

March 26, 2021

BY ELECTRONIC MAIL ([MEPA@mass.gov](mailto:MEPA@mass.gov))  
AND FIRST CLASS MAIL

Secretary Kathleen Theoharides  
Executive Office of Energy and Environmental Affairs  
MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: Parallel Products of New England, LLC  
100 Duchaine Boulevard, New Bedford, MA  
Final Environmental Impact Report – EEA No. 15990

Dear Secretary Theoharides:

We write to offer comments on the Final Environmental Impact Report (“FEIR”) (EEA No. 15990) submitted by Parallel Products of New England, LLC (“PPNE”) concerning the proposed construction of a municipal solid waste and construction and demolition debris processing and handling facility and a biosolids facility (collectively, “the project”) at the New Bedford Business Park. The City’s detailed comments are contained in the attached letter from KP Law (“KP Law letter”), which is serving as special counsel to the City on this matter.

We oppose this project for a variety of reasons. In short, the FEIR is fatally flawed in multiple ways and that the MEPA Office should not certify it, but rather should require PPNE to submit a Supplemental Environmental Impact Report that addresses the numerous deficiencies in the FEIR. The KP Law letter sets forth the City’s objections, and we summarize some of the principal ones here:

- The project, which would be located amid an environmental justice area, does not serve local interests and would place a disproportionate impact upon environmental justice populations in the City. To date, PPNE has not conducted meaningful outreach with the City or its residents to address how the burden imposed by the project on the local community would be satisfactorily mitigated.
- The FEIR does not properly analyze impacts to public health, safety, or the environment from the combined facilities that make up the proposed project. Although PPNE undertook studies during the MEPA review, the studies segregate and thus underrepresent combined potential impacts related to air quality, noise, dust, and odor.

- As described in the KP Law letter, the FEIR is deficient in dozens of other ways, including in its analysis of odor, noise, and other nuisances, greenhouse gas emissions, and wastewater, traffic, wetland, stormwater, and construction period impacts.

While the FEIR fails to adequately describe the environmental impacts of PPNE's proposed project, common sense compels the conclusion that the impacts will be significant, given the scope and nature of the project. New Bedford residents, many of whom are members of environmental justice populations, have already borne the burden of multiple waste disposal and processing facilities and other hazardous sites located in the City. They do not deserve to have another foisted upon them.

Sincerely,

Mayor Jon Mitchell

Senator Mark C. Montigny

Representative Antonio F. D. Cabral

Representative Christopher Hendricks

Representative Christopher Markey

Representative Paul A. Schmid, III

Representative William M. Straus

City Council President Joseph P. Lopes

City Councillor Ian Abreu

City Councillor Derek Baptiste

City Councillor Naomi R. A. Carney

City Councillor Debora Coelho

City Councillor Hugh Dunn

City Councillor Maria E. Giesta

City Councillor Brian K. Gomes

City Councillor Scott J. Lima

City Councillor William Brad Markey

City Councillor Linda M. Morad