Mr. Jay Rourke, Project Manager Boston Redevelopment Authority One City Hall Square Boston, MA 02201-1007

Subject: 316-322 Summer Street

Dear Mr. Rourke:

Thank you for the opportunity to comment on the Project Notification Form for 316-322 Summer Street. 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 restricted to groundwater related issues.

The project is located in the Fort Point Channel section of South Boston, a neighborhood that has been designated as a study area for inclusion in the Groundwater Conservation Overlay District. As stated in the PNF, the building itself is supported on wood pilings, as appears to be true for all of the former Boston Wharf Company buildings. This makes maintaining groundwater levels a critical issue for the proponent, as it is for the Trust and for those who own and occupy nearby buildings.

I appreciate the proponent's commitment that the new foundation elements will be designed to not impact groundwater levels and that new elevator pits extending below the lowest level floor slab will be waterproofed and that there will be no foundation drains.

I also appreciate the proponent's commitment to groundwater level monitoring before, during, and after construction. They have already shared with the Trust monitoring data from wells that they are having monitored around their Fort Point Channel building portfolio. I am pleased with their commitment to share the data with the Trust on an annual basis after construction. I hope that we might be able to conclude an access agreement with them, as we recently did with Berkeley Investments for the observation wells around their properties, so that we can incorporate them into our network. I would also request that the proponent install a new observation well in the sidewalk along A Street

adjacent to the project, so that we can have an even better picture of what is happening to groundwater levels in the area. It might also be valuable to install a well in the alley behind the building near where the infill section will be added. In both cases, the Trust should be given access to these wells, if installed, after construction.

While the project site is not currently in the Groundwater Conservation Overlay District and is therefore not bound by the recharge requirements of the GCOD, it could be advantageous for a recharge system to be installed. The PNF indicates that stormwater will continue to flow to street drains. Capturing some or all of this stormwater for introduction into the ground can help to maintain adequate groundwater levels throughout the area.

The proponent's understanding of the importance of the groundwater issue and commitment to work on it is very encouraging. I look forward to working with the proponent and the Authority as the project proceeds to assure the best possible impact on groundwater levels.

Very truly yours,

Elliott Laffer Executive Director

Cc: John Walser, BRA Maura Zlody, BED