

May 18, 2005

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Attn: Bill Gage, MEPA Office

Subject: The Clarendon, Boston, MA, EOEPA Project 13300

Dear Secretary Herzfelder:

Thank you for the opportunity to comment on the Draft Environmental Impact Report on The Clarendon. The Boston Groundwater Trust was established by the Boston City Council to monitor groundwater levels in areas of the city where wood pile building foundations are threatened by lowered groundwater levels and to make recommendations to help in overcoming the problem. As such, our comments are limited to groundwater related issues.

Section 4.9 of the DEIR, Geotechnical/Groundwater Impacts, is the most thorough such analysis that I have seen from any project at this stage of review. As the section makes clear, this project is located in an area of very significant concern because of lowered groundwater levels. I appreciate the proponent's commitment to research the potential causes and solutions to this situation and look forward to receiving and analyzing their findings.

The proponent's plan for slurry wall construction and for a basement slab design that will not use underdrains ensures, assuming that it is properly constructed, that there will be minimal pumping of groundwater from the site. In order to document the success of the design, the project should be required on an annual basis after construction to file a certification, signed and stamped by a registered professional engineer, that no groundwater has been pumped or drained from the site.

We appreciate the commitment of the proponent to recharge water removed from the site during construction. More significant is their commitment, in Section 7.4.2, to consider a drywell recharge system for roof drainage. Such a system should be made a requirement of any approvals for the project.

We also appreciate the additional groundwater monitoring wells to be installed on public property and monitored prior to, during, and after construction. I look forward to working with the proponent to confirm the ideal locations for the wells. It is critical that criteria be established for groundwater levels that exist prior to construction. Reductions in those levels should trigger immediate actions to remediate the problem, with a requirement that construction halt within a specified time frame if the problem has not been solved and remain at a stop until a solution is implemented.

Again, I appreciate the amount of effort that has clearly been expended by the proponent in preparing the groundwater related sections of the DPIR. I look forward to working with the proponent as these provisions are fleshed out and we make strides toward solving the groundwater level problems in the area.

Very truly yours,

Elliott Laffer
Executive Director