

March 28, 2005

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114
Attention: MEPA Office, Janet Hutchins, EOEPA No. 12171

Subject: Two Financial Center

Dear Ms. Hutchins:

Thank you for the opportunity to comment on the Notice of Project Change regarding Two Financial Center. The Boston Groundwater Trust was established by the Boston City Council to monitor groundwater levels in the sections of the City in which wood piling foundations are threatened by reductions in groundwater levels and to make recommendations for solving the problem. As such, our comments are limited to groundwater related issues.

The project is located on the edge of the original colonial shoreline, adjacent to an area in which it is likely that many buildings were constructed on wood pilings. In fact, as noted on page 12 of the Notice, there is already geotechnical equipment in place to monitor the impact on two nearby buildings. The project's planned five level underground garage could, if constructed without taking into account the necessity to maintain adequate groundwater levels, cause a significant groundwater drawdown.

I am pleased that, in discussion at the NPC review session, the proponent agreed to: monitor groundwater levels during construction and turn over wells after construction to make them part of the Trust's monitoring network; work with the Trust to determine what additional locations, if any, should have groundwater monitoring wells and to install wells as deemed necessary by the Trust; to design its garage so that groundwater will not leak in; and, after construction is complete, to annual certification by a registered professional engineer that no groundwater has been pumped or drained from the building during the preceding year.

I believe that these conditions should be put in place as part of the regulatory approvals for the project to proceed. We look forward to working with the developer and with other government entities to assure

that this project proceeds without causing any drawdown in groundwater levels in the surrounding area.

Very truly yours,

Elliott Laffer
Executive Director