

January 11, 2010

Secretary Ian A. Bowles
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office – Richard Bourre
EOEA #14255
100 Cambridge St, Suite 900
Boston, MA 02114

Subject: Seaport Square

Dear Secretary Bowles:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Seaport Square project. 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.

As stated in the DEIR, the portion of the project that includes Blocks H,J,K, and Q is located within Boston's Groundwater Conservation Overlay District. I am pleased that the proponents have committed to meet the GCOD standard that the buildings in these blocks will be designed so that there will be no reduction in groundwater levels caused by their construction or operation. I look forward to the engineers' certification report that will demonstrate how this pledge will be met and appreciate the proponent's commitment to fully waterproofing below surface walls in all cases and floors where feasible and design of a groundwater cutoff wall in buildings where the floor cannot be feasibly waterproofed so that hydrostatic pressure relief will not affect surrounding groundwater levels.

I also appreciate the proponent's commitment that, even in those buildings not in the GCOD, design criteria will be implemented to assure that groundwater levels will not be lowered, and that no permanent active dewatering systems or perimeter drains below groundwater levels will be allowed.

Variations in groundwater level of the magnitude noted in the DEIR are cause for our concern, particularly if they occur near wood piling

supported buildings. It is critical that the applicant clarify which wells show this variation and share further details of the readings with the Trust to help further our understanding of groundwater variations in the area.

I am pleased that the proponent will coordinate with the Trust in regard to groundwater monitoring. I look forward to meeting with the proponent so that we can agree on the best sites for such wells, and appreciate their commitment to construct them to BGwT standards and ultimately turn them over for incorporation into our network. The proponent states that the monitoring data will be turned over to the Trust and the BRA; this should happen shortly after the readings are taken so that we can respond to any unanticipated changes.

I appreciate the attention that the proponent has given to groundwater issues in the DEIR and look forward to working with the proponent to assure that the project will not have any negative impacts on area groundwater levels.

Very truly yours,

Elliott Laffer
Executive Director