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January 15, 2026

Town of Hingham Conservation Commission
Hingham Town Hall
210 Central Street
Hingham, MA 02043
Attn: Ms. Shannon Palmer, Conservation Officer

Re: Hingham Shipyard Marina - Proposed Maintenance & Repairs Notice of Intent
24 Shipyard Drive, Hingham, MA 02043
DEP File No. 034-1542

Dear Members of the Commission:

On behalf of Hingham Shipyard Marinas, LLC (HSM), Foth Infrastructure & Environment, LLC (Foth) is pleased to submit the information herein to supplement the Notice of Intent (NOI), submitted on September 2, 2025, for the proposed Maintenance and Repairs Project (the "Project") for future activities within the Hingham Marina shipyard located at 24 Shipyard Drive in Hingham, Massachusetts (the "Project site").

The purpose of the Project is to enable HSM to promptly and efficiently address maintenance needs of the marina infrastructure. By ensuring that all marina components are consistently updated and maintained, the Project aims to uphold optimal functionality and upkeep of the facilities. Ongoing maintenance is essential to extending the design life of the marina infrastructure and avoiding more costly repairs in the future. This proactive approach also contributes to the resilience of the marina by allowing for timely responses to specific needs as they arise. For all work within the coastal resource areas regulated under the Massachusetts Wetlands Protection Act (WPA) and Hingham Wetlands Protection Bylaw (Hingham Bylaw), HSM will avoid unnecessary sediment disruption to the maximum extent practicable.

Within the standard three-year timeframe of an Order of Conditions (OOC), HSM is looking to move forward with necessary maintenance, replacements, and repairs to the shipyard facilities. Below is an outline of the repair and maintenance priorities, with the understanding that the proposed work will be determined and scheduled based on materials availability, contractor availability, and cost. We will provide additional documentation and materials, as they become available, once work has been identified and scheduled.

A. Priority Maintenance Activities

As described in Section 1.1 of the NOI, the Project site contains ±315 timber piles (12-inch diameter (±251 square feet (sf)), 33 steel piles (±46 sf), and ±57,000 sf of floats. Attachment 1 includes the site plan submitted with the NOI. HSM conducts comprehensive field inspections throughout the year to identify maintenance priorities. These assessments also include diver-assisted underwater inspections and verifications to determine necessary project sequencing.

As a coastal marina, HSM is regularly exposed to weather events and seasonal use that can contribute to structural vulnerability. For example, a timber pile was damaged during a recent storm and now requires replacement; HSM has identified this repair as a top priority to maintain safe and functional operations. If required to submit separate NOIs for minor repairs, replacements, and other small-scale activities, HSM

would likely face timing challenges that delay essential work. Contractor availability, fluctuating material costs, and the seasonal nature of marine construction may complicate scheduling. The priority projects outlined below include the repair/replacement of up to five (5) steel piles located on “L Dock”, damaged timber piles, and maintenance of the floating docks.

A.1. Repair / Replacement of up to Five (5) Steel Piles on “L Dock”

As shown on the site plan included in Attachment 1, the Project site contains ±33 steel piles (±46 square feet (sf)). Several of these piles are showing rust and deterioration. Following field inspections conducted in 2025, five (5) piles were determined to be in poor condition and require replacement in the near future. The alternatives considered for the replacement of the identified steel piles are summarized below.

A.1.1. Alternatives Considered for Steel Pile Replacement

- A.1.1.1. Remove and Replace: Under this alternative, the existing steel piles would be fully extracted and replaced in-kind. This process would involve pulling each pile from the substrate, re-boring the underlying ledge where the piles were originally drilled and anchored, and installing new steel piles in new boreholes. Based on guidance recently received from Smith Marine, removing the existing steel piles is not preferred because it would require drilling new boreholes in the ledge, which poses construction schedule and cost challenges.
- A.1.1.2. Install Exterior Fiberglass Sleeve: Under this alternative, a fiberglass (or composite) sleeve would be placed around the exterior of each existing pile to encapsulate and reinforce it. The sleeve would be filled or sealed to stabilize the pile and protect it from further corrosion. Installation typically requires work at or below the substrate surface to apply the sleeve properly, which would disturb the substrate and benthic environment. Because the method results in an expanded pile diameter and additional material placed below the mean high water (MHW) line, it would likely trigger additional U.S. Army Corps of Engineers (USACE) permitting requirements, resulting in extended review timelines. Due to these factors, this option is considered less favorable.
- A.1.1.3. Use Existing Piles as Sleeve (Preferred): Under this alternative, a new pile would be inserted inside the existing steel pile, using the original pile as a casing. This method avoids removing the existing pile and eliminates the need to disturb the underlying substrate. Because the original piles remain in place and already extend into the ledge, the new inner pile can be applied securely without excavation, drilling, or sediment displacement. This approach provides structural reinforcement while maintaining the existing conditions of the substrate and adjacent resource areas. This method would best avoid impacts to resource areas, including Land Under the Ocean (LUO), Coastal Beach, Land Containing Shellfish (LCS), and Land Subject to Coastal Storm Flowage (LSCSF). Field inspections indicate that the existing piles remain stable and well-embedded, with no significant signs of movement or structural failure, making them appropriate for over-sleeving or internal reinforcement.

A.2. Maintenance of Floating Dock System and Damaged Timber Piles

As noted previously, storm events and heavy seasonal use can result in wear of the floating dock system within the shipyard. The Project seeks to obtain an OOC to address necessary maintenance activities. Routine float maintenance is not anticipated to result in permanent impacts to resource areas. Temporary and/or indirect impacts may occur, such as shading from vessels used during boat-based maintenance activities.

B. Regulatory Agency Coordination

As described in the NOI, the Project will implement Best Management Practices (BMPs) to ensure compliance with the WPA and the Hingham Bylaw. These BMPs are designed to avoid, minimize, and mitigate potential impacts to resource areas to the maximum extent practicable. No permanent impacts are anticipated from routine maintenance or repairs to the floating dock system. Temporary or indirect impacts may occur from pile repair or timber pile replacement, as well as from vessel shading during boat-based maintenance activities.

HSM will notify the Commission of each maintenance activity conducted within jurisdictional areas. The proposed work is expected to occur over the standard three-year term of an OOC. As the preferred approaches to repairs are finalized, HSM will provide the Commission with applicable documentation and materials.

A small portion of the Project site includes Land Containing Shellfish (LCS) at the southwestern corner near "L Dock" (see Attachment 1). If future activities involve any disturbance of the substrate, HSM will coordinate with the Shellfish Constable, Conservation Commission, and/or the Massachusetts Division of Marine Fisheries (DMF) to evaluate potential LCS impacts, consistent with 310 CMR 10.34.

We appreciate the Commission's attention to this matter. Should you have any questions, need additional information, or wish to schedule a site visit, please don't hesitate to contact me at Fiona.Vardy@foth.com, or (401) 910-7720. Thank you again for your assistance.

Sincerely,
Foth Infrastructure & Environment, LLC

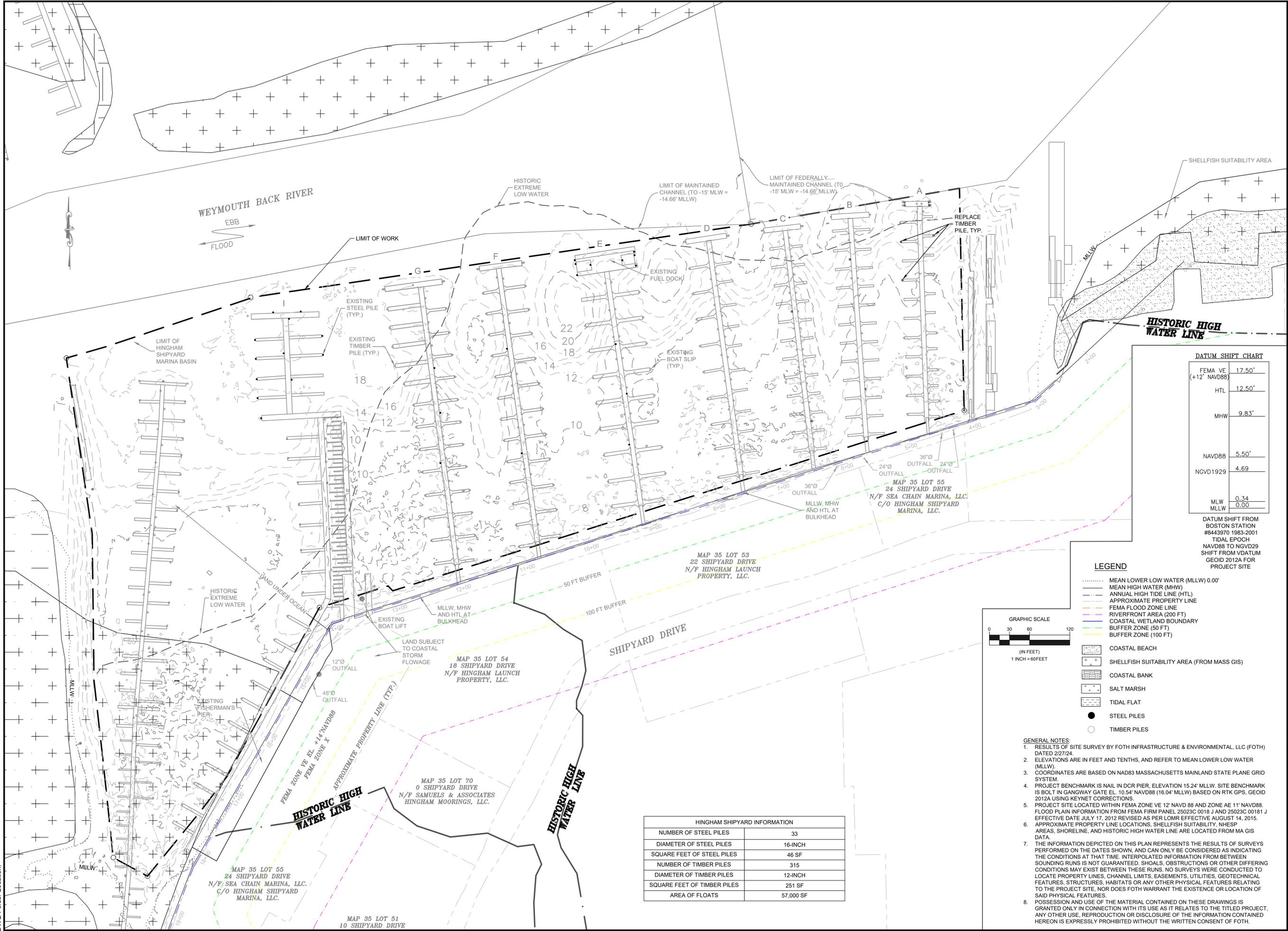


Fiona Vardy
Lead Environmental Regulatory Specialist

Cc: Carlos Peña, P.E. (Foth)
Matt Riley (HSM)

Attachment 1 Site Plan

Attachment 1
Site Plan



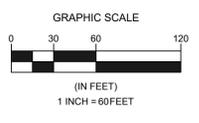
DATUM SHIFT CHART

FEMA VE (+12' NAVD88)	17.50'
HTL	12.50'
MHW	9.83'
NAVD88	5.50'
NGVD1929	4.69'
MLW	0.34'
MLLW	0.00'

DATUM SHIFT FROM BOSTON STATION #8443970 1983-2001 TIDAL EPOCH NAVD88 TO NGVD29 SHIFT FROM VDATUM GEOID 2012A FOR PROJECT SITE

LEGEND

- MEAN LOWER LOW WATER (MLLW) 0.00'
- MEAN HIGH WATER (MHW)
- ANNUAL HIGH TIDE LINE (HTL)
- APPROXIMATE PROPERTY LINE
- FEMA FLOOD ZONE LINE
- RIVERFRONT AREA (200 FT)
- COASTAL WETLAND BOUNDARY
- BUFFER ZONE (50 FT)
- BUFFER ZONE (100 FT)
- [Symbol] COASTAL BEACH
- [Symbol] SHELLFISH SUITABILITY AREA (FROM MASS GIS)
- [Symbol] COASTAL BANK
- [Symbol] SALT MARSH
- [Symbol] TIDAL FLAT
- [Symbol] STEEL PILES
- [Symbol] TIMBER PILES



GENERAL NOTES:

- RESULTS OF SITE SURVEY BY FOTH INFRASTRUCTURE & ENVIRONMENTAL, LLC (FOTH) DATED 2/27/24.
- ELEVATIONS ARE IN FEET AND TENTHS, AND REFER TO MEAN LOWER LOW WATER (MLLW).
- COORDINATES ARE BASED ON NAD83 MASSACHUSETTS MAINLAND STATE PLANE GRID SYSTEM.
- PROJECT BENCHMARK IS NAIL IN DCR PIER, ELEVATION 15.24' MLLW. SITE BENCHMARK IS BOLT IN GANGWAY GATE EL. 10.54' NAVD88 (16.04' MLLW) BASED ON RTK GPS, GEOID 2012A USING KEYNET CORRECTIONS.
- PROJECT SITE LOCATED WITHIN FEMA ZONE VE 12' NAVD 88 AND ZONE AE 11' NAVD88. FLOOD PLAIN INFORMATION FROM FEMA FIRM PANEL 25023C 0018 J AND 25023C 00181 J EFFECTIVE DATE JULY 17, 2012 REVISED AS PER LOMR EFFECTIVE AUGUST 14, 2015.
- APPROXIMATE PROPERTY LINE LOCATIONS, SHELLFISH SUITABILITY, NHESP AREAS, SHORELINE, AND HISTORIC HIGH WATER LINE ARE LOCATED FROM MA GIS DATA.
- THE INFORMATION DEPICTED ON THIS PLAN REPRESENTS THE RESULTS OF SURVEYS PERFORMED ON THE DATES SHOWN, AND CAN ONLY BE CONSIDERED AS INDICATING THE CONDITIONS AT THAT TIME. INTERPOLATED INFORMATION FROM BETWEEN SOUNDING RUNS IS NOT GUARANTEED. SHOALS, OBSTRUCTIONS OR OTHER DIFFERING CONDITIONS MAY EXIST BETWEEN THESE RUNS. NO SURVEYS WERE CONDUCTED TO LOCATE PROPERTY LINES, CHANNEL LIMITS, EASEMENTS, UTILITIES, GEOTECHNICAL FEATURES, STRUCTURES, HABITATS OR ANY OTHER PHYSICAL FEATURES RELATING TO THE PROJECT SITE. NOR DOES FOTH WARRANT THE EXISTENCE OR LOCATION OF SAID PHYSICAL FEATURES.
- POSSESSION AND USE OF THE MATERIAL CONTAINED ON THESE DRAWINGS IS GRANTED ONLY IN CONNECTION WITH ITS USE AS IT RELATES TO THE TITLED PROJECT. ANY OTHER USE, REPRODUCTION OR DISCLOSURE OF THE INFORMATION CONTAINED HEREON IS EXPRESSLY PROHIBITED WITHOUT THE WRITTEN CONSENT OF FOTH.

HINGHAM SHIPYARD INFORMATION

NUMBER OF STEEL PILES	33
DIAMETER OF STEEL PILES	16-INCH
SQUARE FEET OF STEEL PILES	46 SF
NUMBER OF TIMBER PILES	315
DIAMETER OF TIMBER PILES	12-INCH
SQUARE FEET OF TIMBER PILES	251 SF
AREA OF FLOATS	57,000 SF

REVISIONS

NO.	DATE	DESCRIPTION

DATE OF PREPARATION

BY	DATE
SURVEYED JER	02/27/24
DRAWN CJS	03/15/24
DESIGNED	-
CHECKED	-

SHEET TITLE:
SITE PLAN

ISSUANCE:
FOR PERMITTING PURPOSES ONLY

PROJECT NO: 007H063.24
 SHEET NUMBER