



May 11, 2026

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

RE: NOI Supplemental Information  
DEP File #: 034-1559  
Town of Hingham Carlson Complex Pickleball Courts  
25 Bare Cove Park Drive, Hingham, MA 02043  
Parcel ID: 69-0-44

Dear Ms. Palmer & Members of the Conservation Commission:

On behalf of the Applicant, the Town of Hingham Recreation Department, CHA Consulting, Inc. is pleased to provide this Supplemental Information and Attachments for the Carlson Complex Pickleball Courts NOI Application reviewed at the Town of Hingham Conservation Commission public hearing on April 13, 2026. An email was submitted to the Applicant and CHA on April 09, 2026 by Shannon Palmer, Conservation Officer, requesting additional information in response to the NOI Application submitted to the Conservation Commission by the Applicant on March 27, 2026. The questions are numbered sequentially and italicized with the applicable individual responses are in regular font. Attachments are referenced in the responses.

**NOI Application:**

**1. The title and date of all plans should be included on page 8 of WPA Form 3.**

See attached revised WPA Form 3, Page 8 and attached “List of Project Plans”.

**2. The project narrative references 9 pickleball courts. Please ensure all project references are for 8 courts as proposed. The number of proposed pickleball courts is eight (8).**

*The project is proposing eight (8) pickleball courts as seen on the revised Site Plans*

**3. Staff recommends the buffer zone restoration be expanded to include additional plantings (native shrubs appropriate to the area) and hand removal of construction debris and junk as previously discussed. Please add to Sections 4.1 and 4.4. Expanding and improving the restoration area will further benefit the resource areas and result in an improvement to the wetland values of riverfront area and buffer zone including protection of**

**water supply, erosion and sedimentation control, prevention of water pollution, protection of wildlife habitat, protection of open space and protection of aesthetics.**

Twenty (20) shrubs (three varieties: silky dogwood (*Cornus amomum*), common inkberry (*Ilex glabra*) and Northern arrow-wood (*Viburnum dentatum*)) have been added to the restoration area. See Site Plans.

The goal of this project is to raze the existing navel, depot warehouse building and essentially replace, within the building footprint, the proposed eight (8) pickleball courts. Minor buffer zone impact with revegetation is included in the project. However, major buffer zone and Riverfront Area impact and restoration is not part of the scope of the project, and considering the BVW, CVP and Weymouth Back River ACEC resource areas, major restoration could be part of another rehabilitation project due to the fact that a portion of the construction debris, wells/pipes/culverts and cement blocks are present within environmental resource areas themselves, not just buffer zones.

As identified in Section 4.4 of the NOI, monitoring and maintenance will occur during the construction phase of the project and until all final approvals have been obtained. Invasive species will be identified during and after construction and invasive species control/ maintenance is identified in the Stormwater Report under the Long-term Stormwater Operation and Maintenance Plan (O&M). Any restoration of disturbed areas due to control/eradication will be determined at that time. Erosion and sediment control (ESC) measures will remain in place during the various phases of construction until the disturbed areas are fully stabilized. The Contractor shall conduct follow-up inspections of all disturbed areas after the first and second growing seasons to determine the success of re-vegetation.

- 4. Section 4.4 and the project plan should clearly identify the location and square footage of the restoration area(s). (graphic?) If all areas being seeded/planted within jurisdictional areas outside fence including slopes are considered the restoration area, please note and include total square footage.**

The total s.f. of restoration areas (0-50 foot buffer, 50-100 foot buffer, 100- 200 foot outer Riverfront Area riparian zone, and certified vernal pool (CVP) 100-foot “no disturbance” buffer Zone is 7,601 square feet (s.f.) No work is proposed outside of the erosion and sediment control (ESC) measures identified on the Site Plans One goal, in addition to razing the impervious area (building, park area, etc.) within the local 50-foot buffer, the local and state 100-foot buffer, the local “no disturbance” CVP 100-foot buffer and the outer 100-200 foot Riverfront Area riparian zone, was constructing the pickleball courts within the essential building footprint and to reduce impacts to the local and state buffers and the outer 100-200 foot Riverfront Area riparian zone. As referenced above, rehabilitation of the more expansive area may be performed more appropriately in another restoration area project. Note that for this project, we are reducing impervious area and proposing restoration.

- 5. A mitigation summary table was not included. The impact table provided is helpful however does not clearly show impacts what alteration require mitigation in accordance with the Buffer Zone Mitigation Policy.**

Section 7.1 of the NOI, as well as the Site Plans, provide mitigation discussion/measures for the project. As discussed in Section 7.2 of the NOI and summarized in the table below, the Town of Hingham Buffer Zone Mitigation Policy (BZMP) requires mitigation for work within the 0-50 foot, the 50-100 foot and the CVP local 100-foot undisturbed buffer zones under the Town of Hingham, MA Wetlands Protection Bylaw and Regulations (Article 22).

| <b>Location in Buffer Zone<sup>1,2</sup></b> | <b>Existing Conditions</b>     | <b>Proposed Conditions</b>    | <b>Proposed Change</b> | <b>Mitigation Required (to Altered Areas)</b> |
|----------------------------------------------|--------------------------------|-------------------------------|------------------------|-----------------------------------------------|
| 0-50 Foot Buffer <sup>3</sup>                | Pervious Surface = 1,357 sf    | Pervious Surface = 2,473 sf   | Increase of 1,116 sf   | 1:1 Mitigation exceeded                       |
|                                              | Impervious Surface = 1,116 sf  | Impervious Surface = 0 sf     | Decrease of 1,116 sf   | No Mitigation required                        |
| 50-100 Foot Buffer <sup>3</sup>              | Pervious Surface = 589 sf      | Pervious Surface = 4,785 sf   | Increase of 4,196 sf   | No Mitigation required – Mitigation provided  |
|                                              | Impervious Surface = 12,002 sf | Impervious Surface = 8,287 sf | Decrease of = 3,715 sf | No Mitigation required                        |
| CVP 100-foot Un-disturb Buffer               | Pervious Surface = 418 sf      | Pervious Surface = 824 sf     | Increase of 406 sf     | 2:1 Mitigation exceeded                       |
|                                              | Impervious Surface = 406 sf    | Impervious Surface = 0 sf     | Decrease of 406 sf     | No Mitigation required                        |

<sup>1</sup>Note: As defined under the BZMP “mitigation is not required when existing area to be altered is an impervious surface”, defined in part as: building rooftops, parking lots/paved surfaces, etc. However, mitigation is proposed.

<sup>2</sup> Note: Mitigation is proposed to restore/rehabilitate pervious surfaces as identified in the NOI under Section 4.4 and Site Plans (Section V).

<sup>3</sup> Note: Does not include CVP s.f. area

- 6. Section 4.4 paragraph 3 refers to the proposed bioretention area as part of the restoration plan. Please clarify as generally stormwater features are not considered buffer zone restoration.**

The infiltration area recharges groundwater, filters surface runoff and prevents erosion and although a stormwater feature, is also part of the overall site restoration improvements and integral to protection of the adjacent resource areas and is not within the buffer zones.

- 7. Section 4.4 refers to Rough Grading for the restoration area however proposed grades are not shown on the grading plan or site plan (in area behind building being demolished).**

Proposed grades are shown on the Grading Site Plan (See Sheet C-200) as contours and spot elevations. If there are no spot elevations or proposed \contours

are identified it is assumed to be existing gradients. We have added an 18-foot contour at the bottom of the retaining wall to highlight the proposed grade at the bottom of the wall.

- 8. Section 5.1 Erosion and Sediment Control refers to 573 linear feet of ESC measures however page 19 Section 7.11 refers to 1,365 linear feet. Please correct.**

Erosion and Sediment Control (ESC) measures in the form of filter tubes and/or silt sock total 1,365 linear feet (l.f.) for the project as seen on attached, revised Site Plans

- 9. Section 5.6 should include statement regarding stabilization with “native seed mix” and the erosion controls shall not be removed “until authorized by the Conservation Officer.”**

Reference to “native seed mix has been added to Section 5.6. A statement including “until authorized by the Conservation Officer” has been added to the text in Section 5.7. These will be included on the Site Plans as well.

- 10. The RA alternatives should focus on how each alternative will impact the wetland values of the riverfront. Please expand on how the preferred alternative will meet the project objectives (define objectives) and how this alternative varies from the other alternatives in regards to impacts on the riverfront.**

An Alternatives Analysis for this redevelopment project is not required under 310 CMR10.58 (5) but is required under the Hingham Wetland Regulations, Section 21.1(5), to include lots adjacent or in the near vicinity. Alternatives were considered and/or rejected due to impacts to wetland values and are discussed in Section 6.0 of the NOI Narrative as well as a 2024 initial study for the project as summarized below and which can be found at <https://www.hingham-ma.gov/DocumentCenter/View/22324/Pickleball-Presentation-11-6-24?bidId=>

An initial study completed in May 2024 was developed to determine the best location for the pickleball courts. Seven (7) sites were selected, and site visits and assessments were conducted for each location. In addition, two (2) public outreach meetings scheduled. Site parameters included, but were not limited to existing facilities and constraints, town location, parking availability, proximity to abutters, surface and subsurface considerations as well as overall cost. Two sites, both on Town Properties within connection to the Hingham Recreation Department - Carlson Complex, were selected. The proposed project site was selected for several reasons: the connection to the existing Carlson Complex; ADA general access; remote location from abutters (more than 780 feet) with a wooded buffer; and the opportunity to redevelop an existing dilapidated warehouse site.

The selected alternative for the proposed project includes removal of the navel, depot warehouse building and reduction of impervious area will be realized. Revegetation and replanting with tree and shrub rootstock is proposed along with indigenous seed mixes to restore these areas. The project will enhance the Outer 100-200 Riverfront Area riparian zone. Incremental reductions from 12 to 8 pickleball courts and the reduction of impervious area and revegetation of pervious area with indigenous species will improve all wetland values in term of: public and/or private water supplies; groundwater supply; provision of flood control and storm damage prevention, as applicable; prevention of pollution; and, protection of wildlife habitat, as applicable.

**11. Section 7.0 Regulatory Compliance did not include a performance standards analysis for compliance with 3210 CMR 10.58(5). This section should document compliance with both the local and state regulations for impacts to RA and Buffer Zone (HWR Section 22.0(d). Staff also recommends Section 7.1.1 be expanded to clearly demonstrate how the project is improving the interests of the WPA and wetland values of the HWR. The narrative should also clearly document impacts in the riverfront area have been minimized to the maximum extent practical and the resulting improvements from existing conditions.**

As discussed above, the proposed reduction of the pickleball courts and expansion of pervious areas revegetated with tree and shrub rootstock represents an improvement of existing conditions.

The project qualifies under the Massachusetts Department of Environmental Protection (DEP) Wetlands Protection Act (WPA) (310 CMR 10.00) as a Riverfront Area redevelopment project for “*reuse of degraded or previously developed areas*” under 310 CMR 10.58(5) (a) & (b):

- 310 CMR 10.58(5)(a) – *At a minimum, proposed work shall result in an improvement over existing conditions of the capacity of the riverfront area to protect the interests identified in M.G.L. c. 131 § 40.*

The goal of this project is to raze the existing navel, depot warehouse building and essentially replace, within the building footprint and parking area, the proposed eight (8) pickleball courts. The total s.f. of restoration areas (0-50 foot buffer, 50-100 foot buffer, 100-200 foot outer Riverfront Area riparian zone, and certified vernal pool (CVP) 100-foot “no disturbance” buffer Zone is 7,601 square feet (s.f.). The new pervious area will be stabilized/restored and revegetated with indigenous conservation seed mixes and tree rootstock. Tree replacement is in accordance with the Town of Hingham, MA Wetlands Protection Bylaw and Regulations (Article 22) (See Section 4.4 and Site Plans - Section V). Shrubs plantings are included in the restoration plan as well. A number of the trees and shrubs occur within the CVP 100-foot undisturbed buffer “Vernal Pool Protection Zone”. A new stormwater management collection system will be added and include two deep-sump catch basins, placed in series,

and an infiltration basin. The infiltration area recharges groundwater, filters surface runoff and prevents erosion and although a stormwater feature, is also part of the overall site restoration improvements and integral to protection of the adjacent resource areas and is not within the buffer zones or Riverfront Area.

- 310 CMR 10.58(5)(b) – *Stormwater management is provided according to standards established by the Department.* The proposed project and storm drainage system improvements will result in approximately 4,152 s.f. of alteration to the outer 100-foot Riverfront Area riparian zone. No work is proposed within the inner 100-foot Riverfront Area riparian zone. The total Riverfront Area for the 2.25-acre (ac)/98,010 s.f. parcel is 51,929 s.f. The proposed impact of 4,152 s.f. represents only approximately 8% of the total Riverfront Area of the property and falls within the allowable 10% development for proposed projects. Of this area, approximately 2,647 s.f. will occur within existing impervious area (depot warehouse building/parking areas – See Site Plans – Section V). This will result in an approximate reduction of 2,632 s.f. of impervious area and restoration of 4,137 s.f. new pervious/revegetated area within the outer 100-foot Riverfront Area as a result of project construction. The new pervious area will be stabilized/restored and revegetated with indigenous conservation seed mixes and tree rootstock. Tree replacement is in accordance with the Town of Hingham, MA Wetlands Protection Bylaw and Regulations (Article 22) (See Section 4.4 and Site Plans - Section V). Shrubs plantings are included in the restoration plan as well. A number of the trees and shrubs occur within the CVP 100-foot undisturbed buffer “Vernal Pool Protection Zone”.

It should be noted that the majority of criteria under 310 CMR 10.58(5)(c) - (h) have partial compliance and/or are in compliance to the maximum extent practicable as discuss below.

310 CMR 10.58(5)(c) - *Within 200-foot Riverfront Areas, proposed work shall not be located closer to the river than existing conditions or 100 feet, whichever is less, or not closer than existing conditions.*

Project is in compliance with requirement as identified above and/or on Site Plans. The proposed pickleball courts and associated facilities will occur only within the disturbed outer 100-200 foot Riverfront Area and impervious areas will be located further away than existing conditions. No work is proposed in the inner 0-100 foot Riverfront Area

310 CMR 10.58(5)(d) - *Proposed work, including expansion of existing structures, shall be located outside the riverfront area or toward the riverfront area boundary and away from the river...*

Project is in compliance with requirement as identified above and/or on Site Plans. The proposed pickleball courts and associated facilities occur further away from the BVW and inland banks of the intermittent/perennial waterbodies than the existing building, etc. within the disturbed outer 100-200 foot Riverfront Area.

310 CMR 10.58(5)(e) - *The area of proposed work shall not exceed the amount of degraded area, provided that the proposed work may alter up to 10% if the degraded area is less than 10% of the riverfront area...*

The Project is in compliance with this requirement as identified above and/or on Site Plans. The total Riverfront Area for the 2.25-acre (ac)/98,010 s.f. parcel is 51,929 s.f. The proposed impact of 4,152 s.f. represents only approximately 8% of the total Riverfront Area on the property and falls within the allowable 10% development for proposed projects. Of this area, approximately 2,647 s.f. will occur within existing degraded/ impervious area (depot warehouse building/parking areas – See Site Plans – Section V). This will result in an approximate reduction of 2,632 s.f. of impervious area and restoration of 4,137 s.f. new pervious, restored/revegetated area.

310 CMR 10.58(5)(f) - *When an applicant proposes restoration on-site of degraded riverfront area, alteration may be allowed notwithstanding the criteria of 310 CMR 10.58(5)(c), (d), and (e) at a ratio in square feet of at least 1:1 of restored area to area of alteration....*

Project is in compliance with requirement as identified above, in project narrative/above discussion and/or on Site Plans.

310 CMR 10.58(5)(g) - *When an applicant proposes mitigation either on-site or in the riverfront area within the same general area of the river basin, alteration may be allowed notwithstanding the criteria of 310 CMR 10.58(5)(c), (d), or (e) at a ratio in square feet of at least 2:1 of mitigation area to area of alteration*

Project is in compliance with requirement as identified above, in project narrative/above discussion and/or on Site Plans.

310 CMR 10.58(5)(h) - *The issuing authority shall include a continuing condition in the Certificate of Compliance for projects under 310 CMR 10.58(5)(f) or (g) prohibiting further alteration within the restoration or mitigation area...*

The Applicant agrees to prohibiting further alteration within the restoration or mitigation area.

As discussed in Section 7.2 of the NOI and summarized in the table in response to Question #5 above, the Town of Hingham Buffer Zone Mitigation Policy (BZMP) requires mitigation for work within the 0-50 foot, the 50-100 foot and the CVP local 100-foot undisturbed buffer zones under the Town of Hingham, MA Wetlands Protection Bylaw and Regulations (Article 22).

**12. The DOA issued for the wetland boundaries did not include MAHW/Inland Bank for the perennial stream. Please refer to the ORAD issued for 100 Beal Street (DEP No. 034-1509) on 11/7/2024 and include in Attachments.**

We have included the ORAD issued for 100 Beal Street (DEP No. 034-1509) on 11/7/2024 as an attachment for reference to the Riverfront Area for this project. The Inland Bank for the perennial stream (Channel 2), identified on the Site Plans for the 100 Beal Street Project and confirmed by Concom at that time, is used to establish the boundary of Riverfront Area. However, it should be noted that the Inland Bank is off property to the west and not considered part of the project.

- 13. The Stormwater Report will be reviewed by the town's consulting engineer through the Planning Board however please note: Standard 8 on the Checklist is blank, the O&M plan does not include all required components; the illicit discharge statement is not signed; the O&M references this project as "private" which it is not; all of the drainage system components are not included in the long term O&M. A SWPPP will be required prior to construction as disturbance is over 1 acre.**

The "illicit discharge statement" has been signed and is attached. The reference to the project as "Private" in the Stormwater Report has been corrected. Drainage system components have been added and are included in the attached, updated Stormwater Report with updates to the long-term O&M Plan. It should be noted that soil testing (see attached soil logs) have been conducted to establish the depths of the water table and sediment size composition and a discussion is included in the Stormwater Report. Finally, a SWPPP will be prepared for review and approval by the Conservation Commission prior to the start of Construction.

- 14. The project proposes new catch basins without a deep sump. Please explain why deep sump basins cannot be installed which would provide additional treatment and further improve stormwater runoff.**

Two deep-sump catch basins placed in series, the first with a hood, have been added to the stormwater management collection system. This will provide appropriate TSS remove prior to discharge to the infiltration basin per requirement of the MA Stormwater Management Regulations. Note that no work is proposed for the existing infiltration catch basin within the CVP buffer zone or 10-inch clay pipe connection, although a lid for the basin will be provided during the construction phase for current and future safety purposes.

**Site Plans:**

- 15. Only the title sheet is stamped by the registered Professional Engineer. The Commission will need to determine if the additional plan sheets should be stamped by the PE/PLS.**

The title sheet is stamped by the registered Professional Engineer.

- 16. Sheet C-020, Note 12 refers to the town engineer approving tree protection measures. Please correct to the appropriate town official as the Town Engineer does not inspect tree protection measures.**

Sheet C- 02 has been changed to reference Official Representative of the Town instead of the Town Engineer.

- 17. The plan is not color coded as recommended by the NOI checklist. This is very helpful for demonstration purposes especially on plans with multiple resource area boundaries.**

Color coding has been added to the plans and Exhibits W-1 to W-3 and S-1.

- 18. The General Notes on Sheet C-020 should include reference the wetland delineation(s) as required by the NOI checklist.**

The reference to the wetland delineation(s) as required by the NOI checklist have been added to the General Notes on Sheet C-020 of the Site Plans.

- 19. Sheet C-050, sediment controls will also be required prior to demolition activities (not just construction fencing). Please add. Added sediment controls.**

The sediment and erosion control (ESC) measures were added to Sheet C-500 as well as C-400.

- 20. Sheet C-500, the demolition plan should include staging and stockpile locations and the notes should provide more detail on how the demolished building/asphalt materials including asbestos materials will be stored and/or transported off site (e.g. will materials be stored on site and duration of time).**

The staging area/stockpile locations were added to Sheet C-500. Notes have been updated to include more detail on how the demolished building/asphalt materials, including asbestos materials, will be stored and/or transported off site.

- 21. The shaded area on the site plan, Sheet C-100 is not needed as additional exhibits show the disturbance in the buffer zones.**

The shaded area was removed from Sheet C-100.

- 22. The Site Plan or Grading Plan does not show proposed grades/contours in all disturbed areas.**

Areas shown without spot elevations or proposed contours are assumed to be existing grade.

- 23. Sheet C-500, Landscape Plan, please clearly distinguish the "Buffer Zone/RA Restoration" areas from the overall landscape plan. The notes should include**

*reference to native, straight species only, include mulching specifications (root zones only per Mitigation Policy) and watering for the first two growing seasons. Note 5 should be revised to indicate no substitutions shall take place in jurisdictional areas without approval of the Conservation Commission. As noted above, Staff recommends native, straight species of shrubs be added to the Restoration/Landscape Plan.*

Shrubs were added to revised planting and notes to adhere to mitigation policy. The mulching specifications (root zones only per Mitigation Policy) and watering for the first two growing seasons are added to the notes. A note requiring “species substitutions to be approved by the Conservation Commission” will be added to the notes as well. We have shaded the Buffer Zone/RA Restoration area on Sheet C-500.

Should you have any questions or require addental information, please do not hesitate to contact me at your earliest convenience at 401-787-0878, [mmoonan@chasolutions.com](mailto:mmoonan@chasolutions.com) and/or Jay Hall, PWS, CPESC, 781-792-2221, [jhall@chasolutions.com](mailto:jhall@chasolutions.com).

Sincerely,  
**CHA**



Michael S. Moonan, RLA  
Project Manager

Attachments:

- WPA Form 3, Page 8 – List of Project Plans
- Site Plans 05/11/26 w/ Exhibits S-1, W-1, W-2, and W-3
- Stormwater Management Report
  - o Illicit Discharge Statement (Page 18)
- Soil Testing logs/Reports (05/05/26)
- ORAD - issued for 100 Beal Street (DEP No. 034-1509) on 11/7/2024 2024