

November 7th, 2024

Ms. Shannon Palmer
Conservation Officer
Hingham Conservation Board
210 Central Street
Hingham, MA 02043

**RE: Response to Review Comments
Proposed Raze and Rebuild
322 Rockland Street
Hingham, MA 02043**

Dear Ms. Palmer:

The purpose of this correspondence is to respond to outstanding review comments from the Conservation Commission Office.

The following responses in bold related to the proposed raze and rebuild is offered for your review and consideration:

Comments by Shannon Palmer, dated 9/24/24

1. The site plan has a date of June 13, 2024 however the NOI was submitted in September 2024. The referenced FIRM under "Flood Note" on the site plan is now outdated. Please correct the Community Map No. reference (now 25023C0038K effective 7/3/2024).

The date associated with the Fema Flood Note has been revised to say July 3rd, 2024.

2. For any revised plan submittals, please note the recommended color coding for resource areas in the NOI Instructions.

The buffer lines have been revised and updated.

3. The project proposes to rebuild the existing residence in a Special Flood Hazard Area, Zone AE with a crawl space and flood vents to allow passage of flood waters. Please provide details/certification for the proposed flood vents to verify compliance with Section 24.0(i) of the HWR. Was consideration given to an open foundation/use of pilings in this location?

The client considered the use of pilings, however the structural effects of pilings and their tendency to shift during high winds, causing damage to the inner walls of the new home was not ideal for the clients. With this in mind they opted for a poured foundation with flood vents. The Smart Vents™ allow for bidirectional water flow which relieves hydrostatic pressure on the foundation.



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Hanover, MA 02339
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PLYMOUTH OFFICE:
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MARINE DIVISION:
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Plymouth, MA 02360
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FALMOUTH OFFICE:
448 N. Falmouth Highway Unit A
North Falmouth, MA 02556
508-563-2183

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4. The NOI does not identify impacts to LSCSF under Section B.3, Coastal Resource Area. All temporary and permanent impacts to resource areas should be identified on page 3 of the NOI and described in the narrative.

The narrative has been updated as requested.

5. The NOI does not identify the method of delineation for all resource areas. The memo from ECR included in the NOI describes the delineation of salt marsh however the plan also denotes Riverfront Area and “approximate top of coastal bank”. Please clarify how these resource areas were delineated. Also note, in tidal rivers, the mean annual high water line is coincident with the mean high water line determined under 310 CMR 10.23.

The Salt Marsh delineation is described in the memo provided by Environmental Consulting & Restoration. The top of the Bank was determined in accordance with DEP Policy 92-1, by evaluating the extent of the flood zone and the slope of the landform, as required. The top of the coastal bank was shown as approximate due to difficulties getting accurate survey information in that area of the lot, and due to the fact that the top of the coastal bank is more Seaward than the saltmarsh limit.

6. The narrative indicates the proposal is to “build a smaller foot print house within the existing dwelling”. Please include the square footage of the existing and proposed house.

The plan has been updated to show the area of both the existing and proposed homes within the zoning requirement table under building coverage. Please see the revised site plan.

7. Although the project will result in a net reduction in impervious area within the buffer zone, a 263 SF patio is proposed 2.5 feet from the resource area, in an area that is currently lawn. Please provide more detail on the proposed patio including specifications on the site plan and indicate whether permeable or impermeable.

The site plan has been updated to show the material of the patio. The patio is an impermeable blue stone. This patio is located further away from the restored Salt Marsh and will meet the clients needs of access to the rear of there house. A “Permeable Blue Stone Patio Detail” has been added to the site plan.

8. The project proposes restoration of historically mowed/maintained salt marsh by hand seeding with NE coastal salt tolerant grass mix. Additional details are needed to evaluate the restoration proposal (e.g. how will area be prepared for seeding, is loam required, watering, etc.). Also, staff observed a stone wall at the limit of existing marsh. Removal of the stone wall (or a portion of) will allow for connectivity between the restoration area and existing salt marsh and will also prevent potential future impacts to salt marsh if maintenance and or removal of wall is necessary.

The area proposed for restoration is an area of the Salt Marsh that has been historically mowed. All mowing will be stopped in this area to allow the native salt marsh to re-establish itself in this area. This would require monitoring and

supplemental plantings as necessary. Appropriate species include spartina patens (Cord Grass), Distichlis spicata (Spike Grass) and Juncus Gerardii (Black Grass). The stone wall is not proposed be removed as it allows for water to pass through it and protects the dwelling from floating debris in the river during elevated seasonal tides and storm events. Please see the photos attached to this letter showing elevated river levels.

9. The project proposes removal of shed, gravel area, decks, and driveway which will be replaced with lawn in the 50 foot buffer zone. Although a benefit to remove the existing structures and impervious area, was consideration given to planting with a native seed mix for additional buffer zone and resource area enhancement especially in areas closest to the salt marsh? (New lawns are prohibited in the 0-50 under HWR Section 23.3.)

Consideration for the native mix was given when removing the driveway gravel and shed located in the rear the yard however given the needs of the client to be able to gain access to the rear of the house, this area was decided to be planted with grass seed.

10. The performance standards analysis for work in LSCSF, HWR Section 20.1, indicates that the area is “not significant to wildlife habitat” however the project site is within the Weir River ACEC, a highly significant estuarine/saltmarsh ecosystem that provides valuable wildlife habitat for a diversity of bird, mammal, finfish and shellfish species. Please expand on how the project will not have adverse effects or contribute to cumulative adverse effects on the wetland values of LSCSF and also how the project will increase the ability of LSCSF to provide important wildlife habitat functions (e.g. restoration of salt marsh).

The narrative has been updated to add additional information as requested.

11. The performance standards analysis for Filling, HWR Section 23.6, states a “small amount of fill” is proposed for access and construction of the garage. Please indicate the amount of fill required.

Please reference the revised site plan for the amount of fill needed for driveway

12. The Riverfront Area Performance Standards Analysis indicates the project is a redevelopment and describes compliance with 310 CMR 10.58(5). However, not all of the lot is previously developed which is defined as “areas degraded prior to August 7, 1996 by impervious surfaces from existing structures or pavement, absence of topsoil, junkyards, or abandoned dumping grounds”. Please clarify in table format and/or narrative, the amount of degraded versus disturbed areas (i.e. lawn) on the property and proposed alterations.

Please see the “riverfront area analysis” table for more detail on degraded and disturbed areas on the revised Site Plan.

13. The project proposes restoration of riverfront area (salt marsh) under 310 CMR 10.58(5)(f) and appears to comply with the criteria established under 10.58(5) by reducing the amount of impervious area in the RA and not locating the structure

closer to the river than existing conditions. It would be helpful if the analysis specified distances and square footage of alteration (see above) to further demonstrate compliance with the redevelopment standards. Please note, removal of debris and structures does not count toward riverfront restoration credit if being replaced with lawn.

The site plan has been modified to add a “Riverfront area analysis” Table which details existing and proposed areas and closest points of alteration.

14. The narrative does not include performance standards analyses for compliance with HWR Sections 18.4 (salt marsh), 21.1 (riverfront area), 23.7 (structures) and 24.0 (special flood hazard areas). Please also include a discussion of compliance with 310 CMR 10.32(3) for work within 100 feet of a salt marsh.

Please see the revised project narrative.

We appreciate these comments and look forward to presenting these revised plans at the June 10th planning board meeting.

Sincerely,

Merrill Engineers and Land Surveyors



Thomas Tremblay
Design Engineer

Enclosures

cc: S. Lindsay

File 24-041

Photo of Stone Wall



