June 22, 2006

Secretary Stephen Pritchard
Executive Office of Environmental Affairs
MEPA Unit
100 Cambridge Street, Suite 900
Boston, MA 02114-2454
Attn: Anne Canaday, EOEA 12362

Subject: Massachusetts General Hospital

Dear Secretary Pritchard:

Thank you for the opportunity to comment on the Notice of Project Change filed on this project. The Boston Groundwater Trust was established by the Boston City Council to monitor groundwater levels in sections of the city where building foundations are threatened by reduced groundwater levels and to make recommendations for solving the problem. As such, my comments are limited to groundwater related issues.

The project is located on Fruit Street in an area of made land that is in one of the designated study areas for potential expansion of the City’s new Groundwater Conservation Overlay District. The original proposal included relatively limited below grade construction, basically including a loading dock that was only partially below grade and may not have extended below elevations that cause concern for groundwater depletion.

The project contemplated in this NPC includes two full floors and the loading dock below grade. Its potential for groundwater depletion is substantially higher than that for the previously submitted project. It is important that the proponent develop a plan for addressing groundwater issues that includes fully waterproofing all construction below potential groundwater levels so that there will be no potential for the removal of groundwater from the site after construction by either pumping or drainage. In addition, it is important that a recharge system be incorporated to assure that rainwater is infiltrated into the ground to the maximum extent feasible. Finally, it is critical that groundwater levels be carefully monitored before, during, and after construction to assure that the project is not having causing a reduction. The monitoring data should be shared with the Trust so that we can incorporate it into the analysis that
we provide of groundwater levels throughout areas of the city where there is a concern.

I look forward to working with the proponent and other agencies to assure that the project has the maximum possible benefit for groundwater levels and can do no harm to them.

Very truly yours,

Elliott Laffer
Executive Director