

September 2, 2020

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

Re: 100 Industrial Park Road, Hingham

Dear Ms. Savage-Dunham:

We are in receipt of A.W. Perry's letter dated August 27, 2020, containing concerns regarding the application for the above noted project. Our responses are indicated below in ***bold italic*** text and are as follows:

TRAFFIC

1. Primary ingress/egress to 100 IPR is proposed off of Commerce Road. This includes all trailer truck traffic (inbound and outbound), all delivery vans (inbound) and all employee/visitor traffic (inbound and outbound). Commerce Road is private, owned by A.W. Perry ("AWP"), with right to pass easements granted to 100 IPR. The right of way ("ROW") of Commerce is 50', the existing intersection with Industrial Park Road is misaligned, and there is a tight bend in the roadway.

In consideration of the large volume of traffic generated by the proposed use at 100 IPR, we recommend the Board require Commerce Road be upgraded to meet the Planning Board Rules and Regulations requirements for a "Major" Roadway (per Section 4.B.1.a) including a 70' Right-of-Way and a 500' centerline radius. Furthermore, the intersection with Industrial Park Drive has an odd angle to it and should be realigned to provide an appropriate geometrically correct intersection for the large volume of traffic anticipated to now utilize that intersection for this project. These improvements can be accomplished through mitigation involving land comprising part of the 100 IPR site.

***Response: Based on Section 4.B.1.a, a "Major Street" is classified as follow:
"A street which, in the opinion of the Board is being used or will be used as a
thoroughfare between different portions of the Town of Hingham, or which will be the
principal access to a business or industrial subdivision."***

Commerce Road is not a major thoroughfare since it dead ends at the rear access to both 100 Industrial Park Road and 35 Commerce Road. It provides primary access to a 35 Commerce Road so is better classified as a minor street. The current roadway meets these thresholds of a 200' minimum radius and 46' of Rights-of-Way.

It should also be noted the volumes that are estimated for the proposed development at 100 Industrial Park Road is to produce 1,204 vehicle trips per day, which is well below the 3,000 Average Daily Trips (ADTs) threshold that is required by CMR 301, Section 11.03.06.a. Including any trips produced by the other abutting properties on Commerce Road, estimated from peak hour traffic volumes, the ADT for Commerce Road is 250. This brings it well below this threshold with the inclusion of any of the abutting properties.

Mitigation has been provided on Commerce Road, which includes removing vegetation to improve sight lines and moving the driveway further to the east to improve traffic operations with the nearby intersection with Industrial Park Road.

2. Currently, immediately prior to the Industrial Park Road/Commerce Road intersection there is a sharp, 90 degree bend in Industrial Park Road that creates a blind, tight corner, and has been an area of traffic concern in South Shore Park ("SSP"). An opportunity exists to realign Commerce Road across a portion of 100 IPR site, so it intersects at this 90 degree bend to form a "T" intersection, while also addressing the 70' ROW width.

Response: Realigning the intersection of Industrial Park Road to a "T" intersection to meet the requirements of the 70' Rights-of-Way requirements is not feasible due to parking and on-site circulation requirements of the developer. Any realignment of the intersection will also cause a large amount of utility relocation with overhead utilities running along the northbound side of Industrial Park Road.

As a mitigation to address intersection sight distance issues, the existing driveway at Industrial Park Road is being signed with a "No Left Turn" sign and is being redesigned as an egress only out of the Site. Intersection sight distance is acceptable for the right turns out of the Site Drive. Warning signage is also being provided in both directions of Industrial Park Road approaching the driveway.

3. The trip generation information presented by JEB anticipates traffic to and from the site will occur during off peak hours, requiring no traffic mitigation measures. Will there be monitoring in place to insure actual traffic flows occur in off peak times? Currently, a number of existing businesses in South Shore Park ("SSP") operate on a 7 am to 3 pm shift and daily traffic exiting SSP at the 3 pm hour presents a substantial backup at the signal at Pond Park Road/Derby Street. Any variation to the timing of JEB's anticipated midday trip generation figures would have significant consequences to traffic in the area.

Response: As a part of the approval of the special permit for the Site at 100 Industrial Park Road, a traffic monitoring program will be required for this Site for the first 90 days of the issuance of a Certificate of Occupancy for the Project and will need to be repeated 1-year thereafter.

STORMWATER

4. This site is within an Outstanding Resource Water Area providing drinking water supply. All proposed stormwater discharges occur on AWP owned property. Environmental, and future developmental impacts are of significant concern. Upon receipt of the Board's peer review engineer's comments, we will have additional feedback.

Response: Noted. Existing drainage patterns are maintained with the proposed development. The proposed development is designed to meet current MASS DEP and Town of Hingham criteria for stormwater quality on a re-development site and currently there are none at 100 IPR. Currently there is no stormwater treatment and the proposed development significantly improves the stormwater quality treatment for this proposed re-development.

SEPTIC

5. JEB's new septic system plan will require waivers from setback requirements between stormwater drainage and septic per their recent response to comments submitted. Has the applicant pursued other alternates to meet existing Board of Health by-laws?

Response: The Applicant has explored the site for the most ideal septic system location through on-site testing to replace the existing system that is within the 50' buffer. The Site is a re-development project that has site constraints associated in order to drain the stormwater for the site properly that has prompted the request for waivers for the BOH application.

OTHER PERMITTING

6. A MEPA filing will be required for this project. There is no filing identified for 100 IPR on the MEPA database. Due to the fact that 100 IPR abuts state highway Route 3, a MassDOT access permit will be required. Has the Town's review engineers had any discussions with MassDOT and MEPA with respect to this filing?

Response: A MEPA will not be required for this Site. The Applicant's Engineer confirmed with Nicole Berthiaume from MASS DOT on March 13, 2020 that the work will take place within the parcel and not on any portion of the Route 3 ROW. No access, grading, tree trimming, or brush clearing will occur within the DOT ROW, and all drainage will be maintained within the property at 100 IPR. The Applicant's Engineer has also sent the MASS DOT the latest Traffic Impact Study for their review. In addition, the project does not require any state permits and it does not require any state funding.

7. We understand that the proposed use at 100 IPR is a by right use and agree it is consistent with the industrial nature of this property. We support this type of use at SSP, especially in an existing industrial property. However, we do have concerns with activity at 100 IPR that has proceeded in advance of any Town approvals. We request that the Board condition that all necessary permits be obtained prior to any additional construction activity at 100 IPR.

Response: Noted.

8. We are also sensitive that the impacts of this use do not adversely affect the Town's longer-term vision for this area of south Hingham, and the recommendations of the current master plan effort for the entire community.

Response: Noted.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'KH', written in a cursive style.

Kevin Hixson
Senior Project Manager