

BOSTON

GROUNDWATER TRUST

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March 5, 2004

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Heather Campisano, Project Manager
BRA
Boston City Hall, Rm 910
Boston, MA 02201

Re: 360 Newbury Street Condominium Project
P.N.F.

Dear Ms. Campisano:

This letter is in response to your request for comments on the Project Notification Form dated January 20, 2004 for the above referenced project at the Virgin Mega Store building.

In view of the groundwater sensitivities of this site, we believe a subsurface environmental analysis is required to understand if there is a source of groundwater depletion on-site that could jeopardize the stability of nearby buildings. This site is located in the historic Back Bay neighborhood, at the edge of a significant land-fill built area of Boston, where the predominant foundation type utilized was untreated wood piles. The building is supported on or next to retaining wall structures descending to the Massachusetts Turnpike Authority roadbed at a lower elevation. This is the type of aging retaining structure that, at other Turnpike bordering sites, has been suspected as a potential source of groundwater leakage. The building appears to be situated on top of an MBTA tunnel, another structure type vulnerable to maintenance deficiencies that can create harmful groundwater depletion. Also there exists in the building a basement area of size and age similar to others recently determined to be responsible for significant groundwater discharge by pumping.

There are two Observation Wells nearby monitored by the Boston Groundwater Trust. Both were constructed recently. One has been inaccessible because of winter ice conditions. The other location, about halfway to Hereford on the opposite side of Newbury, most recently measured El. - 5.36 BCB, which is thought to be perilously close to the typical top of pile cut-off elevation.

We offer the following suggestions for further investigation by the proponent in their Draft EIR for the project:

1. For the area surrounding this site, an inventory should be created indicating buildings that may be supported on wood piles and therefore are vulnerable to destabilization resulting from groundwater depletion.

2. An engineering investigation and report should be prepared to verify that underlying retaining structures, basement construction of the project and, to the extent accessible, the MBTA tunnel are sound, in good repair and are not a contributing source of groundwater infiltration or depletion.
3. New observation wells should be installed, a report prepared of groundwater levels for public review and the observation wells dedicated to the City for addition to the network being monitored by the Boston Groundwater Trust. We suggest locations at the NE & SE corners of Newbury Street at Massachusetts Ave. and on the south side of Newbury Street about equidistant between Massachusetts Ave. and Hereford Street.
4. We encourage the developer to investigate the feasibility of using roof top storm drains to recharge groundwater in the area.

Thank you for the opportunity to comment on this development proposal and welcome any questions that require further clarification.

Very truly yours,



Tim Ian Mitchell

Trustee & Co-chair, Boston Groundwater Trust