

December 19, 2007

Secretary Ian Bowles
Attention: Deirdre Buckley
EOEEA #13894
Executive Office of Environmental and Energy Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2524

Subject: 585 Commercial Street

Dear Secretary Bowles:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for 585 Commercial 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. As such, my comments are restricted to groundwater related issues.

Since the filing of the Environmental Notification Form in October 2006 and the filing of my subsequent comment letter, the Groundwater Conservation Overlay District has been expanded to include parts of the North End. As acknowledged by the proponent during the scoping session, the project is in the area now covered by the GCOD, and it triggers the requirements of Article 32 because of construction extending below Elevation 7 Boston City Base.

I am pleased that the proponent states in the DEIR that "Design criteria will be developed such that groundwater levels in the vicinity of the project will not be negatively affected by the new construction." I was also pleased to hear during the BRA scoping session that the underground garage will be fully waterproofed and that the slab will have no underdrains.

I was also pleased to note in the DEIR that groundwater monitoring wells will be installed in the sidewalk well in advance of construction to establish baseline groundwater conditions and that monitoring will occur both before and during construction to assure that those levels are maintained. The data from this monitoring should be furnished shortly after each reading to both the BRA and the Trust. I was also pleased with

the commitment to turn the wells over to the Trust after construction, as is required by Public Improvement Commission policy. I look forward to consulting with the proponent and the Authority, as promised in the DEIR, on the best location for the wells. Because they are to become a part of the observation well network, the wells should be installed to Trust standards.

I look forward to working with the proponent to assure that this project can have only positive impacts on local groundwater levels.

Very truly yours,

Elliott Laffer
Executive Director