

December 4, 2014

Boston Redevelopment Authority (BRA)
Attention: Lauren Middleton-Pratt, Project Manager
One City Hall Plaza
Boston, MA 02201

Boston Redevelopment Authority (BRA),

RE: Equity Residential Development of the Garden Garage on Lomasney Way

The West End Museum is a neighborhood museum dedicated to the collection, preservation and interpretation of the history and culture of the West End of Boston. The Museum acknowledges its role as an educational institution and a trustee of significant material culture.

The West End Museum fulfills its mission by providing exhibits to the public on a regular basis, by providing access to its collections for research, by providing a resource to the West End Neighborhood for historical and cultural interests. It involves the public in its mission through outreach programming, neighborhood events, and educational programming in the school systems, thereby increasing and sustaining the public's appreciation of an important American urban neighborhood from the seventeenth century to the present time.

The West End Museum is located at the rear of 150 Staniford Street on the Lomasney Way side of West End Place; it occupies approximately 4300 square feet which is deeded to the Old West End Housing Corporation (OWEHC). The West End Museum is an immediate abutter to the proposed Garden Garage Project (GGP), because of its close proximity the impacts will greatly affect its viability.

WEST END PLACE ABUTTERS' AGREEMENT

The West End Museum has been privy to an ongoing Equity Residential (Equity)/West End Place 'Abutters' Agreement'. Much of the proposed agreement has been conducted through the efforts of an Ad Hoc committee set up by the West End Place managing board. No representative of the West End Museum is on this committee and the Museum Directors have not been satisfied with their efforts to consider the impacts that the GGP will have on the West End Museum now and in the future.

Consequently, representatives of the West End Museum have contacted and met with Equity representatives to discuss how the short term and long term impacts will affect the West End Museum. Discussions have focused on construction management, disruption to our business, supersaturated easement use and the long term effects of traffic. Additionally, there has also been discussion regarding the long term positive effects that the GGP, along with other collaborative developments, the Nashua Street Residences and the Cross Roads Initiative (Connect Historic Boston), will have to create a greatly improved streetscape.

At this juncture the West End Museum Directors do not support any abutters' agreement between Equity and West End Place, nor has there been any such agreement written up between Equity and the West End Museum.

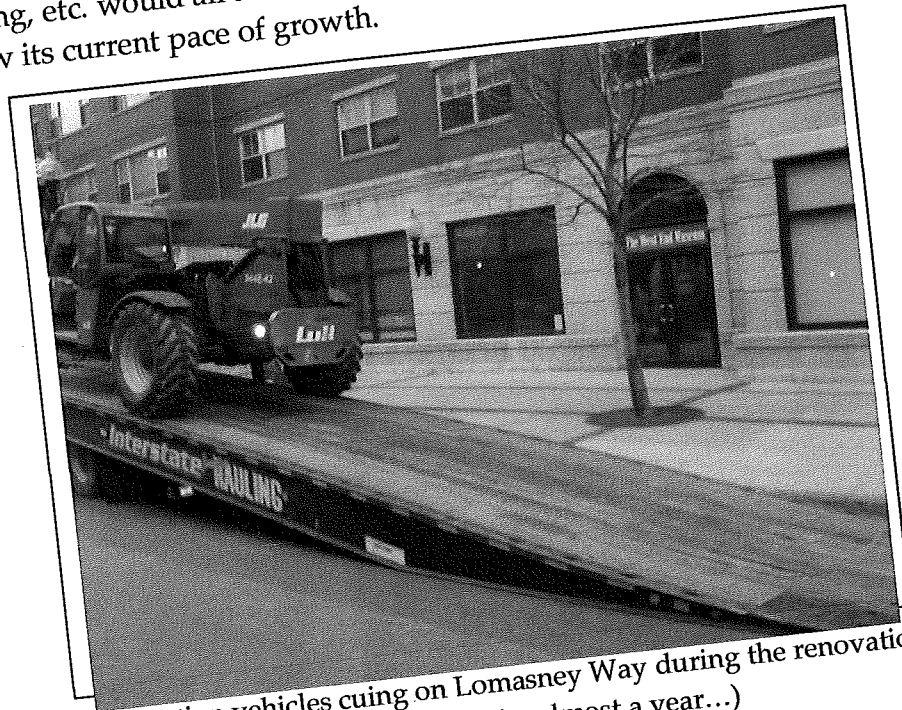
CONSTRUCTION PROXIMITY AND SHORT TERM IMPACTS

Much of the construction and redevelopment of the GGP will occur within 100 feet of the West End Museum. The project design, which has changed three times in as many years, the scope of work, the construction management plan and the time period of construction from start to finish, will all have an immediate impact to our facility and our ability to do business.

The West End Museum has experienced dramatic growth over the past four years. The Museum's volunteer staff has gone from less than five people in 2011 to over forty in 2014. The annual number of visitors to the Museum has gone from a little over 1,000 in FY2011 to 5,000 visitors in FY2014. Prior to 2011, there had been one exhibit mounted in the Museum (*The Last Tenement*); we now average 10 exhibits per year. Concurrently, programming continues to increase along with a well-respected and expanding archive of material culture. The Museum is in the process of completing a Strategic Master Plan along with the

implementation of a Massachusetts Board of Education compliant school visitation program, which projects to increase the number of visitors from 5,000 to 15,000 in the immediate future. Our two greatest challenges ahead are, to maintain our growth and to move from a volunteer staff to a paid staff with a full time director.

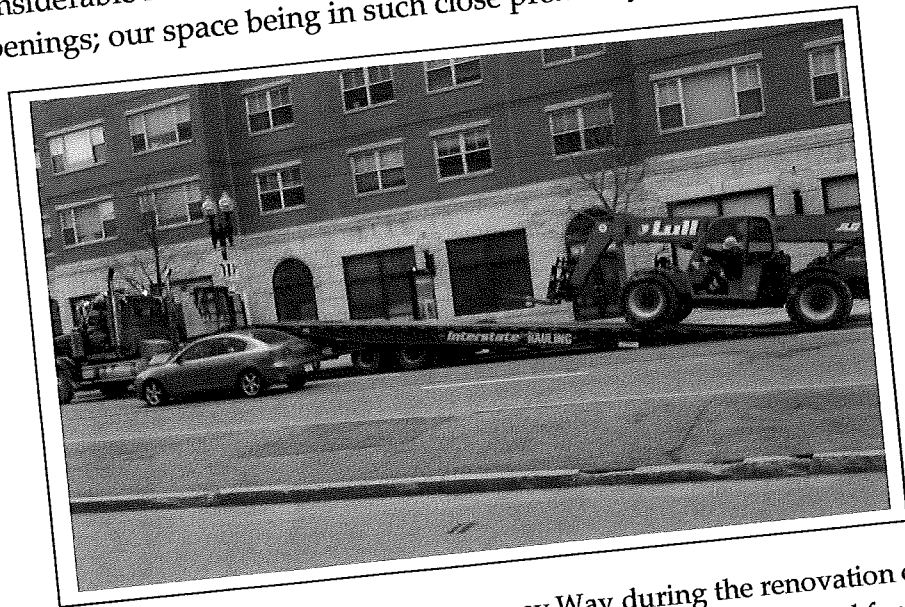
The immediate impact of the GGP would slow our growth down considerably and therefore jeopardize the viability of the West End Museum. These impacts would be prolonged during a 3-5 year construction period; re-routed pedestrian traffic, construction vehicles clogging up on Lomasney Way, noise, dirt, traffic, loss of parking, etc. would all adversely disrupt the Museum's day to day business and slow its current pace of growth.



(Equity construction vehicles clogging on Lomasney Way during the renovation of Longfellow Plaza 2011; this was continual for almost a year...)

- Business for the West End Museum will be disrupted 24/7 for three or more years.
- Noise during business hours will be continuous.
- Dirt and air pollution will persist for 3-plus years
- Traffic will be impacted due to the loss of parking, especially during Bruins and Celtics games when our weekend and evening programs, lectures and presentations take place.
- Increased traffic from the loss of parking will cause idling and traffic jams which will add to the noise and pollution impact.

- The loss of parking will deprive our patrons and offer less parking options.
- The loss of pedestrian flow from Science Park/West End T Station down Martha Road and Lomasney Way will be significant.
- No pedestrian flow will occur from Thoreau Path for three plus years.
- A considerable number of these inconveniences will deter patrons from visiting the Museum.
- The increased number of construction vehicles needed for the proposed project will idle in cue adjacent to our facility on Lomasney Way waiting to enter the construction site. This will create added exhaust pollution, as well as a visual wall in front of our Museum.
- The increased amount of construction vehicles will impact significantly upon the West End Place/Equity easement, which will consequently interfere with access to our employee parking area which is only accessible through that easement.
- Dirt from construction will enter the archive area located 50-feet from the GGP site.
- Noise from construction will be constant for our archivist, collections manager and archive volunteers located 50-feet from the GGP site.
- The excavation and deep digging below the existing surface will unearth a considerable number of rodents which will seek the closest available openings; our space being in such close proximity is at greatest risk.



(Equity construction vehicles cuing on Lomasney Way during the renovation of Longfellow Plaza 2011, walling our vehicular visibility; this was continual for almost a year...)

ARCHAEOLOGICAL CONCERNS

On June 22, 2012, in response to Draft Project Impact Report (DPIR) comment letters (especially regarding 6.0 HISTORIC RESOURCES), the Directors of the West End Museum wrote the following letter to Ms. Brona Simon, State Archaeologist for the Massachusetts Historical Commission, Ms. Jennifer Poulsen, Archaeological Collections Manager at the Massachusetts Historical Commission and Mr. Joe Bagley, City Archaeologist for the Boston Landmarks Commission asking for further considerations to their comments or lack of regarding the GGP (below). The Museum Directors based their request on the following research:

The West End Museum would like to ask that the Massachusetts Historical Commission (MHC) reconsider commenting on the Draft Project Impact Report (DPIR) for the Garden Garage Project submitted by Equity Residential on October 19, 2011 (*note; particularly **section: 6.4.3**). While there are no obvious direct or indirect impacts to properties listed in the State Register of Historic Places, the MHC review may not have considered possible archaeological impacts. The West End Museum has substantial evidence and references to believe that the site location on which the proposed project is taking place may contain historically significant material culture.

The Garden Garage Project proposes to tear down an existing 650 capacity above ground parking garage and dig 50-plus feet below the surface to build an underground garage with two tall towers above. The project is located on land which was made by the process of filling in the Charles River, specifically the area northwest of the Boston Mill Pond and north of former Leverett Street. The location of the original shoreline as indicated by the John Bonner map (1722) and later the Price (1769) and Osgood Carlton (1803) maps, demonstrates evidence of landmaking at the proposed location of the development. The Hales map of 1814 shows further 'wharfing out' and aggressive landmaking, just prior to the arrival of the Boston & Lowell Railroad to that area in 1835.

Digging this far below the surface within an area which is entirely man-made land presents a unique opportunity to excavate and look for significant material culture. In 1961, the Boston Herald newspaper (October 1, 1961) ran a story with a photograph of a Mr. Richard Lufkin, then president of the Bostonian Society, standing with a 166 year old wooden water pipe (cir. 1795) which was uncovered by construction workers while digging an underground garage at Charles River Park near the currant proposed development site.

The project area is located on or near a number of historically significant sites: Colonial era ropewalks on Barton's Point and Allen's Pasture, Lee's Ship Yard, Waldo's Wharf and Stillhouse, A Colonial era Mill, Bulfinch's Alms House, the Leverett Street Jail and a storage wharf for the Proprietors of the Middlesex Canal.

James Barton set up the earliest West End ropewalk on Leverett Street in 1700 and nearby within 100 feet of the proposed Garden Garage development, Steven Minot built a ropewalk in Allen's pasture (between Poplar and Allen Streets). By 1798, there were three ropewalks at the Allen Street location owned by Tyler and Caswell, John Winthrop, and Jeffreys and Russell; the latter having made the anchor cable for the U.S.S. Constitution (Clough's 1920 reconstruct map with information from the Massachusetts Direct Tax 1798). Ropewalks were wooden buildings of significant size (900-feet long and 30-feet wide) which supplied sailing vessels with a standard length of rope (120 fathoms/ 720-feet). These buildings were quickly removed from the area as the Boston economy shifted from a maritime based one to a manufacturing economy, as well as urbanization which required landmaking.

The current project is proposed north of what was formerly Leverett Street in the old West End (1960); the street was replaced by the Charles River Park development of which the proposed Garden Garage was a part of. The north side of Leverett Street was the former shoreline until wharfing out started to take place after 1769 (Price Map). The process of 'wharfing out' as indicated by Nancy Seasholes in her book *Gaining Ground: A History of Landmaking in Boston*, involves the filling in of wharfs with land or landfill materials from buildings and other discarded materials. It is our belief that some of the aforementioned buildings, particularly ropewalks may have been used in this process and may present significant material culture unique to the West End.

(Summary)

6.0 HISTORIC RESOURCES

This section identifies historic resources in the vicinity of the Project and summarizes potential Project-related impacts to identified resources. A review of the State and National Registers of Historic Places and the survey files of the Massachusetts Historical Commission (MHC) and Boston Landmarks Commission (BLC), as well as a field review of the areas in the vicinity of the Project, were undertaken to identify historic resources.

6.1 Historic Resources within the Project Site

The Project site encompasses two buildings: the existing 650-space Garden Garage on Lomasney Way, and a small, vacant one-story wooden structure formerly used as the Boston Children's School Annex. Neither of the buildings is included in the State or National Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth (Inventory) maintained by the MHC.

6.2 Historic Resources in the Vicinity of the Project Site

Multiple properties listed on the State and National Registers of Historic Places or included in the Inventory are located in the immediate vicinity of the Project. Table 6-1 includes the names and addresses of properties listed in the State and National Registers of Historic Places and properties included in the Inventory that are within a one-quarter-mile radius of the Project. Figure 6-1 shows the locations of these properties and is keyed to the Map Numbers listed in Table 6-1.

6.3 Archaeological Resources

There are no known archaeological resources listed in the State and National Registers of Historic Places or included in the Inventory within the Project site. In addition, the Project site is a previously-developed area, and therefore it is unlikely that the Project will affect archaeological resources.

6.4 Coordination of Historic Resource Reviews

6.4.1 Boston Landmarks Commission Article 80 Review

This DPIR continues the BLC's review of the Project under the City's Article 80 Review process. Direct and indirect impacts to historic resources including visual, wind, and shadow are addressed herein.

6.4.2 Boston Landmarks Commission Article 85 Review

The proposed demolition of the two existing buildings on the Project site (the Garden Garage at Lomasney Way and the former Boston Children's School Annex) will be subject to review by the BLC under Article 85 of the Boston Zoning Code. An Article 85 Application for each building will be submitted to the BLC.

6.4.3 Massachusetts Historical Commission State Register Review

The MHC has review authority over projects requiring state funding, licensing, permitting, and/or approvals that may have direct or indirect impacts to properties listed in the State Register of Historic Places (M.G.L. Chapter 9,

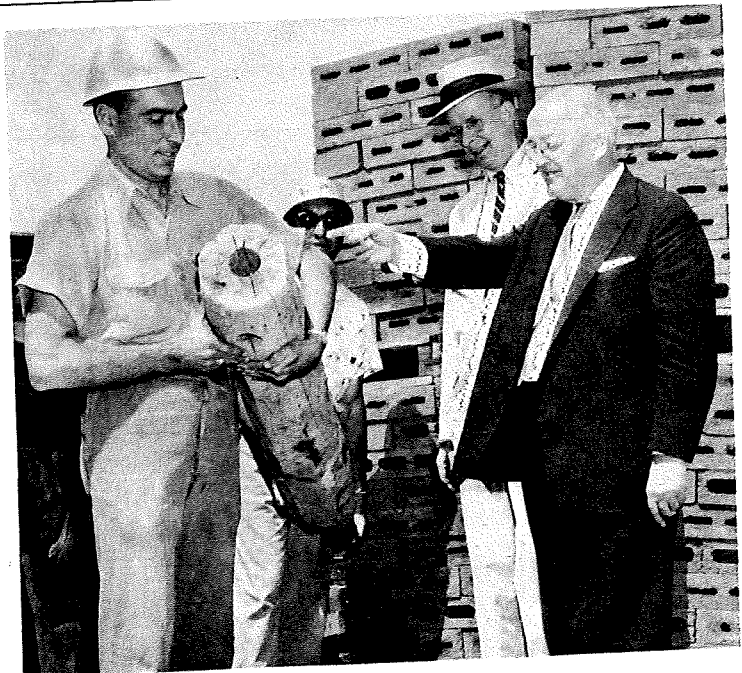
Sections 26-27C, as amended by Chapter 254 of the Acts of 1988). The State Register Review process was initiated through the filing of an ENF (Environment Notification Form) in June 2011. The MHC received a copy of the ENF and subsequently did not provide any comments on the document. The MEPA certificate, issued on July 22, 2011, found that no further MEPA review is required and that the project may proceed to state permitting. This concludes the MHC's review of the project under the State Register Review process.

M.G.L. Chapter 9, Sections 26-27C, as amended by Chapter 254 of the Acts of 1988

The Directors of the West End Museum would ask that Equity consider the possibility of finding significant material culture (artifacts) at the GGP construction site. To date, Equity has taken a great number of core samples from greater than 50-feet in order to test for bedrock; the archivist and historian at the West End Museum recommend that these samples be analyzed (visual inspection) for evidence of material culture. Also, while the excavation and digging process for the GGP foundation is taking place, consideration should be given to the possibility of finding items such as those noted by Mr. Richard Lufkin in 1961 excavation of Charles River Park (Boston Herald, October 1, 1961) and that these items be made available to the permanent collection at the West End Museum Archives.

EXCAVATIONS REVEAL HISTORICAL FACTS

Richard F. Lufkin (right) president of the Bostonian Society points to the bore of a 166-year-old water "pipe" held by construction workers at Charles River Park. The pipe, which carried water to 1500 Boston homes from Jamaica Pond in 1795, was dug up by workers excavating the 308-car underground garage in the apartment group to open next month. Barrett Williams, secretary of the Society, stands next to Mr. Lufkin, who accepted the antique from Charles River Park for exhibit in the Society museum in the old State House.



LONG TERM IMPACTS

The Museum Directors have identified a number of long term affects associated with the GGP: exhaust from the air exchange head house, increased traffic, wind tunneling and Equity/West End Place easement management.

The newest design, as shown in the Notice of Project Change, locates the GGP 'garage air exchange head house' adjacent to the West End Museum and directly under our archive room (within 50-feet). The Museum's archives are located in the rear of West End Place on the second level garage above the easement. The room is currently dry and pollution free. Windows are opened periodically to let in fresh air, especially during the more temperate months. Carbon monoxide being pumped out of an 830 car garage will certainly affect the quality of the air coming into that room unless climate control is added.

Traffic is currently a big problem in the West End, especially in and around the Boston Garden/North Station area. Often it keeps visitors from attending evening events at the West End Museum. More than four major developments are being planned for the immediate future, while four others are currently in construction, all these projects will have some type of onsite parking adding to the already congested streets.

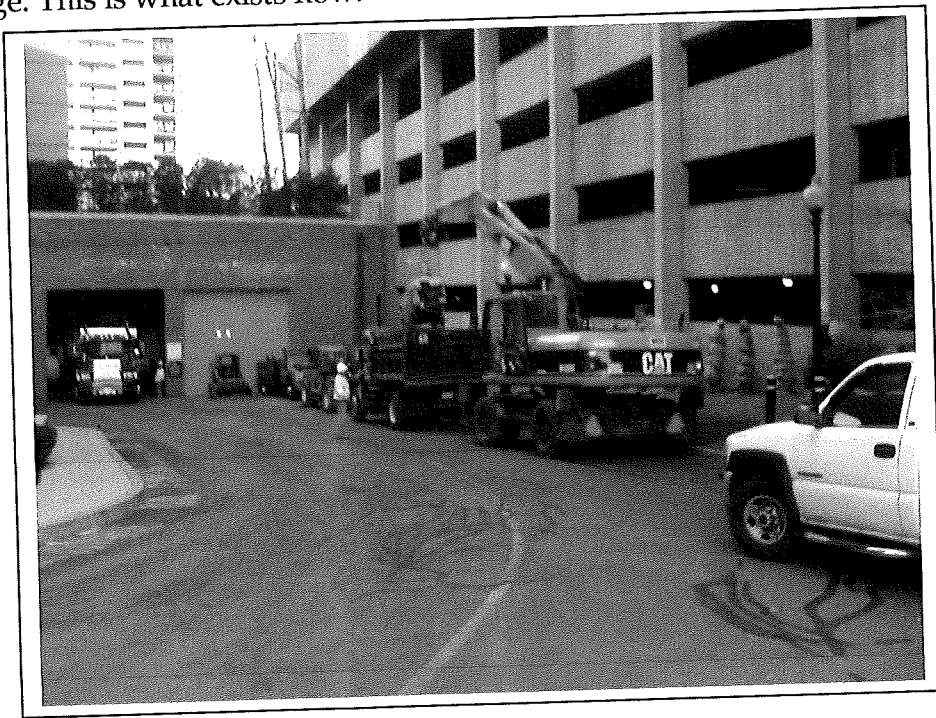
Additionally, there is little or no affordable parking for visitors to events at the West End Museum, especially on nights that there are events at the Boston Garden when price gouging is the norm. Soon there will not be any taxi access either, due to traffic congestion, and Museum patrons will be at the mercy of an archaic and inefficient subway system. Historically, infrastructure preceded development in Boston; now post project mitigation contributes meagerly to patchwork infrastructure.

Lomasney Way and Martha Road are already windy pedestrian thoroughfares; the addition of two 465-foot towers (Nashua Street Residences and the GGP) will only add to the wind tunneling effect. The Museum directors have not seen any design (trees, landscaping, etc.) which will mitigate this impact.

Equity and West End Place share an easement for the purpose of accessing the service areas for West End Place and Equity's Longfellow Towers, as well as accessing the resident parking garage for West End Place. This shared easement agreement has been problematic and an ongoing issue between the two entities for some time. The Museum Directors own three garage spaces in the West End

Place resident parking garage which are used continually between the hours of 8AM – 9PM. The easement to access these spaces is two lanes; one in and one out.

Problems with safely accessing Museum parking spaces have stemmed from numerous capital construction projects by Equity (2011, 2012), to illicit parking by patrons of Basketball City (an Equity tenant); additional problems have also occurred as a result of detail Boston police parking in one of the two easement lanes while directing automobile and pedestrian traffic out of the Garden Garage. This is what exists now!



(Equity construction vehicles monopolizing the Equity/West End Place easement during the renovation of Longfellow Plaza 2011; this was continual for almost a year...)

The GGP proposes to add the service area of a new 46-story tower and an 830-car garage to an already saturated easement and the joint service area mentioned above. How this will work is beyond the comprehension of the Museum Directors and creates an even greater safety concern for our volunteers who park in the West End Place parking garage.

MITIGATION AND COMMUNITY BENEFITS

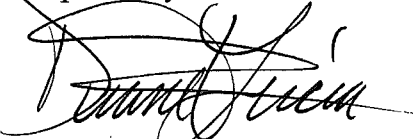
It has come to the attention of the West End Museum Directors that a proposal has been submitted to the IAG to consider mitigation and community benefits as part of the Article 80 process sooner rather than later. The Museum Directors agree with this approach for the following reasons:

Whatever is to be built on the site of the Garden Garage, it will have significant impacts on the greater community, past and present, as well as on the entire City of Boston. The immediate abutters will be more affected than any group both in the short term during construction and in the long term. Given that the developer (Equity) is doubling up on its investment by maintaining its profitable parking garage business, while adding another profit making entity (rental housing), all efforts should be made to lessen any and all impacts. Additionally, mitigation and community benefits should be doubled as well. As the GGP is discussed and reviewed in the Article 80 process, and zoning variances and other considerations are given to the developer, so too should the compensatory mitigation and community benefits be negotiated for all affected. The West End Museum Directors believe that leaving it to the end of the Article 80 process short changes the community, those most affected and the City of Boston.

CONCLUSION

The West End Museum Directors do not oppose the Equity Residential Garden Garage Project, but they are greatly concerned of what the adverse effects mentioned above will have on the West End Museum. The Museum Directors have worked tirelessly to make the West End Neighborhood proud of its historical and cultural contribution to the City of Boston for the past 300 years and would like to continue to do so with the support of all our neighbors.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Duane Lucia", written over a horizontal line.

Duane Lucia

President

The West End Museum, Incorporated

cc:

Cc:

Jim Campano – President, OWEHC and Publisher, West Ender Newspaper

William Grogan - Managing Board President, West End Place

Denton Crews – GGP Ad Hoc Committee, West End Place

Bill Georgaqui – GGP Ad Hoc Committee, West End Place

Jane Forrestall – GGP Ad Hoc Committee, West End Place

Paul Barrett – Equity Residential

Andrew J. Copelotti - VP Development & Construction, Equity Residential

Kathleen Ryan - West End Council (Hawthorne Place)

Angela Rotondo – President, West End Civic Association

Lauren Middleton-Pratt – Project Manager, Boston Redevelopment Authority

Erico Lopez - Director of Development Review and Policy, Boston

Redevelopment Authority

Brian Golden, Acting Director, Boston Redevelopment Authority

Josh Zakim – Boston City Council

Kyndal Henicke – Deputy Chief of Staff, Councilor Zakim

Jay Livingstone – Massachusetts House of Representatives, 8th Suffolk District

Anthony Petrucci - Massachusetts State Senate, 1st Suffolk and Middlesex District

November 22, 2014

Edward McGuire, Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201

Mr. McGuire:

I have lived in the West End: CRP Community since 2002. During this time, there have been many changes. But the one change I feel has negatively affected the community as well as the environment is TRAFFIC!!

I would like to know what Equity's and the City's plans are to address the issues of TRAFFIC CONGESTION AND GRIDLOCK which make me fearful of about the lack of access and egress of emergency vehicles.

One of the most meaningful aspects of Charles River Park complex is the sense of neighborhood. I very much appreciate the creation of open green spaces provided by Equity's last development. However, the presence of an enormous high rise building creates a fortress in what would otherwise be a welcoming urban oasis.

I urge you to work with Equity and the City to provide a traffic plan during construction and thereafter as well the possibility of lowering the height of the proposed new building.

Thank you,

Patricia Kartiganer

8 Whittier Place 5G

Boston, MA 02114

November 22, 2014

Edward McGuire, Project Manager

Boston Redevelopment Authority

One City Hall Square

Boston, MA 02201

Mr. McGuire:

My family and I have lived in the West End: CRP Community since 1966. During this time, there have been many changes. But the one change I feel has negatively affected the community as well as the environment is TRAFFIC!!

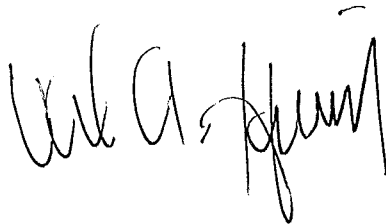
I would like to know what Equity's plans are to address the issues of TRAFFIC CONGESTION AND GRIDLOCK ON OUR ROADS?

Thank you,

Valerie Ashford-Harris

6 Whittier Place 150

Boston, MA 02114

A handwritten signature in black ink, appearing to read 'Val Ashford-Harris', written in a cursive style.

November 22, 2014

Edward McGuire, Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201


Mr. McGuire:

I have resided at the West End-Charles River Park since 2005. I really enjoy living here; it's very family friendly; it offers green space for the kids and the proximity to literally everything.

I am writing to express my concern for the proposed Garden Garage development. My concern is mostly the traffic. It often takes us 45 minutes to go from our front door to the light in front of the Garden Garage. On a day when you haven't planned for an EXTRA 45 minutes (and who has that with 3 children??); it makes you late for everything and very stressed.

I urge you put a tunnel from the Whittier Garage to the Equity Garage on Blossom Street to create another egress and bypass the disastrous traffic on Martha Road.

Thank you,


Chiara Rhoades

8 Whittier Place 12H

Boston, MA 02114

**Boston Water and
Sewer Commission**

980 Harrison Avenue
Boston, MA 02119

617-989-7000
Fax: 617-989-7718



November 28, 2014

Ms. Lauren Middleton-Pratt
Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201

Re: Garden Garage/West End Apartments, Notice of Project Change

Dear Ms. Middleton-Pratt:

The Boston Water and Sewer Commission (Commission) has reviewed the Notice of Project (NPC) Change for the Garden Garage project. The Garden Garage site is located in the West End, to the west of the Tip O'Neill Federal Building. The entire project site occupies 3 acres and is bordered by Martha Road and Lomasney Way to the north, 150 Staniford Street to the east, Longfellow Place to the south and Thoreau Place to the west.

In 2011, the Commission submitted comments to MEPA for a similar project proposed by the proponent for this site. The earlier project proposed the construction of two towers containing 500 residential units. The current NPC proposal plans to construct a single tower with 486 residential units. This project also includes a five-story below-grade garage with approximately 830 spaces and 2,000 square feet of retail space. The proponent estimates that the project will generate 72,480 gallons per day of wastewater which is close to the previous project's wastewater projection.

The Commission advised the proponent in an earlier letter that this project would be required to participate in the Massachusetts Department of Environmental Protection's program to reduce inflow and infiltration. However, the proponent has not indicated in the NPC that this project plans to participate in this program. The requirements of this program are described in more detail on the next page.

The proponent must keep runoff from impervious surfaces and rooftops separate from wastewater flows. The Commission's West Side Interceptor (WSI) is a combined sewer that runs along the eastern and northern borders of the site. Although separate sanitary sewers and storm drains exist in the nearby Thoreau Path, these pipes eventually recombine in Storrow Drive prior to discharging into the Commission's WSI. Consequently, the proponent will be required to direct stormwater to a drain that discharges to the Charles River.



Stormwater

Just to the east of the proposed Garden Garage site, the Commission recently separated flows in an area often referred to as the Bulfinch Triangle. The separation was as part of the Massachusetts Water Resources Authority's (MWRA) Long-term CSO Control Plan. The separation work converted a 72-inch by 90-inch pipe behind the Tip O'Neill Building into a storm drain. The proponent must direct stormwater from the project to this drain which will avoid adding flows into the combined sewer system.

The 72-inch by 90-inch storm drain discharges stormwater into the Charles River where the phosphorus content is a concern. In an attempt to reduce the amount of phosphorus, the Commission will impose constraints on the stormwater it accepts from this project. The Commission will require the proponent to retain the first inch of water on-site during a rain event. The proponent must include details about the infiltration system with the site plan submission. The proponent can contact Mr. Phil Larocque at the Commission to discuss the level of detail required with the site plan.

The proponent should be aware that the drainage collected within the underground garage must be controlled separately. Water collected within the enclosed parking areas will need to pass through an oil-water separator before being discharged to a sanitary sewer.

Wastewater

The parking garage and the vacant building that occupy the site generate minimal wastewater flows. The proponent should discuss where the sanitary flows connect to the Commission's system with Mr. Phil Larocque during the initial stages of the site design.

In April 2014, the Massachusetts Department of Environmental Protection (DEP) promulgated new regulations which affect agencies responsible for operating collection systems containing combined sewers. The Commission, which possesses a National Pollutant Discharge Elimination System (NPDES) Permit for its combined sewer overflows, is subject to section 12.04(2)(d) of the recent changes to 314 CMR 12.00. The section quoted above requires that all new sewer connections exceeding 15,000 gallons per day mitigate the impacts of the development by removing four gallons of infiltration for each gallon of new wastewater.



The Commission will require the project to participate in the 4 to 1 infiltration reduction program. The proponent will need to commit to participating in this program 90 days before the water service for the project is activated.

The following general comments regarding the Garden Garage Project restate our previous comments.

General Comments

1. If any new water mains, sewers and storm drains are required, they must be designed and constructed at the proponent's expense. Also, 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. 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. If the proponent encounters any existing water or sewer connections, they must be cut and capped according to the Commission's standards. The proponent must complete a Termination Verification Approval Form for the Demolition Permit and submit a completed form to the City of Boston's Inspectional Services Department before the Demolition Permit will be issued.
3. The proponent is advised that the discharge of any dewatering drainage to the Commission's drainage system, whether it is temporary or on a permanent basis, requires a Drainage Discharge Permit issued by the Commission. *An NPDES Permit issued by the EPA and/or DEP does not relieve the proponent of the responsibility to obtain authorization from the Commission.* Failure to obtain a Drainage Discharge Permit from the Commission for any dewatering discharge may result in a fine of up to \$ 1,000 per day per violation.
4. Garden Garage must submit a General Service Application and site plan to the Commission for review and approval. The site plan should show the location of all existing and proposed water lines, sewers and storm drains that serve the site. Separate service connections for sanitary flow and storm water will be required. To assure compliance with the Commission's requirements, site plans and General Service Applications should be submitted to the Commission for review when project design is 50 percent complete.
5. With the site plan, the proponent must provide detailed and updated estimates for water demand, sanitary sewer flows and stormwater runoff generation for the proposed project. The amount of potable water required for landscape irrigation must be quantified. The proponent must also provide an analysis of the impacts of the proposed project on the Commission's water, sewer and storm drainage systems.



6. For any proposed masonry repair and cleaning the proponent will be required to obtain from the Boston Air Pollution Control Commission a permit for Abrasive Blasting or Chemical Cleaning. In accordance with this permit the proponent will be required to provide a detailed description as to how chemical mist and run-off will be contained and either treated before discharge to the sewer or drainage system or collected and disposed of lawfully off site. A copy of the description and any related site plans must be provided to the Commission's Engineering Customer Service Department for review before masonry repair and cleaning commences. The proponent is advised that the Commission may impose additional conditions and requirements before permitting the discharge of the treated wash water to enter the sewer or drainage system.

Water

7. The proponent 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. The proponent should contact the Commission's Operations Division for information on how to obtain a Hydrant Permit.
8. The proponent should explore opportunities for implementing water conservation measures in addition to those required by the State Plumbing Code. In particular the proponent should consider outdoor landscaping which requires minimal water. If the proponent 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 also be considered.
9. The Commission utilizes a Fixed Radio Meter Reading System to obtain water meter readings. If a new water meter is needed for the proposed project, the Commission will provide a Meter Transmitter Unit (MTU) and connect the device to the meter. For information regarding the installation of MTUs, the proponent should contact the Commission's Meter Installation Department.

Wastewater and Stormwater

10. The site plan must show in detail how drainage from building roofs and from other impervious areas will be managed. Roof runoff and other stormwater runoff must be conveyed separately from sanitary waste at all times.
11. In conjunction with the site plan and General Service Application, the proponent will be required to submit a Stormwater Pollution Prevention Plan. The plan must:

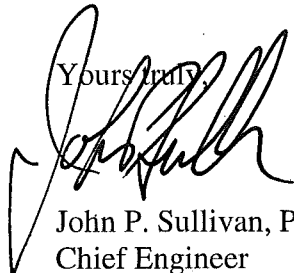


- Identify specific best management measures for controlling erosion and preventing the discharge of sediment, contaminated stormwater or construction debris to the Commission's drainage system when construction is underway.
 - Include a site map which shows, at a minimum, existing drainage patterns and areas used for storage or treatment of contaminated soils, groundwater or stormwater, and the location of major control or treatment structures to be utilized during 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.
12. The project proponent will be required to obtain coverage under the EPA's NPDES General Permit for Construction. A copy of the Notice of Intent and the pollution prevention plan prepared pursuant to the Permit should be provided to the Commission, prior to the commencement of construction.
- If one acre of land or more is disturbed, then the proponent will be required to obtain an NPDES General Permit for Construction from the Environmental Protection Agency and the Massachusetts Department of Environmental Protection. The proponent is responsible for determining if such a permit is required and for obtaining the permit.
- If such a permit is required, then a copy of the permit and any pollution prevention plan prepared pursuant to that permit should 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 11 above.
13. The Commission requires oil traps on drains within an enclosed parking garage. Discharges from oil traps must be directed to the sanitary sewer and not to a storm drain. The requirements for oil traps are provided in the Commission's Requirements for Site Plans.
14. In accordance with the Commission's Sewer Use Regulations, grease traps will be required in any restaurant or commercial kitchen. The proponent is advised to consult with Mr. Richard Fowler, Supervisor for the Commission's Grease Trap Program, prior to preparing plans for a restaurant or commercial kitchen.
15. The Commission requests that the proponent install a permanent "Don't Dump, Drains to Charles River" castings next to any new or modified catch basin installed as part of this project.



16. If the proponent seeks to discharge dewatering drainage to the Commission's collection system, they will be required to obtain a Drainage Discharge Permit from the Commission's Engineering Customer Service Department prior to discharge
17. The proponent should be aware that the US Environmental Protection Agency issued a draft 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, the proponent will be required to apply for a RGP to cover these discharges.
18. 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.

Thank you for the opportunity to comment on this project.

Yours truly,

John P. Sullivan, P.E.
Chief Engineer

JPS/pwk

c.

Paul Barrett – Equity Residential
M. Zlody, Boston Environment Department
P. Laroque, BWSC

Boston Groundwater Trust

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

November 19th, 2014

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Christian Simonelli

Lauren Middleton-Pratt, Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Subject: Garden Garage Notice of Project Change

Dear Ms. Middleton-Pratt:

Thank you for the opportunity to comment on the Notice of Project Change (NPC) for the Garden Garage project. The Boston Groundwater Trust (BGWT) was established by the Boston City Council to monitor groundwater levels in sections of the City where the integrity of building foundations, especially those supported by wood pilings, is threatened by lowered groundwater levels and to make recommendations for solving the problem. As such, my comments are restricted to groundwater related issues.

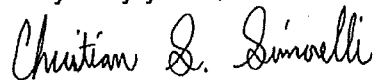
While the project is not located in the Groundwater Conservation Overlay District established under Article of the Zoning Code, it is only a short distance from the Bulfinch Triangle, an area that is within the GCOD and where existing buildings are supported on wood pilings. According to the NPC, the project will include a five level below-grade parking structure with three elevator pits. The NPC also states that the foundation design will likely be similar to that described in the DPIR. As stated in DPIR and again in the NPC, the permanent foundation walls will create a groundwater cutoff and will not present a long-term risk to the shallow groundwater table. Also stated in DPIR and again in the NPC, the lowest floor slab will have an underdrain system to relieve hydrostatic up-lift pressures in which the discharge from the underdrain system will possibly be recharged into the upper aquifer.

Precautions must be taken in the design and construction of the below grade portion of the project to make sure that it will not cause reductions in nearby groundwater levels. In addition to waterproofing the structure, foundation walls, and elevator pits these precautions should assure that no path is created that will allow groundwater to drain from the upper trapped aquifer to a lower aquifer and that any underdrains included in the design discharge through a recharge system into the upper aquifer. At the scoping session the proponent acknowledged that the structure, foundation walls, and elevator pits will be waterproofed. In addition, the proponent also acknowledged that the underdrains included in the design will discharge through a recharge system into the upper aquifer.

The proponent also acknowledged that a groundwater level monitoring program will be in place before, during and after construction to mitigate potential issues and to document groundwater levels.

I look forward to working with the proponent and the Redevelopment Authority to assure that the project can have only positive impacts on groundwater levels in the area.

Very truly yours,

A handwritten signature in cursive script that reads "Christian L. Simonelli".

Christian Simonelli
Executive Director

CC: Kathleen Pederson, BRA
Maura Zlody, BED

11/19/2014

City of Boston Mail - Fwd: Equity Residential



Edward McGuire <edward.mcguire@boston.gov>

Fwd: Equity Residential

1 message

Wed, Nov 19, 2014 at 3:11 PM

Lauren Middleton-Pratt <LMiddleton.Pratt@boston.gov>
To: Edward McGuire <edward.mcguire@boston.gov>

Garden Garage comment letter.

Lauren Middleton-Pratt

Project Manager
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201
617-918-4317
LMiddleton.Pratt@boston.gov

----- Forwarded message -----

From: **Geraldine Quinzio** <jeriq@rcn.com>
Date: Wed, Nov 19, 2014 at 10:13 AM
Subject: Equity Residential
To: lmiddleton.pratt@boston.gov
Cc: josh.zakim@boston.gov

Dear Ms. Middleton and Councilor Zakim,

I am writing as a homeowner, voter, and longtime West End resident who, like so many of my neighbors, is concerned about the proposed Equity Residential Project.

I am not opposed to development in the area. I am not opposed to high-rise buildings. Rather I worry about the lack of overall planning that has been typical in the city. We – those of us who call Boston home – should not be considering this tower or that garage or that museum. We should be looking at the plan of the city: The West End, the North Station area, the North End, Downtown and beyond.

How many new apartments can the area support? What will be the traffic impact, not simply on Causeway Street, Nashua Street, and Lomasney Way, but throughout the area? What do the managers of the hospitals, fire department, police department, supermarket shuttles (a helpful service for the elderly) and ambulance services have to say about their access and how it will be impacted by increased traffic? Is the MBTA planning to increase service to provide an alternative to automobile traffic? Does the commuter rail service plan to expand train service to encourage suburbanites to take the train to events at the Garden and other venues in the city? Does the traffic department plan to make changes that would mitigate the impact of the increased traffic? Have any of these institutions been included in planning?

Is there a comprehensive, long-term plan for the city?

11/19/2014

City of Boston Mail - Fwd: Equity Residential

Too often, projects are considered as if they exist in isolation from their surroundings. They do not. We need city planners to consider each development as part of the whole area and how it would benefit – or harm – the people who call Boston their home. Only then should a decision be made as to whether to approve or reject a development in any part of the city.

Thank you for your help in this very important matter.

Sincerely,

Geraldine M. Quinzio

8 Whittier Place #2E

Boston, MA 02114