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**Boston Water and
Sewer Commission**980 Harrison Avenue
Boston, MA 02119-2540
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March 11, 2005

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Attn: Mr. Richard Bourre, MEPA Office

and

Mr. J. Gribaudo, Economic Development
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201-1007Re: Residences at Pier 5, Charlestown Navy Yard
DEIR/PDEIR, EOEA No. 13279

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MAR 11 2005

MEPA

Dear Secretary and Mr. Gribaudo:

The Boston Water and Sewer Commission (Commission) has reviewed the Draft Environmental Impact Report/Project Impact Report (DEIR/PIR) for The Residences at Pier 5 in the Charlestown Navy Yard.

Last year, the Commission submitted comments on an Extended Environmental Notification Form/Project Notification Form (EENF/PNF) for the Residences at Pier 5. The Commission's extensive comments are contained in a letter dated June 18, 2004.

The proposed project has been modified since the EENF/PNF. The project no longer includes Parcel 2A3: the parking garage proposed on this parcel has been eliminated. The number of residential units has increased from 59 to 75 units. The Harborwalk site circulation will be located within the footprint of the existing pier; extending the pier to the north to accommodate the Harborwalk has been eliminated. The design of the marina on the south side has been revised. The proposed project will include a 1,500 square foot Special Public Destination Facility (SPDF).

The Pier 5 Project is located at the seaward end of Eighth Street in Charlestown in the Charlestown Navy Yard. The proponent proposes to construct a 5-story building containing 75

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residential units. The project will also include a 30-room inn, a 175-seat restaurant and the 1,500 square foot SPDF.

Along the southern portion of the pier, the proponent plans to construct a 14-slip marina with water and electric hook-ups. The proponent plans to acquire 113 parking spaces within the existing Flagship Wharf parking facility.

The demand for water and the amount of wastewater being generated has increased from the EENF/PNF to the DEIR/PIR. The proponent estimates that the project's water demand at 29,079 gallons per day compared to the 17,800 gallons per day in the EENF/PNF. The project is estimated to generate about 26,435 gallons per day of sanitary sewage compared the 15,500 gallons per day estimated in the EENF/PNF.

The water service along Eighth Street is provided by a 12-inch low service water line. The proponent will be required to request fire flow tests, analyze these results and assess the impact of this project on the existing water system. The proponent proposes separate service connections for domestic water and fire protection. The proponent will be responsible for the adequacy of the cold weather protection for these lines.

Separate sanitary and storm sewers exist in Eighth Street; a 10-inch sanitary sewer and a 24-inch storm drain. The proponent plans to connect the sanitary service to the Commission's sanitary sewer. The proponent is reminded that the Massachusetts Department of Environmental Protection (DEP) requires proponents to assist the agency in reducing infiltration and inflow (I/I). The DEP uses a 4:1 ration of I/I reduced to sanitary flows added to the wastewater collection system. The proponent should contact Mr. Phil Larocque at the Commission to obtain more information on this issue.

In the earlier comment letter, the Commission stated that the proponent will be required to route the project's stormwater to the receiving water directly. The DEIR/PIR indicates that a portion of the stormwater will discharge directly to Boston Harbor as requested but a portion of stormwater subject to vehicular traffic will be discharged to the Commission's existing 10-inch storm drain. The Commission's previous position remains. All of the stormwater from this project must be discharged to the receiving water. The proponent is responsible for installing and maintaining the appropriate water quality controls on this drainage system.

If water service is to be provided at the proposed marina, cross connection control devices will be required on the water service. The proponent will also be required to install approved backflow prevention devices on the water services for fire protection and any mechanical or irrigation systems. For more information on the requirements for backflow prevention, the proponent is advised to consult with the Mr. Richard Fowler, Manager of Engineering Code Enforcement. If pump-out stations are to be constructed for the marina slips, the wastewater from the pump-out station must be discharged to a sanitary sewer. The proponent is advised to consult with Mr. Phil Larocque, Site Plan Engineer, with regard to connecting the pump-out station to a sanitary sewer.

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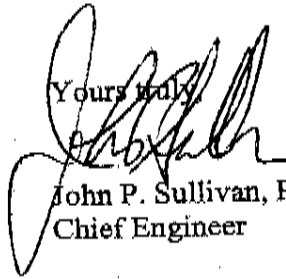
The proponent is also reminded that:

Prior to beginning construction, the proponent must submit a site plan and a General Service Application to the Commission. The site plan must show the locations of all water mains, sewers and drains serving the site, proposed water meter locations and the location and size of the existing service connections.

All new water and sewer facilities must be designed in accordance with the Commission's Water Distribution System Regulations, Sewer Use Regulations and Requirements for Site Plans. To assure compliance with the Commission's requirements, the proponent should submit the site plan and the General Service Application to the Commission for review and approval when the design of the building is 50 percent complete.

Thank you for the opportunity to comment on this project.

Yours truly,



John P. Sullivan, P.E.
Chief Engineer

JPS/pwk

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Martin Oliner - LDA Acquisition
John Walse - BRA
Moura Zlody - BED
C. Jewell - BWSC
Phil Larocque - BWSC
Richard Fowler - BWSC