

June 20, 2008

Secretary Ian A. Bowles
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office – Briony Angus
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 Environmental Notification Form for this significant development. 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 in the ENF that Parcels H, J, K, and Q within the overall plan are included in the Groundwater Conservation Overlay District. As stated in the PNF, within this section of the GCOD there is no requirement for groundwater recharge, but there is a requirement to demonstrate that the project cannot cause a reduction of groundwater levels on the site or on abutting lots. These sections of the project immediately abut the Fort Point Channel area of South Boston, where the majority of the buildings are supported on vulnerable wood piling foundations.

On Parcels H and J, which are included in the request to waive further Article 80 review, there is a small underground construction planned. The proponent did state at the BRA scoping session that there would be a partial basement on Parcel H that would likely not extend below Elevation 7 BCB, but also confirmed that there are no planned underdrains and that any underground sections would be waterproofed. I am pleased with their positive statements of support and compliance with GCOD requirements.

The buildings planned for Parcels K and Q will include a substantial underground garage. I am again pleased with the proponent's pledge that the buildings will comply with the GCOD. At this location it will be

important to understand how the standards will be met. This should be addressed in the DEIR covering these parcels.

The ENF states that groundwater monitoring wells will be installed during planned future subsurface explorations. If possible, these wells should be installed in locations that will be accessible in the future and should be made available to the Trust to incorporate into our observation well network when no longer needed for construction. Groundwater levels should be monitored before construction to establish a baseline and then during to construction to assure that they are not being drawn down. Results should be made available to the Boston Redevelopment Authority and to the Trust shortly after they are gathered.

The attitude expressed by the proponent toward groundwater issues both in the ENF and during the BRA scoping session has been very positive. I look forward to working with them to assure that this project cannot have a negative effect on groundwater levels.

Very truly yours,

Elliott Laffer
Executive Director