Boston Groundwater Trust

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September 25, 2013

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

Subject: Copley Place Notice of Project Change

Dear Mr. Fitzgerald:

Thank you for the opportunity to comment on the Notice of Project Change for the Copley Place Retail Expansion and Residential Addition. 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, especially those supported on wood pilings, is threatened by low groundwater levels and to make recommendations for solving the problem. Therefore, my comments are limited to groundwater related issues.

In my comments on the Draft Project Impact Report, dated Sept. 8, 2011, I noted the requirement under Article 32 of the Zoning Code that established the Groundwater Conservation Overlay District, in which the project is located, that it must provide a certification stamped by a professional engineer registered in Massachusetts describing how the project will be designed and constructed so that it will not cause a reduction in groundwater levels. The proponent had previously committed to providing such a certification to the Authority and the Trust, but we have yet to see it. There is no indication in the NPC that the foundation design will change from that outlined in the DPIR, including the use of slurry walls and drilled shaft foundations. These deep foundation elements will penetrate the largely impervious organic layer that underlies the aquifer critical to protection of wood pilings, and the certification should describe the steps to be taken to assure that no path will be created through this layer to allow the groundwater to drain to a lower level.

I look forward to continuing to work with the proponent and the Authority to assure that the project can have only positive impacts on area groundwater levels.

Very truly yours,

Elliott Laffer Executive Director

Cc: Kathleen Pedersen, BRA Maura Zlody, BED

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