

March 29, 2007

Mr. Ian Bowles, Secretary
Executive Office of Environmental Affairs
Attn: MEPA Office, Mr. William Gage
EOEA #13367
100 Cambridge Street
Boston, MA 02114

Subject: Waterside Place, Boston, MA EOEA #13367

Dear Secretary Bowles:

Thank you for the opportunity to comment on the SEIR for Waterside Place. The Boston Groundwater Trust was established by the Boston City Council to monitor groundwater levels in sections of Boston where the integrity of building foundations is threatened by lowered groundwater levels and to make recommendations for solving the problem. As such, my comments are limited to groundwater related issues.

The Boston redevelopment Authority has recently recommended, and the Boston Zoning Commission is now considering, an extension of the Groundwater Conservation Overlay District to the Fort Point Channel section of South Boston. Although the Waterside Place project is several blocks away from the proposed boundaries of the zone, it will be constructed in made land; a groundwater drawdown there could potentially affect the levels in the Fort Point area where virtually all of the buildings are wood piling supported.

While most of the project related parking will be above grade, there will be a deep garage along Congress Street for which the excavation will extend to about Elevation -21' BCB, well below the level at which pilings are cut off in the Fort Point area. It is critical that the sections of the structure below anticipated groundwater levels be designed to not leak not only during construction but during operation of the facility. If underdrains are to be used, as anticipated in the SEIR, the system must be designed so that they cannot remove groundwater from levels above the organic silt.

I am pleased that the proponent plans to install four groundwater observation wells and to monitor levels before, during, and after construction. As with other major projects, those levels should be shared

with the Trust shortly after they are measured. I further appreciate the proponent's plans to turn the wells over to the Trust after completion of construction so that we can incorporate them into our monitoring network.

As this exciting new area of the City is built out, it is vital that we protect the historic areas that so shape Boston's character. I look forward to working with the proponent and regulatory and planning agencies to make sure that we do so.

Very truly yours,

Elliott Laffer
Executive Director