

May 10, 2019

Executive Office of Energy and Environmental Affairs (EEA)

Attention: MEPA Office

Paige Czepiga: EEA No. 15990 100 Cambridge St, Suite 900

Boston MA 02114

RE: EEA 15990: Parallel Products

Dear Ms. Czepiga,

I write in strong opposition to the establishment of a glass/solid waste/biosolids processing facility to be operated by Parallel Products at 100 Duchaine Boulevard in New Bedford. In addition, I strongly urge MEPA to deny a Phase I Waiver to allow Parallel Products to proceed with the first phase of development as described in the April 12, 2019 Draft Record of Decision.

The company has operated a glass bottle recycling operation at the location for some time in compliance with local zoning, site plan conditions, and conservation restrictions. However, the site as newly conceived, would be an entirely different creature--especially with the inclusion of a biosolids processing facility as detailed in the company's MEPA filing in February.

On March 29 I submitted comments to MEPA regarding the proposed project. The concerns and objections I raised on behalf of the City all remain valid. (I refer you to items 1-7 contained in the letter.) Most important, I made clear then, as well as in several subsequent public remarks, that the burden was on the company to demonstrate that its project would not pose a threat to the quality of life in surrounding neighborhoods.

Since that time, concerns regarding the potential odor, noise, and traffic impacts of the Parallel Products proposal have grown significantly among both neighborhood residents and municipal departments. Based on what we have learned in recent weeks regarding potential odor, noise, and traffic impacts, there is ample evidence to conclude that this project is wrong for New Bedford.

With respect to the company's Waiver request, I believe it important for MEPA to consider the request in the full context of the development proposed at the site. The first development phase is now a part of a much larger, more impactful, multi-faceted project. It is therefore imperative that permitting authorities revise their approach accordingly. For example, at least one component in the first phase (rail access) now also has a direct connection to uses (including biosolid processing) that are being contemplated in future phases. In this broader context, it does not make sense to treat any Phase I component in isolation.

It is therefore wrong and irresponsible to provide a Waiver for certain aspects of the proposed expansion and allow the facility to be effectively approved piecemeal by the state, without adequate analysis and an understanding of the cumulative impact of the project as a whole. On behalf of local residents and businesses, I urge MEPA to refrain from approving any Waivers and instead mandate a full Environmental Impact Report be completed before any state decisions are made on any aspect of development at the site.

Thank you for this opportunity to express my opposition to the Waiver and the project more generally.

Sincerely

Jon Mitchel

Energy & Environmental Affairs Secretary Kathleen Theoharides

MassDEP Commissioner Martin Suuberg

Senator Mark Montigny

Representative Paul Schmid

Representative Christopher Hendricks

New Bedford City Council

New Bedford Planning Board