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June 27, 2020

Heather Charles Lis, Assistant Conservation Officer
Town of Hingham
210 Central Street
Hingham, MA 02043

Re: Notice of Intent – Revised Plan Comments
100 Industrial Park Road
Hingham, MA

Dear Ms. Charles Lis:

We are in receipt of your comments contained in an email dated June 5, 2020, regarding the project noted above. Our responses are indicated below in ***bold italic*** text and are as follows:

1. NOI form. I missed this the first time, but under Section C.5., this site IS within an area designated as an Outstanding Resource Water (and is a Critical Area for stormwater purposes).

   Response: Acknowledged, an updated NOI form is enclosed.

2. Project narrative. A revised project narrative, reflecting the changes to the plans, should be provided.

   Response: The Applicant has revised the plans to propose a new Title 5 septic system located on the north side of the building to replace the existing wastewater treatment facility located on the south side of the main building. Soil evaluations and testing were performed on-site on June 25, 2020, for both the proposed drainage systems and the proposed new Title 5 septic system.

   The overall stormwater management design for the Site has been revised to meet the Massachusetts Stormwater Handbook Standards. These standards are discussed in the revised Stormwater Management Report. Proposed stormwater catch basins are proposed "off-line" and no proposed stormwater systems will utilize infiltration under the revised design. Record mapping (see Map Reference H on the survey) and field verification has outlined the remainder of the stormwater components on the survey.

The proposed treatment on-site consists of pre-treatment (no credit taken) from deep sump catch basins and isolator rows for the underground detention systems. The proposed treatment (at 80% TSS with the forebay designed) for the 0.5" water quality volume (WQV) is preformed by a proposed constructed extended detention stormwater wetland prior to discharging to the wetlands on-site.

An Alternate-1 DRAFT Grading and Drainage Plan (Sheet GD-2 & GD-0) and DRAFT stormwater calculations is included with this revised submission that includes increasing the detention pond behind the foundry building area to meet the 1" water quality for this site. The expansion of the proposed pond encroaches into the 50' buffer to the south.

An Alternate-1 DRAFT Landscape Plan (Sheet LL-2 & LL-0) has been included to proposed plantings in the existing (former) septic leaching area within the 100' buffer located south of the existing main building.

The northern most existing entrance on Commerce Road has shifted to the south per Planning Board Traffic Peer review comments.

The parking lot layout on the southwest side of the site has been revised due to not re-using the existing waster water treatment facility.

3. Plans

- The plan set has been updated with a revision date, but it appears that individual plans do not have revision dates where applicable.

  Response: The individual plans that do not have a revision date are ones that did not have any revisions from the previous submission. Every sheet that has been revised for this submission has 7/27/2020 as a revision date.

- Thank you for adding the 50ft buffer zone, however the legends should also be updated to indicate that WB represents both 50 and 100ft buffers (some of the plans do this but not all) or to make a distinction between the two. Since our OOCs frequently reference these two buffers, we want to avoid any possible future confusion with contractors or others.

  Response: The legends in the DM, SP, GD, SU, and LL sheets are updated to indicate that the WB represents both 50 and 100 ft buffers.

4. Wetland Resource Areas

- FYI. For Zone A, the FEMA-mapped flood zone is not necessarily adequate since flood profile data is generally not available and other information must be used, or a flood study undertaken, in accordance with the regs. For this reason, I usually ask if an applicant does have any other information. However in this case I don't think this

will be an issue given the actual site topography and proposed grading, and the fact that I was able to determine there is a draft FEMA Work Map that shows a decrease in the extent of flood zone in this area.

Response: There are no record cross-sections from FEMA that we have been able to find or any other mapping data with a flood elevation level listed that we could utilize to determine this elevation. We agree that we do no expect construction to impact the Zone A area.

- During the site visit, I observed a small wetland area to the west of the leaching area, around el. 143-144 on the existing conditions plan. I understand the resource areas were established by the current ORAD, but I'm wondering if there is any other information available on this area. I observed a PVC pipe outlet coming into the area from the northeast. The approved ORAD plan shows the area with the pipe I observed and a second pipe, so it seems possible that it is just related to stormwater management.

  Response: The area was an abandoned sludge bed and lagoon, the PVC pipe is an abandoned, reported capped, process waste pipe from the main building. This is no longer in use.

- Similarly I observed a headwall and a channel beginning near the eastern corner of the warehouse to be demolished, and extending southeast. The headwall is shown on the approved ORAD plan. Although the channel was not flagged, this is clearly a sensitive area that discharges directly to the larger wetland system and the LOW should be pulled away from this area as much as possible. A smaller metal outlet pipe is located above and to the north of the headwall, and there are some old metal wire frames and debris such as an old tire that should be removed by hand from this area.

  Response: This headwall has been investigated by BL Companies personnel as well, we do not plan to make any modifications or to the headwall or disturb land other than some minor grading in the immediate area. This grading will not affect the discharge of this headwall during construction and appropriate erosion control measures will be in place.

5. Erosion & Sedimentation Controls

   - The silt fence with filter sock detail should be reversed, with the silt fence backing the filter sock, i.e. filter sock is the first BMP that flows hit. Sorry if this wasn't clear in my initial comments. I have found that this works much better in the field.

     Response: The silt fence shown in the EC-0, 1, and 2 sheets now backing the filter socks. The detail shown in sheet EC-4 is now reversed to show the silt fence backing.

6. Buffer Zone Impacts

- Is it possible to move the drain pipes from MH-06 and from CB-15 further from the wetland and into the paved and already disturbed area, to avoid disturbing this area? If not possible, then the LOW should be shown encompassing this area, and it should be clear how it will be restored afterwards on the landscape plans, particularly as it is currently an undisturbed area.

  Response: The pipes from MH-06 and CB-15 have been shifted as far out of the buffer as possible. Any disturbance for their installation will be temporary and will be restored. This LOD and the area of temporary disturbance has been updated on the SP-0.

7. Stormwater

- As with the initial submittal, any additional comments from the peer review engineer hired by the Planning Board should be addressed, as well as any outstanding initial comments that are still relevant, and the Commission will anticipate this. I'm also providing just a few specific comments here.

  Response:

- A revised Stormwater Report Checklist should be provided.

  Response: Acknowledge, as revised stormwater checklist is enclosed.

- As noted previously by the peer review engineer, the Zone A (for surface water) boundary needs to be shown on the plans and no stormwater BMPs are allowed in this area.

  Response: The Zone A Surface Water Supply Protection Area limits have been shown based on data obtained by the MassGIS Data online.

- Again, it's not clear to me why so many "in-line" catch basins are being proposed as opposed to the generally preferred "off-line" configuration with additional manholes and better TSS removal.

  Response: We are not calculating TSS removal credit for the catch basin sumps, however as requested and discussed, the manholes throughout the site are now "off-line".

- I don't see TSS calculations included as required.

  Response: The TSS calculations are the Water Quality Volume Calculations and Constructed Stormwater Wetlands Pond Storage Sizing Calculations included in Appendix D of the Stormwater Management Report enclosed. This is the only system we are taking credit for, at 80% removal and acceptable in a LUHPPL if an

imperviable liner is provided. The other forms of pre-treatment, deep-sump catch basins and isolator rows, are not included in the calculation since a forebay is still provided for the stormwater wetlands BMP.

- The water quality volume should be 1 inch not 0.5 inches since this is a LUHPPL and in a Critical Area.

  Response: The 0.5" WQV calculation was for 0.5" over the entire site, which is far greater than 1" over the re-developed additional impervious areas. Both of these volumes have been included in Appendix D of the Stormwater Management Report enclosed, for reference. Additionally, Alternate Grading and Drainage and Landscape Plans (GD-0, 2 and LL-0, 2) have been enclosed. These plans outline a constructed stormwater wetland BMP that is sized for the full 1" WQV over the entire site, however the construction of this system would encroach into the 50-ft wetland buffer. This encroachment would not however create additional encroachment on the tree limits identified on the survey in this area, but would occupy buffer space that is currently clear. In order to off-set this encroachment, restorative buffer vegetation is proposed in the existing leaching are to be abandoned. Calculations for this WQV and BMP storage are also enclosed.

- I don't see a detail for the proposed isolator rows. I agree that these are critical in parking lot installations such as this.

  Response: The details provided for the system are generic details. The specific chamber configuration (within limits shown on the plan) and isolator rows will be provided after coordination with the manufacturer prior to construction.

- O&M. I understand you are not taking TSS credit for street sweeping, however as a BMP street sweeping should happen at least quarterly particularly for a LUHPPL, and timing should include spring as noted in the plan and also fall after leaf fall. Catch basins should be inspected and cleaned four times per year at a minimum, not three, in accordance with the Stormwater Handbook. The sediment forebays should ideally be noted separately as needing to be cleaned at least once a year in accordance with Handbook. The plan should specify replacing dead/diseased plants in the constructed stormwater wetland as needed and noting that any replacing plantings or seeding shall be with native species, not cultivars, non-native species or invasive species. The Commission will likely condition a prohibition on the use of pesticides, herbicides and fertilizers, and this could be reflected in the plan.

  Response: Acknowledged, the O&M Plan has been revised and is enclosed.

- The Illicit Discharge Statement should be a separate stamped and signed statement and requires additional information for redevelopment projects on identifying and removing any existing illicit discharges. See the Handbook and also peer review engineer comments.

Response: Acknowledged, an updated illicit discharge statement will be stamped and signed and provided under a separate cover (prior to any illicit discharges and construction) after discussing with town staff. The Stormwater Management Report is stamped and signed containing a general statement acknowledging the prohibition of illicit discharge in the Standard 10 sub-section.

8. Landscaping & Plantings

- Thank you for incorporating native plantings and mostly straight species vs cultivars in the buffer zone.

  Response: Acknowledged.

- In areas in the basin or buffer zone where a "conservation seed mix" is specified, it would be preferable to have a "wildlife seed mix" or similar with a mix of native forbs and grasses for better wildlife value.

  Response: A "Wildlife Seed Mix" has been added for areas in the basin and buffer zone. The wildlife seed mix contains a blend of wildflowers and grasses intended to provide benefits to diverse habitat types.

- How will the two areas where drain pipes are being installed for the new discharge points be restored and planted? The specifications were not clear to me on the plans. Also on the landscape plans, the LOW does not include the more eastern discharge point as it should.

  Response: The proposed areas disturbed for the installation of the stormwater drainage system discharge points will be restored with the specified Conservation/Wildlife Seed Mix. The limit of disturbance (LOD) has been revised to include eastern discharge point.

- Is it possible to plant all of the replacement Red Maples within the buffer zone?

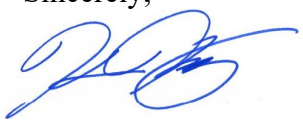
  Response: The proposed locations of the replacement Red Maples trees have been revised to be within the buffer zone.

- Based on my site visit, the area proposed for the constructed stormwater wetland does not just consist of grass, but contains a diversity of species, including a large number of scattered native saplings and shrubs, for example multi-stem birches and sumacs. Although none of these appear to be subject to the Commission's Tree Removal and Replacement Policy, I recommend considering some replacement plantings where feasible.

  Response: Replacement plantings, referred to as "Supplemental Buffer Plantings", have been added to the Landscape Plan(s). Sheet LL-2 Planting Schedule has been expanded to specify species, size and quantity for the Supplemental Buffer Planting Area.

We trust this answers your questions and addresses your concerns. Should you require additional information, please feel free to contact me at 203-608-2438.

Sincerely,



Kevin Hixson
Senior Project Manager