

November 16, 2006

Secretary Robert Golledge
Attn: Deirdre Buckley
EOEA #13894
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2524

Subject: 585 Commercial Street, Boston, MA

Dear Secretary Golledge:

Thank you for the opportunity to comment on the Environmental Notification Form for 585 Commercial 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 lowered groundwater levels and to make recommendations for solving the problem. As such, my comments are restricted to groundwater related issues.

As is stated in the ENF, the project is outside the City's Groundwater Conservation Overlay District. However, it is located on made land and may be near buildings supported on wood piling foundations. I was very pleased to hear the commitments made by the proponent during the BRA's scoping session that the project would be built without foundation underdrains and that the underground garage would be fully waterproofed so that there would be no pumping of groundwater during building operation. These commitments should be included in the DEIR to assure that they are carried out.

I was also pleased that the proponents stated their intention to install groundwater monitoring wells to make sure that levels are maintained during construction. These wells should be installed well in advance of construction to assure that proper baseline groundwater levels are established. Readings both before and during construction should be provided to both the BRA and the Trust. After construction, the wells, ideally installed in public sidewalks, should be turned over to the Trust so that they can be incorporated into our monitoring network. This will allow us to assure that there are no adverse impacts over time to area

groundwater levels caused either by the project or by other underground infrastructure.

I look forward to working with the proponents to make sure that this project cannot have any adverse impacts on local groundwater levels.

Very truly yours,

Elliott Laffer
Executive Director