

January 22, 2025

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Dover Planning Board
Jasmin Farinacci, Town Planner (jfarinacci@doverma.gov)
PO Box 250
Dover, MA 02030

Re: **Site Improvements: Town Garage Property
2 Dedham Street
Proposed Fuel Island Relocation**

Dear Ms. Farinacci and Members of the Dover Planning Board:

Weston & Sampson, on behalf of the Town of Dover's Department of Public Works (the applicant), has been requested by the Planning Board to provide additional information relating to the placement of the proposed fuel system on the Town Garage property at 2 Dedham Street (the project). This letter is hereby issued in response to this request for additional information, and follows two previous letters Weston & Sampson has issued to the Planning Board for the project:

- Letter dated September 13, 2024, issued to the Planning Board, providing responses to miscellaneous questions asked by Board members during the September 9, 2024 public meeting.
- Letter dated October 22, 2024, issued to the Planning Board and Conservation Commission, summarizing the project's spill prevention features and spill response procedures.

During the January 6, 2025 Planning Board meeting, the Board voted in favor of the project. Following the January 6th meeting, the Board has requested the hearing to be re-opened so that the applicant may share additional information relating to the analysis that resulted in the placement of the proposed fuel system.

The new fuel system, as depicted on the site development plans issued to the Planning Board, is proposed to be located in the rear of the property. The existing fuel system on the site is located southeast of the front of the Town Garage. The warranty on the existing system's fuel tanks has expired; accordingly, the existing fuel system is in need of replacement.

Weston & Sampson conducted an alternatives analysis in 2023 to evaluate locations for the proposed fuel system on the site. Relocating the fuel system to a new location was deemed a priority for several reasons relating to safety, convenience, and regulatory compliance:

- The location of the existing fuel system frequently requires vehicles to reverse before or after fueling, which presents a safety risk and makes the delivery of fuel especially challenging. This is described in recent letters received both Fire Chief Wright and Police Chief Vinci, who both support a relocation of the existing fuel system; the letters are attached.
- A new location would allow the existing fuel system to remain operable during construction of the proposed fuel system, such that a lengthy interruption to on-site fueling operations could be avoided, along with the costs associated with temporary fueling.
- The existing fuel system is partially located within the property line structure setback as well as an AT&T utility easement. Relocating the new system outside of the setback would restore conformity with the Dover Zoning Bylaws. Additionally, the AT&T easement documentation recorded in 1970 states that the Town "hereby covenants that no structures shall be erected or permitted" within the easement. Relocating the fuel system outside of the AT&T easement would restore conformity with the conditions of the easement.

Locating the proposed fuel system in the rear of the property was deemed to be the only suitable alternative. Prior to reaching this conclusion, Weston & Sampson evaluated potential alternatives to place the proposed fuel system in the front of the site.

Configuring the fuel system in front of the garage building was quickly deemed to be infeasible, as doing so would either block vehicular access to one side of the building, require removal of the septic system, or require the removal of several parking spaces. In general, the project team determined that locating the fuel system in front of the building would present evident aesthetic, operational, and security limitations.

Configuring the fuel system immediately south of the existing fuel system location was evaluated. This area is approximately 50' x 75', consists of soil land cover, and acts as a material stockpile and storage area for miscellaneous DPW project equipment. Relocating the fuel system to this location was deemed suboptimal, as it would require:

- Designation of a new area for material and equipment storage that comparatively would offer reduced operational efficiency.
- Installation of impervious area on a currently pervious surface. Doing so could exacerbate significant building flooding issues and would require additional stormwater infrastructure. The site has experienced flooding in recent summers; in accordance with stormwater best practices, the DPW aims to avoid the introduction of new impervious area on site to the maximum extent practicable.
- Installation of the fuel island on a 4% slope, which would present concrete pad installation and fueling operation challenges.
- Additional geotechnical and environmental explorations on the site.
- Coordination with Dunkin' regarding potential replacement of customer parallel parking space(s) to accommodate vehicular maneuvering for fueling operations.

The selected location for the proposed fuel system in the rear of the property avoids the above-listed limitations. Among the alternative locations assessed, the rear location maximizes security by avoiding placement of the infrastructure in a public-facing location. The rear location additionally was deemed the best option for fueling operations, enabling maneuvers that do not require Town vehicles to reverse.

In addition to these benefits, placing the fuel system in the rear of the property enables a design that demonstrates conformance with governing regulations:

- At a local level, the design conforms with zoning and dimensional requirements. Additionally, the design has incorporated feedback from the Conservation Commission to the Commission's satisfaction.
- At a state level, the project conforms with the MassDEP stormwater standards, as well as the drinking water regulations (301 CMR 22), which require the storage of liquid petroleum products in Zone II Wellhead Protection Areas to be on an impervious surface, in above ground tanks, and within a containment system that can hold 10% of the storage capacity of all containers, or 110% of the largest container's storage capacity (whichever is greater). The entire developed portion of the Town Garage site is located in a Zone II Wellhead Protection Area; the rear portion of the site is on the edge of the Zone II and the front of the site is closer to the center of the Zone II.
- At a federal level, the project will implement a Spill Prevention, Control, and Countermeasure (SPCC) plan in accordance with the US EPA's Oil Pollution Prevention regulations (40 CFR 112).

For the reasons discussed above, we believe the optimal location for the relocated fuel system is in the rear of the Town Garage site.

Sincerely,

WESTON & SAMPSON ENGINEERS, INC.



Jesse O'Donnell, P.E.
Project Manager I



Tyler Cofelce
Project Manager II