to requirements as if it were in the GCOD. A certification stamped by a professional engineer registered in Massachusetts should be provided to the Authority and the Trust that describes how the project will be designed and constructed in a way that will not lead to any reductions in groundwater levels, with particular attention to preventing reductions in the GCOD.

In addition, as confirmed by Mr. Chris Maher of Boston Garden Development Corp at the scoping session, there is currently water being pumped out of the garage under the TD Garden. It is important to understand if this is groundwater, where it is coming from, and what effect its removal has on groundwater levels in the critical upper aquifer that protects the wood pilings. It is also important to understand what the effect of this water source will be on the new garage and what steps will be taken to deal with it.

The Trust currently monitors three wells along Causeway St across from the project site. In order to gauge the impact of the project, it may be necessary to install additional observation wells. If so, these should be installed by the project at locations selected in consultation with the Trust. The project should monitor an agreed network of nearby wells before construction to establish baseline groundwater levels and then at least weekly during below grade construction. Levels should be reported shortly after they are taken to the Authority and the Trust.

I look forward to working with the proponent and the Authority to assure that the project will not cause any reductions in groundwater levels in the Bulfinch Triangle area.

Very truly yours,

A handwritten signature in black ink, appearing to read "Elliott Laffer", written over the closing "Very truly yours,".

Elliott Laffer
Executive Director

Cc: Kathleen Pedersen, BRA
Maura Zlody, BED