

September 19, 2008

Secretary Ian Bowles
Attention: Holly Johnson
EOEEA #14163
Executive Office of Environmental and Energy Affairs
100 Cambridge St, Suite 900
Boston, MA 02114-2524

Subject: Air Rights Parcel 7

Dear Secretary Bowles:

Thank you for the opportunity to comment on the Draft Environmental Impact Report on this important proposal. The Boston Groundwater Trust was established by the Boston City Council to monitor groundwater levels in sections of the City 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.

I appreciate the proponent's volunteering that a portion of the site, although not the location of the buildings, is located within the Groundwater Conservation Overlay District, as well as his commitment to compliance with the requirements of Article 32. I appreciate as well the effort to look for opportunities to recharge groundwater even from sections of the project that lie outside the boundaries of the GCOD and recognize the challenges to accomplishing this in air rights construction.

I further appreciate the plans to install and monitor geotechnical instrumentation and to monitor groundwater observation wells before and during construction. While the Boston Groundwater Trust has several wells currently installed in the vicinity of the project, it is likely that several additional wells will need to be installed to give a complete picture of what is happening to groundwater levels while the project is built and after it is in operation. These wells should be installed, if possible, on public property and in conformance with the Trust's specifications. The results from all wells monitored by the project should be turned over to the Authority and the Trust shortly after they are read. After construction, the wells should be turned over to the Trust for incorporation into the monitoring network.

The project includes a multilevel garage below buildings one and two. According to the DPIR, the wall system is expected to include slurry walls that will extend into the relatively impervious clay soil. The slab will be constructed with underdrains. As I said in my comments on the Project Notification Form, we prefer that projects be constructed without underdrains to minimize potential risks to wood piling supported foundations. However, if underdrains are to be used, it is critical that there be no possible path for water to flow from the upper trapped aquifer that is critical to preservation of wood piling foundations to lower aquifers or into the underdrain system.

In the DEIR, the proponent has pledged to work with the Trust and the Boston Water and Sewer Commission to develop the best design for the infiltration required under Article 32. I look forward to working with him to assure that this major project can have only positive impacts on area groundwater levels.

Very truly yours,

Elliott Laffer
Executive Director