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August 20, 2026

Via Electronic Mail

Tracy Shriver, Chair
Town of Hingham
Planning Board
210 Central Street
Hingham, MA 02043

RE: 22 Howe Street, Hingham, MA

Dear Chair Shriver and Members:

As you know, we represent Sean and Maireen Marshall in connection with their application for Minor Site Plan Review for proposed site improvements at the property located at 22 Howe Street, Hingham (the "Property"). We write to provide additional updated materials in advance of the hearing on August 24th.

As the Board is aware, during the hearing on August 10th hearing it was indicated by the neighbor at 16 Howe Street that a survey had been completed of his property that depicted the trees on 16 Howe Street as well as on the southerly portion of the Property. At the August 10th hearing, both Applicants' counsel and the Board requested that the survey be submitted to the Planning Department so that it could be provided to the Applicants' professional consultants. After the hearing, the Applicants' counsel followed up on multiple occasions with the Planning Department asking if the survey had been submitted, and after receiving negative responses independently searched the Building Department's system to obtain any survey that may have been submitted as part of a project at 16 Howe Street.

On August 18th, Tara Thiessen Healey made a submission to the Board on behalf of "Neighbors of 22 Howe Street"¹ that included correspondence to the Planning Board with a purported "Reconstructed Pre-Removal Tree Inventory" and a hand-drawn "Tree Location Map." The submitted tree inventory and tree location map purport to identify four (4) trees within the southerly tree yard as part of the claimed pre-removal tree inventory – identified as Trees O-R.

¹ The Neighbors of 22 Howe Street identified in the correspondence are (listed alphabetically) Michael and Tianna Alfieri, 4 Westview Circle; Anne and Walter Ciovacco, 15 Howe Street; Christin and Christoph Eigenmann, 29 Howe Street; Sarah Gillis and Tate Isgrig, 26 Howe Street; Tara and Peter Healey, 19 Howe Street; Abby and Ken Maclean, 16 Howe Street; Nancy and Ed Morris, 24 Paige Street; and Neil Smith and Jennifer GaySmith, 6 Westview Circle.

The basis for these trees inclusion on the inventory provided by the group of neighbors, which includes the owners of 16 Howe Street, is “the February 1, 2022 survey of 16 Howe Street for Trees O–R.”

Unfortunately, the underlying 2022 survey plan was not included with the submittal to the Board. On August 19th, in response to a follow-up request from the Planning Department, the 2022 survey of 16 Howe Street was provided to the department. The survey was subsequently provided by the Planning Department to the Applicants’ consultants.

Review of the February 1, 2022 survey of 16 Howe Street is important in several respects. It is referenced and relied upon by the neighbors in constructing their pre-removal tree inventory and map and identifies four (4) trees along the southerly property line on the Property – two (2) 24 caliper inch trees, a 30-caliper inch tree, and an 8-caliper inch tree, each alleged to have been on the Property in May of 2026. These trees are identified as “Trees O–R” on the neighbors’ inventory and map, and purport to increase the caliper inches of trees allegedly removed in the tree yard by 62 inches.

Applicants’ consultants were asked to review the 2022 survey plan submitted, and they matched the area to readily available public and private aerial mapping data. The mapping data revealed that at least two (2) of the trees – the two 24-caliper inch trees – were removed in 2022 (seemingly as part of a project that included construction of a driveway expansion and retaining wall construction at 16 Howe Street). We have attached Attachment 1, aerial and street view images from Google and Nearmap mapping that depict the area at relevant times. It should be clear from a review of those materials that the “Reconstructed Pre-Removal Tree Inventory” and “Tree Location Map” submitted by the neighbors to the Board are inaccurate and not representative of conditions on the Property in May of 2026 (or the preceding 3-plus years).

As the Board is aware, on August 18th, the Applicants submitted supplemental materials to the Board, including a Tree Exhibit prepared by Homestead Consulting Engineers, dated August 18, 2026, and Landscape Plan prepared by Sean Papich Landscape Architecture, last revised August 18, 2026. Following the disclosure of the 2022 survey plan on August 19th, the Applicants’ consultants updated the Tree Exhibit and Landscape Plan to include an 8” caliper tree and increase the caliper (from 24” to 30”) along the southerly property line. Enclosed for filing, please find (1) an updated Tree Exhibit prepared by Homestead Consulting Engineers, dated August 20, 2026, and updated Landscape Plan prepared by Sean Papich Landscape Architecture, last revised August 20, 2026.

The enhanced number and diversity of proposed trees and species proposed remains unchanged; however, the calculated mitigation requirement has been increased by 7-caliper inches. As reflected on the updated Landscape Plan, the required mitigation has been calculated as 60 caliper inches for 8 protected trees removed. The Applicants propose 123-caliper inches (41 trees) within the tree yard – more than twice the calculated mitigation requirement – and 147-caliper inches (49 trees) throughout the property. The proposal continues to substantially exceed the applicable replacement requirement while simultaneously greatly improving upon the actual pre-existing screening condition.

The updated landscape plan and tree exhibit reflect the continuing work of the Applicants' professional landscape architect and civil engineer to provide an accurate and transparent record and respond to the Board's comments in a comprehensive and technically sound manner.

We look forward to appearing before the Board on August 24th. Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a series of loops and a long, sweeping horizontal stroke that ends in a small upward flick.

Jeffery A. Tocchio

Enclosures

Attachment 1

OCTOBER 2019



NOTE:

GROUND PHOTO TAKEN FROM GOOGLE STREET VIEW.

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HINGHAM, MA 02043
HOMESTEADENG.COM

22 HOWE STREET
HINGHAM, MASSACHUSETTS 02043

APPLICANT SEAN MARSHALL
22 HOWE STREET
HINGHAM, MA 02043

JOB NO.: 900-114
SCALE: NTS
DATE: 08-19-26

APRIL 3, 2021



NOTE:

AERIAL IMAGERY TAKEN FROM NEARMAP.COM.

EXHIBIT

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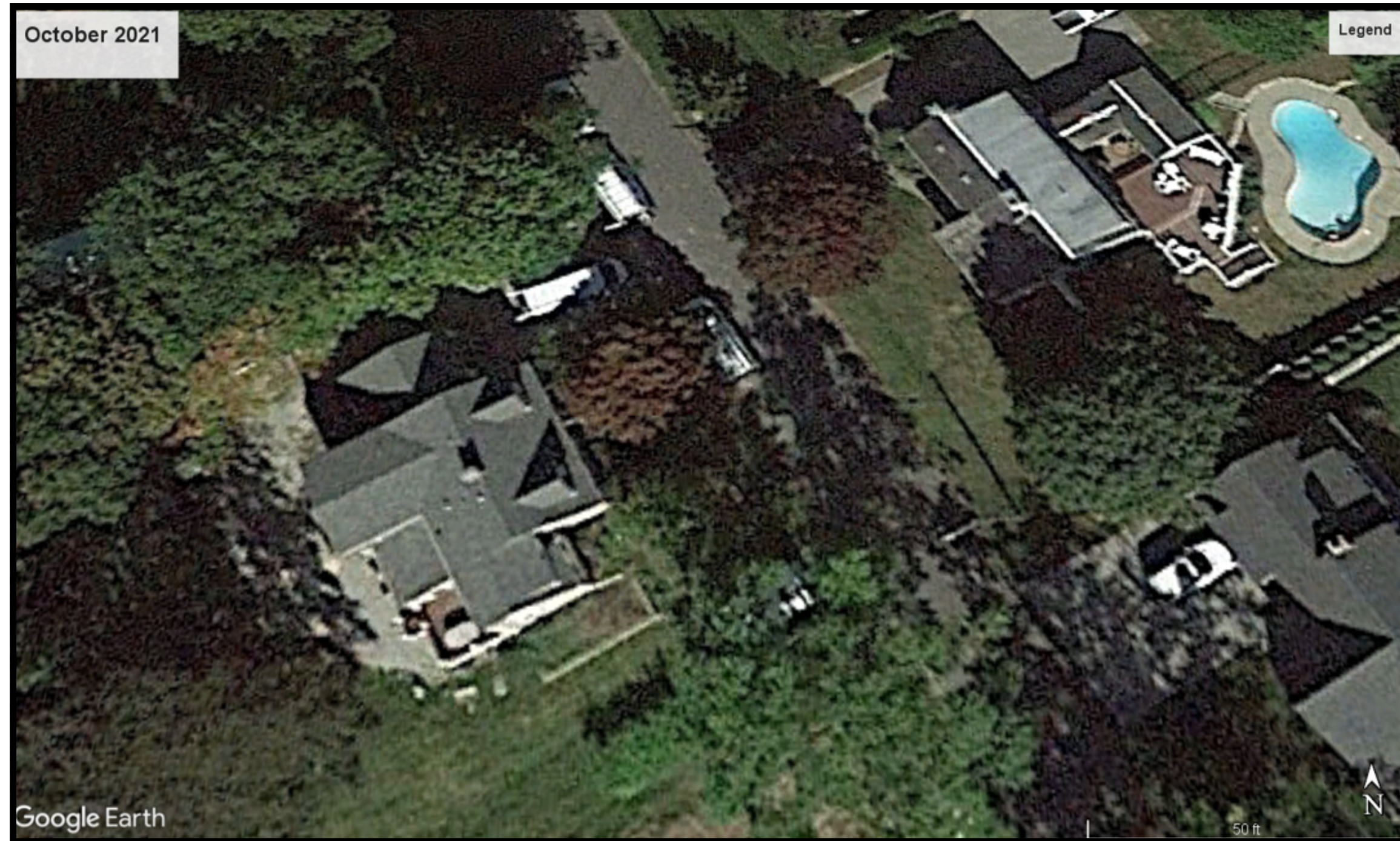
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OCTOBER 2021



EXHIBIT



22 HOWE STREET
HINGHAM, MASSACHUSETTS 02043
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NOTE:

AERIAL IMAGERY TAKEN FROM GOOGLE MAPS.

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JULY 2022



EXHIBIT

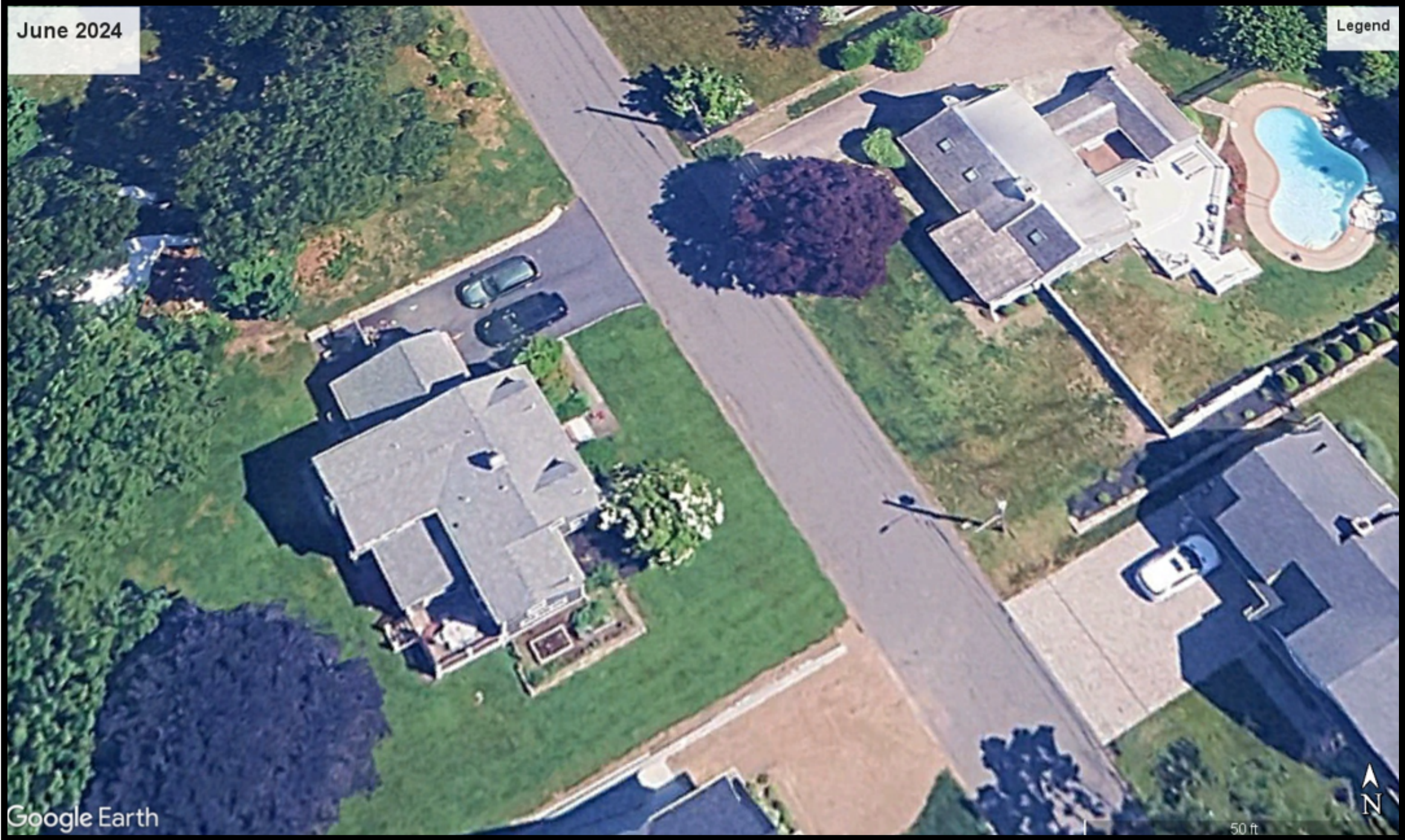
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ENGINEERS
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NOTE:
AERIAL IMAGERY TAKEN FROM GOOGLE MAPS.

JUNE 2024



NOTE:

AERIAL IMAGERY TAKEN FROM GOOGLE MAPS.

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APRIL 10, 2025



NOTE:

AERIAL IMAGERY TAKEN FROM NEARMAP.COM.

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AUGUST 2025



NOTE:

GROUND PHOTO TAKEN FROM GOOGLE STREET VIEW.

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