

August 29, 2008

Mr. Geoff Lewis
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007

Subject: 45 Stuart Street

Dear Mr. Lewis:

Thank you for the opportunity to comment on the Notice of Project Change for 45 Stuart Street. 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 lowered groundwater levels and to make recommendations for solving the problem. Therefore, my comments are limited to groundwater related issues.

As acknowledged in the NPC, the project is located within the Groundwater Conservation Overlay District. I appreciate the proponent's commitment, stated in the NPC and reiterated in the scoping session, to meet the recharge requirements of the GCOD. The plans show a storm water recharge system location in the single level below ground parking area. During the scoping session, the proponent stated that it was sized to meet the Article 32 requirement; this will need to be verified by the Boston Water and Sewer Commission.

In addition to the recharge requirement, Article 32 requires that the proponent demonstrate that the project will not cause a reduction in groundwater levels on the site or adjacent lots. Because the NPC project has only a single level below ground while the previous plan had a multilevel underground garage with drainage below the slab, the new plan may be less likely to cause a reduction in groundwater levels. However, the proponent should address this issue in the Draft Project Impact Report, so that compliance will be clear.

The NPC refers back to the information filed for the 2006 planned project for more details about environmental impacts other than transportation and wastewater. In the Project Notification Form filed on August 31, 2006, the proponent states that "Groundwater observation wells will be installed in the vicinity of the Project prior to start of any site excavation or

dewatering to monitor the groundwater levels prior to, during, and following construction.” The wells should be installed in the public sidewalks and should be constructed to the standards used by the Trust and turned over to the Trust for inclusion in the groundwater observation well network after construction is complete. The well readings taken before and during construction should be shared with the Authority and the Trust shortly after they are observed.

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

Very truly yours,

Elliott Laffer
Executive Director

Cc: Kathleen Pedersen, BRA
Maura Zlody, BED