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

Subject: 350 Boylston Street

Dear Mr. Rourke:

Thank you for the opportunity to comment on the Project Notification Form for 350 Boylston Street. The Boston Groundwater Trust was established by the Boston City Council to monitor groundwater levels in sections of the City where the integrity of building foundations is threatened by low groundwater levels and to make recommendations for solving the problem. As such, my comments are limited to groundwater related issues.

I appreciate the attention to groundwater shown in the PNF, as well as the proponent's addressing the issue in his presentations at the scoping session and public meeting as well as in a meeting with the Trust.

The project is located in a sensitive area for groundwater issues. The buildings to be replaced by the structure are supported on wood pilings, as, I believe, are most of the remaining structures on the block. There has been a history of low to very low groundwater readings at several of our monitoring wells located on Arlington, Berkeley, Boylston, and especially Providence Streets surrounding the block on which the project is to be constructed. It would be very helpful if the project could help to pinpoint potential causes for these low readings.

The project as proposed includes a three level parking garage that extends well below the level at which it could potentially cause groundwater problems. I appreciate the proponent's commitment, repeated in several forums, that the below ground portion of the project will be substantially watertight. The PNF also states that any seepage into the building will be recharged into the ground through the gallery under Providence Street that will be installed to meet the GCOD requirements of Article 32 of the zoning code.

The PNF further states that water removed from the building's underdrain system will also be recharged through the building's storage tank and underground galley, both of which will be sized to handle this flow in addition to the volume required by Article 32 because of the building's footprint.

It is critical that all of these steps be taken in order to assure that the building cannot cause a reduction in groundwater levels on the site or on adjacent lots, as required by zoning. Additionally, the proponent should show in the DPIR the steps that will be taken to make sure that the project will not create a path for groundwater from the upper trapped aquifer which is critical to protection of pilings to penetrate to the aquifer located below the organic soil. Such a path could lead to reductions in critical groundwater levels in spite of the planned recharge system.

I appreciate the proponent's plans to monitor groundwater levels before and during construction. These findings should be reported shortly after they are taken to both the Authority and the Trust. Any new observation wells should be constructed to Trust standards and should be located in the public way and turned over to the Trust after completion of the project. I look forward to consulting with the proponent and his engineers about the best locations for these wells.

I believe that this project has the potential to make a significant positive contribution to improving groundwater levels on a very important site. I look forward to working with the Authority and the proponent to help bring that potential to fruition.

Very truly yours,

Elliott Laffer Executive Director

Cc: Kathleen Pedersen, BRA Maura Zlody, BED