

BOSTON

GROUNDWATER TRUST

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August 18, 2003

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Diana C. Parcon, Mgr.
MBTA Environmental Construction
Environmental Affairs Department
10 Park Plaza, Room 6720
Boston, MA 02116

Re: Draft Environmental Assessment - Notice of Publication July 21, 2003
ARLINGTON STREET LIGHT RAIL ACCESSIBILITY PROJECT

Dear Ms. Parcon:

This letter is in response to your Draft Environmental Assessment on the Arlington Street Station Project and to assist the Federal Transit Administration in their required procedural finding that "there are no significant impacts on the environment associated with the development and operation of this proposed project".

We offer the following suggestions for further environmental investigation of the following significant sections of the draft assessment prepared by the proponent:

3.6 WATER QUALITY

The conclusion of this section that "groundwater is not currently depleted in the area of subsurface construction" appears to be inaccurate. Although there are no supporting data for the statement in the report, observations published by the Boston Groundwater Trust for the vicinity of the project consistently report groundwater levels well below the naturally occurring level of 7' to 9' BCB.

Data from the Boston Groundwater trust is derived from seven nearby monitoring points. For the past 3 years and longer, readings near the Berkeley Street end of the station have indicated a range of levels on the order of 4 to 5 feet below natural levels and occasionally lower. A well near the Arlington Street end of the station has consistently indicated one of the most significant depletions points in the Boston well network and these readings generally have approached 0' BCB, or about 8 feet below natural level.

There is, therefore, publicly accessible documentation that suggests significant groundwater depletion in close proximity to the site of this project. Further environmental assessments should be made to determine the extent of this existing depletion and, more importantly, to identify any construction defects in the existing station that may be contributing to this condition, which is a threat to stability of neighboring wood pile supported buildings.

Also, commitment of the proponent to construction period groundwater monitoring and recharge is notable. However, in consideration for the significance and vulnerability of the neighboring Arlington Street Church and other buildings, additional specific detail for this emergency plan should be prepared in a subsequent elaboration of this environmental assessment and distributed for public review.

3.14 HISTORICAL PROPERTIES

In addition to the Arlington Street Church, it is believed that there may be other wood pile supported buildings, some of historical significance, on both sides of Boylston Street, adjacent to the underground station from Arlington to Berkeley Streets. For these an inventory should be undertaken to confirm those with wood pile foundations. That survey also should determine each building's top of pile elevation, from historical data or test pit if necessary, in order to establish the vulnerability level below which groundwater depletion becomes detrimental. If the proponent has developed that information for the Arlington Street Church, it is not included in the draft assessment and should be. Otherwise the draft conclusion that there is no negative impact on the Church structure may be premature.

3.18 SAFETY AND SECURITY

Structural integrity and foundation stability of buildings adjacent to the Arlington Street underground station are of the utmost concern for public safety. Groundwater depletion in this location that threatens wood pile foundations is a risk that needs full evaluation both to the extent it may stem from existing conditions in the station as well possible impacts from the proposed new project. Because existing groundwater conditions already appear to constitute a potential threat to public safety, it is strongly urged that an analysis of this condition be addressed in the next phase of this important environmental assessment.

We thank you for the opportunity to comment on this development proposal and welcome any questions that require further clarification.

Very truly yours,



Gary L. Saunders



Tim Ian Mitchell

Trustees & Co-Chairs, Boston Groundwater Trust

cc: Richard Doyle, Regional Administrator, Federal Transit Administration
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Michael Cannizzo, Boston Landmarks Commission
David Carlson, Boston Redevelopment Authority
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