

July 30, 2008

Ms. Heather Campisano, Project Manager  
Boston Redevelopment Authority  
One City Hall Square  
Boston, MA 02201-1007

Subject: Copley Place Retail Expansion and Residential Addition

Dear Ms. Campisano:

Thank you for the opportunity to comment on the Project Notification Form for the Copley Place expansion. I also want to thank the Authority and the proponent for arranging a briefing on the project since I could not attend the scoping session. 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 am pleased that the proponent has acknowledged that the project is located within the Groundwater Conservation Overlay District and that the project will meet the requirements of Article 32. Based on the presentation during the briefing, I understand that the proponent asserts that the project will be defined as separate from the existing Copley Place structure, and that the recharge requirements are based on the plan area covered by the retail expansion and residential addition. Should this not be found to be the case and the project be defined as a substantial renovation of Copley Place, then it is likely that the recharge requirement would cover all of Copley Place.

While almost the entire project is to be constructed on air rights over the Massachusetts Turnpike and the adjacent railroad tracks, there is, as was pointed out during the briefing, a small section of land adjacent to Stuart Street. As it was explained, this land will play an important role in the foundation support of the new structure and will also present a good opportunity to site the recharge system. According to the proponent, preliminary calculations indicate capacity in that location for a recharge system of the size required under Article 32. Further, the location is near the corner of Stuart and Dartmouth Streets. The Trust maintains groundwater observation wells on both corners of Stuart Street across

Dartmouth Street from the project which have recorded persistently low groundwater readings, often below Elevation 3 BCB. The recharge as planned should be in a good location to help raise groundwater levels at these wells.

In order to make sure that the recharge from the project helps to raise groundwater levels in the area and is not drawn away by a leak, it would be useful if the proponent could investigate and suggest potential causes of the existing low groundwater levels at the corner of Stuart and Dartmouth Streets.

Based on my conversation with the proponent, it may be difficult to install an additional groundwater observation well near the project. However, I appreciate his offer to do so if it is feasible and to consult with the Trust on the location.

Because the project will not, according to the PNF and the briefing, include any construction below Elevation 7 BCB, it is unlikely to have the potential for negative impacts on nearby groundwater levels. However, I look forward to the certification from the proponent that this will be true.

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

Very truly yours,

Elliott Laffer  
Executive Director

Cc: Kathleen Pedersen, BRA  
Maura Zlody, BED