

January 25, 2005

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
MEPA Office
100 Cambridge Street
Boston, MA 02114
Attention: Richard Bourre

Subject: EOE #13415, Lovejoy Wharf

Dear Secretary Herzfelder:

Thank you for the opportunity to comment on the Environmental Notification Form for the Lovejoy Wharf development. The Boston Groundwater Trust was established by the Boston City Council to monitor groundwater levels in the sections of the city where building foundations supported on wooden pilings are threatened with deterioration because of reduced groundwater levels and to recommend solutions to the problem. As such, our comments are limited to groundwater related issues.

The Lovejoy Wharf project is located near the Bulfinch Triangle area, where many buildings are supported on wooden pilings. The project itself will be built on filled land and may be near other wood piling supported buildings. In addition, the proponent has acknowledged flooding of the basement since construction of the Central Artery project began. This leakage can have the effect of lowering surrounding groundwater levels, threatening the integrity of wood piling foundations.

In order to help understand the vulnerability of structures in the area, we ask that the proponent conduct a survey of nearby buildings to determine which are supported on wood pilings. In addition, we ask that the proponent install an appropriate number of groundwater level observation wells at locations to be determined in consultation with the Trust. These wells should be used to determine that no reduction in groundwater level occurs during construction. Groundwater level readings during construction should be transmitted to the Trust. After project completion, the wells should be turned over to the Trust for incorporation into the observation well network.

To assure that the building does not cause groundwater level reductions after project completion, the proponent should be required to file an

annual certification stamped by a registered professional engineer showing that there has been no groundwater pumped or drained from the building in the previous year.

We look forward to working with the developer and the EOEA to assure that the project will contribute to the solution of the groundwater problem in Boston.

Very truly yours,

Elliott Laffer
Executive Director