

**Boston Water and
Sewer Commission**



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January 26, 2017

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Page Czepiga, EEA No. 15632
100 Cambridge Street, Suite 900
Boston, MA 02114

and

Phil D. Cohen
Project Manager
Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201

Re: 1000 Boylston Street
Environmental Notification Form/Project Notification Form

Dear Secretary Beaton and Mr. Cohen:

The Boston Water and Sewer Commission (Commission) has reviewed the Environmental Notification Form (ENF) and the Project Notification Form (PNF) for the proposed 1000 Boylston Street project in the Back Bay neighborhood of Boston.

The proposed approximately 40,995 acre site consists of four existing parcels located partially over the Boston Extension of the Massachusetts Turnpike and partially over vacant terra firma. The proponent, ADG Scotia II LLC, proposes to construct a mixed use development of up to approximately 685,000 square feet (sf) (exclusive of above grade parking) and consisting of two residential buildings with up to 342 units, first and second floor retail and restaurant space, and above grade parking. There will be 303 above grade vehicle parking spaces. The site is bounded to the north by Boylston Street, to the east by Dalton Street and the Hynes Convention Center, to the south by Scotia Street and an existing above-ground garage, and to the west by St. Cecilia Street and the rear façade of buildings fronting on Massachusetts Avenue.

According to the ENF/PNF, the proposed water demand is 76,610 gallons per day (gpd). The Commission owns and maintains a 12-inch Southern Low and a 12-inch Southern High water main in Dalton Street, an 8-inch Southern Low water main in Scotia Street, a 12-inch Southern Low water main in Cambria Street and St. Cecilia Street.



According to the ENF/PNF, the proposed sewage generation is 69,645 gpd. For sewage and storm drainage service, the site is served by a 12-inch sanitary sewer in Scotia Street and a 12-inch combined sewer in Cambria Street. Dalton Street contains a 54-inch combined sewer and a 60-inch combined sewer (the West Side Interceptor).

The Commission has the following comments regarding the proposed project:

General

1. All new or relocated water mains, sewers and storm drains must be designed and constructed at ADG Scotia II LLC'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 are 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.
2. 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.
3. 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/>

4. ADG Scotia II LLC should be aware that the US Environmental Protection Agency issued the Remediation General Permit (RGP) for Groundwater Remediation, Contaminated Construction Dewatering, and Miscellaneous Surface Water Discharges. If groundwater contaminated with petroleum products, for example, is encountered, ADG Scotia II LLC will be required to apply for a RGP to cover these discharges.
5. The project site is located within Boston's Groundwater Conservation Overlay District (GCOD). The district is intended to promote the restoration of groundwater and reduce the impact of surface runoff. Projects constructed within the GCOD are required to include provisions for retaining stormwater and directing the stormwater to the groundwater table for recharge.
6. ADG Scotia II LLC is advised that the Commission will not allow buildings to be constructed over any of its water lines. Also, any plans to build over Commission sewer facilities are subject to review and approval by the Commission. The project must be designed so that access, including vehicular access, to the Commission's water and sewer lines for the purpose of operation and maintenance is not inhibited.
7. It is ADG Scotia II LLC'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, ADG Scotia II LLC 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. ADG Scotia II LLC must provide separate estimates of peak and continuous maximum water demand for residential, commercial, industrial, 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. ADG Scotia II LLC should also provide the methodology used to estimate water demand for the proposed project.
2. ADG Scotia II LLC should explore opportunities for implementing water conservation measures in addition to those required by the State Plumbing Code. In particular, ADG Scotia II LLC should consider outdoor landscaping which requires minimal use of water to maintain. If ADG Scotia II LLC plans to install in-ground sprinkler systems, the



Commission recommends that timers, soil moisture indicators and rainfall sensors be installed. The use of sensor-operated faucets and toilets in common areas of buildings should be considered.

3. ADG Scotia II LLC 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. ADG Scotia II LLC 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, ADG Scotia II LLC should contact the Commission's Meter Department.

Sewage / Drainage

1. In conjunction with the Site Plan and the General Service Application ADG Scotia II LLC 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. Developers of projects involving disturbances of land of one acre or more will be required to obtain an NPDES General Permit for Construction from the Environmental Protection Agency and the Massachusetts Department of Environmental Protection. ADG Scotia II LLC is responsible for determining if such a permit is required and for obtaining the permit. If such a permit is required, it is required that a copy of the permit and any pollution prevention plan prepared pursuant to the permit be provided to the Commission's Engineering Services Department, prior to the commencement of construction. The pollution prevention plan submitted pursuant to a NPDES Permit may be submitted in place of the pollution prevention plan required by the Commission provided the Plan addresses the same components identified in item 1 above.



3. The Commission encourages ADG Scotia II LLC to explore additional opportunities for protecting stormwater quality on site by minimizing sanding and the use of deicing chemicals, pesticides, and fertilizers.
4. The discharge of dewatering drainage to a sanitary sewer is prohibited by the Commission. ADG Scotia II LLC 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, ADG Scotia II LLC will be required to obtain a Remediation General Permit from the Environmental Protection Agency (EPA) for the discharge.
5. ADG Scotia II LLC 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.
6. 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, ADG Scotia II LLC will be required to meet MassDEP Stormwater Management Standards.
7. 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.
8. The Commission requests that ADG Scotia II LLC 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. ADG Scotia II LLC should contact the Commission's Operations Division for information regarding the purchase of the castings.
9. 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. ADG Scotia II LLC is advised to consult with the Commission's Operations Department with regards to grease traps.
10. 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/afh

C: Adam Weiner, ADG Scotia II LLC c/o Weiner Ventures LLC
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