

July 13, 2020

Mary Savage-Dunham, Community Planning Director
Planning Board
Town of Hingham
210 Central Street
Hingham, MA 02043-0239

Re: 100 Industrial Park Road
Proposed Shipping Warehouse

Dear Ms. Savage-Dunham:

We are in receipt of the Engineering Peer Review comments from Chessia Consulting Services, LLC, dated April 20, 2020 regarding the project noted above. Our responses are indicated below in ***bold italic*** text and are as follows:

GENERAL PLAN REVIEW

The following issues are considered the most significant for the Board to consider in review of the project:

Summary of Main Concerns

- The project site has several existing easements and a note on the plans specifies to verifying if parking, as proposed on the plans, is allowed in one of the easements. This should have been verified prior to submittal as it could alter the design.

Response: Parking is allowed; the note has been removed.

- There is an existing wastewater disposal system that includes an open tank treatment system of some kind with open sand beds. The sand beds are as close as 30 feet to the wetlands, which are tributary to a water supply, and the system is in the FEMA Flood Hazard Zone A. It is likely that this system will need to be upgraded to accommodate the proposed facility. I recommend that the Applicant provide data on the projected flows and a copy of the Title 5 inspection report consistent with the Hingham Board of Health Supplemental Rules and Regulations for the Disposal of Sanitary Sewage. Although this aspect is primarily a Board of Health concern, upgrades to the wastewater system could impact other aspects of the design and should be coordinated at this time.

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.

- Drainage design, there are several issues to be addressed in relative to compliance with the Standards. I note that there are stricter setbacks for stormwater systems from wastewater systems as the site is tributary to a surface water supply. More investigation into the location of all components of the existing stormwater system should be performed to confirm where runoff currently discharges.

Response: Acknowledged. 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. We are requesting a waiver to the minimum setbacks for the proposed Title 5 system. Record mapping (see Map Reference H on the survey) and field verification has outlined the remainder of the stormwater components on the survey.

- Soil evaluations consistent with DEP requirements for stormwater and wastewater should be performed.

Response: Acknowledged. Soil evaluation testing was performed on-site on June 25, 2020, for both the proposed drainage systems and the proposed new Title 5 septic system. No proposed stormwater system will utilize infiltration under the revised design.

- Landscape Design, and screening should be reviewed by the Board.

Response: Noted

- More data on the operation of the facility relative to vehicle and van parking requirements should be provided. It is unclear if sufficient passenger vehicle parking has been provided.

Response:

- ***The 130 spaces are for the personnel working in the warehouse only, and not for the personnel operating the vans. Based on our peak operational forecast (max capacity the building can handle during our busiest times of year), 130 is the required amount of spaces for these personnel.***
- ***For van personnel, there are 46 spaces available for the initial wave of drivers arriving on-site in the morning to park their personal vehicles, pick up a delivery van, and then proceed to move to the loading area within the building. As the vans are moved for loading, this opens up spaces for the next wave of van drivers to park in, and the process repeats itself until all vans needed for deliveries that day are picked up and loaded. At***

night, as vans return, the process is reversed with delivery drivers parking vans in an open space (there will always be a buffer of 46 spaces available to facilitate the parking process in the morning and evening) and proceeding to pick up their personal vehicle and leave the facility.

SECTION I-I SITE PLAN REVIEW

1. Purpose: No comment required.
2. Procedures: It is assumed that the appropriate information has been submitted to initiate the review process. The Board should review the project relative to the specific subsections of this section. I note that an Application for a Special Permit A3 for a parking determination is included in the submittal.

Response: Noted

3. Pre-Application Submittal. It is unknown if a pre-application submittal has been submitted or commented on by the Board.

Response: A pre-application submittal was not provided; however, meetings with both Conservation Commission and Planning staff occurred in November 2019 that included a preliminary discussion of the proposed project.

4. Submittal Requirements: The plans have been stamped by the appropriate professional except the Landscaping Plans have been stamped by a Civil Engineer.
 - a. The submittal includes a “Locus Plan” on the Cover Sheet. The Locus plan is listed as 1”=1000’ scale. The Owner and Applicant are listed as JEB Group LLC. The property limits are indicated on the plans with descriptive data (metes and bounds). I note that the bearings include both Mass State Plain Coordinates and Land Court coordinates. Topography has been indicated for the locus and generally extends beyond the site at least 50 feet and more in most locations. It appears that structures within 100 feet of the locus may exist on the south side of Commerce Road. I recommend that more data on existing buildings and access drives be indicated on the plans as that could impact the proposed access design.

Response: The two drives opposite the subject property on Commerce Road have been identified on the survey.

- b. The plans are drawn to scale. Building plans, etc. have not been provided to Chessia Consulting Services. It appears that exterior modifications to access/egress locations for vehicles are proposed together with modifications for the loading dock. It is unclear if any other changes to the façade or exterior features of the building are proposed. The site plan indicates the location of the existing building to remain and the two buildings to be

razed. I recommend that the existing conditions plans clarify existing loading bays, etc. on the plans.

Response: There are no existing loading bays specifically identified on the existing facility parking layout. Record mapping has been provided in this submission to identify the previous parking layout for the Site prior to the fading of the parking striping. Exterior building elevations of all four sides of the existing building at a later date.

- c. A Traffic Impact Study has been submitted and is under review by Vanasse and Associates, Inc. The site would be accessed through both Industrial Park Road and Commerce Road. The plans include both exterior vehicle parking spaces for automobiles and vans and interior staging/vehicle storage spaces for delivery vans. The automobile spaces are dimensioned and would meet zoning requirements for size. Van spaces are larger, 11' wide and 27' long with a wider access aisle of 30 feet versus 24 feet required. It is unclear if the A3 includes a request to allow oversized spaces for vans as well as some areas where stacking of the vans is proposed for queuing to load the vans. The plans indicate markings for traffic circulation and in general there would be two way traffic in all parking areas. The locations where vans enter/exit the building for loading purposes and the exit onto Industrial Park Road are one way. I note that currently there are some connections to 90 Industrial Park Road that would be closed as part of this project. It should be confirmed that there are no easement rights to access 90 Industrial Park road over the access to 100 Industrial Park Road I recommend a better description of the operation of the facility be included. The traffic report indicates that there are four shifts of 20 van drivers between 7:30 and 10:00. It is unclear how many total shifts per day, how many personal vehicles will be parked at the facility by van drivers at what times and where. The total number of required automobile spaces is less than required under the regulations for the warehouse as there are 130 spaces for automobiles and 328 van spaces. It appears that vans are left at the site after a shift is finished. The building would have at grade access on the east side and an at grade exit at the northern corner. A loading area for up to 7 tractor trailers is located at the south corner of the building. The plans include a sample swept path for a truck to enter and exit the loading area.

No profiles have been provided. Details for paving and parking lot striping have been provided. The Board should determine if a profile of the main access way will be required. Also refer to comments under Section V-A Off Street Parking Requirements.

Response: It is the Applicant's understanding that there are currently no easement rights for access to 90 Industrial Park Road since the school vacated the property.

- ***Delivery stations operate 24/7 to support delivery of packages to customer locations between 11:00 A.M. and 9:00 P.M. At the proposed Hingham, MA facility, AMZL anticipates approximately 10 to 20-line haul trucks delivering packages to the delivery station each day, primarily between the hours of 10:00 P.M. to 8:00 A.M. The customer packages are sorted, picked to the delivery routes, placed onto movable racks and staged for dispatch. Approximately 60 to 70 Amazon associates***

- and 10 to 20 managers support this operation and the shift structure is designed between 2:00 A.M. and 12:30 P.M. that mitigates traffic impact during rush hour periods. Additionally, there will be approximately 20 to 40 managers and dispatchers supervising the delivery operations, arriving at 6:00 A.M. and departing at 2:30 P.M. followed by another shift of dispatchers arriving at 1:30 P.M. and departing at 10:00 P.M.*
- *The third-party delivery drivers arrive at a delivery station at 9:20 A.M. Starting at 9:50 A.M. and ending at 12:10 P.M., approximately 175 to 225 (this number is an estimate based off normal capacity days. During peak timeframe, which includes times such as the holiday season, sites may see a temporary increase in capacity demand. Sites are designed from the beginning to handle this increase.) Delivery vans will load and depart from the delivery station at a rate of 32 vans every 20 minutes to facilitate a regulated traffic flow into the surrounding area. The 1st wave of delivery vans leave at 10:10 A.M. The departure window is designed to mitigate impact on rush hour periods. Approximately 8-10 hours after dispatch, delivery routes are completed, and the vans return to the station between 7:10 P.M. and 8:40 P.M. The drivers park the delivery vans on-site and leave using a personal vehicle or public transport. The overall concept is a one for one swap, where van drivers would swap their personal vehicle for a delivery van when arriving on-site in the morning and reverse this procedure in the evening when they return to station and head home.*
 - *AMZL will also use Amazon Flex to deliver packages from this location. Amazon Flex works in concert with an advanced logistics systems and technology that Amazon has been building since day one. AMZL anticipates approximately 50 traditional passenger vehicles entering the facility staggered between 4:30 P.M. and 6:00 P.M. Flex vehicles will load and depart every 15 minutes.*
 - *Approximately 14 to 30 Amazon associates will work in the delivery station between 12:00 P.M. and 10:30 P.M. to support the Flex and DSP drivers as they return to the station. After the check out and release of all delivery vehicles by 9:10 P.M., delivery station associates prepare the delivery station for the next day's packages.*
- d. The Application does not request any relief from zoning requirements. The site is in the Industrial Park and South Hingham Development Overlay zoning districts. The use would be a freight terminal or storage warehouse, which is a permitted use in the Industrial Park district. The project would also meet setback, coverage and height requirements based on the Zoning Information Table on Sheet SP-0. I note that the building is an existing building and no expansion of the building is proposed.

Response: No relief from zoning is requested at this time and no expansion of the main building is proposed.

- e. Some data on utilities has been provided. The ALTA Land Survey Plans have incomplete data on some utilities. There is a water line that enters the site off of Industrial Park Road in the northwest corner and goes around the building on the north side. There is a fire pump vault with an access door and vent pipe that the water passes through just to the northeast of the existing building to remain. The water connection to the building is not indicated although a post indicator valve, typically located at the sprinkler connection is indicated on the east side of the building south of the proposed vehicle entrance. It is unclear if the building will require interior upgrades to the sprinkler system or domestic water. I recommend that the Board obtain input from Aquarion Water Co. Drainage improvements proposed on the north side of the building are in direct conflict with the existing water line and should be revised or the water main relocated.

Response: The survey has been updated from field investigation and record mapping that was available. This mapping has also been provided with the submittal. Any additional utility information will be field verified prior to construction. The fire protection design will be modified to tenant fit out. The domestic water system will be modified per proposed plumbing drawings as needed to serve the new tenant layout.

A gas line enters the site off of Commerce Road and extends to roughly the center of the building to a meter. An additional branch gas line extends to the smaller building that is proposed to be razed. The gas meter is proposed to be relocated approximately 15 feet south of the existing location to avoid conflicts with the new entrance for vehicles. There are extensive modifications to the electrical system proposed including wiring for parking lot lighting. It is unclear if changes to the telephone or cable systems are also proposed.

Response: Currently there are minimal changes to the existing building to remains' utilities. All utility locations and connection will be confirmed with test pits prior to construction.

There is an existing wastewater disposal system in the easterly corner of the property. I recommend that the system be inspected as required by Title 5. I recommend that the Board of Health comment on the suitability of the existing system to service the new facility. It is unknown if there would be an increase in occupancy proposed for the site. Based on a brief review of Title 5 requirements it appears that the system would fail under two of the criteria and require replacement/upgrade. As a building with storage and drive through of vehicles, it is likely that floor drains and a holding tank for the floor drains would be required.

Response: Floor drains are proposed at the vehicle entry and exist to the building which will drain to tanks to be pumped and disposed of appropriately as needed. The existing 3,900 GPD treatment facility will be replaced with a 3,900 GPD subsurface septic system.

Refer to comments below for stormwater issues. I note that the existing system has not been fully detailed on the plans. There are several manholes that have only stubs of pipes with unknown outlets. Although most of the existing system is being removed, the existing system should be fully indicated to determine where runoff currently discharges.

Response: Record mapping and field verification have outlined the remainder of the stormwater components on the survey.

Landscaping Plans and details have been included as required, although the plans are stamped by a Professional Engineer not a Landscape Architect. The Board should review this aspect of the design. Refer also to comments under Section V-A Off Street Parking.

Response: Revised Plans are now stamped by a Landscaped Architect.

The plans do not indicate a new dumpster, it is unclear how refuse will be addressed on the site.

Response: One of the loading bays in the truck dock will have a dumpster/compactor as indicated in the revised site plan sheet SP-1.

- f. The submittal includes a grading plan and stormwater runoff analysis. A Traffic Impact Study has been provided and is under review by others. Refer to comments under Stormwater Management Regulations below for drainage design. I recommend that the existing conditions plan be provided at 1" = 40' the same scale as the design plans. In several areas the data is difficult to review, in particular utilities, etc. The submittal does not include an estimate of net import/export of material. As a redevelopment of an existing site it is likely that much of the work is near existing grades. There is a higher vegetated area proposed to be excavated to create a parking area for vans. This area is wooded with some exposed ledge as observed in the field. It is likely that blasting will be required to lower this area. The grade in this wooded area would be lowered between 8 and 15 feet +/- to implement the design. I recommend that earthwork volume calculations be provided or relief requested of the Board regarding this data.

Response: An Earthwork Management Plan, sheet EM-1 and volume calculations have been provided in the revised Stormwater Management Report.

- g. This item requires information to assess the impact of the development on soil, water supply, ways and services. The submittal should address soil removal and/or import and identify if an earth removal permit will be required. The project proposes to reuse the existing wastewater disposal system for wastewater disposal.

It is unclear if there has been a Title 5 inspection or if any changes to the number of employees is proposed. As noted, it appears that the existing system would not pass a Title 5 inspection. The wastewater system as currently configured does not meet current setbacks or design requirements and it could be required to replace this system. Any revisions to the wastewater disposal system would need to comply with setbacks or be

granted variances. Since vehicles will be driving through the building and potentially parked in the building for a period of time floor drains will likely be required. Floor drains would need to discharge to a tight tank. There are no provisions for interior floor drain discharge on the plans. The Board of Health has requested more data on the existing wastewater disposal system but should also comment on this aspect of the project.

It is unclear if there would be an increase in employees at the facility and if there would be an increase in water demand. The property is currently connected to Aquarion water. Aquarion should comment on the project. The existing gas line would remain but the meter would be relocated. The submittal includes some data on soil testing.

Geotechnical borings were performed in January 2020. Results indicate mostly sandy loam soils with shallow depth to groundwater and ledge in some areas and less permeable silt loam in some areas. Testing in conformance with DEP requirements for infiltration systems will be required. I recommend that testing be performed by a soil evaluator and witnessed by an agent of the Town. There are wetland resource areas present on the site including Bordering Vegetated Wetlands and Bordering Land Subject to Flooding. The Application data indicates that the wetlands were approved by an Order of Resource Area Delineation (ORAD). The wetlands are tributary to a surface water supply.

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 was performed on-site on June 25, 2020 and witnessed by an agent for the Town (Civil Peer Reviewer) for both the proposed drainage systems and the proposed new Title 5 septic system.

- h. The regulations require compliance with DEP Stormwater Management Regulations as discussed below:

STORMWATER MANAGEMENT POLICY/EROSION AND SEDIMENT CONTROL:

The DEP Stormwater Management Regulations consist of ten Standards. The standards were reviewed using the Massachusetts Stormwater Handbook Documenting Compliance (MSHDC) together with other sections of the Handbook as appropriate. This section of the correspondence lists the standards and identifies whether the submittal complies, does not comply or if additional information is required to demonstrate compliance. This project would be considered a partial redevelopment as there is an increase in impervious areas proposed for the site. Full compliance is required for the increased impervious area and improvement to the maximum extent practicable is required for existing impervious areas.

Standard 1 – Untreated Stormwater

This Standard requires that the project not result in point sources of untreated runoff and that runoff not result in erosion or sedimentation.

It is proposed to collect runoff in a series of linked catch basins for flow through a proprietary hydrodynamic treatment unit and subsurface detention or combination detention/infiltration systems and in some cases runoff flows off of the pavement to constructed filter systems contained in cast in place concrete structures. Although there may be some treatment in some of these systems the components either do not comply with DEP requirements for treatment credit or insufficient documentation to demonstrate compliance has been provided in nearly all cases.

The plans should also identify the full extent of all existing systems to remain including an inspection of outlets for erosion under current conditions. If an increase in flow is proposed at a specific outlet location, outlet protection may need to be installed or improved and supporting calculations regarding outlets should be provided.

Additional information regarding this Standard should be provided.

Response: Acknowledged. 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. Record mapping and field verification have outlined the remainder of the stormwater components on the survey and have confirmed our approximation of existing drainage patterns are correct.

Standard 2 – Post Development Peak Discharge Rates

This Standard requires that the peak rate of discharge does not exceed pre-development conditions and that the design would not result in off-site flooding during the 100 year storm. System designs should comply with the DEP Handbook for stormwater management systems. I note that portions of the site are within the 100 year flood zone.

In general runoff from the south west portion of the flows to the south into existing storm drainage systems or wetlands. It is unclear where the existing building to be razed flows as there is no data on the roof drainage. The area to the south of the building to be razed flows into wetlands to the south ultimately although there is a berm of soil along the fence line. The northerly part of the site, and it appears that the larger building to remain, all flow into the easterly wetlands. All of the site's runoff ultimately flows into the Old Swamp River. The site has minimal stormwater infrastructure with most of the pavement flowing into catch basins at the access points on Commerce Road or a paved swale and drain north of the larger building to remain. Some outlet pipes were observed along the easterly side of the site and at the eastern most access point on Commerce Road. There also appears to be an existing stormwater basin adjacent to the wastewater sand beds on the west side of the beds. This area was holding substantial water at the time of my site visit and has an outlet pipe to the north. Depending on flows into this area it may be required to analyze the impact of flow through the basin.

Response: Acknowledged. 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. The building to

be razed has existing roof downspout gutters that drain overland from their discharge points. Additionally, the area observed is not a stormwater basin but an abandoned processed waste area. Record mapping and field verification have outlined the remainder of the stormwater components on the survey. The building to be razed has gutters that discharge to surface flow. Dye testing has confirmed that roof leaders from the building to remain discharges to the headwall at DP-1. The stormwater network in Commerce Road discharges ultimately at DP-2 (See Existing Drainage Area Map ED-1 for more details).

General:

Drainage areas are not consistent with contours in some cases and should identify pipe outlets and other control points. It is unclear that the entire south side of the site flows to the wetlands as some of the drainage appears to connect into the street drainage system, which is not fully documented on the plans.

The analysis assumes that the entire site consists of Hydrologic Soil Group (HSG) D soils although soil mapping from the Natural Resources Conservation Service (NRCS) indicates mostly HSG A soils. Soil testing that has been performed indicates a mix of soils but predominantly sandy loam which are typically better drained than HSG D soils.

Response: The soil types utilized for stormwater calculations have been updated per the NRCS mapping and assuming type A soils where NCRS has not identified underlying soils.

Existing Conditions:

I recommend that the above issues be addressed in the analysis. The following issues with the analysis should also be addressed:

- Cover conditions observed in the field are not consistent with assumptions in many cases. Woods are in good condition with the exception of some small areas of steep slopes with minimal cover. Grass is in good conditions where present. There is an area with some thin cover and spoil/debris piles to the northwest of the wastewater treatment units. The various cover types and conditions should be identified on the plans.

Response: Acknowledged. The cover types have been revised and the cover types have been identified on the Existing and Proposed Drainage area Maps, sheets ED-1 & PD-1.

- Time of concentration (Tc) calculations use a longer sheet flow time than is typically used in Massachusetts. Nearly all designs in this area use a maximum of 50 feet of sheet flow. I also note that the most hydraulically distant location is required, which is not necessarily the furthest distance.

Response: Acknowledged. The time of concentrations have been revised to ensure a maximum sheet flow of 50-ft.

- The existing roofs are connected impervious as the roofs are flat with internal drains, no exterior downspouts were observed in the field. The location of the roof drain outlets should be indicated on the plans.

Response: After discussions with the Owner, reviewing record mapping from the Town as well as a site visit by BL personnel to inspect the site conditions and confirmed with dye testing, there is an existing headwall where the roof drain discharges. This location is designated Design Point 1 (DP-1).

- It appears that runoff from subarea EDA 1B at least partially flows into an existing drainage basin.

Response: The area observed is not a stormwater basin but an abandoned processed waste area which is to remain unaltered and is connected to the wetland at the discharge point DP-1.

- EDA 1A flows into a catch basin with an undetermined outlet. Overflow would discharge to the highway right of way. It appears based on grades that the area along the highway would then flow to the wetlands but there are also low areas within this area that could trap and retain runoff and may impact overall runoff rates if modeled as small ponds.

Response: The yard drain associated with EDA-1B by the highway ROW will be abandoned. The depressions in this area were not modeled in order to be conservative with our stormwater design. Those areas are also not significantly being altered in the proposed conditions. No alterations are proposed beyond the property line.

- EDA 2A may need to be further divided as there is a collection system at the westerly entrance with an undetermined discharge location.

Response: After reviewing record mapping from the town and performing field verification, it was determined that the discharge collected in the roadway in EDA 2A will pond and run overland into the drain at the existing drive or directly into the wetland designated as Design Point 2 (DP-2) at the end of Commerce Road. The efforts to capture the stormwater onsite and treat it, compared to the existing conditions where it flows off into the street untreated, significantly reduces the flow entering the system in Commerce Road. This reduction will improve the overall stormwater quality in the roadway and treat the stormwater prior to entering the wetland at DP-2.

- The outlet for the roof of the smaller building (EDA 2B) should be also located on the plans.

Response: There are gutters that drain to the surface and flow overland from the buildings.

Proposed Conditions:

Comments listed above regarding soils, cover, unconnected roofs, Tc, etc. apply to proposed conditions and should be revised in the model. The Tc calculations should reflect actual proposed conditions.

Runoff from parking areas is proposed to be collected in a series of linked catch basins for discharge to subsurface systems composed of chambers surrounded by stone or in two locations to constructed filter systems. Below is a discussion of each system type.

1B and 1D are proposed as infiltration systems, although no credit for infiltration during the storm has been accounted for in the calculations. Both systems have a 0.5 foot deep sump between the bottom of the stone and the outlet pipe. I recommend that common diameter outlets be proposed as it will be difficult to core or cast a 6.4" opening. Soil evaluations consistent with DEP requirements should be performed. I recommend that a soil evaluator licensed in Massachusetts perform the testing and that an agent of the Town witnesses the tests. These systems are large and several tests will be required to confirm soil conditions and groundwater depth. Each system has had only one boring performed at the proposed system location. 1B has a reported groundwater separation of 2.5 feet which for the system design would be acceptable subject to confirmatory testing. 1D has 1.3 feet of groundwater separation, which is not compliant with requirements and is reportedly in an area of fill material. Prior uncontrolled fill is not acceptable for infiltration.

2A is a sealed system with a liner, similar to that proposed at the Lexus site. I recommend that if the project is approved, that the same conditions be applied relative to installation. This system is in a location with shallow depth to ledge and would provide no infiltration and function strictly as a detention system.

It is not clear that this Standard has been met by the design. Additional information is required to demonstrate compliance with this Standard as noted above.

Response: Acknowledged. 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.

Standard 3 – Recharge to Groundwater

The design would result in an increase in impervious area. The difference in impervious area over the existing conditions should be infiltrated in accordance with the standard.

The proposed increase in impervious area is 87,764 square feet. The calculations provided are not consistent with the requirements. In this case overall runoff flows either east or south to wetlands. It is required to recharge a specific volume in each watershed based on the increase in impervious area. No recharge is provided in the southerly area and an adjustment calculation is required. In this case over 65% of the site's increase in impervious area is on the south side and would not be recharged such that the project would not comply even with an adjustment.

As noted additional testing is required for the systems proposed and I recommend that testing to determine if there are other areas with suitable soil that could provide recharge on the southerly side.

There are other requirements including calculations for the time to drain, etc. that should be provided in the Report to document that the design complies with DEP Handbook requirements.

This Standard would not be met. Refer to comments under other Standards for other issues that would impact the design.

Response: Groundwater recharge will not be provided since the Site has an Activity and Use Limitation (AUL) that precludes inducing runoff to the groundwater in any existing impervious locations on the Site.

Standard 4 – 80% TSS Removal

This standard requires that runoff be treated to remove 80% of total suspended solids (TSS) prior to discharge. Since the site is in a critical are, tributary to a surface water supply, pretreatment prior to infiltration of 44% TSS removal is required. Treatment is required for the Water Quality Volume (WQV). In this case 1" over the impervious area. It is not required to fully treat all existing impervious areas but improvement is required to the maximum extent practicable. As the entire parking area is being regraded and repaved and the new areas generally merge with existing areas it should be feasible to meet treatment requirements for paved areas. The roof of the existing building is likely not feasible to treat.

The following BMP's are proposed:

- Street sweeping – Street sweeping is a discretionary credit that is very difficult to enforce and has not been accepted by the Board on previous projects. I do not recommend that this credit be applied to the project.

Response: Acknowledged. This is included in the O&M manual but no credit is included for this practice towards the 80% TSS removal.

- Catch basins – The submittal includes calculations of the impervious area tributary to each catch basin. DEP only credits TSS removal for catch basins with ¼ acre or less

impervious area tributary. Catch basins are also required to be “off-line” i.e. there is no other flow into the catch basin except that the enters through the surface grate. Only one catch basin has less than ¼ acre of impervious area and is the first in line. No other catch basins would receive credit for TSS removal. I recommend that the design be revised to have catch basins connect to manholes rather than linked catch basins and that additional catch basins be provided to limit the impervious area to ¼ acre each.

Response: Acknowledged. No credit is included for this practice towards the 80% TSS removal.

- Vegetated Filter Strip – There are two areas that these are proposed, just upgradient of the media filter units (called bioretention filter boxes). These systems are undersized for the tributary impervious area. To receive credit, if this BMP is feasible for this site, would require a much larger width of between 25-50 feet for 10% TSS removal and 50 feet or more for 45% TSS removal. The proposed width is approximately 5 feet. The DEP Handbook does not allow these systems within 50 feet of a wetland, the southerly system is in the 50 foot buffer. The flow path is required to be 75 feet or less if over pavement. The flow path over pavement is over 175’ long for the north side of the access and 200 feet long for the south side of the access way. I recommend that the DEP Handbook be reviewed for a suitable pretreatment system at this location. Refer also to comments under Standard 5.

Response: The proposed vegetated filter strip has been removed.

- Proprietary Treatment Units – Prior to each of the proposed subsurface systems a hydrodynamic separator is proposed. No supporting data on the proposed units as required by the DEP Handbook and other DEP guidance has been provided. The submittal should include Water Quality Volume (WQV) to flow conversion calculations. Each unit should be sized based on the calculations and specific details for each unit provided. Subject to proper documentation a TSS removal rate of 30% has been accepted by the Board in the past for similar systems.

Response: The proposed hydrodynamic separators have been removed.

- Infiltration Chambers – It is proposed to install two systems for infiltration (Ponds 1B and 1D). I recommend that infiltration chambers be designed with an isolator row to improve the ability to maintain the systems, in particular for large parking lots as proposed. The Report should include a calculation of the volume infiltrated below the outlet and it should equal or exceed the WQV for the impervious area tributary. Subject to documentation of proper sizing, adequate pretreatment and suitable soils, the infiltration system could receive 80% TSS removal credit.

Response: Acknowledged. 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.

- Detention Chambers – It is proposed to install a subsurface detention system (pond 2A). DEP does not credit these types of systems with TSS credit. This system would not provide TSS removal.

Response: Acknowledged. 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.

- Media Filter – It is proposed to install two media filters for parking lot runoff from the southeast part of the site. Insufficient pretreatment has been provided and one of the systems is within 15 feet of wetlands. This wetland buffer is currently wooded with an existing 40 foot wide undisturbed wetland buffer. It is unclear that this type of alteration would be allowed by the Conservation Commission. More design data should be provided for these systems including support for the depth of media as it is less than in the DEP Handbook. These systems should be designed as off line units. Any overflow from these systems would either discharge to the roadway or the wetlands directly. Provided the design is consistent with the DEP Handbook a removal rate of 80% could be applied to these systems. As designed they would not receive TSS removal credit.

Response: The proposed media filters have been removed.

Refer also to comments on the design of these systems under Standards 2 and 3.

This Standard would not be met.

Standard 5 – Higher Potential Pollutant Loads

It appears that this project would be considered a Land Use with Higher Potential Pollutant Loads (LUHPPL). The DEP Handbook lists exterior fleet storage, which appears to be applicable in this case. Parking lots with more than 1,000 vehicle trips per day would also be considered LUHPPL's. More data on how the site will operate is required to make this determination.

BMP's suitable for use in LUHPPL include catch basins if designed consistent with the DEP Handbook and sand/media filters as proposed, but the other systems are proprietary systems and require specific approvals. It has not been documented that they would meet requirements.

Insufficient data to demonstrate compliance with this Standard has been provided.

Response: Acknowledged. 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. 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.

Standard 6 – Protection of Critical Areas

The site is located in a critical area. The entire site is tributary to a surface water supply and portions of the site are located in the Zone A of a surface water supply according to MassGIS. The Zone A of a surface water supply should be indicated on the plans. No new stormwater BMP's are allowed in a Zone A. As noted under other Standards additional data on the design and pretreatment data is required to demonstrate compliance with this Standard.

Response: The Zone A line is now shown of the plans. This line was obtained from the MassGIS database. The stormwater BMPs are not within the Zone A line.

Standard 7 – Redevelopment Projects

The project would be considered a partial redevelopment. Refer to comments under other Standards.

Response: Acknowledged; however, it is noted that in order to be conservative, the WQV calculated to be treated for the Site is for the entire site impervious area as practical (except for the existing roof), not just the proposed additional impervious area. Resulting in a significant improvement to the existing stormwater conditions.

Standard 8 – Erosion/Sediment Control

This Standard requires development of plans and narrative data to control erosion and sedimentation resulting from the removal of vegetation, etc. as a result of construction. In this case the work area is over the one acre of disturbance threshold and an EPA NPDES Permit and SWPPP will be required.

Some data has been provided regarding erosion and sediment control, including plans, details and a brief write up in the Report. I recommend that review of this aspect be deferred until a draft SWPPP is prepared. In general, I note the haybales are typically not allowed in Hingham due to the presence of invasive species in the hay. In addition, sediment basins should not be located over future infiltration systems. It is typically required to install and protect stormwater systems in the early phases of construction. All

sizing data should be provided to support the design. In this case based on site observations blasting will be required, it is unclear if stone processing equipment is proposed to be brought to the site.

Additional data is required under this Standard.

Response: A Draft SWPPP has been included in this response submission. Haybales are no longer proposed as a form of erosion control; they have been replaced with compost filter socks.

Standard 9 – Operation and Maintenance Plan

An Operation and Maintenance Plan (O&M) was provided in the Report. For all projects a comprehensive O&M is required for the entire site, including areas not proposed to be altered.

The (O&M) includes a general description of facility operation requirements and lists the following BMP's:

The following structural BMP's are proposed.

Catch basins – The maintenance is consistent with DEP requirements. As noted under other Standards, the area tributary should be limited to ¼ acre of impervious surface.

Proprietary Hydrodynamic Separator – Three units are proposed for the site. The O&M should include the manufacturers maintenance manual.

Subsurface Detention System – There are two proposed subsurface infiltration systems and one system for detention only. The O&M should include the manufacturers maintenance manual. The typical installation in Hingham for these types of systems includes isolator rows. The O&M specifies cleaning the systems but there is no information on how to accomplish cleaning and subsurface systems are very difficult to maintain without specific design features to implement maintenance.

Bioretention System (Media Filter) – Two media filters contained within cast in place concrete tanks are proposed. These appear to be designed by the engineer for the project as the design is not consistent with an organic media filter in the Handbook, and appears more like a proprietary system. Maintenance has been compared to a sand/media filter in the DEP Handbook. The maintenance should include inspections after every major storm (I recommend 1" or greater rainfall) in the first few months. The submittal should include more data on proposed plantings, etc. There are some discrepancies in the description or more design details are needed as it is not a rain garden, it is unclear if there is an overflow spillway, the system connects to a pipe network as the main outlet.

Outlet Control Structures – Not listed, I recommend that outlet control structures be inspected at the same time as the subsurface systems.

Pipe Outlets – Not listed, I recommend that outlets be inspected at the same time as the catch basins.

The following non-structural BMP's are listed.

Parking Lots – The O&M lists a once a year sweeping which is not acceptable to receive any TSS credits. As noted under Standard 4 I do not recommend allowance of this credit but do recommend more frequent sweeping.

Landscaping – The O&M is acceptable.

Outdoor Storage – No outdoor storage is proposed.

Snow Removal and Storage – The Plans should identify snow storage locations.

I recommend that a standalone O&M be provided prior to occupancy of the facility with an updated plan, if required, identifying the location of various BMP's. A plan has been included in the O&M. The O&M matrix should be updated to include all BMP's and remove catch basin filters, which are not proposed.

I recommend some additional data be provided to document compliance with this Standard.

Response: Acknowledged. An Operation & Maintenance Site Plan, sheet OM-1 has been included with the revised O&M Manual. The O&M manual has been revised to address the above comments.

Standard 10 Illicit Discharge

There is a statement regarding illicit discharge connections being prohibited. The Applicant should review requirements in the DEP Handbook Volume 1 under Standard 10, as a redevelopment of an existing building investigations by a qualified professional including potentially dye testing etc. to identify the location of all drainage, wastewater and other discharges is required. The plans should address floor drainage if any drains are proposed in the automobile maintenance area or lower level parking within the building.

This Standard would not be met.

Response: Acknowledged, a revised statement has been added to the revised Stormwater Management Report, under "Standard 10". Floor drains are proposed at the vehicle entry and exist to the building which will drain to tanks to be pumped and disposed of appropriately as needed. They are not connected to the stormwater system network that will be discharged or the subsurface sewage disposal septic system.

- i. The plans include photogrammetric plans for the proposed lighting. There is limited spillover but as the site is surrounded by other commercial or industrial property the impact would be minimal. The Board should review proposed lighting.

Response: Acknowledged.

- j. It is unclear if the Board requires or requests and other materials not identified above regarding the project.

Response: Acknowledged.

The Board should review the comments and determine if all of the information required under Section 6. Review Standards and Approval have been addressed by the Applicant prior to arriving at a decision.

SECTION III-E SOUTH HINGHAM DEVELOPMENT OVERLAY DISTRICT

The project is located in the Industrial Park District within the South Hingham Overlay District. Sections 1 through 4 do not require engineering comment.

5. Permitted Uses

The proposed use is permitted in the underlying district.

- a. Not applicable the site is in the Industrial Park District.

Response: Acknowledged.

6. Sign and Parking Criteria

Refer to Sections V-A and V-B as noted in this section.

Response: Acknowledged.

7. Intensity

b. Industrial Park District

- i. Not applicable an office building is not proposed. It is unclear if there would be a significant office component within the building.

Response: There is a ±10,216 square foot office portion of the building proposed.

- ii. The Application does not request a taller building than allowed in the underlying district. The existing building is listed as 22' in height where up to 40 feet is allowed in the Industrial Park District. A height of up to 48 feet is allowed without a Special Permit in the Overlay District.

Response: Acknowledged.

8. Traffic

The Board should review Traffic issues, it is my understanding that Vanasse & Associates are reviewing traffic issues.

Response: The Applicant is currently addressing these comments in a revised submittal and comment response letter under separate cover dated July 13, 2020.

9. Screening

The Board should review screening requirements. The site is likely not visible from a Residential area but there is significant street frontage that also requires screening. There is a Landscape Plan that proposes some spruce trees near the roadway. The Board may require cross section line of sight views to clarify compliance with this requirement.

Response: Acknowledged.

SECTION V-A OFF STREET PARKING REQUIREMENTS

1. The site is currently occupied with an existing warehouse building and other appurtenant buildings. The current use of the building is unknown, but appears to be largely vacant. The existing conditions plans do not identify any parking spaces only the limits of pavement, some faded striping was observed in the field. As a warehouse facility not all pavement would be for vehicular parking as loading bays, etc. are also required. The plans should identify existing parking on the site. This aspect of the Bylaws addresses congestion and parking on streets, which the Board may review as part of the project and without documentation of existing conditions it is difficult to determine the change in congestion. I note that it is proposed to expand the pavement considerably over the existing conditions.

Response: There are no existing loading bays specifically identified on the existing facility parking layout. Record mapping has been provided in this submission to identify the previous parking layout for the site prior to the fading of the parking striping, a total of 331 parking spaces as of 1989. The addition of the existing pavement limits will be mitigated by the significant improvements being made to the exiting site stormwater management system in accordance with the Massachusetts Stormwater Handbook.

2. There is a table of Parking Information on Sheet SP-0. The parking provided is not consistent with the requirements as most of the parking is for vans and based on the Traffic Study it appears that the vans spaces are not for personal vehicles. The building is proposed as a warehouse that has an overall area of 149,000 square feet. This would require 149 spaces. There are 130 automobile spaces and 328 van spaces. The regulations also encourage Applicants not to provide parking in excess of typical demand. In this case there is an excess of required van spaces and it appears that there are insufficient standard automobile spaces. A Special Permit A3 is requested to determine the parking requirements. Parking is all located on the parcel.

Response:

- *The 130 spaces are for the personnel working in the warehouse only, and not for the personnel operating the vans. Based on our peak operational forecast (max capacity the building can handle during our busiest times of year), 130 is the required amount of spaces for these personnel.*
- *For van personnel, there are 46 spaces available for the initial wave of drivers arriving on site in the morning to park their personal vehicles, pick up a delivery van, and then proceed to move to the loading area within the building. As the vans are moved for loading, this opens up spaces for the next wave of van drivers to park in, and the process repeats itself until all vans needed for deliveries that day are picked up and loaded. At night, as vans return the process is reversed, with delivery drivers parking vans in an open space (there will always be a buffer of 46 spaces available to facilitate the parking process in the morning and evening) and proceeding to pick up their personal vehicle and leave the facility.*

3. Parking Dimension Requirements:

The proposed parking spaces vary in dimension. Automobile spaces are 9' wide by 20' long, some spaces include a curb stop others would end at another space or a concrete curb. Van spaces are 11' wide by 27' long.

There is an area labeled for loading that has seven bays each bay is 20' wide by 60' long, which exceeds requirements. The height is not specified but it appears to be uncovered. Aisle widths vary, with both a 24' aisle for automobile parking and a 30' aisle for van parking areas.

There is a one-way egress lane to Industrial Park Road that is 18 feet wide at its narrowest, and has sections that are 24' and 25' wide. The portion of this egress to Industrial Park Road is not proposed to be altered. The northern most access/egress on Commerce Road is 30' wide and is in the same general location of the current access point. The southern access/egress to Commerce Road is proposed to be 45' wide. It is currently 40' wide.

The proposal complies with the minimum requirements, there are no maximum dimensions listed.

4. The plan is drawn at 1"=40' as required excepting the ALTA existing conditions plans, which are 1"=50'. I recommend that the existing conditions plans be a 1"=40' as required. Key Sheets are at 1"=60' as are some special detail plans such as the striping and signage plan. The plans are stamped as required.

Response: The Existing Conditions Plan has been revised to reflect a 1"=40' scale

- a. Details of proposed curb, sidewalks, curb stops, etc. have been provided. Sign details, lighting and landscaping data have also been provided. Refer to other sections for comments on drainage system details.
- b. The required building location, lot lines, etc. have been indicated. A zoning table is provided on Sheet SP-0.

- c. A Landscaping Plan has been provided, but is stamped by a Civil Engineer. The Board should review the plans. The plans include a list of species and sizes as required.

Response: Acknowledged.

5. Design standards

- a. This section addresses general safety and access convenience. This aspect of the project has been reviewed by Vanasse and Associates.
- b. It is proposed to utilize the existing access/egress locations with some modifications proposed. There should be a plan of sight lines and an assessment of required sight distance at all intersections with Industrial Park Road and Commerce Road. It is likely that sight distance will also be addressed by Vanasse & Associates.
- c. One loading area with seven bays is proposed for tractor trailer truck deliveries. It is also proposed to have four sets of staging areas for 16 vans each. Two staging areas are within the building and two are outside the building. This aspect of site operation should be discussed by the Board. The plans do not include an area for a dumpster, it is unclear how refuse will be stored on site.

Response: Acknowledged. The revised submittal includes addressing Vanasse & Associates comments. The northern entrance off of Commerce Road has been relocated in order to improve the sight distance to the intersection of Industrial Park Road and Commerce Road. As mentioned previously, the tenant is proposing one dumpster/compactor in one of the loading dock spaces.

- d. There is a sample truck turning plan on Sheet SP-1 for the exterior tractor trailer loading area. In addition, the plans indicate van loading and staging locations. Passenger vehicles are parked separate from the vans and would access separately from tractor trailer units. Passenger vehicles and vans would both utilize the northerly curb cut to Commerce Road. There would not be conflicts with the tractor trailers or van staging and passenger vehicles as presented.

Response: Acknowledged.

- e. There are some stacked staging areas but these are not counted as parking spaces. The submittal complies with this requirement.

Response: Acknowledged.

- f. No spaces overhang the sidewalk. The Fire Department should comment on the design.

Response: Acknowledged.

- g. The entire parking lot has either curb or berms as required.

Response: Acknowledged.

- h. Photogrammetric plans and lighting details for pole mounted lights have been provided. It appears that the plans would not include lights that shine upward or into neighboring properties. Details for wall mount lights and any other lighting that has not been included on the plans should be provided. The Board should review proposed lighting.

Response: Acknowledged. Details have been provided on the Lighting Plan, Sheet LP-2.

- i. The plan specifies white pavement markings as required for parking spaces.
- j. There are 6 handicap spaces proposed. Based on 521 CMR a minimum of 5 handicap spaces would be required for either the 149 required spaces or the 130 passenger vehicle spaces but insufficient spaces would be provided if van spaces are included in the overall parking count. The Board should address this as part of the Special Permit.

Response: The 6 handicap spaces are based on the 130 passenger vehicles spaces.

- k. A plan that indicates proposed snow storage areas should be provided.

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

- l. The proposed parking lot complies with grade requirements as grades are between 1 and 4%. Refer to comments under Section 4. h. regarding stormwater design. I have not reviewed the storm sewer system at this time as the design will likely need to be revised to comply with stormwater management requirements.

Response: Acknowledged. 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.

- m. The parking lot would have 130 passenger vehicle spaces and 328 van spaces. I note that van spaces are larger and have more pavement area for both the spaces and the aisles. The Board should determine if van spaces would be subject to this requirement for landscaping or if additional trees would be required for the larger spaces. The parking layout is similar for both types of vehicles, excepting the larger paved area for vans. Based on the table on Sheet LL 0 there are only 13 proposed trees that would comply with size requirements. 46 total trees are proposed but 13 have a diameter of 3" as required and 33 are only 2-inch diameter.

Response: The current Landscape Plan (LL-0) shows 23 proposed trees within the parking lot area specified with 3-inch caliper at install. In addition, greater than 23 existing trees are to remain along the perimeter of the parking area meeting the

required total of 46 trees. There are two additional ornamental trees within the parking lot area specified with 2-inch caliper at install. The Landscape Plan Schedule has been modified on Sheet LL-0 to clearly identify parking lot trees (3-inch caliper), ornamental trees (2-inch caliper) and evergreen trees proposed. The Existing Tree Plan (Sheet LL-4) provided additional information regarding existing trees to remain along Industrial Park Rd, Commerce Rd and parking area.

- n. It does not appear that shared parking is proposed, this section is not applicable.
- o. Not applicable, a reduction in parking is not requested.

SECTION V-B SIGNS

The Board should address signage. It is unclear if there are identifying signs proposed for the project.

Response: Site signage is included in the plan set. See the Site Signage and Pavement Marking Plan, sheet SP-3 and the Detail Sheets, DN-1 and DN-2 for more details.

We trust our responses address the concerns that were posed. Should you require additional information, please feel free to contact me at 203-608-2438.

Sincerely,



Kevin Hixson
Senior Project Manager