January 4, 2005

Secretary Ellen Roy Herzfelder Executive Office of Environmental Affairs MEPA Office 100 Cambridge Street Boston, MA 02114 Attention: William Gage

Subject: EOEA #13253, Nashua Street Residences

Dear Secretary Herzfelder:

Thank you for the opportunity to comment on the Draft Environmental Impact Report on the Nashua Street Residences. The Boston Groundwater Trust was established by the Boston City Council to monitor groundwater levels in parts of the City where buildings constructed on wooden pilings are threatened with structural damage due to piling deterioration caused by lowered groundwater levels and to make recommendations for overcoming the problem. As such, our comments are limited to groundwater related issues.

Because the proposed structure is to be primarily supported on foundations built for this purpose during the construction of the underlying MBTA garage, there is likely to be little threat to surrounding structures caused by its construction. However, the DEIR does reference the possibility that dewatering will be required during some of the additional foundation work for the project. The project itself is built on filled land and is near the filled land of the Bulfinch Triangle, where many of the buildings are likely supported on wooden pilings. It is therefore important to understand any impacts that the project may have on these nearby structures. We appreciate the commitment of the proponent on page 4-92, to work with the MBTA to provide groundwater monitoring wells at the site as requested by the Boston Groundwater Trust.

We look forward to working with the proponent and the relevant State and City agencies to site these wells and to better understand and overcome the groundwater level reductions that threaten such an important part of Boston's heritage, vibrancy, and economy.

Very truly yours,

Elliott Laffer Executive Director