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September 14, 2020

## **Via Electronic Delivery (dunhamn@hingham-ma.gov)**

Kevin M. Ellis, Chairman  
Planning Board  
Town of Hingham  
210 Central Street  
Hingham, MA 02043

### **RE: 100 Industrial Park Road – Proposed Amazon Package Fulfillment Center**

Dear Chairman and Members:

This office represents A.W. Perry, Inc., and related entities (“Perry”), in connection with the applications of JEB Group LLC for Special Permit A3 Parking Determination/Waivers and Site Plan Approval in Association with Application for Building Permit for the property located at 100 Industrial Park Road, in the South Shore Industrial Park (the “Amazon Project”). We are writing to provide comments to the materials submitted to the Planning Board in support of the Amazon Project. At this time, Perry has serious concerns regarding the proposal as described, including the safety and sufficiency of Industrial Park and Commerce Roads to responsibly support the Amazon Project. Perry forwarded an initial set of comments, dated August 27, 2020, and has since sought to engage in discussions with representatives of the Applicant. To date, the comment responses fail to adequately address Perry’s initial comments, and discussions with the Applicant’s representatives have not occurred. Perry approaches this process aware of underlying issues and limitations relating to the layout of Industrial Park Road, Commerce Road and surrounding properties, and has considered working cooperatively with the Applicant and the Town. Perry remains open to discussing potential solutions to existing limitations but will be unable to do so without a full and credible articulation of the use.

At the outset, Perry questions the base set of underlying assumptions advanced by the Applicant. The Applicant has advanced inconsistent employee and vehicle counts within their various board filings, and there has been no presentation or discussion regarding the August 10<sup>th</sup> plan set (*See* Overall Floor Plan, Sheet A.101, attached as Exhibit A). The Floor Plan shows: (1) a “Pick Up Entrance” that will allow the general public to come onsite and pick up packages – with NO parking accommodation noted, or any discussion of the retail nature of this use or frequency; (2) an “Associate Area” showing 188 seats (including an apparent cafeteria) and a 25-seat classroom; and (3) an “Office Area” showing a conference room with 12 seats and desk seating for 20 people.

By email dated August 21, 2020, the Applicant's agent confirmed the use of the facility as a "Last-Mile Delivery Station," and "confirmed there are no plans *at this time* for any off-site lot that will be associated with this site..." (See attached Exhibit B). This statement does little to support Perry's confidence in the Applicant's proposal, as Amazon representatives have in the past approached Perry seeking off-site parking for both construction and long-term operational support. This heightens Perry's concerns regarding overall impacts not only to the roadways within the industrial park, but Derby Street and immediate roadways as well. Moreover, Perry asserts that seasonal delivery holiday peak use of the transportation facility must be fully identified, studied and reviewed.

The Applicant proposes to rely upon an existing 1960s-era industrial subdivision road that it neither controls nor owns. Several problems are apparent. An area of extreme concern is the 90-degree with vertical curve segment of Industrial Park Road. This geometry deficiencies have long been criticized and present a major safety concern to not only Perry, but to the abutting South Shore Education Collaborative, which has detailed its concerns to the Board by letter dated July 14, 2020. This existing safety problem will not go away, cannot be ignored and must be addressed now. Perry respectfully suggests that the Board require upgrade to Major Street (per Section 4.B.1.a) with a 70' Right-of-Way and 40' travel width, which would be consistent with that portion of Commerce Road in Hingham presently providing access to Blue Cross Blue Shield and EMD Serono (See attached Exhibit C). The Applicant and Perry own or control sufficient portions of abutting parcels and right of way to allow the Applicant to upgrade to a Major Street and suggests that the Planning Board require a detailed evaluation of roadway realignments. In the interest of public safety, Perry will entertain contributing land to accommodate a realignment (with parking) substantially similar to that shown on the attached Exhibit D.

Currently, the segment of Commerce Road fronting on the Applicant's property dead-ends and lacks a constructed turn-around. Perry intends to continue that roadway to connect to the Commerce Road layout farther south in Hingham and Rockland (Blue Cross Blue Shield/EMD Serono). Conversion to a Major Street, as suggested above, would allow for the construction of a safety turn-around in the short-term, and roadway designation consistency as future connection is made to the existing Hingham Major Street layout to the south.

Perry asserts that full answers to the above requests, supported by data generated at other Last-Mile Delivery Stations operated by Amazon, will result in at least one MEPA threshold trigger, as the Amazon Project meets the Standard Operating Procedure ("SOP") requiring a MassDOT Access Permit. There has been very little parking at the site that has been vacant for many years, and the proposed traffic will be viewed as essentially net "new" traffic.

Our comments above relate primarily to traffic and access issues. We reserve the opportunity to offer comments regarding other aspects of the Application. Thank you for your attention to and consideration of this matter.

Very truly yours,

Jeffery A. Tocchio

REVISIONS	DESCRIPTION	DATE	NO

Designed: Designer  
Drawn: Author  
Reviewed: Approver  
Scale: As Indicated  
Project No. 1901517  
Date: 05/04/2020

Title:  
OVERALL FLOOR PLAN

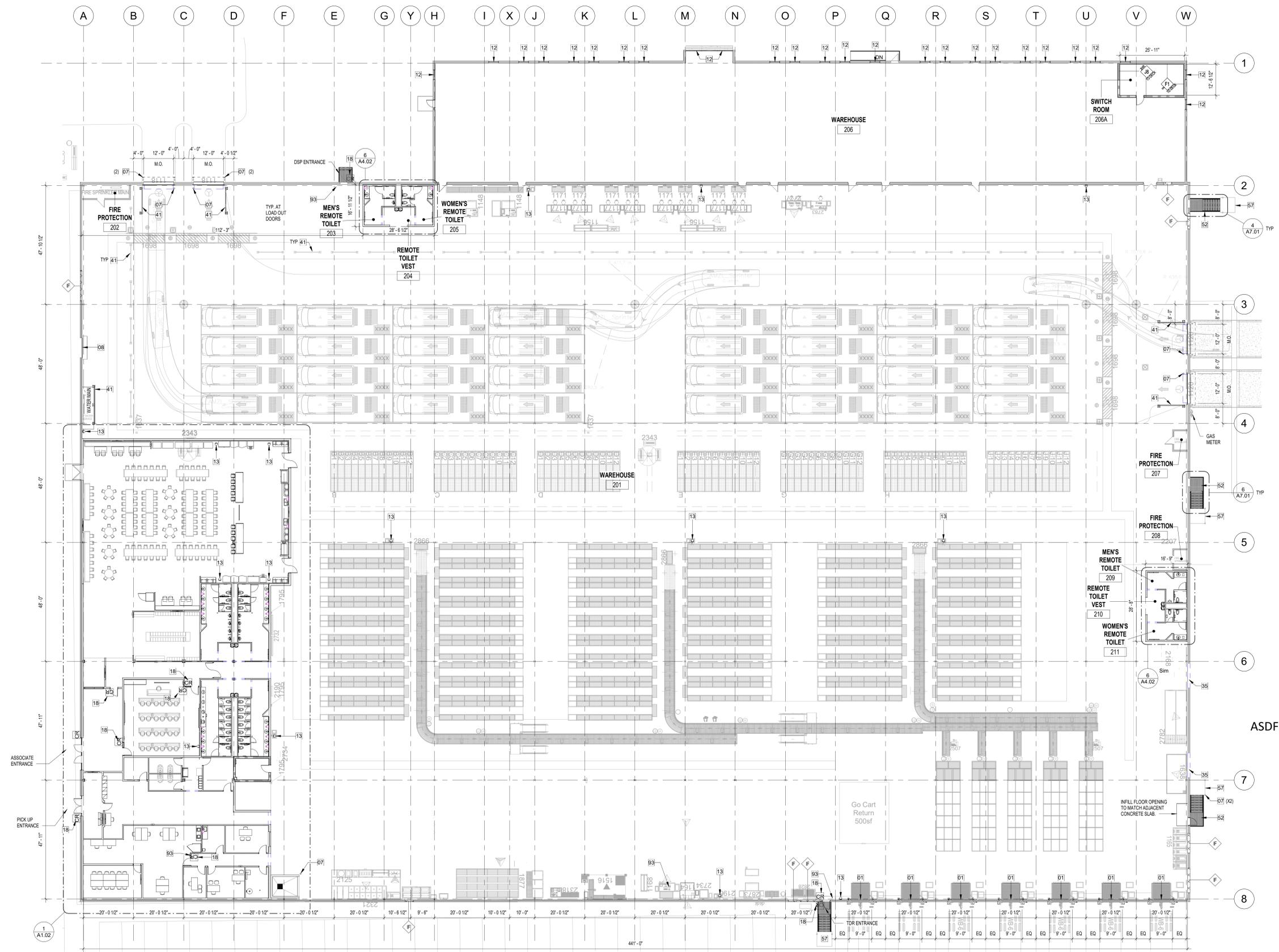
Sheet No.

A1.01

LEGEND	
	EXISTING WALLS TO REMAIN
	NEW WALL
	EXISTING DOOR TO REMAIN
	NEW DOOR
	WALL TYPE WALLS WITH NO TAG TO BE INFILLED TO MATCH EXISTING CONSTRUCTION
	INFILL WALL TO MATCH EXISTING

KEYNOTES	
#	DESCRIPTION
01	NEW OVERHEAD DOOR WITH DOCK EQUIPMENT PACKAGE. SEE DOOR SCHEDULE.
07	6" DIA. STEEL BOLLARD. PAINT SAFETY YELLOW (P-9). SEE DETAIL 5A9.01
08	INACTIVE DOCK DOOR. REFERENCE INACTIVE DOCK DOOR DETAILS ON A6.02
12	SECURITY WINDOW FILM (WF-1). PROVIDE AT ALL WINDOWS AND DOORS EXPOSED IN WAREHOUSE FROM FINISHED FLOOR TO 12'-0" A.F. SEE MATERIAL FINISH KEY ON A10.01 FOR MORE INFO.
13	WATER COOLERS PROVIDED AND INSTALLED BY TENANT. FINAL NUMBER AND LOCATIONS TO BE DETERMINED. SEE PLUMBING AND ELECTRICAL DRAWINGS.
18	CARGO READERS BY TENANT'S SECURITY CONTRACTOR. G.C. TO PROVIDE CONDUITS AND PULL STRINGS WITHIN PARTITIONS.
35	NEW MECHANICAL LOUVERS. SEE MECHANICAL DRAWINGS FOR MORE INFO.
41	PREFAB GUARDRAIL. LOCATION SHOWN SCHEMATICALLY. FINAL LOCATION TO BE COORDINATED WITH TENANT. SEE A4A.01
52	INSTALL NEW STAIR, RAILING AND BOLLARDS.
93	AI PHONE LOCATION.

- CONSTRUCTION GENERAL NOTES:**
- FIELD VERIFY ALL DIMENSIONS AND ADVISE ARCHITECT OF ANY DISCREPANCIES PRIOR TO COMMENCEMENT OF WORK OR PROCUREMENT OF DIMENSION SENSITIVE PRODUCTS.
  - DIMENSIONS ARE TO THE FACE OF STUDS, UNLESS OTHERWISE NOTED.
  - GYPSUM WALLBOARD
    - WORK SHALL COMPLY WITH ASTM C840 STANDARD SPECIFICATIONS FOR APPLICATION AND FINISHING OF GYPSUM BOARD.
    - GYPSUM WALLBOARD TO RECEIVE LEVEL 4 FINISHES PER ASTM C840. SURFACE SHALL BE SMOOTH AND READY TO RECEIVE FINISH MATERIAL. PROVIDE MOISTURE RESISTANT GWB IN RESTROOM WET WALLS AND AT SINK COUNTERS.
    - GYPSUM WALLBOARD NOT TO RECEIVE FINISHES SHALL BE FINISHED TO LEVEL 2 FINISH PER ASTM C840.
    - WATER RESISTANT GYPSUM TO BE 5/8" GENS ARMOR PLUS OR EQUAL COMPLYING WITH ASTM C1178, C1288 OR C1285. PROVIDE AT PARTITIONS ADJACENT TO PLUMBING FIXTURES.
    - ALL GYPSUM WALLBOARD IS TO BE 5/8" THICK UNLESS NOTED OTHERWISE. PROVIDE TYPE "X" GYPSUM WALLBOARD AT ALL FIRE RATED PARTITIONS.
  - WHERE NEW PARTITIONS ARE ALIGNED WITH EXISTING, ALIGN FROM FINISH FACE OF BOTH. IF PARTITIONS ARE TO ATTACH, MAKE TRANSITION SMOOTH UNIFORM SURFACE.
  - UNIFORM LOAD AT PARTITIONS IS 5 PSF WITH ALLOWABLE DEFLECTION OF L/240 UNLESS SHELING AND EQUIPMENT IS PROPOSED FOR ATTACHMENT.
  - ALL PARTITIONS TO BE BUILT TO DECK SHALL ENCOMPASS ANY STRUCTURE SUCH AS JOISTS AND BEAMS THAT MAY NEED TO BE FRAMED OUT TO PROVIDE DRYWALL TO DECK. ALL PENETRATIONS AND FLUTES IN DECK SHALL BE SEALED AS REQUIRED.
  - PROVIDE BRACING PER MANUFACTURER RECOMMENDATIONS OF ALL PARTITIONS THAT DO NOT EXTENDED FULL HEIGHT TO UNDERSIDE OF STRUCTURE ABOVE. PROVIDE GALVANIZED STEEL SHEET DEEP LEG DEFLECTION TRACK (20 GA.) "SLP-TRX" BY SLP TRACK SYSTEMS, INC. SECURE TO STRUCTURE WITH FASTENERS AT 2'-0" O.C. MAXIMUM. DO NOT SECURE TRACK TO VERTICAL STUDS. PROVIDE MINIMUM 2" TO TOP OF STUD.
  - ALL BOTTOM TRACK RUNNERS TO BE HELD IN PLACE WITH FASTENERS AT 2'-0" O.C. MAX. WITH HLT1 POWDER DRIVEN ANCHORS #288, 0.145" DIA. SHANK WITH 1.18" MIN. PENETRATION.
  - PROVIDE HORIZONTAL BRACING IN ALL PENETRATION FRAMING AT MAXIMUM OF 8'-0" VERTICALLY, UNLESS OTHERWISE NOTED.
  - METAL STUD NON-STRUCTURAL WALL SYSTEMS TO FOLLOW C754 AND ASTM B46.
  - FIRE STOPPING REQUIREMENTS: ALL PENETRATIONS WITHIN OR THROUGH RATED ASSEMBLIES SHALL BE TIGHTLY SEALED USING APPROVED LISTED MATERIAL & SYSTEMS COMPLYING WITH ASTM E 814 OR UL-1479 (AS PER CODE). SEALANT MEETING THESE REQUIREMENTS TO BE FLAME STOP OR APPROVED EQUAL.
  - PROVIDE COMPRESSIBLE FIRE STOPPING MATERIAL AT CEILING LEVEL OF ALL PARTITIONS IN WHICH THE GYP. BD. DOES NOT EXTEND TO DECK. HOLD FIRE STOPPING IN PLACE WITH 1" WIDE (25GA.) 1 1/2" x 1 1/2" IMPLING ANGLE ON EACH STUD TO SECURE EACH END OF MATERIAL.
  - PROVIDE ACQUISICAL SEALANT AT THE CONNECTION OF ALL GYP. BD. TO DECK OR SLAB CONDITIONS. HOLD GYP. BD. 3/8" OFF STRUCTURE FOR SEALANT. PROVIDE J-BEAD AT ALL SEALED EDGES PER 715 & 715.3 OF B.C. ALL CONCRETE AND EXPOSED INSULATION SHALL HAVE A CLASS A FLAME SPREAD AND SMOKE DEVELOPMENT INDEX PER ASTM E 84.
  - INSULATING MATERIALS WHEN INSTALLED IN BUILDINGS OF ANY TYPE CONSTRUCTION SHALL COMPLY WITH LOCAL JURISDICTION CODE.
  - ALL PLYWOOD & BLOCKING TO BE FIRE RETARDANT TREATED.
  - PROVIDE CONTROL JOINTS IN ALL WALLS EXCEEDING 30' IN LENGTH AND HEIGHT AND EVERY 30' THEREAFTER. JOINTS SHALL BE LOCATED WITH HINGE SIDE OF FRAME 4" OFF FINISHED WALL, AT CORNER CONDITION, UNLESS OTHERWISE NOTED.
  - 5% BUT NOT LESS THAN 1% OF SEATING AND STANDING SURFACES AT DINING SURFACES SHALL BE ACCESSIBLE.
  - ZIP WALLS TO BE INSTALLED FOR PROTECTION DURING TIME OF CONSTRUCTION.



1 OVERALL FLOOR PLAN  
1/16" = 1'-0"

EXHIBIT A





**Mary Savage-Dunham, AICP,  
CFM**

Director of Community Planning  
Town of Hingham  
210 Central Street  
Hingham, MA 02043  
O: (781) 741-1419  
C: (781) 561-6304

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[www.hingham-ma.gov](http://www.hingham-ma.gov)

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**From:** Keleher, Michael [mailto:kelehem@amazon.com]  
**Sent:** Friday, August 21, 2020 8:47 AM  
**To:** Savage-Dunham, Mary <dunhamm@hingham-ma.gov>  
**Cc:** Hixson, Kevin <KHixson@blcompanies.com>  
**Subject:** Amazon Off-Site Parking - 100 Industrial Park Rd

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

Ms. Savage-Dunham,

Amazon has been made aware of some outstanding questions regarding off-site parking for the proposed Last-Mile Delivery Station located at 100 Industrial Park Rd in Hingham. Amazon has confirmed there are no plans at this time for any off-site lot that will be associated with this site in the Town of Hingham. The site as designed will not require any additional off-site parking.

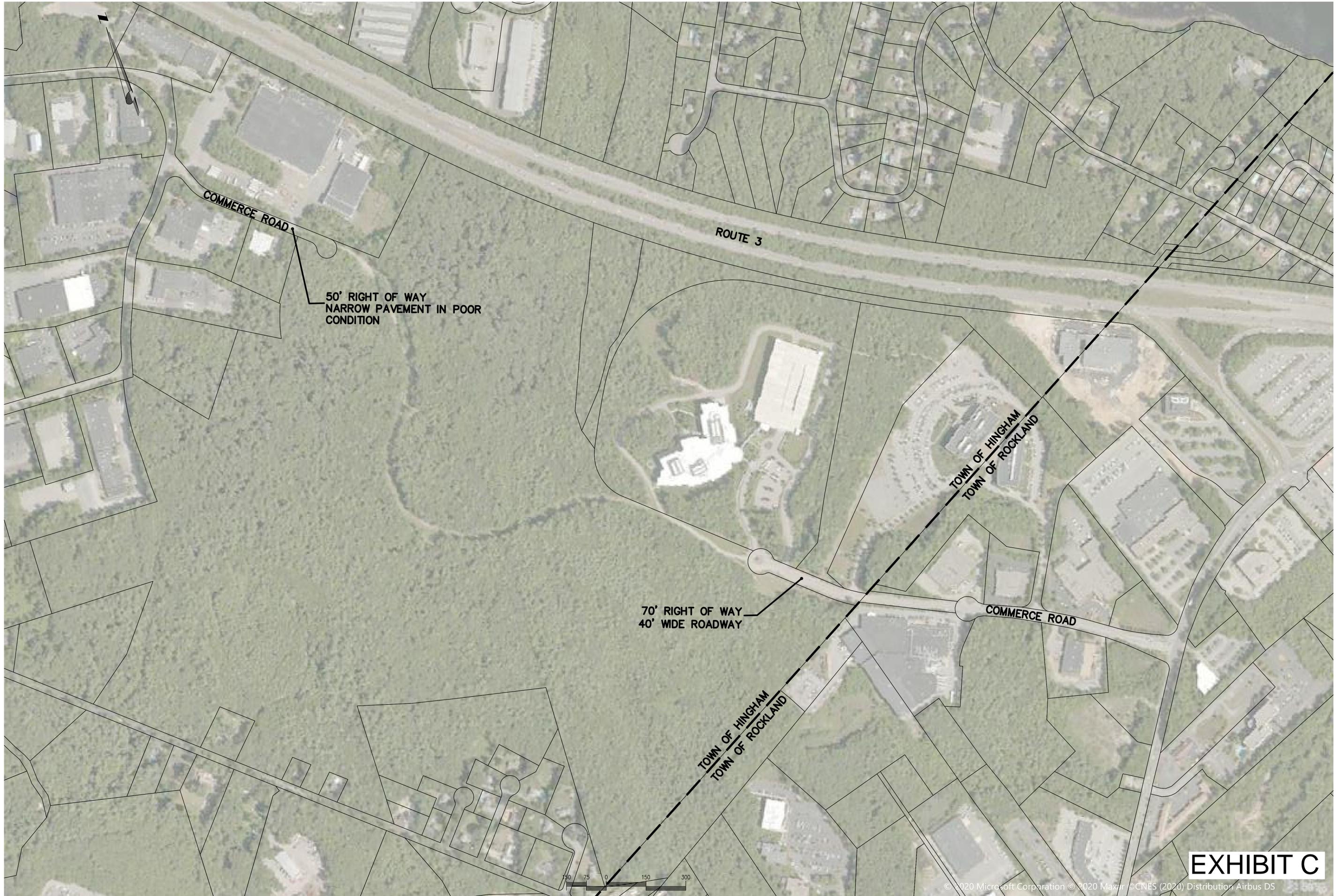
Thank you

Michael Keleher

**Michael Keleher**

**Sr. Program Manager**  
e: [kelehem@amazon.com](mailto:kelehem@amazon.com)  
p: 615-975-6954





**EXHIBIT C**

SP190151701.dwg  
DWG.SP-024/36.60SC.

UTILIZED BY ANY PERSON, FIRM OR CORPORATION WITHOUT THE SPECIFIC WRITTEN PERMISSION OF BL COMPANIES.

PROTECT EXISTING  
EXISTING CONCRETE-BLA  
TO BE REMOVED

90 INDUSTRIAL PARK JV, LLC  
BOOK 12 PAGE 35  
PARCEL ID: 131201000000120

ACCESS FOR EMERGENCY  
VEHICLES TO REMAIN.

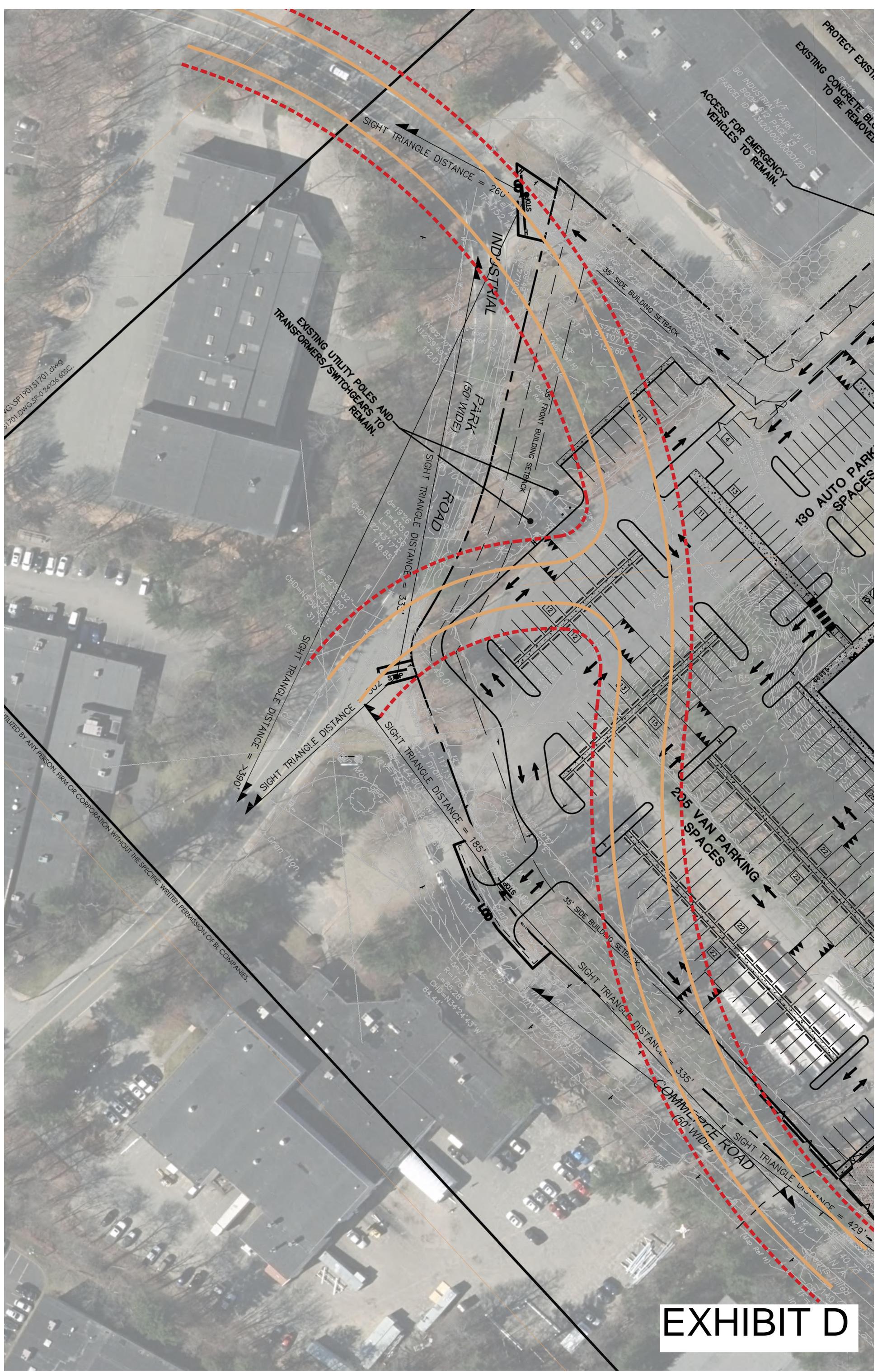


EXHIBIT D