



May 29, 2024

Crystal Kelly, Chair  
c/o Shannon Palmer, Conservation Officer  
Hingham Conservation Commission  
210 Central Street  
Hingham, Massachusetts

Via: Federal Express and Email to [palmers@hingham-ma.gov](mailto:palmers@hingham-ma.gov)

Reference: Response to Comments  
Notice of Intent DEP File # 034-1493  
Roadway Improvements and Seawall Repair  
Martins Lane  
Hingham, Massachusetts  
B+T Project No. 2489.02

Dear Chair Kelly and Members of the Commission:

On behalf of the applicant, the Town of Hingham, Beals and Thomas, Inc. respectfully submits this response to comments from the Hingham Conservation Commission Officer received via email on May 8, 2024 regarding the Notice of Intent (NOI) submitted to the Hingham Conservation Commission for roadway improvements and seawall repair proposed at Martins Lane.

For clarity of the Administrative Record, comments received are noted in *italics*, followed by our current response in **bold**.

- 1. The project will result permanent impacts to Coastal Beach, Coastal Bank and LSCSF and a portion of the project (road repairs) has been filed as a limited project pursuant to 310 CMR 10.24(7)(c)(1). A construction methodology and sequence was not included therefore it is not apparent if there will be any temporary impacts to Salt Marsh or Land Containing Shellfish during demolition or excavation. Please provide additional construction details in the narrative and verify if the seawall work will result in any temporary impacts to any other resource area. An erosion and sediment control plan sheet should be included showing staging areas, stockpile locations, sediment controls as needed (in addition to turbidity curtain), etc.*

**Applicant Response: The Project has been designed to minimize impacts to sensitive resource areas. The existing wall will be removed and the new pre-cast concrete wall constructed using heavy equipment located on Martins Lane. No heavy equipment will be used with the saltmarsh or land containing shellfish. As requested, the plans have been revised to include an erosion and sediment control plan showing staging, stockpile and sedimentation controls.**

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- The project appears to be subject to the Stormwater Standards as a "Redevelopment Project" however the required documentation was not included with the NOI. Redevelopment includes "maintenance and improvements of existing roadways including widening less than a single lane, adding shoulders....improving existing drainage systems and repaving". Please provide a Stormwater Checklist and associated documentation to demonstrate compliance with the applicable standards to the maximum extent practical including an O&M plan and Construction Period Erosion, Sedimentation and Pollution Prevention Plan.*

**Applicant Response: As requested, a stormwater checklist and O+M Plan are enclosed. Sheet C1.2 of the plans has been revised to include a Construction Period Erosion, Sedimentation and Pollution Prevention Plan.**

- The project proposes to remove 8 trees at the location of the proposed wall expansion. The narrative indicates the trees are within coastal bank however the plan appears to identify this area as coastal beach. Please clarify if the area was delineated as Bank based on slope and revise plan as applicable. Please address the loss of trees in the narrative, particularly given their importance in and near coastal banks as described in the HWR Section 18.1(a), "Large trees either growing directly in a Coastal Bank or within the buffer zone to a Coastal Bank provide bank stability through their extensive root systems. Their canopy areas serve to dissipate storm energy and partially limit the amount of rainfall reaching the ground. They also serve as valuable habitat for many bird, mammal, and other species."*

**Applicant Response: The trees to be removed are located within the coastal beach area the associated permanent impacts are included in the 95 SF of impact area noted on Form 3. The Applicant acknowledges that in some situations trees often aid in stability of a Coastal Bank, however in this situation, the Martins Lane roadway is being destabilized by the trees' root system. These trees will be removed for the installation of the new pre-cast concrete wall which will provide the necessary stabilization of the Martins Lane roadway.**

- Tree and/or shrub replacements (in accordance with the Commission's Tree Replacement Policy) would benefit the resource area and replace the lost values of the trees to be removed. There are several native, salt tolerant shrubs suitable to the area that would provide shading, erosion control, and habitat value if trees are not advised due to potential interference with the long term integrity of the wall. Staff can provide plant recommendations if needed.*

**Applicant Response: The plans have been revised to note the requested shrub plantings.**

5. *The plan does not indicate proposed grades in the location of the trees and new wall section. Presumably there will be temporary disturbance and re-grading in this area for tree removal and wall construction. Please elaborate on proposed activities in this area (i.e. how the trees will be removed (including stumps) and plans to stabilize and replant the area, as applicable, following wall construction).*

**Applicant Response: Grading and disturbance in front of the wall is not anticipated. The trees within 5-feet of the new pre-cast concrete wall are to be cut and stumps removed. Trees outside of the wall footprint are to be cut and their stumps to remain in place. The plans have been revised to note the requested shrub plantings.**

6. *The narrative states that the project is designed to minimize, using best available measures, adverse effects on adjacent coastal beach due to changes in wave action and also that the project will not have adverse impacts on water quality, movement of sediment, or wildlife species. It would be helpful if the discussion further substantiated these statements with specific best available measures. The project will replace an existing stone and mortar wall with a reinforced concrete block wall. CZM Guidelines StormSmart Properties Fact Sheet 7: Repair and Reconstruction of Seawalls and Revetments | Mass.gov provide several recommendations for reconstruction of seawalls to minimize impacts on coastal resource areas including: sloping structures to dissipate wave energy; adding a curved face on vertical walls to direct reflected waves away from the wall; providing wall rough surfaces and avoiding grout between rocks to reduce wave energy and provide habitat for marine species and spaces for shellfish; and tapering the ends of structures so its elevation and slope are gradual to further reduce erosion and end effects of the wall. As feasible, please incorporate these seawall design considerations into the project design, and if not feasible please explain.*

**Applicant Response: As noted, the Project has been designed to minimize the impacts on coastal resources. As shown on the plans, the new pre-cast concrete wall is a sloping structure which will aide in wave dissipation, however, the Martin's Lane seawall is located in a protected cove and experiences minimal wave action. The referenced 'curved face' is typically used with a smooth faced concrete wall and not feasible for use in this location. A rough face is proposed as the pre-cast concrete wall will be faced with a 3" natural quarried stone. The proposed wall height tapers from a maximum height of about 8.5' to less than 4' at the ends of the wall.**

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7. *Please list any other state or federal permits needed for the wall replacement, as applicable.*

**Applicant Response: The Project is anticipated to require a Minor Project Modification from Massachusetts Department of Environmental Protection Waterways Chapter 91 and a Self-Verification Notification (SVN) from the United States Army Corps of Engineers (USACE)**

We look forward to meeting with the Commission again on June 3, 2024. Please do not hesitate to contact us with any further questions or comments.

Sincerely,

BEALS AND THOMAS, INC.



Daniel M. Gagne, PE WEDG  
Senior Civil Engineer

Enclosures: Revised Plans, dated May 29, 2024  
Checklist for Stormwater Report, dated May 29, 2024  
Operations and Maintenance Plan (O+M) (under separate cover from Hingham DPW)

cc: Town of Hingham (via email)

JYB/DMG/mac/248902LT002