

May 10, 2006

Mr. Jim Grabaudo, Project Manager
Boston Redevelopment Authority
One City Hall Plaza
Boston, MA 02201

Subject: South Station Air Rights

Dear Mr. Gribaudo:

Thank you for the opportunity to comment on the Final Project Impact Report on the South Station Air Rights 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 lowered groundwater levels and to make recommendations for solving the problem. As such, my comments are limited to groundwater related issues.

While this project is located outside the Groundwater Conservation Overlay District, it will be built on made land in an area that has been designated as a study area for possible inclusion in the GCOD in the future. South Station is directly across from the Leather District, which is included in the GCOD, and the South Station Headhouse itself is supported on wood pilings.

We appreciate that there will be no permanent foundation or underslab drains, and that the below grade space will be sealed and water-proofed. We also appreciate that the project will coordinate off-site observation wells with the Trust and will make off-site wells available to the Trust for future incorporation into our observation well network.

Because of the project's sensitive location, it would be good if it could provide some recharge of stormwater into the groundwater aquifer. While this tightly site constrained air rights project is outside the GCOD, installation of a recharge system, even if smaller than what the GCOD would require, will help to maintain adequate groundwater levels within the area.

I look forward to working with the proponent and the Authority on the resolution of groundwater related issues raised by the project.

Very truly yours,

Elliott Laffer
Executive Director

Cc: John Walser, BRA
Maura Zlody, BED