

May 13, 2020

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

Re: Notice of Intent - 100 Industrial Park Road
Hingham, MA

Dear Ms. Lis:

We are in receipt of your comments dated April 8, 2020, regarding the project noted above. Our responses are indicated below in ***bold italic*** text and are as follows:

1. NOI form. BL Companies should be listed as the representative with contact information.

Response: The NOI form has been revised accordingly.

2. Plans

- o Have you submitted stamped and signed plans to Conservation? Specifically, I'm looking for PLS, PE and RLA for respective plans. The set I'm reviewing remotely is not stamped, but it's possible we do have the stamped plans in our office. We can verify this later this week.

Response: It has been confirmed with the Town of Hingham that hardcopy plans were stamped and signed when they were received by the Conservation Commission on March 9, 2020.

- o The 50-ft buffer line should be shown in addition to the 100-ft buffer where feasible.

Response: The 50-ft buffer lines are added and shown on the Civil Plans.

- o Site Plan SP-1 incorrectly labels the "Wetlands 100 Ft Buffer" to the west of the proposed driveway off Commerce Rd.

Response: The incorrect label has been removed from the Site Plan, sheet SP-1.

3. Wetland Resource Areas

- I understand that work is being proposed outside the FEMA-mapped flood zone and at generally higher elevations on the site, however the flood zone is not accurate as depicted on the plans since it is not based on site specific topography (and was also not confirmed in the current ORAD). Note that the line does not follow existing topography, crosses contours at a perpendicular in places, and extends into the wetland. I know Zone A has no associated elevation, however do you have any other information that may help in confirming that proposed work is out of the flood zone, for example records or observations of historical flooding or other documentation?

Response: Typically, since there are no specific FEMA Flood elevations assigned for this area, the FEMA mapped flood zone would not necessarily follow detailed on-site surveyed contours. Therefore, the FEMA-mapped flood zone limit as shown in the plans should be adequate.

4. Erosion Controls & Limit of Work

- The Commission does not allow straw or hay products due to concerns over spreading invasive plants seeds. For slopes, I would suggest silt fence with filter socks (aka mulch logs) on the inside not outside, instead of hay bales, for both erosion and sedimentation control and visibility during construction.

Response: The hay bales are now replaced with compost filter socks in the Sediment and Erosion Control Plans. The installation and maintenance protocol and details for these devices are now highlighted in sheets EC-3, EC-4, and EC-5.

- I am very concerned about the proximity of the limit of work to the southwestern wetland. Currently the limit actually extends slightly into the wetland at one point and is immediately adjacent to the wetland for much of its length. The limit should be moved as far as possible from the wetland. Can the proposed electric line be shifted north or to a different location? Even temporary impacts to wetlands may be considered an alteration and may not be allowed or may require additional effort to mitigate/restore.

Response: Acknowledged, the proposed electric conduits for electric vehicle charging are being relocated outside of the 50-ft and 100-ft wetland buffers where previously undisturbed. This item is still being coordinated with the electrical designers.

- In this same vicinity, why does the silt fence cut in closer to the wetland than the limit of work to the east of the driveway? The limit of work should encompass all work.

Response: The silt fence line has been updated and does not surpass the limit of work line shown on the Sediment and Erosion Control Plans, sheets EC-0 through EC-2.

- Will the limit of work be marked in the field?

Response: Yes, the Sediment and Erosion Control Sheet EC-3, under "Construction Sequence," Note 2, pinpoints the protocol for limit of work markings.

- Can the temporary sediment trap in the southern corner be moved further away from the wetland?

Response: The two temporary sediment traps in the southern corner of the site have been moved further away from the wetlands as shown in the Sediment and Erosion Control Sheets EC-0 and EC-2.

- Do you have a dewatering plan if needed?

Response: Yes, dewatering practices are specified in the Draft SWPPP, included with this response submission.

5. Buffer Zone Impacts & Performance Standards

- Please provide a breakdown of impacts in the 0-50-ft buffer and the 50-100 ft-buffer. It would be helpful to have the changes in surface type or type of alterations.

Response: A breakdown of the impacts in the 0-50-ft buffer and 50-100-ft buffer is shown on the Overall Site Plan Sheet SP-0.

- The narrative doesn't directly address the buffer zone performance standards in the local Hingham Wetlands Bylaw regulations. For example, the 50-ft buffer is a no-disturb zone and is intended to be maintained as naturally vegetated or restored if already altered. It is not clear if the proposed bioretention area would meet the regulations. More information on current conditions would be helpful. Is any other mitigation proposed for alterations in the 50-ft buffer?

Response: The bioretention area and associated grading has been removed, there are no previously undisturbed areas in the 0-50-ft wetland buffer to be disturbed in this project except as noted on the Overall Site Plan, sheet SP-0 for the installation of two new discharge points with scour holes.

- The regulations also prohibit new lawns or driveways in the 50-ft buffer. It appears that new lawn is being proposed in the 50-ft in the southern corner of the site, near the southwest wetland. Is it not clear if the existing driveway is expanding in the 50-ft.

Response: The driveway limits are proposed at the edge of the existing driveway limits, there are no previously undisturbed areas in the 0-50-ft wetland buffer to be disturbed in this project except as noted on the Overall Site Plan, sheet SP-0 for the installation of two new discharge points with scour holes.

- Is there an overall cut or fill in the 100-ft buffer zone? Please quantify the total if possible.

Response: The proposed constructed stormwater wetlands will be cut within the 50-100-ft buffer zone, it has a volume of ±34,000-cubic feet (1,260 cubic yards). There will also be some minor re-grading where the existing entry drive and building to be razed is located currently. In total there will be a net ±1,400-cubic yards cut within the 100-ft buffer.

6. Stormwater

- Please explain how the existing yard drain that is remaining will function.

Response: The existing yard drain will have a manhole top installed and is no longer proposed to function as a yard drain.

- Calculations are needed to show discharges to the wetlands will not cause scour or erosion. A detail is likely needed as well since the standard endwall detail does not adequately address this issue.

Response: There are now two new point discharges proposed to the wetlands. Scour holes will be used to dissipate flows up to the 100-year storm at these discharge points. Calculations are included in the revised Stormwater Management Report in Appendix D.

- The plans assume that rooftop runoff from the existing building (to be renovated) flows through the headwall to the wetlands, but has this been confirmed?

Response: After discussions with the owner, reviewing record mapping from the town as well as a site visit by BL personnel to inspect the headwall, this is still most likely the case. Final confirmation is proposed by test pit, color dye test, etc. prior to construction.

- More data is needed on soil conditions to confirm whether proposed BMPs will function as intended.

Response: Proposed stormwater BMPs no longer rely on infiltration, closed concrete chambers and a lined constructed stormwater wetland will be used instead.

- TSS. More documentation is needed to confirm whether the standard is met. Calculations are needed for each design point, not just the overall site, and calculations are needed for the 44% pre-treatment since this is a LUHPPL, not just the 80% overall. Independent testing results or TARP/STEP data are required for proprietary BMPs, not just manufacturer data. The TSS worksheet doesn't mention the hydrodynamic separators. A number of catch basins appear to be configured in-line versus off-line, for example CB 10, 11 and 12 in the buffer zone, which wouldn't allow for TSS credit. Please address how these CBs would function. You cannot take 10% credit for sweeping unless the O&M plan specifies type of sweeper and appropriate frequency of sweeping in accordance with the Stormwater Handbook (for ex. monthly average with a high efficiency vacuum sweeper).

Response: The 80% TSS will now be provided by a constructed stormwater wetland. According to the Massachusetts Stormwater Handbook, this is an acceptable measure for LUHPPL sites if the basin bottom is lined and sealed and has a suitable forebay (and various other components as specified and sized appropriately). We are proposing this lined and sealed basin for the site's water quality treatment with one discharge point into the stormwater wetland pond forebay. Calculations for the percentages of the WQV required and the volumes provided from the various components of the stormwater wetland system can be found in the Stormwater Management Report Appendix D. In addition to this, landscaped islands, catch basins with hoods and deep sumps, underground isolation rows in the underground detention and street sweeping (not specified) are proposed, but no design credit is calculated or given to these features.

- I appreciate that LID has been incorporated into the design, however the vegetated filter strip is not wide enough to receive TSS credit. Are there other options for pre-treatment here or LID on site?

Response: The vegetated filter strip is no longer considered.

- We still need an illicit discharge statement.

Response: This statement has been added to the revised Stormwater Management Report, under "Standard 10".

- The O&M plan for the bioretention area should include inspecting and replacing any dead or diseased plants. The Commission may want to prohibit pesticides and herbicides and limit fertilizers to slow-release phosphorus-free.

Response: The bioretention system is no longer proposed. However, the constructed stormwater wetland section of O&M manual specifics the need to replaced dead plants.

- Where are the snow storage areas?

Response: Snow storage areas have been identified in the O&M Manual on the Operation & Maintenance Site Plan, sheet OM-1.

7. Sewer. Are any changes being proposed to the sewer infrastructure or existing leaching area? Information on the current condition and functioning of the leaching area would be helpful.

Response: Currently we are coordinating with the Applicant on this item and will provide an updated response at a later date.

8. Landscaping & Plantings

- The Commission typically requires all native species in the buffer zone. I appreciate the native plants proposed for the bioretention and wetland buffer enhancement areas, however the landscape islands near the southwestern wetland have a non-native plum (*Prunus cerasifera*) proposed.

Response: The non-native plum tree has been removed from the plans and all plantings within the buffer zone are proposed native species. In addition, native species have been proposed throughout the remainder of the site where appropriate.

- The Commission has a Tree Removal & Replacement Policy that should be addressed. Here is a link to the policy: <https://www.hingham-ma.gov/DocumentCenter/View/8602/Tree-Removal-and-Replacement-Policy-PDF>

Response: Tree to be removed and replaced in accordance with the Tree Removal & Replacement Policy are specified on the Landscape Plans, sheet LL-2.

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