



TOWN OF LEE

32 Main Street, Lee, MA 01238
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R. Christopher Brittain
Town Administrator

TO: R1Housatonic@epa.gov

FROM: Town of Lee

DATE: February 12, 2023

RE: Comments on...

- Upland Disposal Facility Conceptual Design Plan (PDF)
- Interim Pre-Design Investigation Data Summary Report for Upland Disposal Facility Area (PDF)

The Town of Lee, Massachusetts would like to provide the following comments and suggestions related to the UDF design and Pre-Design Summary.

1. Section 3 of the document makes several references to vernal pool(s) which are severely threatened resources in Massachusetts, however, there is a lack any specificity of how the resource and surrounding habitat will be protected.
2. Section 2.3.7 states that semi-annual testing will take place. The town requests that these tests be completed on a quarterly basis to provide seasonal water quality data.
3. Section 3.7 states that modifications can be made to the analyte list. The town requests that only modifications that add to this testing be made and that no modifications are made that will remove any portions of this testing.
4. Section 3.8 states that hydraulic conductivity tests were completed “excluding the two deep monitoring wells”. The town requests that tests are also performed on deep wells.
5. Section 3.10 includes a cultural resources assessment that was completed by the same consultant as the other assessments. The town requests that the assessment be reviewed by an outside consultant that specializes in cultural resources.
6. The summary indicates that that UDF area is covered by 36% of forested area; however, the plan does not address how this will be restored or replaced to compensate for the loss of carbon sequestration resulting from removal of trees.