

January 11, 2021

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

Re: 100 Industrial Park Road

Dear Ms. Savage-Dunham:

Listed below are questions and concerns raised at the December 14, 2020, Planning Board meeting. Our responses are indicated below in ***bold italic*** text and are as follows:

GARY TONDORF-DICK

1. Concern over the intensity of use – larger vehicles are to be used than what the infrastructure can handle.

***Response: The traffic at this facility will be a mix of standard passenger vehicles for employees and flex deliveries, and delivery vans. It will also include a limited number of larger trucks, most of which will arrive and depart during evening and overnight hours. This traffic is in no way inconsistent with the type of traffic customary in industrial districts and industrial parks.***

2. The National model in terms of drainage and flow is increasing every year. The modeling for the project site's stormwater management is containing the water and slowing the flow down. The volume coming off of this site is equal to the volume that's coming across and through the culvert at Abington Street from other adjacent sites. Problematically, we are exceeding the 2.5 acres of the site by increasing the impervious area which creates a demand on the natural infrastructure.

***Response: The actual increase in impervious for the Site is between 1.37 acres and 2.17 acres. The drainage calculations were performed with the more conservative 2.17 acres; however, there is 0.8 acres of rock ledge outcrop on the Site that is proposed to be removed for additional parking. While some runoff may find its way through the***

*existing rock outcrop, most of the rainfall will find the faster path of draining down the rock to the existing pavement located around the base of the raised outcrop.*

*Rainfall information for the stormwater analysis is from NOAA's National Weather Service Atlas 14 data for this location. The Civil Peer Reviewer has stated that there are no known past flooding issues for this culvert and no comments have been received by DPW about flooding for this existing culvert. The stormwater flow from the increase in impervious area is managed on-site using detention and outlet control structures to limit peak flow rates. Additionally, an analysis of the contributing drainage area to the downstream culvert in Abington Street demonstrates that the impact of the proposed development, and the increase in volume, will not increase the runoff rate for the watershed area to the culvert. Therefore, the development does not impact, to any significant amount, the existing condition of the downstream culvert. Further details of this analysis can be found in the provided Stormwater Management Report.*

- a. What is allowed under the by-right for stormwater management (including flow, recharge, and infiltration) compared to what is requested under the waiver?

*Response: The application complies with the requirements of the Massachusetts Stormwater Handbook and the Planning Board's site plan review standards for stormwater management and is not asking for a waiver. The repeated use of the term "waiver" in these dialogs is not technically accurate as the ground water recharge requirements for an Activity Use Limitation site are to be accomplished to the "maximum extent possible". A waiver is neither required nor requested by the Project. The Massachusetts Stormwater Handbook Volume 1 Standard 3 (page7) states: "MassDEP also recognizes that on some sites, there is a risk that infiltrating the required recharge volume may cause or contribute to groundwater contamination. Consequently, MassDEP requires infiltration only to the maximum extent practicable..."*

*The site LSP has identified areas of the Site where recharge is acceptable. Test pits have been performed in all of those areas to determine if recharge could be provided. A Drainage Test Pit Memorandum was provided to the Town on 1/8/2021.*

- b. What is a benefit (or pro) about the proposed stormwater management for the redevelopment that the Town should understand?

*Response: There is no existing stormwater treatment system for the Site. That is, the existing site, which has 9.5 acres of impervious area, currently discharges all of the untreated stormwater (of every storm event), without retention or detention directly to the wetlands in the southeast corner of the Site.*

*Under proposed conditions the project will collect and treat stormwater with:*

- *26 new catch basin structures with sumps*
- *12 Slow splitters*
- *12 Oil/Grit separators with a combined water quality volume of 28,098 cubic feet (210,187 gallons)*
- *53 manholes*
- *4,763 feet of stormwater pipe ranging in size from 18” to 36” diameter.*
- *A constructed stormwater detention basin with total detention volume of 52,224 cubic feet (390,662 gallons).*

*The proposed stormwater system goes beyond what is required for a re-development site, as the proposed design will treat the 1” water quality volume for the entire pavement area (8.4 acres) of the Site not just the additional impervious area of 1.37 acres.*

*The existing stormwater infrastructure at the Site does not meet current standards of the Massachusetts Stormwater Handbook. The proposed re-development for this site complies with all of the Massachusetts Stormwater Handbook requirements including ground water recharge in that it meets these standards to the maximum extent practicable given the AUL condition for this site. A field investigation was conducted on December 29, 2020 in order to determine if there was recharge in the northwest portion of the Site, previously not investigated. The results of this investigation found the areas tested to be unsuitable for recharge due to the presence of high groundwater traits. This is in addition to a drainage investigation that occurred on June 25, 2020 around the subject property to identify suitability of proposed systems early in the design process.*

## JUDITH SNEATH

1. How does the delivery station impact the air and stormwater runoff?

*Response: The delivery station will not have any detrimental impacts on air quality compared to other commercial and industrial uses. It does not generate any process emissions. Amazon requires compliance with regulatory requirements limiting vehicle idling and ensures that delivery vans receive regular maintenance. All of the captured stormwater from the parking surface is routed through oil-grit separators prior to discharging to the constructed stormwater wetland treatment basin. The proposed stormwater management has been designed to conform to the Massachusetts Stormwater Handbook, Standard 5 for a Land Use with Higher Potential Pollutant Loads (LUHPPL) to account for the intended vehicle use on site.*

2. (Along with Kevin Ellis) Immense concern over utilizing off-site space (Commerce Road) to do on-site movements, especially with potentially having on-street parking.

***Response: The plans have been revised to eliminate the need to use Commerce Way for van circulation. Vans will arrive at the Site using the Commerce Way entrances, and from that point circulation will occur within the Site.***

3. Collector streets around South Hingham are currently experiencing heavy through-way traffic. We really need to talk about what routes these trucks are going to take to know and protect the local neighborhoods.

***Response: Tractor-trailers will be accessing the Site via Route 3 since they will be coming from other Amazon facilities that are more than an hour away. Heavy vehicles, especially tractor trailer traffic, will be entering and exiting the Site during non-peak hours. Amazon logistics prides itself on speed and efficiency so heavy vehicles will be using the fastest routes.***

#### JOHN CHESSIA

1. Because it's hard to keep water in the permanent pool, recommends that the permanent pool in the Stormwater Wetland basin should be 3 feet deep.

***Response: The micropool and forebay will be 3.5 feet deep.***

2. A waiver is needed for stormwater recharge and infiltration.

Planning Board - What are the circumstances the applicant is dealing with aside from having to maximize the use of the site?

***Response: A waiver is neither required nor requested by the Project. The repeated use of the term "waiver" in these dialogs is not technically accurate as the ground water recharge requirements for an Activity Use Limitation site are to be accomplished to the "maximum extent possible".***

***The Applicant complies with the Massachusetts Stormwater Handbook requirements for stormwater recharge and infiltration and does not require a waiver. The Stormwater Handbook states that sites that have an Activity and Use Limitation are required to comply with these standards "to the maximum extent practicable." The applicant satisfies that standard. Massachusetts Stormwater Handbook Volume 1 Standard 3 (page 7) states: "MassDEP also recognizes that on some sites, there is a risk that infiltrating the required recharge volume may cause or contribute to groundwater contamination. Consequently, MassDEP requires infiltration only to the maximum extent practicable on the following sites: sites where recharge is proposed at or adjacent to an area classified as contaminated, sites where contamination has been capped in place; sites that have an Activity and Use Limitation (AUL) that precludes inducing runoff to the groundwater, pursuant to MGL Chapter 21E and the Massachusetts Contingency Plan 310 CMR 40.0000. For purposes of Standard 3, "to the maximum extent practicable" means that:***

- (1) **The applicant has made all reasonable efforts to meet the Standard;**
- (2) **The applicant has made a complete evaluation of all possible applicable infiltration measures, including environmentally sensitive site design that minimizes land disturbance and impervious surfaces, low impact development techniques, and structural stormwater best management practices; and**
- (3) **If the post-development recharge does not at least approximate the annual recharge from pre-development conditions, the applicant has demonstrated that s/he is implementing the highest practicable method for infiltrating stormwater.”**

*The site LSP has identified areas of the Site where recharge is acceptable. Test pits have been performed in all of those areas to determine if recharge could be provided. A Drainage Test Pit Memorandum was provided to the Town on 1/8/2021.*

*A field investigation was conducted on December 29, 2020 in order to determine if there was recharge potential on a portion of 100 Industrial Park Road in Hingham, Massachusetts. Present for the investigation was Alexander Klose, E.I.T. from BL Companies, Todd MacDonald from BSC Group and Paul Brogna, P.E., a witness for the Town of Hingham. This is in addition to a drainage investigation that occurred on June 25, 2020 around the subject property to identify suitability of proposed systems early in the design process. The results of this investigation found the areas tested to be unsuitable for recharge due to the presence of high groundwater traits. Please see the Drainage Test Pit Investigation Memorandum enclosed for more information.*

3. (And Planning Board) Can we designate some more areas throughout the site for snow storage?

*Response: Additional snow storage has been identified on the OM-1 plan, “Snow Storage Prohibited” signs have been added to the Site Plan along the south and southeastern portion of the site. Additionally, Provisions have also been added within the operations and maintenance manual for the use of snow melting equipment to relieve snow storage issues for high precipitation events.*

#### KEVIN ELLIS

1. What does peak operation look like, especially during the holiday season? How does that impact queuing and flow? Can the study area at large handle this potential influx of traffic?

*Response: As addressed at the hearing [and discussed in the response to Dirk #2 below], peak operation involves Amazon running earlier and later “waves” of delivery vans, not running more vans per wave. There will be no change to queuing and on-site traffic flow as a result of peak operations. The Applicant met with Mass DOT and is*

*updating the traffic analysis to address holiday peak according to parameters provided by MassDOT. This is reflected in an addendum to the Traffic Impact Study detailing the findings of this analysis.*

#### JEFFREY DIRK

1. The applicant/counsel should demonstrate that they have the rights to use Commerce Road as a function for vans to leave site and re-enter for loading.

***Response: The plans have been revised to change internal circulation and eliminate the need to use Commerce Way for that purpose.***

2. The applicant should provide a differential in traffic conditions between peak and average conditions.

***Response: During peak periods, Amazon expects to add approximately 2 additional waves of delivery van departures. This would increase the number of vans dispatched from the Site to approximately 260 during peak seasons, as compared with the 191 that Amazon expects to dispatch during typical steady state operations. The waves would be added to the beginning or the end of the currently proposed operations. This means that the waves could start departing at 9:30 AM and still end at 11:30 or the vans could still commence departing at 10:10 AM and end at 12:10 PM.***

#### ATTORNEY JEFFERY TOCCHIO

1. Revise fire truck turning plan according to the current Town of Hingham specifications.

***Response: The correct Hingham apparatus was used per the specifications provided by the Fire Marshal as shown on plan sheet TT-1. The detail of the fire truck in the top right corner of Sheet TT-1 was mislabeled:***

- ***The curb to curb radius was labeled as 24.5 ft. versus 40.08 ft.***
- ***The overall length was labeled as 41.67' versus 42.33 ft.***

***The detail on Sheet TT-1 has subsequently been corrected.***

- a. A fire truck driving through the one-way van exit to access the back lot of the adjacent property may be problematic.

***Response: If fire trucks were dispatched to the Site or adjacent property, Amazon would be aware of the need to keep this emergency access clear and would do so. While there is no current agreement in place for the abutter's use of the subject site's driveway, the Owner has no objection to its use for public safety.***

2. Still has a concern over the 90 degree bend where vans are exiting from the proposed site. A number of pedestrians walk along Industrial Park Road, especially at the 90 degree bend, a sidewalk may be necessary.

***Response: The plans provide adequate sight distance along Industrial Park Road for the vans using the right turn only exit onto Industrial Park Road. Industrial Park Road is a Town-owned road. The Applicant is willing to add a sidewalk along the frontage of 100 Industrial Park Road if the Board agrees that pedestrian usage of that stretch of the road warrants that improvement.***

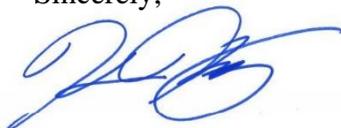
SUE SULLIVAN (PUBLIC)

1. The traffic study done this year on the intersections along Derby Street is not incongruent with the November 2017 South Hingham traffic study that shows some of those intersections having different levels of service such as levels D and F. The concern is that the latest traffic study was done during Covid-19 where people were traveling less on the roadways.

***Response: The report that was produced in November 2017 (well prior to the Covid-19 pandemic) does not incorporate the traffic signal and roadway improvements that were built in 2019. All intersections, overall, operate at acceptable levels when analyzing the Derby Street corridor with the improvements.***

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

Sincerely,



Kevin Hixson  
Senior Project Manager