

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SOUTH COAST NEIGHBORS UNITED, INC.)
and)
CONSERVATION LAW FOUNDATION, INC.,)

Complainants,)

v.)

MASSACHUSETTS EXECUTIVE OFFICE)
OF ENERGY AND ENVIRONMENTAL)
AFFAIRS,)

Respondent.)
_____)

**COMPLAINT UNDER TITLE VI
OF THE CIVIL RIGHTS ACT
OF 1964**

I. INTRODUCTION

On August 29, 2022, the Secretary of the Massachusetts Executive Office of Energy and Environmental Affairs (“EEA”) issued a Massachusetts Environmental Protection Act (“MEPA”) Certificate (“MEPA Certificate”)¹ determining that Parallel Products of New England (d/b/a South Coast Renewables, LLC (“Project Proponent”) fully complied with state law and its accompanying implementing regulations when it sought to expand its existing waste management facility on 71 acres in New Bedford, Massachusetts that would accept and process 1,500 tons per day of municipal solid waste and construction and demolition debris and transport most of that waste for disposal at other sites (“Project”). The MEPA Certificate came despite years of community members and their allies calling attention to the failure of the Proponent to engage the public, specifically its failure to engage New Bedford’s limited English proficient (“LEP”) speakers. Over the past three years, EEA Secretary and the MEPA Office allowed the Proponent to go months without conducting any community outreach, providing little to no interpretation services, and effectively withholding information from LEP speakers by failing to provide copies of key documents translated into the community members’ languages. Therefore, South Coast Neighbors United (“SCNU”) and Conservation Law Foundation (“CLF”) file the within complaint, seeking to hold EEA and the MEPA Office accountable to its duties and obligations under Title VI of the Civil Rights Act to uphold language justice by prohibiting any recipient of federal funds from engaging in discrimination on the basis of national origin.

¹ Massachusetts Executive Office of Energy and Environmental Affairs, EEA-15990, Certificate of the Secretary of Energy and Environmental Affairs on the Notice of Project Change and Supplemental Final Environmental Impact Report (Aug. 29, 2022). *See* Attachment A, MEPA Certificate and public comments.

The City of New Bedford is a racially, ethnically, and linguistically diverse community that has contributed to Massachusetts history since the 1700s. Once home to Frederick Douglass, its whaling industry created jobs and a home to those making passage along the underground railroad, contributing to the diverse community it is today.² Now, New Bedford is home to almost 100,000 residents, including state-designated environmental justice (“EJ”) populations.³ For all New Bedford has contributed to Massachusetts history, culture, and community, there can be no doubt that EEA and the MEPA Office were legally obligated to ensure a better and more inclusive environmental review process complete with multilingual materials; yet these entities failed to meet this obligation before issuing the MEPA Certificate to the Project Proponent.

Communities of color, low-income, LEP, and immigrant communities have disproportionately borne the environmental impacts of industrial advancement for too long. For communities like New Bedford, where a substantial number of LEP speakers live amidst state-designated environmental justice populations, these harms are exacerbated by the lack of meaningful access to public processes. Waste management facilities contribute multiple environmental burdens to host communities such as: heavy-duty vehicle traffic, noise, odor, pollution, and contamination.⁴ Before such facilities are permitted and constructed, it is vital that

² *The Underground Railroad*, NATIONAL PARK SERVICE (July 14, 2021), <https://www.nps.gov/nebe/learn/historyculture/undergroundrailroad.htm> (last visited Feb. 17, 2023).

³ Massachusetts law defines environmental justice populations as a neighborhood that meets one or more of the following criteria: (i) the annual median household income is not more than 65% of the statewide annual median household income; (ii) people of color or Indigenous People comprise 40% or more of the population; (iii) 25% or more of households lack English language proficiency; or (iv) people of color or Indigenous People comprise 25% or more of the population and the annual median household income of the municipality in which the neighborhood is located does not exceed 150% of the statewide annual median household income. *See An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy*, St. 2021, c. 8, § 56.

⁴ Celine Yang, *Q&A: Addressing the Environmental Justice Implications of Waste*, ENVIRONMENTAL AND ENERGY STUDY INSTITUTE, (May 14, 2021), <https://www.eesi.org/articles/view/qa-addressing-the-environmental-justice-implications-of-waste> (last visited Feb. 17, 2023).

the people most impacted receive an opportunity to influence decisions about what is happening in their community, and it is EEA's and the MEPA Office's obligation to safeguard that opportunity.

Civil Rights Act objectives include, among other things, promoting the full and fair participation of all affected populations in decision-making by state agencies receiving federal assistance and ensuring meaningful access to federally-funded programs and activities by LEP speakers. The mandate to include LEP speakers in public processes was emphasized as recently as February 16, 2023 when President Biden issued an *Executive Order on Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, wherein he proclaimed that “[a]gencies shall comprehensively use their respective civil rights authorities and offices to prevent and address discrimination and advance equity for all, including to increase the effects of civil rights enforcement and to increase public awareness of civil rights principles, ...[to] improve language access services to ensure that all communities can engage with agencies’ respective civil rights offices, including by fully implementing Executive Order 13166 of August 11, 2000 (Improving Access to Services for Persons with Limited English Proficiency).”⁵ As a recipient of federal financial assistance, EEA and the MEPA Office are bound by Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.*, to ensure that no residents are unlawfully excluded from their public decision-making processes. This mandate requires the meaningful participation of LEP speakers. The mandates of Title VI

⁵ *Executive Order on Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, EO No. 14091 at section 8(e), available at [Executive Order on Further Advancing Racial Equity and Support for Underserved Communities Through The Federal Government - The White House](#).

are also reflected in EEA’s own Environmental Justice policy (“EEA EJ Policy”),⁶ in which EEA emphasizes that “communities must have a strong voice in environmental decision-making regardless of race, color, national origin, income, or **English language proficiency** [and] that such voices [must have the opportunity to] influence environmental decision-making....”⁷ Additionally, a 2021 Massachusetts law, An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (“Roadmap Law”),⁸ and a 2014 Massachusetts Executive Order, Executive Order on Environmental Justice (“E.O. 552”)⁹ further commit EEA and the MEPA Office to ensuring a just and inclusive public decision-making process.

Here, the Project Proponent has sought permission to expand a waste management facility subject to MEPA review in New Bedford. The Project Proponent obtained the MEPA Certificate for their Notice of Project Change (“NPC”) and Supplemental Final Environmental Impact Report (“SFEIR”) on August 29, 2022¹⁰ after initially filing the Project environmental review materials in 2019. The MEPA Certificate marked the completion of the MEPA review process. For the entire three-year period from filing to certification, the Project Proponent failed to engage the New Bedford community, particularly New Bedford’s LEP speakers. First, the Project Proponent failed to provide adequate community outreach, adequate notice, and accessible registration processes for public meetings. Then, for the handful of public meetings

⁶ Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs (June 24, 2021), available at: [download \(mass.gov\)](#).

⁷ *Id.* at 2 (emphasis added).

⁸ An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy, St. 2021, c. 8.

⁹ Massachusetts Executive Order 552, Executive Order on Environmental Justice (Nov. 20, 2014).

¹⁰ MEPA Certificate at 1.

that were held, the Project Proponent provided little to no interpretation services for residents who required them. Additionally, the Project Proponent failed to make translated copies of factual and important documents available to LEP speakers in their own languages. Finally, barriers that English-speaking community members faced in submitting public comment were exacerbated for LEP speakers. When SCNU and CLF raised these concerns, the Project Proponent only provided excuses.

Despite the MEPA Office's obligations under Title VI and parallel state and regulatory mandates, the EEA Secretary issued a MEPA certificate knowing about the Project Proponent's failure to provide adequate community engagement and meaningful language access. Notably, even with the above-mentioned language access deficits that dampened community involvement, the MEPA Office received hundreds of comments about the Project, demonstrating community interest in the Project and warranting more comprehensive steps to safeguard language access.¹¹ The EEA Secretary and MEPA Office's certification of Project Proponent's NPC and SFEIR is a failure of their duties under Title VI to: (1) not discriminate based on national origin or English-language proficiency; and (2) provide adequate access for LEP speakers of the impacted community. It is also a violation of EPA's Title VI implementing regulations, 40 C.F.R. Part 7, *Nondiscrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency* ("EPA Regulations"), and EPA's guidance to recipients of federal funds, *Guidance to Environmental Protection Agency Financial Assistance Recipients*

¹¹ *Id.* (noting that the EEA Secretary "received over 300 comment letters from elected officials, the New Bedford City Council, legislators, community and environmental organizations, and residents on this NPC/SFEIR filing ... [expressing] concerns about the project because of its noise, air quality, odor and traffic impacts and its proximity to residences and schools.").

Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Persons, Docket No. FRL-7776-6 (June 25, 2004) (“EPA LEP Guidance”).

Complainants now request the United States Environmental Protection Agency’s (“EPA”) External Civil Rights Compliance Office (“ECRCO”) promptly and thoroughly investigate the allegations set forth in this complaint and take all actions necessary to ensure that the Respondent complies fully with the law, including: (1) suspending Project Proponent’s ongoing Massachusetts permitting process until the conclusion of ECRCO review;¹² (2) requiring the EEA Secretary and MEPA Office to re-open the MEPA review process to allow additional public comment opportunities following written translation of project materials into languages spoken by LEP speakers affected by the Project and at least two in-person public meetings with language interpretation services, as well as a fully accessible registration process for public meetings; (3) suspending any further federal funding disbursements to EEA until the MEPA Office consistently requires environmental justice and language access compliance for all project proponents; and (4) any other remedy that the EPA deems appropriate.

II. PARTIES

a. Complainants

i. Conservation Law Foundation

Conservation Law Foundation is a nonprofit, member-supported organization dedicated to protecting New England’s environment. CLF protects New England’s environment for the benefit of all people and uses the law, science, and the market to create solutions that preserve

¹² See, e.g., TITLE VI LEGAL MANUAL, Civil Rights Division U.S. Department of Justice at 117 (stating that a remedy can include measures associated with a permitting action such as “modifying permit conditions to lessen or eliminate the demonstrated adverse disparate impact” referencing EPA Investigations Guidance, 65 Fed. Reg. at 39,683.), available at [DOJ Title VI Legal Manual \(epa.gov\)](https://www.epa.gov/epa-title-vi-legal-manual).

our natural resources, build healthy communities, and sustain a vibrant economy. CLF’s mission includes working to end the unfair environmental burdens imposed on low-income communities and communities of color, and safeguarding the health and quality of life of all New England communities. CLF has 3,331 members in Massachusetts, including residents who reside in New Bedford. CLF’s zero waste project, operating within its environmental justice program, protects New England communities from the dangers posed by unsustainable ways of managing our waste. CLF became involved with this Project and SCNU in 2019 when the Project Proponent initially sought to build a sewage sludge drying facility at the site located at 100 Duchaine Boulevard in New Bedford, Massachusetts. CLF’s Massachusetts members include residents with a deep interest in protecting our natural resources and in reducing the need for landfills, incinerators, and trash transfer stations, as well as promoting zero waste programs in the Commonwealth.

ii. South Coast Neighbors United

SCNU is an organization of concerned residents who formed initially in opposition to expanding gas infrastructure in Massachusetts and is now primarily focused on challenging the Project Proponent’s facility. SCNU is a registered non-profit and has a subcommittee of New Bedford residents concerned specifically with the Project: Citizens Against Parallel Products Project (“CAPPP”). Together, SCNU and CAPPP have approximately 1,100 Facebook members, the majority of whom reside in New Bedford and are directly impacted by the Project.

b. Respondent - EEA and its MEPA Office

EEA is the primary agency of the Commonwealth of Massachusetts for environmental planning, charged with, “analyz[ing] and mak[ing] recommendations, in cooperation with other

state and regional agencies, concerning the development of energy policies and programs in the commonwealth.” M.G.L. c. 21A, § 2(17). EEA is a large agency containing many offices. The EEA office at issue here is the MEPA Office, charged with overseeing a review process that “provides meaningful opportunities for public review of potential environmental impacts,”¹³ for various projects like the one at issue in this complaint. The MEPA Office issues certificates determining whether a project adequately and properly complies with M.G.L. c. 30, §§ 61-62I and its implementing regulations, 301 CMR 11.00 et seq.

III. JURISDICTION

Under Title VI of the Civil Rights Act, acceptance of federal funds, including assistance from the EPA, for a program or activity, obligates the recipient to comply with the Title: “[n]o person in the United States shall, on ground race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance.” 42 U.S.C. § 2000d. EEA is a “program or activity” which receives federal EPA assistance, making it subject to Title VI and EPA’s implementing regulations.

Under EPA regulations, a complaint may be filed by a person “who believes that he or she or a specific class of persons has been discriminated against” in violation of EPA regulations and Title VI. 40 C.F.R. § 7.120(a). Additionally, the complaint must be in writing, alleging the discriminatory acts that occurred, and be filed within 180 calendar days of the alleged

¹³ MASSACHUSETTS ENVIRONMENTAL POLICY ACT OFFICE, [Massachusetts Environmental Policy Act Office | Mass.gov](https://www.mass.gov/info-details/massachusetts-environmental-policy-act-office) (last visited Feb. 17, 2023).

discriminatory acts. 40 C.F.R. § 7.120(b). As explained below, this complaint satisfies all jurisdictional requirements outlined in 40 C.F.R. § 7.120.

a. Federal Financial Assistance

Under the EPA’s Title VI regulations, EEA is a “recipient” of federal financial assistance. A “[r]ecipient” is “any State or its political subdivision, any instrumentality of a State or its political subdivision, any public or private agency, institution, organization, or other entity, or any person to which Federal financial assistance is extended directly or through another recipient, including any successor, assignee, or transferee of a recipient.” 40 C.F.R. § 7.25. In Fiscal Year 2022 alone, EEA received \$4,427,000 in federal funds.¹⁴ Because EEA receives federal financial assistance from EPA, it is subject to Title VI and EPA’s Title VI implementing regulations. 40 C.F.R § 7.25.

b. Program or Activity

A “program or activity” includes “all of the operations of . . . a department, agency, special purpose district, or other instrumentality of a State or of a local government; or [t]he entity of such State or local government that distributes such assistance and each such department or agency (and each other State or local government entity) to which the assistance is extended, in the case of assistance to a State or local government.” 40 C.F.R. § 7.25.

Significantly, the entire entity does not need to receive federal funds for it to be governed by these regulations; indeed, “if any part of a listed entity receives federal funds, the entire entity is

¹⁴ *Capital Investment Plan*, MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS (2022), <https://budget.digital.mass.gov/capital/fy22/beneficiary-agency/energy-and-environmental-affairs/co-of-energy-and-environmental-affairs> (last visited Feb. 17, 2023).

covered by Title VI.” *Ass'n of Mexican-Am. Educators v. Cal.* 195 F.3d 465, 475 (9th Cir. 1999), rev'd in part on other grounds, 231 F.3d 572 (9th Cir. 2000) (citing *Grimes v. Superior Home Health Care*, 929 F. Supp. 1088, 1092 (M.D. Tenn. 1996)).

EEA is an agency of the Commonwealth of Massachusetts. The Massachusetts General Court has conferred general jurisdiction onto EEA to execute a broad range of environmental regulations for the benefit of all residents of Massachusetts. M.G.L. c. 21A, § 2. EEA contains, a “Massachusetts Environmental Policy Act Office,”¹⁵ the office relevant to this complaint. The agency is also vested with plenary powers that it may exercise as necessary and convenient to perform acts within its jurisdiction, such as notice requirements for matters within its jurisdiction. EEA’s operations and status as a state agency meet the definition of a “program or activity” under Title VI, and, therefore, it must comply with Title VI in implementing all its regulatory activities.

c. Timeliness

For a complaint to be timely, it must be filed “within 180 calendar days of the alleged discriminatory acts, unless the OCR waives the time limit for good cause.” 40 C.F.R. § 7.120(b)(2). The MEPA Certificate approving Project Proponent’s NPC and SFEIR was issued August 29, 2022, making the filing of this complaint fall within the 180-day limit.

d. Other Jurisdictional and Prudential Concerns

¹⁵ MASSACHUSETTS OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS, <https://www.mass.gov/orgs/executive-office-of-energy-and-environmental-affairs> (last visited Feb. 17, 2023).

This complaint satisfies all other jurisdictional criteria under Title VI and EPA's implementing regulations. Specifically, this written complaint describes the alleged discriminatory acts, identifies the challenged practice, and is filed with EPA by CLF and SCNU who assert and allege that EEA and the MEPA Office's actions with respect to New Bedford's LEP speakers amounts to discrimination on the basis of national origin, violating Title VI and associated EPA regulations. 40 C.F.R. §7.120(a), (b).

IV. FACTUAL BACKGROUND

a. New Bedford is a Community with a Substantial LEP Population.

New Bedford is the sixth largest city in Massachusetts, located on the Acushnet River on Massachusetts' south coast. With a population of just under 100,000, New Bedford boasts a large multi-ethnic population, where 33% of residents do not speak English very well.¹⁶ As of 2020, 20% of New Bedford's population were foreign-born and 40.9% identify as something other than Non-Hispanic White.¹⁷ The largest non-White ethnic groups in New Bedford are Hispanic or Latino at 14% and Black or African American at 6.21%.¹⁸ White non-Hispanic people make up 59.1% of New Bedford's population. Comparatively, Massachusetts has a 12.8% Hispanic or Latino population, 9.3% Black or African American population, and 70.1% White non-Hispanic or Latino population, reflecting the fact that New Bedford has a higher proportion of non-White ethnic groups than is reflected in the overall Massachusetts population, including a higher

¹⁶ Languages Spoken in Massachusetts Mapping Tool, New Bedford, [Languages spoken in Massachusetts \(arcgis.com\)](#) (data can be accessed by clicking on New Bedford, census tract 6515, and then using the right arrow to navigate to screen 6/8 (02740), which indicates that 33.4% of households speak a language other than English); see also *Demographics*, NEW BEDFORD, [New Bedford, MA | Data USA](#).

¹⁷ *Demographics*, NEW BEDFORD, [New Bedford, MA | Data USA](#).

¹⁸ *Id.*

percentage of Hispanic residents.¹⁹ According to the EPA’s Environmental Justice Screen, of the 38% of residents that speak a language other than English at home, 15% of New Bedford residents speaks English “less than very well.”²⁰ Project Proponent is located at the New Bedford Business Park, an area designated by Massachusetts law and mapping tool as an environmental justice population, and where 10% of the population is language isolated.²¹ The fact that New Bedford has both large LEP and people of color populations invariably is related to its many poverty and environmental justice issues. The median per capita income for 2017-2021 was \$27,583, meaning 18.7% of New Bedford lives in poverty,²² 8.3% above the state average of people living in poverty.²³ In a state where almost half the adult population has a bachelor’s degree,²⁴ New Bedford falls severely behind with only 17% of the population holding a bachelor’s degree or higher.²⁵

New Bedford’s environment and community bear the impact of industry today. As a large port city, New Bedford’s fishing industry generates more than \$1 billion in economic activity. Fishing in the New Bedford Harbor itself, however, is banned because of polychlorinated

¹⁹ QuickFacts Massachusetts, UNITED STATES CENSUS BUREAU (2021), [U.S. Census Bureau QuickFacts: Massachusetts](#).

²⁰ EJScreen: Environmental Justice Screening and Mapping Tool, [EJScreen: Environmental Justice Screening and Mapping Tool | US EPA](#) (last visited Feb. 17, 2023).

²¹ Languages Spoken in Massachusetts Mapping Tool, New Bedford, [Languages spoken in Massachusetts \(arcgis.com\)](#).

²² QuickFacts New Bedford City, Massachusetts, UNITED STATES CENSUS BUREAU (2021), [U.S. Census Bureau QuickFacts: New Bedford city, Massachusetts](#).

²³ QuickFacts Massachusetts, UNITED STATES CENSUS BUREAU, (2021), [U.S. Census Bureau QuickFacts: Massachusetts](#).

²⁴ *Id.* (45.2% of the population age 25+ has a Bachelor’s degree or higher, 2017-21).

²⁵ QuickFacts New Bedford City, Massachusetts, UNITED STATES CENSUS BUREAU (2021), [U.S. Census Bureau QuickFacts: New Bedford city, Massachusetts](#).

biphenyl contamination from industrial waste.²⁶ In fact, the Harbor is so contaminated, it has become the largest EPA Superfund Site in the country.²⁷ Despite this, locals have been documented fishing for both recreation and sustenance in the contaminated area.²⁸ EPA research into this pattern has revealed a potential explanation: fishing advisories, which are printed in English, Spanish, and Portuguese, are not accessible to new immigrants to New Bedford from Guatemala, who speak K'iché, a non-written Mayan language.²⁹ New Bedford also suffers from a multitude of health and environmental concerns, like statistically significantly higher blood lead levels³⁰ and combined sewer overflow.³¹

To be considered an environmental justice population in Massachusetts, the neighborhood must meet one of the following criteria:³²

1. The annual median household income is 65% or less of the statewide annual median household income;
2. People of color or Indigenous Peoples make up 40% or more of the population;
3. 25% or more of the households identify as speaking English less than “very well;”

²⁶ *Persistent Contamination with PCBs in New Bedford Harbor, Massachusetts, The US*, ENVIRONMENTAL JUSTICE ATLAS (Nov. 3, 2021), <https://ejatlas.org/conflict/pcbs-in-new-bedford-harbor-massachusetts#:~:text=New%20Bedford%20is%20made%20up,environmental%20justice%20communities%20%5B2%5D>.

²⁷ *Id.*

²⁸ Conservation Law Foundation, NEW BEDFORD, MASSACHUSETTS ENVIRONMENTAL JUSTICE IN THE TWENTY-FIRST CENTURY at 16 (August 2016), available at [Microsoft Word - FINAL New Bedford EJ Assessment.docx \(clf.org\)](#).

²⁹ *Id.* For additional evidence of failure to recognize K'iche language, see Colin Hogan, *DOJ settlement: New Bedford Schools must increase focus on K'iché language and culture*, NEW BEDFORD LIGHT (Sept. 19, 2022), [DOJ settlement: New Bedford schools must increase focus on K'iché language and culture - The New Bedford Light](#).

³⁰ Massachusetts Department of Public Health Environmental Justice Tool, [EJ screening custom mapping \(mass.gov\)](#) (to access data, select “New Bedford”).

³¹ ArcGIS CSO Reporting Map, [ArcGIS - CSO Reporting Map](#) (last visited Feb. 21, 2023).

³² An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy, St. 2021, c. 8, § 56; see also Environmental Justice Populations in Massachusetts, EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS (2022), <https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts#:~:text=In%20Massachusetts%2C%20an%20environmental%20justice,or%20more%20of%20the%20population>.

4. People of color or Indigenous Peoples make up 25% or more of the population and the annual median household income of the municipality in which the neighborhood is located does not exceed 150% of the statewide annual median household income.

New Bedford meets **all** criteria.³³ Over 78% of New Bedford residents meet criteria for an environmental justice population.³⁴ Because New Bedford residents are already burdened by environmental and health concerns, it is especially critical for New Bedford’s LEP speakers to be included in decisions like the expansion of a waste management facility, a decision that has the potential to worsen environmental and health conditions in their community.

b. Project Proponent Is Subject to the MEPA Approval Process and Accompanying State Law.

Before detailing how MEPA’s certificate approving Project Proponent’s NPC and SFEIR was a violation of its duties under Title IV, Complainants will first set forth the timeline and provide details of Project Proponent’s waste management facility construction. In 2019, the Project Proponent initially filed an Extended Environmental Notification Form with the MEPA Office.³⁵ The Project is part of a 71-acre waste management facility that currently recycles and processes glass, and seeks to additionally handle solid waste, including both municipal solid waste (“MSW”) and construction and demolition waste (“C&D”).³⁶ The Project is split into two phases, where Phase 1 includes the construction of:

³³ Environmental Justice Populations in Massachusetts, EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS (2022), <https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts>; *see also* List of Massachusetts Cities & Towns with Environmental Justice Populations (updated Nov. 2022), available at [EJ 2020 updated municipal statistics Nov2022.xlsx \(s3.us-east-1.amazonaws.com\)](https://www.mass.gov/doc/ej-2020-updated-municipal-statistics-nov2022.xlsx).

³⁴ MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS, 2020 ENVIRONMENTAL JUSTICE POPULATIONS (NOV. 2022) (available at: <https://www.mass.gov/doc/massachusetts-cities-towns-with-environmental-justice-populations/download>).

³⁵ MEPA Certificate at 1.

³⁶ *Id.* at 2.

[A] 27,5000 foot (sf) building for glass recycling/processing (“Glass Processing Building”), a 23,320-sf bunker building (“Glass Processing Bunker Building”) attached to the north side of the Glass Processing Building, a 21,973-sf side bunker building (“Glass Processing Side Bunker Building”) southeast of the Glass Processing Building, a railroad (“RR”) sidetrack from the main RR line to the glass processing facility, and installation of an approximately 1.9-megawatt (“MW”) solar photovoltaic (“PV”) array mounted on rooftops and canopies.³⁷

A majority of Phase 1 was completed after the Project Proponent obtained a Phase 1 waiver.³⁸

Currently, Project Proponent operates the glass recycling and processing portion of Phase 1, and construction is almost complete on all other Phase 1 components.³⁹ Phase 2 is construction of the MSW and C&D transfer station, which will include a 65,317 sf MSW and C&D tipping and processing building, extension of the railroad sidetrack, and construction of additional roof- and canopy-mounted solar arrays.⁴⁰ The facility will have trucks traveling to and from the site for thirteen hours straight every weekday and for nine hours on Saturdays;⁴¹ certain waste, like processed MSW, will be baled and shrink-wrapped for transport via rail.⁴²

This large undertaking will impact the surrounding environmental justice populations. Residents will be subjected to 418 daily truck trips, air pollutants, odor, and noise.⁴³ The facility will use 19,650 gallons of water per day and generate 113,750 gallons of wastewater at the same

³⁷ *Id.* at 2-3.

³⁸ *Id.* at 3.

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² *Id.*

⁴³ *Id.* at 4.

time.⁴⁴ The facility itself is located in an environmentally sensitive area, bordering both vegetated wetlands and land under water to the north and west, and the Acushnet Cedar Swamp State Reservation to the west.⁴⁵ By reviewing a map of New Bedford, it becomes immediately apparent that on weekdays, when 418 trucks will be traveling daily on Route 140 along with the additional traffic added by 90% of the Project Proponent’s employees, such traffic will impede and interfere with the comings and goings of school children, teachers, and staff of an elementary school located not more than 1,000 feet from the exit ramp.⁴⁶ Further, Route 140 runs through environmental justice populations to the north and south of the Project site.⁴⁷

To construct the Project, the Project Proponent is subject to MEPA review and must prepare and submit an Environmental Impact Report (“EIR”).⁴⁸ MEPA jurisdiction regarding this Project is “broad” because the Project Proponent is seeking financial assistance.⁴⁹ Project Proponent is subject to the EEA EJ Policy due to its location within an EJ population and because it exceeds EIR thresholds for sewage and solid waste.⁵⁰ Since initiating the MEPA review process in 2019, the Project Proponent over the past three years has: (1) filed an Extended Environmental Notification Form (“EENF”) in February 2019 and a two-part supplemental

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ *Id.*

⁴⁷ *Id.*

⁴⁸ 301 CMR 11.03(5)(a)(6), 11.03(9)(a).

⁴⁹ 301 CMR 11.01(2)(a)(2) (“MEPA jurisdiction is broad when a Project is undertaken by an Agency or seeks the provision of Financial Assistance”). *See also* Background Document on Proposed Regulations by Massachusetts Environmental Policy Act (MEPA) Office (Sept. 2021) at 2, available at [download \(mass.gov\)](https://www.mass.gov/info-details/download-mass-gov).

⁵⁰ MEPA Certificate at 5.

submittal to the EENF in March 2019;⁵¹ (2) received a Phase 1 Waiver from EEA in May 2019;⁵² (3) filed a two-part Draft Environmental Impact Report (“DEIR”) in November 2019;⁵³ (4) obtained MEPA approval for the DEIR in January 2020;⁵⁴ (5) submitted a Final Environmental Impact Report in January 2021;⁵⁵ (6) submitted a combined SFEIR and NPC in July 2022;⁵⁶ and finally, (7) received the MEPA Certificate for both its NPC and SFEIR on August 29, 2022.⁵⁷

EEA has acknowledged the widespread community opposition to the Project. In fact, in the Certificate, the EEA Secretary states: “I received over 300 comment letters from elected officials, the New Bedford City Council, legislators, community and environmental organizations, and residents on this NPC/SFEIR filing. Most commenters expressed concerns about the project because of its noise, air quality, odor and traffic impacts and its proximity to

⁵¹ GREEN SEAL ENVIRONMENTAL INC., EXPANDED ENVIRONMENTAL NOTIFICATION FORM (2019), available at: [MEPA-EENF-Complete-Report-Final.pdf \(parallelproductssustainability.com\)](#); GREEN SEAL ENVIRONMENTAL INC., EXPANDED ENVIRONMENTAL NOTIFICATION FORM, SUPPLEMENTAL SUBMITTAL (2019), available at: [PPNE-Supplemental-Submittal-1.pdf \(parallelproductssustainability.com\)](#); GREEN SEAL ENVIRONMENTAL INC., EXPANDED ENVIRONMENTAL NOTIFICATION FORM, SUPPLEMENTAL SUBMITTAL NO. 2 (2019), available at: [PPNE-Supplemental-Submittal-2.pdf \(parallelproductssustainability.com\)](#).

⁵² MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS, FINAL RECORD OF DECISION (2019), available at: [MEPA-Phase-One-Approval.pdf \(parallelproductssustainability.com\)](#).

⁵³ GREEN SEAL ENVIRONMENTAL INC., DRAFT ENVIRONMENTAL IMPACT REPORT (2019), available at: [Complete-PDF-pg-1.pdf \(parallelproductssustainability.com\)](#) and [Complete-PDF-pg-2.pdf \(parallelproductssustainability.com\)](#).

⁵⁴ MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS, CERTIFICATE OF SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (2020), available at: [15990-DEIR-Parallel-Products-of-New-England.pdf \(parallelproductssustainability.com\)](#).

⁵⁵ GREEN SEAL ENVIRONMENTAL, INC., FINAL ENVIRONMENTAL IMPACT REPORT (2021), available at: [feir.pdf \(parallelproductssustainability.com\)](#).

⁵⁶ GREEN SEAL ENVIRONMENTAL, INC., NOTICE OF PROJECT CHANGE AND SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (2022), available at: [sfeir.pdf \(parallelproductssustainability.com\)](#).

⁵⁷ MEPA Certificate at 1-2.

residence and schools. Most commenters opposed to the project have highlighted the environmental burden placed on EJ populations and residents in nearby sections of New Bedford....”⁵⁸

For the entirety of this Project, Project Proponent has been and remains subject to the Roadmap Law, which requires “additional measures to improve public participation by the environmental justice population,” when a proposed project “affects” such a population.⁵⁹ Such additional measures include “(i) making public notices, environmental notification forms, environmental impact reports and other key documents related to the Secretary’s review and decisions of a project review available in English and **any other language spoken by a significant number of the affected environmental justice population**, (ii) providing **translation services at public meetings** for a significant portion of an affected environmental justice population that lacks English proficiency”⁶⁰ The Secretary and MEPA Office have failed to meet their obligations under Title VI and the Roadmap Law.

When the Secretary and MEPA Office approved the Project Proponent’s NPC and SFEIR on August 29, 2022, they concluded that the Project Proponent “adequately and properly complie[d]” with the Massachusetts Environmental Policy Act and its implementing regulations.⁶¹ Having received the MEPA Office’s approval, the Project Proponent will go on to other state permitting procedures.

⁵⁸ *Id.* at 1-2.

⁵⁹ An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy, St. 2021, c. 8.

⁶⁰ *Id.* (emphasis added).

⁶¹ MEPA Certificate at 1.

c. Multiple Barriers Existed that Prevented New Bedford’s LEP Speakers from Being Involved in the MEPA Review Process.

Throughout the entirety of MEPA review process, the Project Proponent consistently failed to engage New Bedford’s LEP speakers about the Project and its impact on their community. The public process leading up to the NPC/SFEIR approval lacked community participation in multiple ways. First, the Project Proponent failed to provide adequate outreach to the community, and notice and accessible registration processes for public meetings. Then, for the handful of public meetings that were held, the Project Proponent provided little to no interpretation services for residents who required them. Additionally, the Project Proponent failed to make translated copies of factual and important documents available to LEP speakers in their own languages. Finally, the Project Proponent failed to provide the community with adequate time to comment on its NPC/SFEIR, a highly technical document that even to English speakers would be challenging to read and respond to quickly. Each of these obstacles is discussed in more detail below.

- i. Barriers to LEP speakers were created by inadequate outreach having been conducted, and insufficient notice of and poor access to the few public meetings that occurred.*

The Project Proponent failed to conduct sufficient community outreach throughout the MEPA review process. While their door-to-door outreach program purportedly reached 1,390 homes, such outreach occurred three years ago.⁶² The Project Proponent has not provided door-

⁶² Notably, although a Parallel Projects employee identified herself as responsible for community outreach at the last of several meetings held in 2021 (June 18, 2021), that person was not in attendance at any of the meetings held in 2022, so there is no evidence that anyone was responsible for outreach during 2022, when the Project Proponent submitted its NPC/SFEIR.

to-door outreach since 2019, during which time new people may have moved into or within the community. So limited is the Project Proponent's outreach that it describes its sponsorship of the 2019 New Bedford Chowderfest as one of its outreach events. Comments from the public demonstrate that the only reason many community members had any notice of Parallel Projects' plans was because community-based organizations, such as SCNU, worked hard to keep community members informed. Instead of reaching out to the community that would be impacted by its Project, the Project Proponent delivered notice of meetings **only** to state and city officials, and to only those community members and community-based organizations that had previously submitted comments regarding prior project filings or attended prior virtual meetings. Because few community members and community-based organizations comprised this group, much of the community was never provided notice of the meetings. The deficiency of community outreach is perfectly illustrated by one of the 300 comments provided to MEPA: "the **only** reason I am aware of the project, its development, and the MEPA process is due to the outreach efforts made by the members of the South Coast Neighbors United and the CAPP Committee."⁶³

Prior to the global COVID-19 pandemic, which first impacted Massachusetts in March 2020, community members report little to no contact with the Project Proponent. In fact, the Project Proponent held only four meetings in 2019, three of which occurred in June 2019 and at which the Project Proponent restricted attendance to 20 people. For over a year, from June 2021 to July 2022, the Project Proponent failed to conduct any public meetings at all. Finally, the Project Proponent held two virtual meetings on August 3, 2022, and August 18, 2022.⁶⁴

⁶³ See Attachment A at 39 (emphasis added).

⁶⁴ Parallel Projects' website indicates that it held a virtual public meeting on June 3, 2022, but that meeting actually occurred on August 3, 2022, which is evidenced by information on the first slide on the video recording of the

Frustratingly, these meetings, which were about the changes to Final Environmental Impact Report that had been submitted sixteen months earlier in January 2021, were held **after** the SFEIR, describing those changes, had been submitted to EEA in July 2022. The public comment period deadline to the MEPA Office on the SFEIR was August 22, 2022, just four days after the August 18, 2022 meeting.⁶⁵ This resulted in the SFEIR submission being without meaningful community involvement (see *subsection iv* below for more discussion on this point). Additional barriers to participating in the August 2022 public meetings were created by the Project Proponent requiring prospective attendees to register for these meetings on their website in advance.

The MEPA Office acknowledges in its Certificate that the Project Proponent failed to engage with the community: “I do recognize that the [Project] Proponent, by its own admission, did not engage the public on the changed components of the project prior to filing, which is inconsistent with the spirit of the EEA EJ Policy.”⁶⁶ Yet, in the face of this admission, the EEA Secretary and MEPA Office still certified the Project Proponent’s NPC/SFEIR, which concluded the MEPA review process.

meeting. The website also indicates that it held a virtual public meeting on August 18, 2022, but that recording is identical to the one labeled June 3, 2022. There is not a recording of the August 18, 2022 on Parallel Products’ website. See [Meetings – Parallel Products Sustainability](#).

⁶⁵ Subsequent to the August 2022 public meetings, the Project Proponent held two additional virtual meetings (September 21, 2022 and December 15, 2022) and one in-person meeting (January 11, 2023), which are not relevant to the within complaint as such complaint deals with the MEPA Certificate that was issued on August 29, 2022.

⁶⁶ See MEPA Certificate at 2. Interestingly, the EEA Secretary suggests that because the Project Proponent removed a third portion of the Project, a biosolid waste component, its defects in outreach and community involvement were thereby cured. Removal of the biosolid component does not cure such defects, because the Project Proponent continues to advance other portions of the Project without having meaningfully engaged community members, including LEP speakers, in the process leading up to the MEPA Certificate.

- ii. Barriers to LEP speakers were created by the existence of little or no interpretation services, which were not truly accessible to LEP speakers even when offered.

When registering for some public meetings, participants were prompted to indicate if they needed interpretation services; however, they were prompted to do so in **English only** and they were not able to indicate **what** language they required interpretation services in. Even after registering for the August 3, 2022 meeting and requesting language interpretation services, one person received an **English language** email with instructions on how to access interpretation services.⁶⁷ For LEP speakers, then, even requesting interpretation services for public meetings was not truly accessible.⁶⁸

Further issues around communication and access developed during the August 3, 2022 meeting. Attendees were permitted to enter questions into the virtual chat, but were not able to view any other entries in the chat, meaning they could not see if their questions were echoed by other community members or if clarification/answers were provided in the chat. Additionally, attendees who planned to ask a question live discovered that they were unable to unmute themselves on the virtual platform. This resulted in questions going unanswered by the Project Proponent. During the meeting itself, the lack of interpretation services was brought to the Project Proponent's attention. Their response was that the submissions requesting interpretation

⁶⁷ The email stated in English, "our registration records show you recently requested interpretation services for this event... Please clarify what sort of services you will need," indicating a total lack of awareness that a person requesting interpretation services may have trouble making the request for same in English.

⁶⁸ Even now, having obtained a MEPA Certificate and entering the site suitability application process with Massachusetts' Department of Environmental Protection, the Project Proponent continues to fail to make its public meeting registration process accessible to LEP speakers. *See* Attachment B (screenshot of recent registration form accessed February 17, 2023 for March 1, 2023 public meeting in English with instructions for requesting interpretation services in English only).

services had been provided too late to accommodate. As an alternative to live interpretation, the Project Proponent proposed that community members take additional time to meet with them individually at their facility, one on one. The Project Proponent recorded the meeting and posted it on its website, erroneously dated June 3, 2022.

A second virtual meeting was held on August 18, 2022. The Project Proponent provided live interpretation in Spanish at this meeting, though a recording of this meeting is not available on the Project Proponent's website in English or Spanish.⁶⁹ In fact, of the eight recordings of public meetings posted on Parallel Products' website, one is labeled "private video"; one is misdated (June 3, 2022); two (those labeled June 3, 2022 and August 18, 2022) are identical recordings of the same meeting (the meeting that occurred on August 3, 2022), and none of the recordings is available in any language besides English.⁷⁰ Notably, only one of these meetings occurred during the public comment period for the NPC/SFEIR.⁷¹

iii. Barriers to LEP speakers were created by the lack of materials translated into other languages.

Any LEP speakers seeking information from the Project Proponent about the Project would have experienced challenges finding multilingual or translated materials. The Parallel Products website has an entire webpage dedicated to the New Bedford Facility expansion where

⁶⁹ A recording labeled August 18, 2022 is available on the Project Proponent's website, but that recording is identical to the recording labeled June 3, 2022, which is, in fact, a recording of the August 3, 2022 public meeting.

⁷⁰ See Parallel Products "Community Meeting Recordings" available at [Meetings – Parallel Products Sustainability](#) (last visited Feb. 17, 2023).

⁷¹ Only the August 18, 2022 meeting occurred during the public comment period for the NPC/SFEIR, but as discussed earlier, there is no recording of this meeting on Parallel Projects' website (the recording labeled August 18, 2022 is a duplicate of the recording labeled June 3, 2022, which is actually a recording of the meeting that occurred on August 3, 2022).

links to twenty-five documents are available. Of those documents, only one – the air quality fact sheet – has been translated into a language other than English; this document was translated in Spanish and Portuguese, which, upon review by CLF, appeared to have been translated by a translator without sufficient understanding of the content to communicate language nuances accurately.⁷² Documents that contain a wealth of relevant information about the Project – such as the Traffic Impact Study Summary, January 2020 Informational Meeting PowerPoint, Site Rendering, EENF Certificate, and others – are not translated into any other languages, making them inaccessible to anyone who does not read English. So too was other important information, such as the Project Proponent’s NPC/SFEIR submittal and the announcement that the Project Proponent signed a host agreement with the City of New Bedford, leaving LEP speakers with no access to this process for which public involvement is essential.

Notably, SCNU members recall that fact sheets distributed by the Project Proponent sometimes contained instructions on how to request translation services by email. However, expecting LEP speakers to access translated copies of documents by first reading and following English-language instructions is nonsensical and demonstrates how poorly the Project Proponent cared to make its materials accessible to LEP speakers.

iv. Heightened barriers to LEP speakers were created by the short comment period permitted for the NPC/SFEIR.

⁷² See Parallel Products, “New Bedford Facility” available at [Parallel Products Sustainability](#) (last visited Feb. 17, 2023). The fact sheets contain phrases and language that are a literal translation of the text lacking accuracy and precision. For example, in the Spanish fact sheet, the phrase “How could the project impact me?” is translated as “¿Cómo podría impactar el proyecto en mí?” which if it had been translated accurately would have read, “¿Cómo podría impactarme el proyecto?” The phrase used in the fact sheet reads incoherently instead of fluently. Another example of language that fails to accurately convey the intended meaning is found in the phrase, “emisiones presenciales,” which is meant to communicate “on-site emissions,” but actually reads as “in person” or “face-to-face” emissions. Relying on computer-generated translation or translators who lack understanding of the English content instead of utilizing trained translators leads to documents that are not immediately accessible or clear to understand.

Approval of the NPC/SFEIR completes the MEPA review process for this Project, triggering the next step, which includes Massachusetts Department of Environmental Protection's ("DEP") review for permitting. Therefore, the public comment opportunity on the MEPA documents was the last chance for the community to participate in the MEPA process and the only time that an agency looks at the Project operations in their entirety, not limited to only one component of the Project, such as air emissions. Massachusetts law anticipates that the NPC and SFEIR will be submitted as two separate documents with two separate comment periods lasting for 20 days and 37 days, respectively.⁷³ Here, the MEPA Office allowed the Project Proponent to incorporate the NPC into the SFEIR, resulting in only one comment period for the public, instead of the typical two. This circumvention resulted in a comment period for the combined NPC/SFEIR of 37 days for a 997-page document. Many commenters requested an extension of time to comment.⁷⁴

Despite these requests for more time to comment, the MEPA Office refused to extend the comment period for any length of time, stating the only way to extend the comment period would be for the Project Proponent to withdraw and resubmit the NPC/SFEIR to restart the clock.⁷⁵ Predictably, the Project Proponent did not select this course of action. MEPA regulations detail the responsibilities of the MEPA Office.⁷⁶ Among other things, the MEPA Office is

⁷³ Background Document on Proposed Regulations by Massachusetts Environmental Policy Act (MEPA) Office (Sept. 2021) at 2 ("An ENF filing undergoes 30-day review period [with 20 days for public comment], while each EIR is subject to a 37-day review period [with 30 days for public comment]). *See* M.G.L. c. 30, §§ 62A-62C").

⁷⁴ Joint comment letter of CLF, SCNU, Slingshot, and Just Zero to Secretary Card, EEA at page 4 (Aug. 22, 2022).

⁷⁵ MEPA Certificate at 6-7.

⁷⁶ 301 CMR 11.01(5)(b).

responsible for: “ensuring adequate prior public notice of site visits, public consultation sessions, and comment periods, and meaningful opportunities for public review of review documents”⁷⁷

The MEPA regulations further allow the Secretary to extend the public comment period for up to 30 days “on account of the Proponent’s failure to meet circulation or Public Notice requirements, with the consent of the Proponent for a draft EIR or as part of a Special Review Procedure.”⁷⁸

Instead of using available time to engage the public, however, the Project Proponent was in negotiations with the City of New Bedford’s elected officials to reach an agreement that would result in the Project Proponent paying a fee to the city, engaging in discussions that were not transparent and inclusive, thereby shutting the community out of the process.⁷⁹

V. LEGAL ANALYSIS

a. The MEPA Certificate Sanctions Intentional Discrimination on the Basis of National Origin, Prohibited by Title VI of the Civil Rights Act.

The Project Proponent’s failure to provide language services to LEP speakers is intentional discrimination on the basis of national origin. By issuing the MEPA Certificate, then, EEA and the MEPA Office have engaged in intentional discrimination on the basis of national origin, which, as a recipient of federal funds, they are prohibited from doing.

i. Language-based discrimination can be a form of national origin discrimination.

⁷⁷ *Id.*

⁷⁸ 301 CMR 11.08(4).

⁷⁹ MEPA Certificate at 6 (stating that the Project Proponent did not engage the public with regard to its changed Project, because it was “still in negotiations with the City about these changes”); *see also* PARALLEL PRODUCTS DROPS BIOSOLIDS PROJECT IN AGREEMENT WITH CITY, City of New Bedford (July 15, 2022), available at [Parallel Products Drops Biosolids Project in Agreement with City - City of New Bedford Official Website \(newbedford-ma.gov\)](https://www.newbedford-ma.gov/parallel-products-drops-biosolids-project-in-agreement-with-city).

Courts have long articulated that language-based discrimination can be a form of national origin discrimination, which is prohibited under Title VI of the Civil Rights Act of 1964. In *Lau v. Nichols*, the Supreme Court held that the San Francisco Unified School District had violated state regulations promulgated under Section 602 of Title VI by California’s Department of Health, Education, and Welfare, which required school districts to “take affirmative steps to rectify the language deficiency” of “national origin-minority group children,” when the district failed to provide English-language instruction to Chinese-speaking students.⁸⁰ While “little case law”⁸¹ has attempted to test the parameters of the Supreme Court’s 2001 *Alexander v. Sandoval* decision,⁸² which refined the scope of *Lau*, there can be no doubt that language-based discrimination remains a form of national origin discrimination proscribed by Title VI of the Civil Rights Act. *See e.g., T.R. v. Sch. Dist. of Philadelphia*, 223 F. Supp. 3d 321, 335 (E.D. Pa. 2016) (the “Supreme Court’s pronouncement in *Lau* instructs that language based discrimination can constitute an actionable form of national origin discrimination”); *New York by Schneiderman v. Utica City Sch. Dist.*, 177 F. Supp. 3d 739, 752 (N.D.N.Y. 2016) (concluding that an allegation that senior school district officials “directed their subordinates to divert LEP

⁸⁰ *Lau v. Nichols*, 414 U.S. 563, 568, 94 S. Ct. 786, 789, 39 L. Ed. 2d 1 (1974) (internal quotations omitted) (abrogated on other grounds by *Alexander v. Sandoval*, 532 U.S. 275, 121 S. Ct. 1511, 149 L. Ed. 2d 517 (2001), holding that Section 601 of Title VI prohibits only intentional, not disparate impact, discrimination). *See also United States v. Maricopa Cnty., Ariz.*, 915 F. Supp. 2d 1073, 1079–80 (D. Ariz. 2012) (noting that “longstanding case law, federal regulations and agency interpretation of those regulations hold language-based discrimination constitutes a form of national origin discrimination under Title VI”).

⁸¹ *Almendares v. Palmer*, 284 F. Supp. 2d 799, 805 (N.D. Ohio 2003) (stating that “even if there is little case law after *Sandoval*, [the defendants’ argument that the] plaintiffs can only allege a claim of intentional discrimination by demonstrating they were ‘treated differently than similarly-situated individuals’ is not an accurate statement of the law”).

⁸² *Alexander v. Sandoval*, 532 U.S. 275, 121 S. Ct. 1511, 149 L. Ed. 2d 517 (2001) (holding that Section 601 of Title VI prohibits only intentional, not disparate impact, discrimination).

immigrant students aged 17–20 ... into alternative, unequal educational settings” was sufficient to state a Title VI claim); *United States v. Maricopa Cnty., Ariz.*, 915 F. Supp. 2d 1073, 1079 (D. Ariz. 2012) (“longstanding case law, federal regulations and agency interpretation of those regulations hold language-based discrimination constitutes a form of national origin discrimination under Title VI”).

ii. Failing to provide language services to LEP speakers can be a form of discrimination on the basis of national origin.

Federal courts have also recognized that failing to provide language services to LEP speakers can be a form of intentional discrimination on the basis of national origin. In *Reyes v. Clarke*, for example, the court denied a defendant’s motion to dismiss, noting that “courts have accepted at the pleading stage that the failure to provide services in any language other than English may support an inference for intentional discrimination on the basis of national origin.”⁸³ See also *H.P. v. Bd. of Educ. of City of Chicago*,⁸⁴ where the court observed that “all Plaintiffs must allege to suggest intentional discrimination” and avoid dismissal on defendant’s motion to dismiss is allege that “she was treated differently than other students because of her race or national origin, and has provide[] specific examples of the ways in which she was treated differently.”

The federal government has also recognized the importance of providing language services to LEP speakers as an essential mechanism for Title VI compliance. In an effort to improve accessibility of services to LEP persons, President Clinton ordered Federal agencies to

⁸³ *Reyes v. Clarke*, No. 3:18CV611, 2019 WL 4044316, at *24 (E.D. Va. Aug. 27, 2019).

⁸⁴ *H.P. v. Bd. of Educ. of City of Chicago*, 385 F. Supp. 3d 623, 638 (N.D. Ill. 2019) (citing *Marcial v. Rush Univ. med. Ctr.*, No-16-cv-1609, 2017 WL 2180503, at *4 (N.D. Ill. May 18, 2017).

“ensure that recipients of Federal financial assistance ... provide meaningful access to their LEP applicants and beneficiaries ... [and] ensure that the programs and activities they normally provide in English are accessible to LEP persons and thus *do not discriminate on the basis of national origin in violation of title VI ...*” Access to Persons with Limited English Proficiency, 2000. Exec. Order No. 13,166, 65 Fed. Reg. 50,121 (2000) (emphasis added).⁸⁵ The EPA’s 2004 LEP Guidance also emphasizes that “[i]n certain circumstances, failure to ensure that LEP persons can effectively participate in or benefit from Federally assisted programs and activities may violate the prohibition under Title VI of the Civil Rights Act of 1964 ... against national origin discrimination.”⁸⁶

Disparate impact discrimination on the basis of national origin also remains unlawful under Title VI with respect to actions by recipients of federal financial assistance from the EPA. *See Nondiscrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency*, 40 C.F.R. Part 7 (making clear that actions having “the effect of” discrimination are prohibited alongside actions that are intentionally discriminatory); *see also Guidance to Environmental Protection Agency Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient*

⁸⁵ Significantly, the EPA has stated that Executive Order 13166’s prohibition against disparate impact discrimination is not undone by the U.S. Supreme Court’s decision in *Alexander v. Sandoval*. *See Guidance to Environmental Protection Agency Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*, Docket No. FRL-7776-6, 69 Fed. Reg. 35,602, 35,605 (June 25, 2004) (concurring with the Department of Justice’s position that *Alexander v. Sandoval* does not “impliedly strik[e] down the disparate impact prohibition in the regulations promulgated under Title VI that form part of the basis for Executive Order 13166”).

⁸⁶ *Guidance to Environmental Protection Agency Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*, Docket No. FRL-7776-6, 69 Fed. Reg. 35,602, 35,604 (June 25, 2004); *see also EPA Order - Compliance with Executive Order 13166: Improving Access to Services for Persons with limited English Proficiency* (Feb. 10, 2017) (which, by providing internal management guidance of EPA’s language access program, demonstrates the very high level of commitment the EPA has to ensuring language services for LEP people).

Persons, Docket No. FRL-7776-6, 69 Fed. Reg. 35,602, 35, 605 (June 25, 2004) (maintaining that *Alexander v. Sandoval* does not upset the prohibition against disparate impact discrimination by Title VI). Therefore, an allegation that language services were not provided to LEP speakers in a setting where English language services were provided to English speakers supports a claim of discrimination on the basis of national origin.

iii. The Project Proponent's failure to provide language services to LEP speakers is evidence of discrimination on the basis of national origin.

The Project Proponent discriminated against LEP speakers on the basis of national origin when it failed to provide interpretation and translation services during the MEPA review process. The Project Proponent knew about New Bedford's substantial LEP population; the Project Proponent also knew that such population requires written translation of materials and verbal interpretation services at public meetings. Yet, the Project Proponent consistently failed over the course of three years to provide these materials and services. Adding insult to injury, the MEPA Office was aware of and ignored the Project Proponent's failures. By issuing a Certificate, then, the MEPA Office has sanctioned the Project Proponent's actions that discriminated against LEP speakers on the basis of national origin in contravention of Title VI of the Civil Rights Act of 1964.

b. The MEPA Certificate was Issued in Violation of the EPA's Regulations and Guidance Proscribing Discrimination on the Basis of National Origin and Requiring the Reduction of Language Barriers.

The EPA's implementing regulations and guidance, in line with Title VI, both proscribe language-based discrimination. In these materials, the EPA has enumerated prohibited actions

and factors that can be used to determine whether a recipient of federal funds has violated Title VI. A full assessment of the activities that occurred over the course of the MEPA review process leads to the inevitable conclusion that EEA and the MEPA Office failed to comply with the EPA's regulations and guidance when it sanctioned the Project Proponent's failure to even minimally reduce language barriers for LEP speakers.

i. The EPA's Title VI implementing regulations proscribe recipients of federal funds from intentional and disparate impact discrimination on the basis of national origin.

The EPA has codified its Title VI implementing regulations under 40 C.F.R. Part 7, *Nondiscrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency* ("EPA Regulations" or "Part 7").⁸⁷ The EPA Regulations apply to EEA and the MEPA Office. *See* 40 C.F.R. § 7.15, Applicability (stating that Part 7 "applies to all applicants for, and recipients of, EPA assistance in the operation or activities receiving such assistance"). Furthermore, Part 7 provides that recipients of EPA assistance are prohibited from discriminating on the basis of national origin, either with intention or by disparate impact. *See* 40 C.F.R. § 7.35(b) (stating that "[a] recipient shall not use criteria or methods of administering its program or activity which **have the effect of** subjecting individuals

⁸⁷ *See also Guidance to Environmental Protection Agency Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*, Docket No. FRL-7776-6, 69 Fed. Reg. 35,602, 35,605 (June 25, 2004) (describing the authority of the EPA Regulations as originating in Section 602 of Title VI, which "authorizes and directs Federal agencies that are empowered to extend Federal financial assistance to any program or activity 'to effectuate the provisions of [section 601] ... by issuing rules, regulations, or order of general applicability'"). So committed is the EPA to providing meaningful access to LEP individuals that in 2017 it provided administrative updates to its order, *Compliance with Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency* (Feb. 10, 2017), which provides internal management guidance of EPA's language access program with an emphasis on "providing LEP individuals with meaningful access to EPA's programs and activities," though the order is not intended to be utilized in administrative and judicial proceedings.

to discrimination because of their ... national origin, ... or **have the effect of** defeating or substantially impairing accomplishment of the objectives of the program or activity with respect to individuals of a particular ... national origin ...”) (emphasis added). With the language emphasized above (“have the effect of”), Part 7 signals that intentional *and* disparate impact discrimination are prohibited under the regulations.

Significantly, under the EPA Regulations, a recipient is prohibited from engaging in, *inter alia*, the following discriminatory actions:

- Providing any person service, air or other benefit that is different, or is provided differently from that provided to others under the program or activity;
- Subjecting a person to segregation in any manner or separate treatment in any way related to receiving services or benefits under the program or activity;
- Denying a person or any group of persons the opportunity to participate as members of any planning or advisory body which is integral part of the program or activity.⁸⁸

These prohibitions will be discussed in more detail in section (b)(iii) of the Legal Analysis.

ii. The EPA Guidance requires recipients of federal funds to reduce language barriers.

In addition to promulgating the regulations under Part 7, the EPA has published the EPA Guidance, first discussed in section (a)(ii) of the Legal Analysis. Noting that “[t]he Federal Government is committed to improving the accessibility of programs and activities to eligible LEP persons,” the EPA Guidance instructs recipients of federal financial assistance to reduce language barriers that would preclude meaningful access by LEP persons to such programs and

⁸⁸ 40 C.F.R. § 7.35(a)(2), (4), and (5).

activities, and that failure to do so can “violate the prohibition under Title VI of the Civil Rights Act of 1964 ... and Title VI regulations against national origin discrimination.”⁸⁹

Under the EPA Guidance, there are four flexible and fact-dependent factors to determine if a recipient has met their obligation to provide LEP services:

1. the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
2. the frequency with which LEP individuals come into contact with the program;
3. the nature and importance of the program, activity, or service provided by the program to people’s lives, and
4. the resources available to the grantee/recipient and costs.⁹⁰

These factors will also be discussed in more detail in section (b)(iii) of the Legal Analysis.

Significantly, the EPA Guidance also addresses the importance of translating “vital written materials”;⁹¹ and emphasizes the importance of quality and accuracy, noting that “regardless of the type of language services provided, quality and accuracy of those services can be critical in order to avoid serious consequences to the LEP person and to the recipient.”⁹² Merely providing some form of language services, then, does not necessarily amount to compliance with EPA Guidance if the quality of such services is poor and the documents that are translated do not include the “vital” ones.

iii. The MEPA Certificate sanctions the Project Proponent’s failure to provide adequate language services to LEP speakers in violation of EPA regulations and guidance.

⁸⁹ EPA Guidance at 602.

⁹⁰ *Id.* at Part V, *How Does a Recipient Determine the Extent of Its Obligation to Provide LEP Services?*

⁹¹ *Id.* at Part VI, *Selecting Language Assistance Services.*

⁹² *Id.*

As discussed in Section V(b)(i) of this complaint, *supra*, under the EPA Regulations, a recipient is prohibited from engaging in certain discriminatory actions. With respect to the first action identified earlier – providing any person services differently from those provided to another under the program or activity – there can be no doubt that English-speaking members of the New Bedford community had much greater access to the Project than did their LEP counterparts. The Project Proponent conducted outreach and notice of public meetings, albeit at insufficient levels, in English, thereby providing different services for New Bedford community members depending on whether they were English-speaking or not.⁹³ Furthermore, until August 18, 2022, the last of the public meetings held before the issuance of the MEPA Certificate, no interpretation services were provided at any of the public meetings.⁹⁴ Finally, all the documents on the Project Proponent’s website, with the exception of the air quality fact sheet, were available in English only, thereby treating residents who read English differently than those who read other languages.⁹⁵

With respect to the second action prohibited by the EPA Regulations – subjecting a person to segregation or separate treatment – the Project Proponent, when challenged on not providing interpretation services during a virtual public meeting on August 3, 2022, offered to remedy that defect by inviting LEP speakers to make special arrangements to come to the facility at a later time to obtain information about the Project that was available to English-speaking

⁹³ See Section IV(c)(i) of this complaint - *Barriers presented by inadequate outreach, and insufficient notice of and poor access to the few public meetings that occurred.*

⁹⁴ See Section IV(c)(ii) of this complaint - *Barriers presented due to little or no interpretation services that, when offered, were not truly accessible to LEP speakers* (a Spanish interpreter was provided at the August 18, 2022 public meeting, though Spanish is not the only language spoken by a significant number of members of New Bedford’s LEP community).

⁹⁵ See Section IV(c)(iii) of this complaint - *Barriers presented by lack of materials translated into other languages.*

community members at the public meeting. This proposal was in every way a mechanism of segregation, since it would separate community members based on the language they speak. Furthermore, by instructing LEP speakers to come to the facility, the Project Proponent deprived them of the accountability and safety that exists in a public forum, and unlawfully shifted the onus from the Project Proponent, where it belongs, to LEP speakers. Finally, the invitation was only an empty offer if no one at the facility was competent to interpret for residents who might have accepted it.⁹⁶

With respect to the last action proscribed by the EPA Regulations – denying a person the opportunity to participate as members of any planning that is integral to the program or activity – when it failed to provide interpretation and translation services over the course of the MEPA review process, the Project Proponent denied New Bedford’s LEP speakers the “opportunity to participate.”⁹⁷ This fact is not even disputed in the MEPA Certificate. By issuing the Certificate, then, the Respondent has failed to comply with the EPA Regulations that prohibit a recipient from engaging in such proscribed discriminatory actions. Because the EPA Regulations explicitly prohibit a recipient from using criteria or methods which **have the effect of** subjecting individuals to discrimination because of their national origin, there can be no doubt that EEA has violated such regulations by issuing the MEPA Certificate.

Turning now to the EPA LEP Guidance, whether a recipient has met their obligation to provide LEP services can be determined by looking at the four factors enumerated in the previous subsection. In the instant case, the Project Proponent’s activities, sanctioned by EEA

⁹⁶ See, e.g., *EPA Guidance at Part VI, Selecting Language Assistance Services* (observing that “regardless of the type of language services provided, *quality and accuracy* of those services can be critical in order to avoid serious consequences to the LEP person and to the recipient”) (emphasis added).

⁹⁷ 40 C.F.R. § 7.35(a)(5).

and the MEPA Office, fail to measure up on all fronts. The first two factors focus on the community being affected; specifically, the number or proportion of LEP individuals likely to be encountered and the frequency with which such individuals encounter the program. The larger the proportion and the higher the frequency, then, the more likely language services are required. There is no questioning the fact that New Bedford has a sizeable LEP community, which is known to EEA. In fact, EEA has a database of communities in Massachusetts considered EJ populations⁹⁸ and New Bedford is one of the municipalities on the list of “Massachusetts Cities & Towns with Environmental Justice Populations” due to its population’s English isolation, among other factors.⁹⁹ Therefore, by permitting the MEPA review process to exclude a large number of LEP speakers – members of New Bedford’s environmental justice population – EEA has failed to meet its obligations under the EPA Guidance.

The third factor under the EPA’s LEP Guidance relates to the nature and importance of the program; specifically, how the program will impact the lives of the LEP community. The greater the impact, the stronger the case for providing holistic language services. As discussed earlier, the construction and operation of a waste management facility of this size will significantly impact the lives of New Bedford’s community members. The MEPA process is the venue for concerned residents to learn about what is happening in and to their community, as well as the venue for them to voice their concerns and/or opposition to the Project. As noted earlier, hundreds of residents participated in the MEPA review process, showing their concern;

⁹⁸ *Environmental Justice Populations in Massachusetts*, MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS (2022), <https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts>.

⁹⁹ 2020 ENVIRONMENTAL JUSTICE POPULATIONS, MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS (Nov. 2022), available at: <https://www.mass.gov/doc/massachusetts-cities-towns-with-environmental-justice-populations/download>.

yet many residents of New Bedford (those who are LEP speakers) were excluded. Measured against the third factor, EEA has failed to meet its obligation under EPA Guidance by leaving New Bedford's LEP community out of the Project Proponent's plan to erect a community-changing facility.

The fourth and final factor of the EPA's LEP Guidance deals with the resources available to the recipient and cost. This factor is a balancing factor, demonstrating the EPA's recognition that smaller entities may not have resources to provide extensive interpretation and translation services. EEA is a statewide entity that in the 2023 Fiscal Year Budget has a total unrestricted budget over \$127 million.¹⁰⁰ Because EEA is not a small entity, it certainly has the necessary resources to require a process that is fully accessible to LEP speakers. Further, the issue here is not even whether the language services provided were adequate, but whether language services were provided **at all** during most of the MEPA review process.

An analysis of the instant case against all four factors leads to the inevitable result that EEA and the MEPA Office had the capacity to ensure that language services were accessible to LEP speakers. The MEPA Certificate, then, is a blatant dereliction of duty by EEA to New Bedford's residents who do not speak English proficiently, and, as such, a violation of EEA's obligation, as a federally funded entity, to abstain from discrimination on the basis of national origin. The impact of the Project on the New Bedford LEP community has been clearly apparent and clearly known throughout the entire MEPA review process; this is evinced by the repeated calls for community meetings and the hundreds of public comments submitted on various MEPA filings. In fact, Complainants CLF and SCNU, along with two other organizations, Just Zero and

¹⁰⁰ FY 2023 Final Budget, 2022 Mass. Acts 126.

Slingshot, sent joint comments to the Secretary of EEA and director of the MEPA Office detailing the four groups' concerns regarding the Project's impact on New Bedford's community and living environment, including its LEP population.¹⁰¹ Yet in a city of almost 100,000 people, the Project Proponent expressly limited attendance to only **twenty** people to the four meetings it held in 2019. With Phase 1 of the Project involving the construction of two 20,000+ sf buildings, a railway, and a solar array, that the Project Proponent limited the number of people who could participate in public meetings on such an immense project to sixty people out of 100,000 residents is an alarming fact.

The NPC/SFEIR, the very document that the community was called to comment on for the conclusion of the MEPA review process, is almost a thousand pages and available in English only. Further, even for those residents who had English reading ability, the community was only given two weeks to digest and comment on this extensive document and was afforded only one public meeting on August 18, 2022 with the Project Proponent at which to ask questions. A document of this length and technical density would be difficult for even an English speaker with a high level of education to digest in that timeframe; that the MEPA Office gave LEP speakers this timeframe to read a long, technical document in English is an exercise of gross disregard of their duty to uphold Title VI's prohibition against national origin discrimination.

The EPA LEP Guidance also instructs recipients to provide translation services for "vital documents." In the instant case, at a minimum, documents such as notices advising LEP speakers of free language assistance, and notices of environmental hazards must be considered "vital" to the MEPA review process. Other important documents, such as the Traffic Impact Study and even a summary of the NPC/SFEIR and instructions on how to comment on same, are also

¹⁰¹ See Attachment C, Letter to EEA Secretary from CLF, Just Zero, SCNU, and Slingshot (August 22, 2022).

“vital” to participate in the MEPA process. These documents and others are incredibly important to LEP speakers precisely because they describe how the Project would impact their community, environment, and health; they contain the key information that New Bedford’s LEP community needed to be informed and to meaningfully participate in the public comment period; yet none of these documents were translated into the languages spoken by community residents. Instead, the only items translated into other languages available on Parallel Products’ website are Spanish and Portuguese language versions of the air quality fact sheet, which, upon review by a CLF staff person fluent in both languages, seem confusing and to have been produced by a computer or translator who lacks understanding of the English content rather than by a trained translator.¹⁰² EEA and the MEPA Office should not have issued a MEPA Certificate finding that the Project Proponent’s NPC/SFEIR adequately and properly complied with MEPA or other laws without the Project Proponent first demonstrating that it included New Bedford’s LEP speakers, members of an environmental justice population, in the process as it is required to by law.

In the MEPA Certificate, the EEA Secretary acknowledges that the Project Proponent did not do enough to engage the public and that its actions were “inconsistent with the spirit of the EEA EJ Policy.”¹⁰³ The Secretary, however, seemed unconcerned about this because the Project Proponent simply “anticipates”¹⁰⁴ that MassDEP will require additional outreach to the New Bedford community.¹⁰⁵ EEA and the MEPA Office, however, cannot pass on their obligations and duties under Title VI to the next reviewing agency. MassDEP public engagement

¹⁰² See footnote 72.

¹⁰³ MEPA Certificate at 2.

¹⁰⁴ *Id.* at 6.

¹⁰⁵ *Id.*

requirements that will apply once the Project Proponent files an application for site suitability approval do not mitigate EEA's and the MEPA Office's failure to ensure adequate outreach and inclusion of LEP speakers by the Project Proponent during its review process.

VI. RELIEF REQUESTED

It is evident from the MEPA Certificate that the Secretary, EEA, and MEPA Office knew of the Project Proponent's failure to meaningfully engage New Bedford's LEP residents during the MEPA review process. EEA and the MEPA Office's approval of the Project Proponent's NPC/SFEIR is a breach of their duties under Title VI to safeguard LEP speakers' access to federally funded programs. Complainants respectfully request that the EPA's External Civil Rights Compliance Office:

1. Suspend the Project Proponent's ongoing permitting process with the Massachusetts Department of Environmental Protection until the conclusion of ECRCO review;
2. Require EEA to re-open the MEPA review process to allow additional public comment opportunities following written translation of project materials into languages spoken by LEP speakers affected by the Project and at least two in-person public meetings with language interpretation services, as well as a fully accessible registration process for public meetings;
3. Suspend any further federal funding disbursements to EEA until the MEPA Office consistently requires environmental justice and language access compliance for all project proponents; and
4. Issue any other remedy that the EPA deems appropriate.

Federal funding from the EPA is supporting EEA in its failure to require language access to residents of New Bedford, thus discriminating on the basis of national origin. Therefore, such funding should be suspended until the EPA is confident that their funds are being used lawfully. On June 1, 2020, CLF and an environmental justice non-profit organization, GreenRoots, Inc., filed a similar claim against EEA, among other agencies, regarding insufficient language access

regarding the siting of an electrical substation and transmission lines in East Boston, which remains open at the time of this filing. At this point in time, an individualized remedy to this solution is not proportionate to the harm. EEA is once again failing to ensure LEP residents are meaningfully engaged in situations where it oversees and engages in community-altering decisions. To prevent this continued pattern of harm, a systematic remedy is required; that remedy is suspension of EPA funds to EEA.

VII. CONCLUSION

For these reasons, Complainants respectfully request that ECRCO accept this complaint, promptly and thoroughly investigate the allegations set forth in this complaint, and take all actions necessary to ensure that Respondents are brought into full compliance with the applicable law.

Respectfully submitted,

South Coast Neighbors United, Inc. and Conservation Law Foundation, Inc.
By its attorneys,



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Attachment A: MEPA Certificate and Comments



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August 29, 2022

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
NOTICE OF PROJECT CHANGE AND
SUPPLEMENTAL FINAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME : South Coast Renewables, LLC (formerly known as
Parallel Products of New England)
PROJECT MUNICIPALITY : New Bedford
PROJECT WATERSHED : Buzzards Bay
EEA NUMBER : 15990
PROJECT PROPONENT : South Coast Renewables, LLC (formerly known as
Parallel Products of New England, Inc.)
DATE NOTICED IN MONITOR : July 22, 2022

Pursuant to Section 11.08(8)(c)(2) of the MEPA regulations, I hereby determine that the Supplemental Final Environmental Impact Report (SFEIR) submitted on this project **adequately and properly complies** with the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62I) and with its implementing regulations (301 CMR 11.00).

This project was originally filed in 2019, and has been the subject of substantial public attention and scrutiny. Review of the Final Environmental Impact Report (FEIR) for the project in 2021 resulted in issuance of a Scope for an SFEIR, focused primarily on analyzing impacts from potential per- and polyfluoroalkyl substances (PFAS) discharges from the biosolids processing component of the project and further analysis of impacts on surrounding environmental justice (EJ) populations. Subsequent to issuance of the Scope for an SFEIR in April 2021, the project was amended to remove the biosolids processing and this joint Notice of Project Change (NPC)/SFEIR filing was submitted with MEPA shortly thereafter.

I received over 300 comment letters from elected officials, the New Bedford City Council, legislators, community and environmental organizations, and residents on this NPC/SFEIR filing. Most commenters expressed concerns about the project because of its noise, air quality, odor and traffic impacts and its proximity to residences and schools. Most

commenters opposed to the project have highlighted the environmental burden placed on EJ populations and residents in nearby sections of New Bedford associated with the cumulative impacts of existing solid waste facilities, including active and inactive landfills, hazardous waste sites and traffic congestion. Many commenters also indicated that the Proponent did not engage the public prior to filing the NPC/SFEIR regarding the changed components of the project. The Proponent acknowledges that the removal of biosolids was the subject of negotiations with the City of New Bedford (City), and that an agreement was reached only recently such that prior engagement with the public was not possible.

While I acknowledge the strong concerns raised by the public, the NPC/SFEIR filing represents the culmination of a multi-year review through the MEPA process. The impacts of the project have been thoroughly studied, and the outstanding issues that were included in the Scope for the SFEIR have been addressed in this filing. Importantly, the significant concerns raised about PFAS contamination of the wastewater stream and air emissions associated with biosolids processing are no longer implicated by the project. I do recognize that the Proponent, by its own admission, did not engage the public on the changed components of the project prior to filing, which is inconsistent with the spirit of the EEA EJ Policy. MEPA policies now seek to ensure opportunities for enhanced public participation at every step of the permitting process. Nevertheless, the required determination upon the filing of an NPC under 301 CMR 11.10(8) is whether the change to the project “significantly increases the environmental consequences of the Project” such that it warrants further MEPA review in the form of a supplemental EIR or changes to the Scope. Because the environmental consequences of the project are clearly reduced from the proposed change, I do not find there is basis to require further review on the basis of the project change. As to the SFEIR, no substantial issues exist that cannot be addressed through subsequent permitting. I note that traffic congestion on existing roadways, particularly during school peak periods, is acknowledged by the Proponent and should continue to be addressed in permitting.

As with any MEPA project, the conclusion of MEPA review is only the beginning of state permitting procedures. It is my expectation that the Massachusetts Department of Environmental Protection (MassDEP) will require a comprehensive and public permitting process. As a solid waste facility, it is subject to the enhanced public participation protocols required by MassDEP. The Proponent is directed to comply fully with these protocols.

Project Description

As described in the NPC/SFEIR, the project includes the construction of a waste management facility comprised of a glass recycling/processing facility and a solid waste handling and processing facility that will accept 1,500 tons per day (tpd) of municipal solid waste (MSW) and construction & demolition (C&D) waste. As discussed below, the biosolids processing component, which was included starting with the Expanded Environmental Notification Form (EENF) filed in 2019, was removed from the project and is no longer proposed.

The project will be constructed in two phases. Phase 1 includes construction of: a 27,500-square foot (sf) building for glass recycling/processing (“Glass Processing Building”), a 23,320-sf bunker building (“Glass Processing Bunker Building”) attached to the north side of the Glass Processing Building, a 21,973-sf side bunker building (“Glass Processing Side Bunker

Building”) southeast of the Glass Processing Building, a railroad (RR) sidetrack from the main RR line to the glass processing facility, and installation of an approximately 1.9-megawatt (MW) solar photovoltaic (PV) array mounted on rooftops and canopies. The glass recycling/processing facility will also occupy an approximately 50,000-sf portion of an existing 92,200-sf building (“existing building”). The glass recycling/processing facility will recycle glass collected through the Massachusetts bottle deposit system. Glass processing will include crushing, sizing and separation of the glass by color. Processed glass will be stored in bunkers until it is loaded into rail cars or trucks for shipment to bottle manufacturers. Phase 1 was proposed by the Proponent to meet a regional need for glass processing by providing an alternative market for glass that would otherwise be discarded. The Proponent submitted an EENF in February 2019 with a Phase 1 Waiver request to allow Phase 1 to proceed prior to completion of MEPA review of the second phase of the project. A Phase 1 Waiver was granted in a Final Record of Decision (FROD) issued on May 15, 2019 and no further MEPA review of the Phase 1 project components, as described in the EENF, is required. The glass recycling facility is operating in the existing building and in the 27,500-sf Glass Processing Building. Construction of the other Phase 1 components is almost complete.

Phase 2 includes the MSW and C&D transfer station, extension of the RR sidetrack to service these facilities and construction of an additional roof- and canopy-mounted PV array with a generating capacity of 1.35 MW. The transfer station will be comprised of a 65,317-sf MSW and C&D tipping and processing building attached to the west side of the existing building, which will house sorting and processing equipment to remove waste ban items and separate out recyclable materials. The MSW tipping building will have four 70-ft high (above ground level) exhaust stacks and the MSW processing building will have three 70-ft high exhaust stacks. Shipment of all outbound material will primarily occur via rail car.

According to the NPC/SFEIR, MSW and C&D material will be delivered to the facility by truck between 6:00 AM and 7:00 PM, Monday through Friday, and from 7:00 AM to 4:00 PM on Saturday. The facility will receive C&D, baled MSW, and loose MSW in live floor trailers, transfer trailers, and packer trucks (respectively). All material will be deposited and processed within the tipping and processing building. Trucks will be weighed on a truck scale and backed into the proposed tipping building to tip their load. Processing equipment and manual picking lines will remove waste ban items, including recyclables, from the mixed waste and will separate other recyclable materials for recycling or diversionary uses. Extracted recyclables are expected to comprise 20 percent of the MSW throughput and will be sent to recycling markets by rail or truck. The facility will include two processing lines with a total capacity of 40 tons of MSW per hour. Residual waste will be baled, shrink-wrapped, and transported via rail for disposal at off-site locations. Baled waste delivered to the site will not be further processed by transported off-site. The facility will receive Category 2 (pre-processed) and Category 3 (bulky waste with minimal recyclable material) C&D, which will be delivered to the tipping facility in trailers. Processed MSW will be baled and shrink-wrapped prior to being loaded onto rail cars. The facility is anticipated to generate 1,300 tpd of processed MSW and C&D for disposal, which would fill approximately 15 rail cars each day. Prior to completion of the permitting process, the Proponent will be required to provide a financial assurance mechanism (FAM) to MassDEP that will include sufficient funds to clean up the site and remove any stored solid waste on the site in the event of an unplanned closure of the facility.

Changes Since the Filing of the FEIR

The NPC/SFEIR identified the changes to the project design listed below.

- The biosolids drying facility is no longer proposed;
- The proposed tonnage of waste to be accepted at the site has not increased since the filing of the FEIR; however, the proposed MSW tipping building has increased in size from 48,900 sf to 65,317 sf to provide more interior space for waste processing and to enclose rail tracks adjacent to the building;
- The hours during which material will be accepted at the site have been reduced from 5:00 AM to 9:00 PM Monday through Saturday and 6:00 AM to 6:00 PM to 6:00 AM to 7:00 PM Monday through Friday and 7:00 AM to 4:00 PM on Saturday (material will not be accepted on Sunday); and,
- A 1.35-MW of rooftop- and canopy-mounted solar PV will be installed in Phase 2.

Project Site

The 71-acre project site is located within the New Bedford Industrial Park at 100 Duchaine Boulevard. The site is generally bounded by industrial properties and Samuel Bernet Boulevard to the north, Phillips Road to the east, an Eversource maintenance facility to the south, and RR tracks and the Acushnet Cedar Swamp State Reservation to the west. The site was previously developed by the Polaroid Corporation and contains access roads, parking areas, stormwater management infrastructure and numerous buildings. The Proponent purchased the site in 2016 and has relocated a portion of its processing and recycling operations from 969 Shawmut Avenue in New Bedford to the project site. The site also contains a 1.6-MW solar PV system mounted on a series of carport canopies. Access to the site is provided from Duchaine Boulevard, via an internal one-way loop roadway surrounding the proposed facility.

Most of the northern and western parts of the site are comprised of wetland resource areas, including Bank, Bordering Vegetated Wetlands (BVW), Land Under Water (LUW), and Riverfront Area. The project site is not located in Priority and/or Estimated Habitat as mapped by the Division of Fisheries and Wildlife's (DFW) Natural Heritage and Endangered Species Program (NHESP) or an Area of Critical Environmental Concern (ACEC). The site does not contain any structures listed in the State Register of Historic Places or the Massachusetts Historical Commission's (MHC) Inventory of Historic and Archaeological Assets of the Commonwealth.

Environmental Impacts and Mitigation

Potential environmental impacts associated with full buildout of the project include alteration of 8.2 acres of land; alteration of 4,095 sf of BVW, 45 linear feet (lf) of Bank, 4,700 sf of Bordering Land Subject to Flooding (BLSF) and 4,700 sf of Riverfront Area; generation of 718 average daily trips (adt), including 418 daily truck trips; use of 19,650 gallons per day (gpd) of water, and generation of 113,750 gpd of wastewater. Of these impacts, the following are attributable to Phase 2: generation of 460 adt (including 318 truck trips), use of 17,150 gpd of potable water and generation of 2,750 gpd of wastewater. Construction and operation of the

facilities will emit air pollutants and odors and generate noise. The project will also emit Greenhouse Gasses (GHG) in connection with its energy use and trip generation.

Measures to avoid minimize, and mitigate project impacts include constructing the project on a previously altered site; reducing impervious by approximately 0.3 acres; enclosing all areas where discharge, handling and processing of glass and solid waste will occur; use of rail to transport the majority of material from the site; installation of a floor drain collection system that drains to a holding tank or sanitary sewer system to prevent groundwater contamination; operation of a 4.7-MW solar PV generating system; installation of a traffic signal at the intersection of Braley Road and Phillips Road/Theodore Rice Boulevard; erosion and sedimentation controls; stormwater management controls and implementation of Best Management Practices (BMPs) to minimize odor, dust, noise, and litter impacts.

Jurisdiction and Permitting

The project is undergoing MEPA review and requires the preparation of a mandatory EIR pursuant to Sections 11.03(5)(a)(6) and 11.03(9)(a) of the MEPA regulations because it requires Agency Actions and will result in: New Capacity for storage, treatment, processing, combustion or disposal of 150 or more wet tpd of sewage sludge and New Capacity of 150 or more tpd for storage, treatment, processing, or disposal of solid waste (respectively). Because it requires an EIR, the project is subject to review in accordance with the MEPA GHG Emissions Policy and Protocol. The project is also subject to the EEA EJ Policy, most recently revised in 2021, as it is located within an EJ Population and exceeds mandatory EIR thresholds for sewage and solid waste. The project was originally filed prior to January 1, 2022, when new MEPA regulations and protocols applicable to projects proposed near EJ populations went into effect.

Phase 1 of the project will receive Financial Assistance from the Massachusetts Department of Transportation (MassDOT) Industrial Rail Access Program (IRAP) in the amount of \$500,000. Phase 1 received an Order of Conditions (DEP File No. SE49-0381) from the New Bedford Conservation Commission on July 30, 2020 and an amended Site Plan Approval from the New Bedford Planning Board on December 23, 2020.

Phase 2 of the project will require a Determination of Site Suitability, Authorization to Construct, and Authorization to Operate from MassDEP and a NPDES General Permit (GP) for Construction and/or Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity from the Environmental Protection Agency (EPA). The project will also require a number of local permits from the City, including: Site Assignment from the Board of Health, a new and/or Amended Order of Conditions from the Conservation Commission, and a new and/or amended Site Plan Approval from the Planning Board.

Because the Proponent is seeking Financial Assistance, MEPA jurisdiction is broad in scope and extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations. The impacts arising from Phase 2 also are closely related to the required Permits, including MassDEP's site suitability standards for solid waste handling facilities which are broad enough to be functionally equivalent to full scope jurisdiction for purposes of MEPA review.

Review of the NPC/SFEIR

The NPC/SFEIR was generally responsive to the Scope included in the FEIR certificate. It described the project, provided detailed site plans, including existing conditions and site conditions under Phases 1 and 2, and identified environmental impacts and proposed mitigation measures. The NPC/SFEIR included a review of the project's permitting status, a response to comments received on the FEIR and draft Section 61 Findings. A major issue identified in the Scope provided in the FEIR certificate was related to emissions of PFAS associated with the biosolids drying facility; however, that portion of the Scope is no longer applicable because the biosolids facility has been removed from the project. If biosolids drying is proposed to be added in the future, the project would require additional MEPA review and permits. The NPC/SFEIR reviewed the Proponent's public engagement efforts since the filing of the EENF and described planned public outreach in connection with the filing of the NPC/SFEIR and after MEPA review of the project has concluded. As noted above, the Proponent did not engage the surrounding communities, including EJ populations, regarding the changes made to the project that necessitated this NPC filing. While the Proponent has conducted extensive outreach with respect to the project as a whole, it acknowledges that it did not engage the public with regard to the changed components, including the removal of biosolids processing, as the Proponent was still in negotiations with the City about these changes. Meetings specific to the changes were not held until after the filing of this NPC/SFEIR.

Environmental Justice

According to the NPC/SFEIR, since the filing of the EENF the Proponent has conducted a door-to-door outreach program reaching 1,390 homes, provided fact sheets and comment cards with pre-paid postage to residents, made over 21,000 phone calls to residents, held approximately 30 meetings with stakeholders and the public, including open houses, public meetings and virtual meetings. MEPA review documents have been distributed to over 1,400 commenters and 38 community-based organizations. Additional meetings in connection with the filing of the NPC/SFEIR were held on August 3 and 18, 2022. Notice of the meetings was published in local newspapers, including the Portuguese Times, advertised on the radio, and listed on the Proponent's web site. The August 18 virtual meeting was interpreted live in Spanish and Portuguese and the meeting was recorded and is available on the Proponent's web site. The Proponent has prepared a project fact sheet, which provides a summary of the project, reviews the baseline health assessment of communities near the site, and addresses the project's air impacts, in English, Portuguese and Spanish. The fact sheet was distributed to over 400 residents and community-based organizations. The Proponent has scheduled additional public meetings have been scheduled on September 21, October 12, November 2, and December 15 of this year, and on January 11, 2023.

Many commenters asserted that the Proponent failed to conduct timely and well-publicized outreach prior to the filing of the NPC/SFEIR, in particular, to ensure opportunities to have input on recent project changes. Commenters criticized how some of the meetings were conducted, including the level of language interpretation services made available. Many commenters requested an extension of the 30-day comment period in order to fully review the nearly 1,000-page NPC/SFEIR. The MEPA regulations do not permit an extension of the comment period on an SFEIR; in addition, the Proponent declined to withdraw and refile the NPC/SFEIR as permitted by 301 CMR 11.08(5) to provide sufficient time for the public to

review and comment on the document. According to the NPC/SFEIR, the Proponent anticipates that MassDEP will require additional outreach as part of the Public Involvement Plan (PIP) that will be developed by MassDEP during the Site Suitability permitting process. MassDEP has identified the following public outreach efforts that will be required of the Proponent; as noted, the Proponent is directed to fully comply with these requirements:

- Development of draft project fact sheets to be shared with the community prior to being finalized;
- Working with residents and community groups to identify hard-to-reach populations and encouraging their full participation in the review of the project; and,
- Scheduling public meetings at times and locations convenient for the community and providing notice of meetings in traditional and non-English media outlets.

While the biosolids processing has been removed, public comments received on the NPC/SFEIR continue to raise concerns with environmental and public health impacts of the project. Comments note that the surrounding EJ populations are subject to existing environmental burdens and related public health consequences, including elevated asthma rates, and that truck traffic will coincide with school bus pickup times at a nearby elementary school located about one mile from the project site. I note that the new MEPA EJ protocols effective January 1, 2022 identify diesel-generated truck traffic of 150 adt or higher as presumptively indicating that a project will “impact air quality” such that outreach and analysis of EJ impacts must extend over a 5-mile radius. See 301 CMR 11.02 (definition of “Designated Geographic Area”). The project is not directly subject to these new protocols, but will result in more than 150 New adt (418 daily truck trips) diesel truck trips.

As previously provided in the DEIR, the modeling of the project’s air emissions (including both stationary and mobile sources (truck traffic)) described a worse-case scenario based on maximum site processing rates, including the previously-proposed biosolids facility. The analysis documented that maximum concentrations of air contaminants emitted by the facility will be below MassDEP’s air permitting thresholds and MassDEP has not identified the need for an air permit for the project. As stated in the DEIR, the national ambient air quality standards (NAAQS) are intended to address the cumulative effect of the project’s emissions and the project’s emissions of criteria pollutants are evaluated against the standards after adding background pollutant concentration for other sources. The air quality analysis in the DEIR indicated that the addition of criteria pollutants from the project would not cause an exceedance of the NAAQS. The air dispersion model was prepared using methods prescribed by the EPA and incorporated weather conditions reflected in five years of hourly weather data; according to the Proponent, dispersion of pollutants is affected by colder temperatures rather than the prolonged period of high temperature projected under future climate conditions. The NPC/SFEIR included a draft of a log sheet that will be used by the Proponent to document complaints received from the public regarding noise, odor and/or dust generated by the facility. Upon receipt of a complaint, staff of the facility will note weather conditions, attempt to confirm the odor, noise and/or dust impact reported by the complainant, implement mitigation measures to eliminate or minimize the impact, evaluate the cause of the complaint and determine whether new practices or procedures are necessary to avoid a repetition of the impact, and respond to the complainant. The Proponent has committed to monitoring the facility’s emissions of Volatile Organic Compounds (VOCs) and Particulate Matter (PM₁₀) by tracking monthly mass rates of

air emissions and applying an air emissions factor based on the corresponding tonnage of processed glass and MSW.

Solid Waste

The Scope included in the NPC/SFEIR certificate required the NPC/SFEIR to include a review of the cumulative impacts of the project and nearby existing solid waste facilities. The NPC/SFEIR provided a qualitative assessment of the traffic, noise and air quality impacts of the following facilities, all of which are located in New Bedford except the Crapo Hill Landfill:

- The City's transfer station, located approximately 3.6 miles south of the project site at 1103 Shawmut Avenue. The facility is a recycling drop-off facility for residents only and is permitted to accept 274 tpd.
- New Bedford Waste Services, located approximately 3.4 miles south of the project site at 1245 Shawmut Avenue. The facility is privately owned and permitted to accept up to 1,500 tpd of C&D and MSW.
- Crapo Hill Landfill, located approximately 1.5 miles northwest of the project site at 300 Samuel Barnet Boulevard in Dartmouth. The facility is operated by the Greater New Bedford Regional Refuse Management District and is permitted to accept 425 tpd, half of which is residential MSW from Dartmouth and New Bedford and the other half is commercial waste. The landfill currently covers an area of 39 acres (including 22 acres which are capped) and is expected to expand to 70 acres total before the landfill reaches capacity in 2027. The site includes a 100,000-gallon anaerobic digester that converts food waste delivered to the site into a biogas which, in combination with landfill gas from the site, is used to generate 3.3 megawatts (MW) of electricity, which is distributed to the electrical grid.
- New Bedford landfill, located adjacent to the City's transfer station. This facility accepted 500 tpd of MSW when it stopped accepting waste in 2000. The landfill is now closed and capped.

According to the NPC/SFEIR, only traffic associated with the Crapo Hill Landfill uses the same local roadways that will be used by project-generated traffic, including Exit 7 off Route 140 and intersections along Braley Road; traffic associated with the other sites will use a different exit off Route 140 located several miles to the south. Route 140 runs through or adjacent to EJ populations to the north and south of the project site. The traffic analysis included in the NPC/SFEIR takes into account existing levels of traffic generated by the Crapo Hill Landfill traffic under all existing and future scenarios. As detailed below, the traffic analysis documented that the project will increase delays and congestion at intersections along Braley Road but not change the level-of-service (LOS) compared to No Build conditions. In addition, the Proponent will signalize the intersection of Braley Road/Theodore Rice Boulevard at Phillips Road, which will generally improve overall traffic operations along Braley Road. Because the Crapo Hill Landfill is anticipated to close in 2027, traffic associated with that site will overlap with project-generated traffic for approximately four years.

According to the NPC/SFEIR, the facilities are unlikely to have negative cumulative impacts with respect to noise, odor or dust due to the distance between the sites and mitigation measures in place at each facility to minimize impacts. The noise analysis included in the

NPC/SFEIR concluded that the project will increase daytime noise levels at the residences nearest the project site (approximately 525 to 800 feet away) by only 1 to 3 decibels (dBA) above existing noise levels. According to the NPC/SFEIR, based on the minimal noise impact of the project at residences 800 feet away, noise from the other solid waste facilities, which are located 1.5 to 3.6 miles away, will not be detectable at the locations studied in the noise analysis. In addition, the Crapo Hill Landfill does not operate at night, which is when project-generated noise causes larger increases of 3 to 7 dBA compared to ambient levels and any cumulative impacts would be greatest. As noted, air quality analysis in the DEIR was performed on stationary and mobile source emissions from the project, which were compared against the NAAQS; this measure takes into account background sources of emissions.

Dust and odor will be controlled during construction and operation of the project using mitigation measures, including paving surfaces at the site that could be a source of dust; use of a misting system with odor controls in the tipping building; handling waste inside the building when the doors are closed; street sweeping; and covering rail cars and trucks. According to the NPC/SFEIR, the Crapo Hill Landfill and New Bedford Waste Services facility employ odor and dust control measures to ensure that any off-site impacts are localized to the area adjacent to the landfill and are unlikely to contribute to dust or odors in the vicinity of the project site. The City's transfer station accepts only recyclables, which are not a significant source of odors. According to the NPC/SFEIR, the New Bedford Landfill could cause odors due to the release of landfill gas through vents; however, the odors will dissipate and dilute before impacting the area near the project site, which is over three miles away. The electric generating facility at the Crapo Hill Landfill helps uses landfill gas and biogas that otherwise could cause odors.

Traffic

The NPC/SFEIR included a revised traffic analysis with updated traffic data and additional analyses to address the Scope and issues identified in comment letters. The analysis compared traffic volumes and roadway and intersection operations during peak periods under 2021 Base, 2021 Existing, 2028 No Build and 2028 Build conditions. In addition to evaluating traffic operations during the AM and PM peak periods, the NPC/SFEIR analyzed a "school peak period" corresponding to the dismissal time of the Casimir Pulaski Elementary School, which is located off Braley Road less than 1,000 feet east of the Route 140 NB ramps. Traffic conditions prior to the addition of truck and vehicle traffic generated by Phase 1 of the project are reflected in the 2021 Base scenario, which was established by deducting 240 vehicle trips (including 90 truck trips) associated with existing glass recycling operations from the 2021 Existing condition. Consistent with MassDOT guidance, the 2021 Existing condition was developed by collecting traffic counts in April 2021 and adjusting the counts by adding five percent to account for lower traffic volumes due to the COVID-19 pandemic.¹ The Proponent used observations of driver behavior and queue lengths at unsignalized intersections to calibrate the traffic model to more accurately reflect traffic operations at intersections along Braley Road and the Route 140 ramps. The No Build 2028 condition was modeled by increasing traffic volumes in the 2021 Existing scenario by one percent per year over the seven-year study horizon. The 2028 Build condition was developed by adding the truck and automobile trips generated by the full buildout of the

¹ According to the Proponent, traffic volumes used in the FEIR analysis were prepared prior to MassDOT developing COVID-related guidance and overestimated traffic volumes under existing and future conditions compared to the volumes in the SFEIR developed using MassDOT guidance.

project to the 2028 No Build scenario. In general, the results of the traffic analysis presented in the NPC/SFEIR are consistent with those provided in the FEIR and DEIR. However, according to the Proponent, the analysis in the NPC/SFEIR more accurately reflects existing and future traffic operations along Braley Road because of the model calibration and adjustment of traffic volumes using guidance provided by MassDOT. The analysis reviewed traffic operations at the seven intersections that were previously studied in the DEIR and FEIR:

- Route 140 Northbound (NB) Ramps at Braley Road;
- Route 140 Southbound (SB) Ramps at Braley Road;
- Braley Road/Theodore Rice Boulevard at Phillips Road;
- Theodore Rice Boulevard at Duchaine Boulevard;
- Duchaine Boulevard at Samuel Barnet Boulevard;
- Phillips Road at Samuel Barnet Boulevard; and,
- Duchaine Boulevard at Site Driveway.

All truck trips and 90 percent of employee trips associated with the project are expected to travel to the site along a route from Route 140 to Braley Road/Theodore Rice Boulevard and onto Duchaine Boulevard, and to follow the same route in reverse when leaving the site; 10 percent of employee trips will use Phillips Road to access the site from the south. The NPC/SFEIR included a commitment to prohibit trucks associated with the facility from using Phillips Road (which extends directly adjacent to the closest residences to the project which are located outside mapped EJ populations), and the Proponent has agreed to provide the City with funding to conduct a planning study for the purpose of establishing a truck ban on Phillips Road.

To provide conservative estimates, the NPC/SFEIR did not include revised trip generation estimates for the project to account for removal of the biosolids processing component; 48 truck trips associated with the previously-proposed biosolids facility continue to be included in the analysis, as they were in the DEIR and FEIR. The project's trip generation for each phase is shown in Table 1. According to the NPC/SFEIR, the trip generation estimate is conservative because it assumes that all material will be brought to and transported from the site by truck and that there will be no "backhauls" (off-site transport of waste by empty delivery trucks); there will be up to 112 fewer truck trips if outbound material is transported by rail. However, if the Proponent intends to seek approval for all 418 trips, the analysis cannot be considered to be conservative and therefore the impacts to traffic operations are likely to be similar to those identified in the traffic study.

Table 1. Trip generation estimate (# trips).

Project Component	Trucks	Other vehicles	Total
Existing (Phase 1) glass recycling operation	90	150	240
Additional Phase 1 trips	18	-	18
Phase 2	310	150	460
Total	418	300	718

The results of the revised analysis of traffic operations at study area intersections provided in the NPC/SFEIR are consistent with the analyses previously provided in the DEIR

and FEIR. Under the 2021 Base, 2021 Existing and 2028 No Build scenarios, intersections along Braley Road operate at LOS E or F during some peak periods, including the school peak period, and will continue to do so under 2028 Build conditions; however, project-generated trips will generally increase delays and congestion compared to 2028 No Build conditions. The Proponent has proposed to mitigate conditions along Braley Road by installing a traffic signal at the Braley Road/Theodore Rice Boulevard at Phillips Road intersection. According to the NPC/SFEIR, a traffic signal would improve the overall LOS at this intersection from LOS E or F under 2028 Build Conditions to an overall LOS of C or D. The NPC/SFEIR included a Traffic Signal Warrant Analysis that supported the installation of a signal at this intersection.

The NPC/SFEIR also provided additional analysis of queue lengths on the Route 140 NB and SB off-ramps and along Braley Road. The traffic study provided previously in the FEIR documented that project-generated truck traffic would increase queue lengths on the Route 140 NB by up to 277 feet in the AM peak period and 228 feet in the PM peak period, and by up to 437 feet on the eastbound Theodore Rice Boulevard approach to the Braley Road/Theodore Rice Boulevard at Phillips Road intersection. However, based on the updated vehicle volumes and calibrated model used in the NPC/SFEIR, project-generated trucks would have significantly less impact on queue lengths than described in the FEIR. The project will increase queue lengths on the Route 140 NB ramp by up to 72 feet (during the school peak period), by up to 72 feet on eastbound Theodore Rice Boulevard during the school peak period and by up to 80 feet on westbound Theodore Rice Boulevard during the AM peak period. According to the NPC/SFEIR, these extended queues correspond approximately to the length of two packer trucks or one transfer trailer; furthermore, the project will not cause traffic to back up onto Route 140, as was shown in the FEIR to be the case at the Route 140 NB ramp. The NPC/SFEIR did not identify any mitigation measures to address the project's impacts on queue length, nor did it address any measures to minimize potential impacts to school children who may experience idling of school buses adjacent to the trucks associated with the project. As recommended by MassDOT, the Proponent should minimize its traffic impacts, including added congestion and delays during the school peak period, by scheduling deliveries to the facility during off-peak and off-school-peak hours. I expect that this issue will continue to be addressed during subsequent permitting.

In addition to installing a traffic signal at the Braley Road/Theodore Rice Boulevard at Phillips Road intersection, the Proponent has proposed to mitigate the project's traffic impacts by providing the City of New Bedford with \$5,000 for a traffic analysis in support of the establishment of a truck ban on Phillips Road and by implementing TDM measures described below. According to MassDEP, the Proponent may be required to conduct post-construction monitoring of traffic operations to confirm the conclusions of the traffic analysis. I note that the Proponent has identified the use of railcars to haul waste off-site as a mitigation measure to minimize truck traffic and associated impacts, including GHG emissions. However, the traffic analysis modeled the truck trips associated with off-site transport of waste and the Proponent may seek approval to generate up to 418 truck trips, which would appear to be 112 truck trips more than is necessary to deliver 1,500 tpd of waste. The traffic analysis documented that even though the LOS at intersections will not change between No Build 2028 and Build 2028 conditions, the project will cause increased delay, queues and congestion (volume/capacity ratio). During the permitting process, I encourage MassDEP to determine a minimum level of truck trips necessary for waste transport to minimize the project's traffic and air quality impacts.

Noise

The NPC/SFEIR included a revised noise analysis based on the current project design without the biosolids building and without a previously-proposed sound wall east and south of the biosolids building. It identified sources of noise, reviewed potential mitigation measures and provided the results of modelling of noise impacts on nearby residential properties. Noise sources previously identified in connection with the biosolids facility, including rooftop exhaust fans, cooling towers, a biofilter fan, and a biofilter stack, are no longer proposed.

Noise sources and potential mitigation measures evaluated by the Proponent include:

- Seven rooftop exhaust fans, including four on the MSW tipping building and three on the MSW processing building: Proposed mitigation measures, such as the use of quieter fans, rooftop barriers or fan silencers will achieve a reduction of 5 dBA at the source; further reductions in noise from this source are not possible without affecting the ability of the fans to achieve the necessary air exchange.
- Three open loading door bays on the west side of the MSW building: Noise from this source is generated by dumping and moving MSW with a front end loader inside the building with the doors open. Mitigation measures include siting of the building on the west side of the site, away from residences along Phillips Road and orienting the doors to open to the west. In addition, the doors will be closed whenever possible; the Proponent anticipates that the doors will be closed for a substantial portion of the time, but cannot commit to keeping the doors closed at all times because they must be open to allow MSW and equipment into and out of the building.
- One ventilation opening on the west side of the glass building: The use of an acoustic louvered intake will reduce noise levels at the source by 15 dBA while still providing for the needed airflow through the vent.
- Two ventilation fans exhausting into one stack on the roof of the glass building: The use of a stack silencer will reduce noise levels by 2 dBA. According to the NPC/SFEIR, the noise model determined that the use of a larger stack silencer would not result in reduced noise levels at off-site noise receptors.
- Idling locomotives: Mass Coastal Railroad locomotives will pick up rail cars loaded with MSW and deliver empty rail cars once per day, 6 days a week. To minimize noise generated by locomotive engines, locomotive activity will take place at the western side of the site and will be restricted to the hours between 5:00 AM and 9:00 PM. In addition, movement of rail cars within the site will be done using an electric railcar mover rather than locomotives, which do not generate engine noise and can move rail cars slowly to minimize coupling noise impacts. According to the NPC/SFEIR, the Proponent will not own the locomotives to be used to service the site; therefore, installation of noise controls on the locomotives is not feasible. In the FEIR, the Proponent had proposed to construct a 25-ft high noise wall adjacent to the biosolids building to minimize noise impacts to nearby residences. The noise wall is no longer proposed because additional modelling has determined that the wall would have to be 30-ft high rather than 25-ft high in order to significantly reduce impacts at nearby residences, which is not justified based on the short duration of locomotive activity expected at the site. According to the NPC/SFEIR, the wall could have the

- effect of directing truck noise from the industrial park toward residences, which would minimize any benefit of the wall.
- Backup alarms on trucks unloading MSW: The impact of this noise will be minimized by siting MSW operations at the west side of the site. Trucks associated with the glass recycling facility, which is closer to residences, will not have to back up and will therefore have no alarms; due to site and operational constraints, it is not possible for MSW trucks to avoid having to back up. The trucks delivering MSW will not be owned by the Proponent and the Proponent cannot commit to the use of noise reduction systems to minimize the volume of backup alarms; however, white noise technology will be used on Proponent-owned equipment such as the railcar mover.
 - Railcar mover: The use of an electric railcar mover will eliminate engine noise associated with a diesel rail car mover.
 - Railcar coupling: Noise associated with the mechanical connection of two railcars will be reduced by 10dBA at the source by using an electric railcar mover, which can push one railcar into another at a slower speed. The Proponent will not own the railcars and cannot commit to engineer or use a quieter railcar coupling system.
 - On-site truck traffic: Noise from on-site truck traffic will be minimized by requiring trucks to travel at slow speeds, by concentrating truck activity in the western part of the site, reducing the number of trucks by using rail cars to haul waste away from the facility.
 - Other noise sources, such as heating, ventilation and cooling of conditioned interior space, employee vehicles, and indoor material handling: These sources of noise will produce noise that is at least 10 dBA less than other sources described above, and therefore will not contribute to overall sound levels produced by the facility.

According to MassDEP, the Proponent will be required to implement all noise mitigation measures that are technologically and economically feasible, including the potential use of a noise wall to minimize noise generated by rail activity at the site.

As described above, the project will increase noise levels at nearby residences by up to 7 dBA over nighttime ambient sound levels and by up to 3 dBA over daytime ambient sound levels, which represents a decrease of 2 to 3 dBA compared to the analysis provided in the FEIR. This analysis did not include noise sources from trucks and rail cars that the Proponent believes are regulated only at the federal level. In response to MassDEP's comments on the FEIR, the Proponent evaluated the project's noise impacts by combining continuous sound sources at the facility and intermittent noise caused by railcar coupling, locomotive idling and backup beepers; however, the analysis did not include noise generated by truck traffic, which the Proponent asserts cannot be modeled in combination with other sources of noise. According to the NPC/SFEIR, the mitigation measures identified above will reduce noise levels by up to 10 dBA compared to noise levels that would be generated without the use of any mitigation measures. With respect to truck noise, the NPC/SFEIR indicated that the project will not cause sound levels to exceed the Federal Highway Administration's (FHWA) standard of 66 dBA. According to MassDEP, the Proponent's permit application should include a complete noise analysis, including a justification for the data used to establish background sound levels and isopleth maps depicting No Build and Build sound levels. In addition, the Proponent will be required to evaluate the project's cumulative noise impacts, including an assessment of on-site truck traffic in combination with other noise sources.

Greenhouse Gas Emissions

The NPC/SFEIR provided additional information on the project's energy use and GHG emissions. The Glass Processing Building and the Glass Processing Bunker Building are the only two buildings with conditioned space. Construction of the Glass Processing Building was completed in 2020 and the Glass Processing Bunker Building is currently under construction. The NPC/SFEIR included new commitments to use air-source heat pumps (ASHP) for space heating and a high efficiency envelope consisting of R-30 metal panels with no windows in the Glass Processing Bunker Building, and to retrofit the Glass Processing Building with an R-11 insulated roof liner, which was required by the Building Code in effect when the building received a building permit but not constructed. Solar PV systems at the site will have a combined generating capacity of approximately 4.7 MW, which will produce enough electricity to offset 745 tpy of GHG emissions.

As described in the NPC/SFEIR, the proposed buildings will emit 982 tons per year (tpy) of carbon dioxide (CO₂), a reduction of 67 tpy (6.4 percent) compared to the emissions that would be produced if the buildings were designed to meet Building Code baseline energy requirements (1,049 tpy). The project will generate 1,721 tpy of GHG from mobile sources such as trucks, employee vehicles and on-site waste moving equipment such as front-end loaders. According to the Proponent, the use of trains to haul waste to out-of-state landfills will significantly reduce GHG emissions compared to the use of trucks for this purpose; as previously documented in the DEIR and FEIR, out-of-state transport by rail will generate 12,901 tpy of CO₂ compared to GHG emissions of approximately 31,702 tpy if trucks were used (a reduction of approximately 60 percent). It is unclear if this estimate was premised on utilizing approximately 112 less trips than the 418 adt modeled through the traffic study. During the permitting process, the Proponent should work with MassDEP to determine a minimum level of truck trips necessary for waste transport to minimize the project's traffic and air quality impacts. To the extent the use of additional trucks up to the 418 adt number decrease mobile source emissions reductions to less than 60 percent, the Proponent should commit to equivalent measures to maintain that same level of reduction.

Mitigation and Section 61 Findings

The FEIR includes a separate chapter summarizing proposed mitigation measures and includes draft Section 61 Findings for each Permit to be issued by Agencies. It contains commitments to implement these mitigation measures, identifies the parties responsible for implementation, and includes a schedule for implementation. The Proponent will provide a GHG self-certification to the MEPA Office that is signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) indicating that all of the GHG mitigation measures or equivalent measures that are designed to collectively achieve identified reductions in GHG emissions from stationary and mobile sources and land alteration have been incorporated into the project. To the extent the project will take equivalent measures to achieve the identified reductions, I encourage the Proponent to commit to achieving the same level of GHG emissions identified in the mitigated (design) case expressed in volumetric terms (e.g., tpy). To the extent the use of additional trucks up to the 418 adt number decrease mobile source emissions reductions to less than 60 percent, the Proponent should commit to equivalent measures to maintain that same level of reduction. The Proponent has committed to implement the following measures to avoid, minimize and mitigate Damage to the Environment:

Environmental Justice

- Require waste delivery trucks to use Duchaine Boulevard, Theodore Rice Boulevard and the section of Braley Road between Phillips Road and Route 140 in order to avoid travel on residential streets;
- Support a truck ban on Phillips Road by the City;
- Implement mitigation measures described below to minimize noise, odors and emissions of air pollutants;
- Monitor the facility's emissions of Volatile Organic Compounds (VOCs) and Particulate Matter (PM₁₀) by tracking monthly mass rates of air emissions and post the data on the Proponent's web site;
- Provide an easy and confidential system for the public to submit noise, odor or dust complaints and implement a complaint log system for tracking and responding to complaints;
- Conduct public informational meetings on September 21, October 12, November 2, December 15 (2022) and January 11 (2023), with notice of the meetings to be published in local newspapers, including the Portuguese Times, advertised on the radio, and listed on the Proponent's web site;
- Provide Spanish and Portuguese interpreters at public meetings; and,
- Implement Public Involvement Plan developed by MassDEP, which is expected to include, at a minimum, development of draft project fact sheets to be shared with the community prior to being finalized, working with residents and community groups to identify hard-to-reach populations and encouraging their full participation in the review of the project, and scheduling public meetings at times and locations convenient for the community and providing notice of meetings in traditional and non-English media outlets.

Solid Waste

- The Proponent will provide a financial assurance mechanism (FAM) to MassDEP that will include sufficient funds to clean up the site and remove any stored solid waste on the site in the event of an unplanned closure of the facility;
- The Proponent will be required to demonstrate to MassDEP and the New Bedford Board of Health that the project meets all siting and operating requirements and incorporates, at a minimum, the mitigation measures described herein.

Transportation

- Install a traffic signal at the Braley Rd at Phillips Rd/Theodore Rice Blvd intersection;
- Provide the City with \$5,000 for a study to exclude trucks from Phillips Road;
- Encourage employees to participate in transit subsidy or reimbursement programs;
- Coordination with the Southeastern Regional Transit Authority (SRTA) to request revising existing transit service to better service the project site
- Inform employees of alternative commuting options, including nearby transit stops and bicycle and pedestrian amenities;
- Encourage bicycle ridership to the site by providing bike racks and other storage

facilities onsite;

- Implement an employee carpool/vanpool program, including preferential parking;
- Provide preferential parking for carpools and vanpools;
- Offer paperless, direct deposit offered to employees;
- Work with the City to provide striped bicycle lanes along Duchaine Boulevard and shared bicycle markings along Theodore Rice Boulevard to provide connectivity to the existing bicycle amenities along Braley Road; and,
- Continue to work with MassDEP and the City on additional transportation mitigation, including ways to minimize impacts during school peak hours.

Wetlands, Waterways and Stormwater

- Comply with Order of Conditions issued by the New Bedford Conservation Commission;
- Mitigate impacts to 4,095 sf of BVW by providing a wetlands replication area of 6,700 sf (1:1.6 replication ratio);
- Process MSW on impervious concrete floors within proposed buildings with trench drains at all truck door entrances to prevent contact water on the handling floors from leaving the buildings;
- Conduct regular sweeping of outdoor paved surfaces to minimize potential sediment migration during storm events;
- Utilize stormwater controls and BMPs throughout operation of the site;
- Development and implement a Stormwater Pollution Prevention Plan (SWPPP);
- Install a bridge for the rail crossing over an existing drainage swale to minimize any impact on the drainage swale; and,
- Modify the existing stormwater management system on-site as required to maintain compliance with the Massachusetts Stormwater Management Policy.

Air Quality and Noise

- Conduct all waste processing and handling operations indoors;
- Construct buildings with openings facing west, away from residential areas, to minimize potential noise, dust, or odor nuisance conditions;
- Enclose the rail tracks adjacent to the glass building where railcars are to be loaded;
- Minimize the size of openings of the solid waste handling facility to reduce wind tunnel effects and potential for release of and odors;
- Incorporate ventilation systems to exhaust through elevated stacks to promote dispersion of exhaust air;
- Use of an electric railcar mover to minimize noise impacts;
- Construct the rail track without at-grade crossings to eliminate the need for the use of bells, horns, or whistles on locomotives;
- Use of low-noise air handling units and fans fitted with silencers or placed within rooftop barriers for sound attenuation;
- Use of acoustic louvered air intakes to provide baffling for noise attenuation;
- Reduce backup alarm noise by arranging a forward traffic flow for glass unloading;
- Require trucks to drive through the site at slow speeds and locate truck scales away

- from residences;
- Control dust and odor by using an atomized water mist and water spray;
- Minimize dust by paving and regularly sweeping exterior and interior surfaces;
- Cover all trailers and containers after bulk loading and before leaving the building;
- Require all waste delivery vehicles to be covered; and,
- Conduct daily inspections as part of the Operations & Maintenance Program.

Greenhouse Gas Emissions

- Use of an electric ASHP to provide space heating in the Glass Processing Bunker Building;
- Construction of a high efficiency envelope consisting of R-30 metal panels with no windows in the Glass Processing Bunker Building;
- Installation of an R-11 roof liner in the Glass Processing and Glass Processing Bunker Buildings;
- Reduced lighting power density (LPD) exceeding Building Code requirements;
- Use of high-efficiency mechanical equipment with variable frequency drives;
- Transport processed waste by rail to reduce GHG emissions by 60 percent compared transportation by truck (a reduction that shall be documented in GHG self-certification in addition to other measures);
- Use of an electrically powered rail car mover to eliminate emissions; and,
- Install rooftop and canopy-mounted solar PV systems with a combined generating capacity of approximately 4.7 MW, which will offset 745 tpy of GHG emissions.

Construction Period

- Implement a SWPP, including sedimentation and erosion controls;
- Designate a truck route for construction vehicles that avoids residential streets;
- Use dust control measures, such as wetting agents, to minimize the spread of dust;
- Minimize noise impacts by minimizing idling by equipment and trucks, limiting construction to daylight hours, and using mufflers on equipment;
- Minimize air emissions from construction vehicles by using emissions controls such as diesel oxidation catalysts and/or particulate filters and Ultra Low Sulfur Diesel (ULSD) to meet MassDEP's Air Pollution Control regulations at 310 CMR 7.00 and the U.S. EPA's Tier 4 Emissions Standards (40 CFR part 1039); and,
- Maximize recycling of construction materials and disposing of wastes in compliance with MassDEP's Solid Waste regulations.

Conclusion

Based on a review of the NPC/SFEIR, and in consultation with Agencies, I find that the NPC/SFEIR adequately and properly complies with MEPA and its implementing regulations. In addition, the changed components of the project do not significantly increase environmental consequences such that further review is warranted. The project may proceed to permitting.



August 29, 2022

Date

Bethany A. Card

Comments received:

08/06/2022	Moroney Family
08/07/2022	Matt Murphy
08/08/2022	Susan and Bruce Sylvia
08/10/2022	Charles Kennedy
08/12/2022	Carol Strupczewski
08/12/2022	Mary Duchane
08/12/2022	Thomas and Susan Southworth
08/14/2022	Deborah L. Viera
08/14/2022	Susan Swisher
08/14/2022	William Moroney
08/15/2022	Carole Sherman
08/15/2022	Richard Hinkley
08/15/2022	Thomas C. Grotta
08/15/2022	Gale Orłowski
08/15/2022	Carol Strupczewski
08/15/2022	Christina Melo
08/15/2022	Cindy Costa
08/15/2022	Donna Poyant
08/15/2022	Ken Costa
08/15/2022	Mary Myers (2)
08/15/2022	Matt O'Donnell
08/15/2022	Paul Gaudette (2)
08/15/2022	Peter Swible
08/15/2022	R Carleen Cordwell
08/15/2022	Leroy Vargas
08/15/2022	Mary Jo Grotta
08/15/2022	Gale Orłowski
08/15/2022	Linda D. Vargas
08/15/2022	Carole Sherman
08/15/2022	Robert Melancon
08/15/2022	thwynne@verizon.net
08/15/2022	Vincent Carolan
08/16/2022	Andrea Honore
08/16/2022	Bethany Enzian
08/16/2022	Chenelle Saulnier
08/16/2022	Colin Dacosta
08/16/2022	Deborah Moser

08/16/2022 Diane Barboza (2)
08/16/2022 Elizabeth Saulnier
08/16/2022 George Borden
08/16/2022 Greg Sylvia
08/16/2022 Janytzabell Rodriguez (2)
08/16/2022 John G. Andrade
08/16/2022 Ken Costa (2)
08/16/2022 Kevin Barboza
08/16/2022 Kimberly Wallace
08/16/2022 Lori Silveira
08/16/2022 Meghan Rogers
08/16/2022 Michelle Dacosta (4)
08/16/2022 Mireille Bejjani
08/16/2022 mireille@slingshotaction.org
08/16/2022 Rachel Pires (2)
08/16/2022 Raymond Dubois
08/16/2022 Richard Fournier
08/16/2022 Nuno Da Costa (2)
08/16/2022 Keith Da Costa (2)
08/16/2022 Ronald R. Cabral
08/16/2022 Tracy Wallace (2)
08/16/2022 Vincent Carolan (2)
08/16/2022 Delia DaCosta (2)
08/17/2022 Andrew Mellody (2)
08/17/2022 A Honore
08/17/2022 Angela Days
08/17/2022 Arlindo Caetano
08/17/2022 Carl E. Roza and Michelle Roza
08/17/2022 Carmen Rodriguez
08/17/2022 Cheryl Souza
08/17/2022 Christopher Santos
08/17/2022 Debra Jardin
08/17/2022 Donna Poyant
08/17/2022 Dorene McHugh
08/17/2022 Dorvalino deMedeiros (3)
08/17/2022 Elizabeth Saulnier
08/17/2022 Irene Duprey-Gutierrez
08/17/2022 Jacqueline Pina
08/17/2022 Jamie Berberena (2)
08/17/2022 Karen Vilandry (2)
08/17/2022 Katherine Fisher (2)
08/17/2022 Kathleen Verkade
08/17/2022 Marlene Pollock
08/17/2022 Melissa Brito
08/17/2022 Michael McHugh (2)
08/17/2022 Michelle Roza
08/17/2022 Paul Schofield
08/17/2022 Sean Deandrade

08/17/2022 Sheena deMedeiros (3)
08/17/2022 Steven R. Hashim
08/17/2022 Susan O'Donnell
08/17/2022 Suzanne Blouin (2)
08/17/2022 Wendy Graca (2)
08/18/2022 Geoffrey Grant
08/18/2022 Eric Tavares (2)
08/18/2022 Joseph Orłowski (2)
08/18/2022 Paul M. Costa
08/18/2022 Jose Tavares
08/18/2022 Adrianna Kennedy
08/18/2022 Jo-Anne Chevalier (2)
08/18/2022 Richard Chevalier (2)
08/18/2022 Charles F. Kennedy (2)
08/18/2022 Michelle Torres
08/18/2022 Joan T. Poisson
08/18/2022 Bernice Sylvia (2)
08/18/2022 Cisaltina Branco
08/18/2022 Jeffrey Torres (2)
08/18/2022 Jose Sousa
08/18/2022 Arleen Medeiros (2)
08/18/2022 Rosa Medeiros (2)
08/18/2022 Martin W. Flinn
08/18/2022 Amanda Woolen
08/18/2022 Katherine Grant
08/18/2022 Geoffrey Grant
08/18/2022 Carl Gilbert (2)
08/18/2022 Charles Kennedy (2)
08/18/2022 Isabel Costa
08/18/2022 Mary M Flinn
08/18/2022 Stacey Sousa
08/18/2022 Kelly M. Sousa
08/18/2022 Michelle Torres
08/18/2022 Elizabeth A. Bartolome
08/19/2022 Roger P. Blanchard
08/19/2022 Doreen Sylvia
08/19/2022 Sherri-Lynn Schoorens
08/19/2022 Paul F. Powers
08/19/2022 Amanda Woolen
08/19/2022 Joe M. Lima
08/19/2022 Corie Trezon
08/19/2022 Deanna DeMello
08/19/2022 Dianne Mosher
08/19/2022 Elizabeth Gibbs
08/19/2022 Kathleen Nelson
08/19/2022 Lauren Fernandez
08/19/2022 Linda Heys (2)
08/19/2022 Lisa Field (2)

08/19/2022 Robin A. Grimes (2)
08/19/2022 Jennifer Goncalves (2)
08/19/2022 Fernando M. DaSilva (2)
08/19/2022 Nelson Brun (2)
08/19/2022 Dara L. Burt (2)
08/19/2022 Jo-Ann V. Powers
08/19/2022 Christine Dzioba (2)
08/19/2022 Allison Baxter (2)
08/19/2022 Jeanne A. Blanchard
08/19/2022 Jennifer L. Vargas
08/19/2022 Nathalie Bridegam
08/19/2022 Senator Mark Montigny, Second Bristol and Plymouth District
08/19/2022 Joanna Couto (2)
08/19/2022 Donna L. Wooler (2)
08/19/2022 David P. Wooler (2)
08/19/2022 Maria D. Lima
08/19/2022 Donna M. Boutin
08/19/2022 Steve Sylvia
08/20/2022 Luis Rodrigues
08/20/2022 Maxine A. Bonneau (2)
08/20/2022 Bruce J. Bonneau (2)
08/20/2022 Ronald J. Walsh
08/20/2022 Paul Richard
08/20/2022 John Frizado (2)
08/20/2022 Francisco J. Amaral (2)
08/20/2022 Maria A. Amaral (2)
08/20/2022 Justina Perry (2)
08/20/2022 Kendy Capois
08/20/2022 Madeleine M. Walsh
08/20/2022 Gina Galarza (2)
08/20/2022 Dean Galarza (2)
08/20/2022 Doris J. Richard
08/20/2022 Diane Rodrigues
08/20/2022 Rob Vandenabeele
08/20/2022 Sandra L. Andrade Penn
08/20/2022 Tanya Lobo (2)
08/21/2022 Adrien Mercier, Jr.
08/21/2022 Charles Kennedy
08/21/2022 Jennifer Cote
08/21/2022 Robin Gonsalves
08/21/2022 Sandra L. Lefever (2)
08/21/2022 Mark D. Levefer (2)
08/21/2022 Jeanne Motyl (2)
08/21/2022 Chris Coe (2)
08/21/2022 Jessica Coe (2)
08/21/2022 Melanie Nunes
08/21/2022 Michaelah Nunes
08/21/2022 Tracy Wallace

08/22/2022 Andrew Griffith
 08/22/2022 Bambi Good
 08/22/2022 Betsy Bizarro
 08/22/2022 Charles Kennedy
 08/22/2022 Conservation Law Foundation
 Just Zero
 South Coast Neighbors United, Inc.
 Slingshot
 08/22/2022 Claudia Koska
 08/22/2022 Cynthia Costa
 08/22/2022 David Butcher
 08/22/2022 David Greenberg
 08/22/2022 David Michalski
 08/22/2022 david.greenberg3@gmail.com
 08/22/2022 Deborah Valianti (2)
 08/22/2022 Debra Hopwood
 08/22/2022 Eileen M. Brennan
 08/22/2022 Elizabeth Murphy (2)
 08/22/2022 Elizabeth Saulnier
 08/22/2022 Emily Reckard-Mota
 08/22/2022 Heidi Stanley (2)
 08/22/2022 Ida DelVecchio
 08/22/2022 Jacob Chin (2)
 08/22/2022 Janet Billane
 08/22/2022 Janet Cason (2)
 08/22/2022 jenwexshayndle@gmail.com (2)
 08/22/2022 Jill Poisson
 08/22/2022 Karen Boutin
 08/22/2022 Karen Chin
 08/22/2022 Larry Stoodt
 08/22/2022 Laura Gardner
 08/22/2022 Laurel Facey (2)
 08/22/2022 Leonard Rapoza
 08/22/2022 Linda Wetzman
 08/22/2022 Maiyim Baron
 08/22/2022 Massachusetts Department of Environmental Protection (MassDEP)/Southeast
 Regional Office (SERO)
 08/22/2022 Massachusetts Department of Transportation (MassDOT)
 08/22/2022 Michele OLeary (2)
 08/22/2022 Michelle Perry
 08/22/2022 New Bedford City Clerk on behalf of the New Bedford City Council
 08/22/2022 oriang375@gmail.com
 08/22/2022 Peter Fuller
 08/22/2022 Representative Christopher Markey, 9th Bristol District
 Representative William Straus, 10th Bristol District
 Representative Paul Schmid, 8th Bristol District
 Representative Christopher Hendricks, 11th Bristol District
 Representative Tony Cabral, 13th Bristol District

08/22/2022 roslynf@rcn.com
08/22/2022 Sabrina Davis
08/22/2022 sarah@massclimateaction.net
08/22/2022 Seth Evans
08/22/2022 Staci Rubin
08/22/2022 Steven Wenner
08/22/2022 Sylvia Staub
08/22/2022 Wendy Morrill
08/23/2022 Andrea Stone (2)
08/23/2022 Betsy Sowers
08/23/2022 Candace Vaughan
08/23/2022 Carlee Moser
08/23/2022 Cynthia Blanchette
08/23/2022 Cynthia Roy
08/23/2022 Dianne Bolen
08/23/2022 Emily Follett
08/23/2022 Fran Ludwig
08/23/2022 Ida Almeida
08/23/2022 Jadilyn Kagan
08/23/2022 Karen Chin
08/23/2022 Kelly Haggerty
08/23/2022 Laura Orlando
08/23/2022 Linda Rose
08/23/2022 Linda Sullivan
08/23/2022 Lori Rodrigues
08/23/2022 Michael Niemczyk
08/23/2022 MP Feitelberg (2)
08/23/2022 Raymond D. Milici
08/23/2022 Roger Cabral
08/23/2022 Rosemary Wessel (2)
08/23/2022 Roxanne Boga
08/23/2022 Sharon Rua
08/23/2022 Sonya Kinney (2)
08/23/2022 Stephanie Marques
08/23/2022 Tracy Manzella
08/23/2022 Veronica Surges
08/24/2022 Erica Scott
08/24/2022 Tali Smookler
08/24/2022 tsmookler@uumassaction.org
08/25/2022 Bethany Fauteux
08/27/2022 Raymond D. Milici
08/28/2022 Christine Manns
08/28/2022 Ann Dupont
08/29/2022 Athena Tetrault
08/29/2022 Jennifer DeBarros
08/29/2022 Brian Cass
Undated Normand Cabral (2)
Undated Edward Motyl (2)

EEA# 15990

NPC/SFEIR Certificate

August 29, 2022

Undated Daniel Tavares (2)

BAC/AJS/ajs

From: [kearymoroney](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: EEA #15990
Date: Saturday, August 6, 2022 5:15:52 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Mr Strysky,

My family lives in the Pine Hill Acres community off of Phillips Rd in New Bedford and alongside our neighbors our voices need to be heard.

The proposed project by Parallel Products of New England puts our health and welfare at risk and should not be allowed to happen.

Health concerns as well as increased noise puts all of us in jeopardy and will bring down the value of our homes in this sought after North End New Bedford neighborhood.

Please take our community's concerns seriously to STOP this expansion from happening !!!

The Moroney Family
124 Ridgewood Rd
New Bedford, Ma. 02745
617-877-3841

Sent from my Verizon, Samsung Galaxy smartphone

From: [Matthew Murphy](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: PPNE New Bedford
Date: Sunday, August 7, 2022 2:11:45 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello Alex,

My name is Matt Murphy and I am a resident of New Bedford at 40 Blueberry Terrace which borders the NB Industrial Park.

We strongly disapprove of the expansion of services proposed by Parallel Products NE within the New Bedford Industrial Park.

There will surely be negative environmental impacts and any attempt to say otherwise would be unfounded.

The infrastructure and roads surrounding the industrial park, which are already congested, are not capable of handling the increased truck and added employee traffic.

Although a proponent of recycling and green methods the negative impacts that this site would bring to the surrounding neighborhoods and green spaces out weigh any positive factors.

We look for the support of the EEA in confirming the negative effects this project would pose to our city and surrounding neighborhoods.

Regards,
Matt Murphy

From: [Susan Sylvia](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: PPNE
Date: Monday, August 8, 2022 2:46:25 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

My family has lived in Pine Hill Acres for at least 40 years . I am very concerned with the health issues that could arise with this project being so close to our home. Another concern is the smell this project will cause. Thankfully, I have not experienced any issues to date with the glass processing facility in process. In regards to the municipal solid waste, 1500 tons per day is quite a bit of waste. I am sure we will experience odors from this, especially during the summer months. Also, we have no idea what other kind of "waste" will be processed in the future??? My family is totally against this project. Thank you.

Susan & Bruce Sylvia
12 Ivy Road
New Bedford, MA 02745



alexander.strysky@mass.gov

[Dashboard](#) > [View Comment](#)

View Comment

Comment Details

EEA #/MEPA ID 15990	First Name Charles	Address Line 1 106 Birchwood Drive	Organization --
Comments Submit Date 8-10-2022	Last Name Kennedy	Address Line 2 --	Affiliation Description Individual
Certificate Action Date 8-22-2022	Phone --	State MASSACHUSETTS	Status Opened
Reviewer Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	Email cfkennedy1956@gmail.com	Zip Code 02745	

Comment Title or Subject

Topic: Extension to Comment Period

Comments

Rich text editor toolbar: Undo, Redo, Bold, Italic, Underline, Link, Font Face (Segoe UI), Font Size (10 pt), Text Color, Background Color, Subscript, Superscript, Text Color, Text Background Color, Paragraph, Bulleted List, Numbered List, Indent, Outdent, Link, Unlink, Print, Source Code.

Please extend the comment period for this project to an additional 30 days to give enough time to read over and prepare comments on the 900+ page Supplemental FEIR.

Attachments

Update Status

Status

Opened

SUBMIT

Share Comment

SHARE WITH A REGISTERED USER

[BACK TO SEARCH RESULTS](#)

From: [MEPA \(EEA\)](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Fw: EEA No. 15990
Date: Monday, August 15, 2022 2:21:26 PM
Attachments: [phase 2 letter 3.docx](#)

From: cstrupczewski@verizon.net <cstrupczewski@verizon.net>
Sent: Friday, August 12, 2022 7:46 AM
To: MEPA (EEA) <mepa@mass.gov>
Cc: wendygraca@aol.com <wendygraca@aol.com>; wallacetracy99@gmail.com <wallacetracy99@gmail.com>; rrcrt@aol.com <rrcrt@aol.com>
Subject: EEA No. 15990

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning

I am attaching my letter of opposition regarding Parallel Products now known as South Coast Renewables. There are many reasons for my opposition which is, once again, explained in my letter. There are hundreds of single family homes, apartments building, a large elementary school with close to 600 students enrolled and the many other business located in the New Bedford Park.

As you are aware, the New Bedford Business Park is surrounded by wetlands some of which are on Parallel Product's land.

Carol Strupczewski

1075 Braley Road
New Bedford, MA 02745
August 6, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
MEPA Office
100 Cambridge Street
Boston, MA 02114

Ladies and Gentlemen

EEA No. 15990

Once again I am writing for the third time requesting the that your agency DENY the approval of Parallel Product of New England now known as South Coast Renewables located in New Bedford, Massachusetts 02745 request to have Phase 2 granted. There are a number of reasons for my objections some of which I wrote to you in the past:

- Parallel (South Coast Renewables) is located close to a hundreds of residential homes, more than 200 in Pine Hill and at least 12 homes bordering its own property with just a split rail fence and bales of hay separating Parallel's land from those 12 homeowners land.
- Truck will be transporting raw materials to Parallel (South Coast Renewables) throughout the day and perhaps the evening via highways as well as on city roadways. What happens if there is an accident and the raw materials spills onto the streets impacting homeowner's property and public lands? Who will be responsible for the major cleanup?
- Parallel (South Coast Renewables) is surrounded by wetlands. Again, what impact will occur on the wetlands if an accident(s) happen(s)?
- Parallel (South Coast Renewables) is planning on having side trail tracks put in from the main rail line to their facility. Again, what happens if the rail cars turn over and spills materials into the wetlands?
- How is Parallel Product (South Coast Renewables) going to prevent trucks from using Phillips Road to transport materials to their company?
- With the anticipated expansion of the company, how many more additional trucks will be entering the facility? Presently there are times during the day that Exit 7 Braley Road is in gridlock. Traffic is backed up onto the highway (Route 140 N Exit 7) in the mornings and especially during the morning hours and during snowstorms.
- There are hundreds of children going to Pine Hill Park located on Phillips Road a route that some of these trucks might use—disaster waiting to occur!
- Not far from Pine Hill which is a big development within visual view of Parallel Products (South Coast Renewables), there are two other large housing communities off of Phillips Road, a condo unit, and apartment complexes. There are thousands of people living in close proximity to this company. Parallel (South Coast Renewables) is NOT located in the inner part of the business park.


- Parallel (South Coast Renewables) proposes erecting many stacks. What toxins might be emitted into the air from these stacks now and in the future? How will that impact our air quality? What testing will be done and when?
- Water use and sewage from the processing of materials. Presently, we residents, in the Far North End of New Bedford where Parallel is located, are experiencing extremely low water pressure. What will be the impact on our water pressure with the proposed expansion, and what will be the future impact on the City's aging sewage treatment plant?

Presently with the agreement that the current Mayor Jon Mitchell signed with Parallel Product (now known as South Coast Renewables), what will happen in the future if the company changes hands and Mayor Mitchell is no longer in office. Might a different company come in and change the agreement to process bio solids?

There are many unanswered questions and potential accidents waiting to happen that will impact thousands of residents' lives as well as the environment. Here in New Bedford, we have had and are still cleaning up past environmental contamination such as Sullivan's Ledge, the New Bedford Harbor, Parker Street Waste Site, former Goodyear, etc. Let's not add Parallel Products to the list. Please do not grant the company the permission to move ahead with Phase 2.

Sincerely

Carol Strupczewski




Mary J. Ducharme
888 Hillcrest Road
New Bedford, MA 02745

Do Not Want Parallel Products
of New England, dumping

garbage for processing
@ The New Bedford Industrial
Park in MA.

The noise from the trucks
and congestion, plus the
ruining of the roads. The smell
and animals it will attract
will ruin the neighborhood
which pays some of the highest
taxes in the area.



Mary Duchane
8/12/2022

B17422

From: [MEPA \(EEA\)](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Fw: Project number: EEA #15990
Date: Monday, August 15, 2022 2:21:05 PM

From: Tom And Sue <tomsue75@comcast.net>
Sent: Friday, August 12, 2022 11:31 AM
To: MEPA (EEA) <mepa@mass.gov>
Subject: Project number: EEA #15990

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern:

First of all we are requesting a 90 day extension of the comment period deadline. With the report being almost 1,000 pages long there would not be enough time to read through it by August 22nd.

When we have attended meetings the Parallel representatives (now south coast renewables) have stated they would be good neighbors. We know for a fact that their previous place on Shawmut Ave was disgusting and filthy with trash strewn everywhere. They were definitely not good neighbors to the residences and businesses in that neighborhood. That was on a much smaller scale than what they have proposed for our neighborhood. We cannot imagine how things will go when they bring in other municipalities' solid waste. We have lived here more than 30 years and the concern of odors and pests are very worrisome. Also if everything isn't handled properly people's health could be affected. (Note things were not handled properly in the past)

This will definitely affect everyone's quality of life. Between the noise, traffic congestion (which is already bad), and possible impact on both our water and sewage systems we will all be negatively affected. Needless to say property values will go down. Who will want to purchase a home so close to a municipal waste station.

This is definitely not an industry that should be located so close to residences and a local school.

Thank you
Thomas and Susan Southworth
320 Valley Rd
New Bedford

Sent from my iPad



alexander.strysky@mass.gov

[Dashboard\(javascript:void\(0\);\)](#) > [View Comment\(javascript:void\(0\);\)](#)

View Comment

Comment Details

EEA #/MEPA ID 15990	First Name SUSAN	Address Line 1 52 BLUEBERRY TER	Organization --
Comments Submit Date 8-14-2022	Last Name SWISHER	Address Line 2 --	Affiliation Description Individual
Certificate Action Date 8-22-2022	Phone --	State MASSACHUSETTS	Status Opened
Reviewer Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	Email susanswisher@att.net	Zip Code 02745	

Comment Title or Subject

Topic: Parallel Products Project

Comments

The citizens of New Bedford need a 90-day extension of the comment priod deadline. The report is 1000 pages long. Concerned citizens cnott possibly read through the entire document and make informed comments by the 8/22/2022 deadline date. Please allow us the time to review and understand these documents. EEA #15990

Attachments

Update Status

Status

Opened

SUBMIT

Share Comment

SHARE WITH A REGISTERED USER

[BACK TO SEARCH RESULTS](#)

From: [MEPA \(EEA\)](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: Fw: EEA#15990
Date: Monday, August 15, 2022 2:13:33 PM

From: kearymoroney <kearymoroney@gmail.com>
Sent: Sunday, August 14, 2022 5:59 AM
To: MEPA (EEA) <mepa@mass.gov>
Subject: EEA#15990

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

As a concerned homeowner in the Pine Hill Acres neighborhood of the North End of New Bedford, we urge you to please extend the comment period deadline to 8/22/23.

We are all concerned about the odors, traffic, noise, pollution, water quality and so many more points as well as our home values decreasing with a solid waste treatment plant being constructed alongside such a large neighborhood of families.

This is NOT where a facility of this type should be placed !!!!

Please take the time to make sure all of the citizens of New Bedford are heard.

The city is looking to agree to this for tax money and jobs and not thinking about the welfare of their citizens who live here.

Come take a walk through our beautiful neighborhood and see what's at stake !

Sincerely
William Moroney
124 Ridgewood Rd

Sent from my Verizon, Samsung Galaxy smartphone

From: [MEPA \(EEA\)](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: Fw: EEA No. 15990
Date: Monday, August 15, 2022 2:12:11 PM

From: cstrupczewski@verizon.net <cstrupczewski@verizon.net>
Sent: Monday, August 15, 2022 8:04 AM
To: MEPA (EEA) <mepa@mass.gov>
Cc: wendygraca@aol.com <wendygraca@aol.com>; wallacetracy99@gmail.com <wallacetracy99@gmail.com>; rrcrt@aol.com <rrcrt@aol.com>
Subject: Re: EEA No. 15990

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I recently was reminded that Parallel Products is in violation of not informing the residents and having meetings with the community and did not include this statement in the letter I attached to my email to you on Friday, August 12, 2022. (See the below statement in larger and bolder print below.)

"I write to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy. "

Seems like a lot of back door maneuvering has been going on with this company. .

Carol Strupczewski

-----Original Message-----

From: cstrupczewski@verizon.net
To: mepa@mass.gov <mepa@mass.gov>
Cc: wendygraca@aol.com <wendygraca@aol.com>; wallacetracy99@gmail.com <wallacetracy99@gmail.com>; rrcrt@aol.com <rrcrt@aol.com>
Sent: Fri, Aug 12, 2022 7:46 am
Subject: EEA No. 15990

Good morning

I am attaching my letter of opposition regarding Parallel Products now known as South Coast Renewables. There are many reasons for my opposition which is, once again, explained in my letter. There are hundreds of single family homes, apartments building, a large elementary school with close to 600 students enrolled and the many other business located in the New Bedford Park.

As you are aware, the New Bedford Business Park is surrounded by wetlands some of which are on Parallel Product's land.

Carol Strupczewski

From: [Chris Melo](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: Violation by Parallel Products
Date: Monday, August 15, 2022 7:52:20 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I write to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

Christina Melo
Peckham Rd resident

From: [Cindy Costa](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: Eea# 15990
Date: Monday, August 15, 2022 8:14:45 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Stryisky,

I write to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

City Costa

New Bedford resident in the environmental justice impact zone

Sent from my iPad

From: [Donna Poyant](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: New Bedford
Date: Monday, August 15, 2022 8:34:43 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning

My name is Donna Poyant

I live at 39 Ridgewood Rd in New Bedford

Phillips Rd runs directly behind my home

I feel that our neighborhood has been taken advantage of by the city and industry for years. I am opposed to the municipal solid waste project at parallel products. I am concerned about rodents and odors it may bring to this residential area.

New Bedford is too densely populated to have this type of industry.

Thank you for listening to my concerns

Sent from my iPhone

From: [k.Costa](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: EEA #15990
Date: Monday, August 15, 2022 8:05:09 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr Strysky,

I am writing to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates regarding EEA#15990 and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

Thanks,
Ken Costa
New bedford resident

From: [mary.myers](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: opposition to Parallel Products actions and project design and poor community communication
Date: Monday, August 15, 2022 11:26:54 AM

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August 15, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
ATTN: MEPA Office
Alex Stryisky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card:

This letter is to express opposition to a project proposed by South Coast Renewables LLC (f.k.a. Parallel Products of New England LLC) (PPNE), to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

As a 91 year old resident of Pine Hill Acres since 1970, widow and mother of six children, I want you to know the specific points that I have learnt and find most concerning.

The reasons for my opposition include the following:

- The proposed facility will further pollute a community already burdened by environmental injustice and poses health risks to New Bedford residents, many who are working-class and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past.
- PPNE explicitly admits in the host agreement signed with the City of New Bedford this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the host agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, and loss of business in the community.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.
- PPNE failed to seek community input before signing off on a host agreement with the City of New Bedford. Residents were deliberately left out of the process.
- PPNE has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs. (no translators,
- PPNE has a poor track record of being a “good neighbor” and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility will generate 418 truck trips per day, and process 1500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future, over 80% to landfill.

- PPNE claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states. Rather than focusing on sustainable, zero waste solutions, the proposed facility mirrors a dirty materials recovery facility. It is unclear how many materials would be recycled there, as some waste will enter baled and not be eligible for recycling, and others will be too contaminated. How many materials will be eligible for recycling, how will they extract these materials, what is the market for these materials, how much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- PPNE surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are everything but GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, any further subjection to pollutants is unacceptable.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- What is the company's de-commission plan, in case this business fails?

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

The data contained in my letter can be found in the following sources:

SEIR Part 1: [Supplemental Environmental Impact Report - pages 500-997.pdf - Google Drive](#)

SEIR Part 2: [Supplemental Environmental Impact Report - pages 1-499.pdf - Google Drive](#)

Letter from KP Law: <https://docs.google.com/document/d/1gcPH5mpM9scjY2nSgAuX27to7yoO-TCbskXy9GBMcVc/edit?usp=sharing>

Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

MOU with Brockton and Fall River: https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf>

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Sincerely,

Mary Myers



Virus-free www.avg.com

From: [mary.myers](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: Violation by Parallel Products
Date: Monday, August 15, 2022 11:15:02 AM

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I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

I'm 91 and have lived in Pine Hill Acres since the 1970s and want to live in a safe, healthy community that seeks and values my input. I hope immediate action is taken to address this violation.

Mary Myers

From: [Matthew O'Donnell](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: Fwd: Opposition and Concerns About the Parallel Products Project
Date: Monday, August 15, 2022 8:04:52 AM

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Sent from my iPhone

Begin forwarded message:

Subject: Opposition and Concerns About the Parallel Products Project

Good morning, I am writing you to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of this project, its developments, and the MEPA process is due to the outreach efforts made by members of the South Coast Neighbors United and the CAPPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation police.

This is a very unfortunate event and hope that Parallel Products, dba South Coast Renewables will be held accountable for their actions.

Sincerely,

Matt O'Donnell

From: [Paul Gaudette](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Parallel Products Project
Date: Monday, August 15, 2022 10:44:36 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I write to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

From: [MEPA \(EEA\)](#)
To: [Strysky, Alexander \(EEA\)](#)
Cc: [Kim, Tori \(EEA\)](#)
Subject: Fw: Parallel Products Project
Date: Monday, August 15, 2022 2:10:28 PM

From: Paul Gaudette <paulg912@comcast.net>
Sent: Monday, August 15, 2022 10:46 AM
To: MEPA (EEA) <mepa@mass.gov>
Subject: Parallel Products Project

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I write to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

From: [Swible <lpswib@comcast.net>](mailto:Swible<lpswib@comcast.net>)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Parallel Products Opposition
Date: Monday, August 15, 2022 7:09:43 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I am written at this time regarding opposing the expansion plan for Parallel Products, whereas Parallel Products has violated the law for failing to publicly notify of expansion, this is being done by side stepping the public and making coordinating efforts and negotiations with Mayor Michell, directly, this action is only in the best interest of Parallel Products and the Mayor Michell an complete disregard for the citizens and the community of New Bedford. Sincerely Peter Swible

From: [Carleen Cordwell](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: Letter
Date: Monday, August 15, 2022 12:52:07 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I write to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

I'm a stakeholder in the community and I'm totally against this project.

R Carleen Cordwell

213 Acushnet Ave

New Bedford, MA 02557

From: rmelan@comcast.net
To: [Strysky, Alexander \(EEA\)](#)
Subject: EEA#15990
Date: Monday, August 15, 2022 9:56:56 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Strysky,

I write to advise you that I was not informed by Parallel Products, DBA South Coast renewables, Of any project updates, and that the only reason I am aware of the project, it's developments and the MEPA process, is due to the outreach efforts made by members of the southcoast members united and the CAPPP committee. Therefore, I believe the company is in violation of the 2017 Environmental participation justice enhanced policy. Could you please take a further look into this, Mr. Strysky? Your opinion is everything..

Thank you, Robert Melancon

From: [AOL support](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: EEA# 15990 PARELEL PRODUCTS
Date: Monday, August 15, 2022 10:52:53 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I write to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

From: [Vincent Carolan](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: South Coast Renewables
Date: Monday, August 15, 2022 6:49:03 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Greetings Alexander,

I am writing to inform you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates and that the only reason I am aware of the project, its developments and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPP Committee. Subsequently, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

**Sincerely,
Vincent Carolan**

From: [A.H](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Parallel Project comments EEA No. 15990
Date: Tuesday, August 16, 2022 10:21:08 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Mr Strysky-

Not sure if you-all are aware, but MA has some Environmental Justice laws with teeth now that everyone MUST follow. The company has NOT met the EJ requirements/laws and the majority of comments MEPA has received are a result of hours of community outreach, and not the company's.

This is unconscionable and illegal.

- Andrea Honore

--

A. HONORE

From: [Bethany Enzian](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 9:19:24 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Mr. Alex Stryisky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Stryisky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.stryisky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

<https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?>

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

<https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?>

[_ga=2.95911068.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Bethany Enzian

be.6261@gmail.com

1046 Tobey St

New Bedford, Massachusetts 02745-4322

From: [Chenelle Saulnier](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 5:58:32 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

This letter is to bring the attention of the MEPA Office to the blatant disregard of Environmental Justice regulations and guidelines by Parallel Products of New England, dba South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of their seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The proponent has failed to meet the 2017 Environmental Justice Enhanced Public Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The basis of these findings are as follows:

- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not that of the Project Proponent's.
- A 30-day comment period is an unacceptable time limit to offer for review of a 997 page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class citizens, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc...
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper procedures.
- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR they state that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.

- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language translation or distribution.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.
- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, allowing for minimal community participation.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach events s sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

Under state Executive Office of Energy and Environmental Affairs guidelines, Environmental Justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are

especially vulnerable.” The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice regulations. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

[https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

[https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

[_ga=2.95911068.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Chenelle Saulnier

chenellesaulnier@gmail.com

31 Howland Road, 1

FAIRHAVEN, Massachusetts 02719

From: [Colin Dacosta](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 16, 2022 10:35:15 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

The data contained in this letter can be found in the following source:

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

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MOU with Brockton and Fall River:

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Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Colin Dacosta

mimidacosta77@gmail.com

85 Ivy Rd

New Bedford , Massachusetts 02745

From: [Deborah Moser](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 9:01:18 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

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[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Deborah Moser

dmoser120@gmail.com

120 Heritage Drive

New Bedford, Massachusetts 02745

From: [Diana Barboza](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 16, 2022 9:52:09 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Diana Barboza

dbarboza19@comcast.net

50 Cottonwood Rd.

New Bedford , Massachusetts 02745

From: [Diana Barboza](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 9:50:20 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
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to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

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- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
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- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

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Diana Barboza

dbarboza19@comcast.net

50 Cottonwood Rd.

New Bedford , Massachusetts 02745

From: [Elizabeth Saulnier](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 10:58:56 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

This letter is to bring the attention of the MEPA Office to the blatant disregard of Environmental Justice regulations and guidelines by Parallel Products of New England, dba South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of their seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The proponent has failed to meet the 2017 Environmental Justice Enhanced Public Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The basis of these findings are as follows:

- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not that of the Project Proponent's.
- A 30-day comment period is an unacceptable time limit to offer for review of a 997 page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class citizens, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc...
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper procedures.
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Elizabeth Saulnier

bsmrc2@comcast.net

94 Birchwood Dr

New Bedford, Massachusetts 02745

From: [George Borden](#)
To: [Ron Cabral](#)
Cc: [Strysky, Alexander \(EEA\)](#); antonio.cabral@mahouse.gov; christopher.markey@mahouse.gov; paul.schmid@mahouse.gov; chris.hendricks@mahouse.gov; [Mark Montigny](#); Mayor.Mitchell@newbedford-ma.gov; Ian.Abreu@newbedford-ma.gov; Derek.Baptiste@newbedford-ma.gov; Shane.Burgo@newbedford-ma.gov; Naomi.Carney@newbedford-ma.gov; Hugh.Dunn@newbedford-ma.gov; Maria.Giesta@newbedford-ma.gov; Brian.Gomes@newbedford-ma.gov; Scott.Lima@newbedford-ma.gov; Brad.Markey@newbedford-ma.gov; Linda.Morad@newbedford-ma.gov; Ryan.Pereira@newbedford-ma.gov
Subject: Re: South Coast Renewables a/k/a Parallel Products
Date: Tuesday, August 16, 2022 9:29:38 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I agree it was a back room deal why is their not city audits or have Maura Healy investigate this bullshit

Sent from my iPhone

On Aug 16, 2022, at 9:02 PM, Ron Cabral <rrcrt@aol.com> wrote:

participation policy.

From: [Greg Sylvia](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: Parallel Products Violation
Date: Tuesday, August 16, 2022 3:01:42 PM

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Hello,

I write to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

Regards,

Greg Sylvia

From: [JANYtzabell Rodriguez](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 16, 2022 8:23:19 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by South Coast Renewables LLC (f.k.a. Parallel Products of New England LLC) herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.

- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?

- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....

- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.

- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?

- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.

- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.

- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.

- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

The data contained in this letter can be found in the following source:

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

JANYtzabell Rodriguez

janyboricua@aol.com

195 Osborne St

New Bedford , Massachusetts 02740

From: [JANYtzabell Rodriguez](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 8:23:01 PM

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

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- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
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JANYtzell Rodriguez

janyboricua@aol.com

195 Osborne St

New Bedford , Massachusetts 02740

From: [John G Andrade](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 11:20:22 PM

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John G Andrade

obvdcbr@yahoo.com

41 Bedford Street

New Bedford, Massachusetts 02740

August 9, 2022

Secretary of Energy and Environmental Affairs

**Executive Office of Energy and Environmental Affairs
(EEA)**

Attn: MEPA Office

Alex Strycky EEA #15990

100 Cambridge street Suite 900

Boston Ma 02114

EEA#15990

**Stop the Proposed Parallel Products Trash Transfer Station from
overburdening an Environmental Justice Community**

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INTRODUCTION

Parallel Products (rebranded as South Coast Renewables) is proposing to operate a bottle recycling center and trash transfer facility at the New Bedford Industrial Park at 100 Duchaine Blvd. Parallel Products is an International corporation headquartered in Louisville, KY, with five locations in the USA and one in Canada. The company has extensive bottle recycling experience. However, they have zero experience in handling municipal solid waste according to their website listing the locations and processes at each facility. On January 13, 2016 a planning board meeting was held during the morning hours regarding a site approval for 50 Duchaine Blvd by applicant Parallel Products of New England Inc. The application for that location lists a request for a liquid waste disposal and recycling facility. It is worth noting that the proposed site in the application is not the site that they are now seeking to build upon. The first public community meeting was initiated by Councilor at Large Brian Gomes and Brad Markey at the Pulaski School auditorium on April 29, 2019. The meeting was well attended by approximately 300 residents voicing their concerns. This facility is being proposed to be sited in a large and densely settled residential area. A draft environmental Report for Parallel Products was also conducted by Green Seal Environmental, Inc. and submitted to the Executive Office of Energy and Environmental Affairs (EOEEA) on November 15, 2019.

ENVIRONMENT JUSTICE COMMUNITY

On February 11, 1994, President Clinton signed Executive Order 12898 known as the Federal Executive Order on Environmental Justice. The E.O. directs federal agencies to identify and address the disproportionately high and adverse human health and/or environmental effects of their actions on minority and low-income populations to the greatest extent practicable and permitted by law. The order also directs each agency to develop a strategy for implementing environmental justice. The order is also intended to promote nondiscrimination in federal programs that affect human health and the environment as well as provide minority and low-income communities access to public information and public participation.

In 2014 Governor Deval Patrick signed Executive Order 552. E.O. 552 extended environmental justice (henceforth E.J.) obligations to all executive branch agencies. The existing

state E.J. policy, E.O. 552, calls for, among other things, the formulation of E.J. strategies by all executive branch agencies.

A community in Massachusetts is determined to be an “Environmental Justice Community” if it meets at least one of three criteria:

- Has one or more Census block groups whose annual median household income is equal to or less than 65 percent of the statewide median (\$62,072 in 2010, which would be \$40,347);

or

- Has one or more Census block groups where 25% or more of the residents identify as minority;

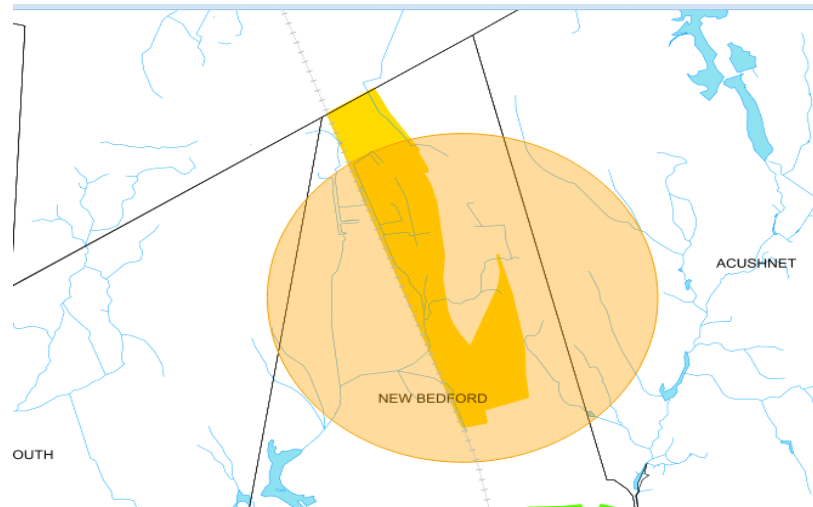
or

- Has one or more Census block groups where 25% or more of households have no one over the age of 14 who speaks English only or very well (i.e., Limited English Proficiency (LEP)).

The EPA makes a strong case for this policy in their document ‘Waste Transfer Stations: A Manual for Decision-Making’:

“During the site selection process, steps should be taken to ensure that siting decisions are not imposing a disproportionate burden upon low-income or minority communities. Overburdening a community with negative impact facilities can create health, environmental, and quality of living concerns. It can also have a negative economic impact by lowering property values and hindering community revitalization plans. These are just a few of the reasons environmental justice concerns need to be addressed when selecting a site for a waste transfer station.” pg. 11

Sixty-two of New Bedford’s 87 census block groups (71.3 percent) meet the definition of an Environmental Justice Community. That covers 66,180 of New Bedford’s total population of 95,072. According to 2010 U.S. Census data, 38 percent of New Bedford’s residents speak a language other than English at home, compared to a statewide average of 21 percent. Its Native American population is four times the state average, and New Bedford’s African American and Latino populations grew by 48 and 66 percent, respectively, between 2000 and 2010. The median household income is \$36,000, with 23.5 percent of New Bedford’s population living below the poverty line.



Map indicating direct impact from proposed facility. The dark yellow area designates the Environment Justice Minority population. Note the 1.0 mile circle indicates the impact area around the proposed site.

Within the 1.0-mile zone of impact there are two schools (Pulaski & Campbell), an active day health center for adults and many apartment buildings, condos, and single-family homes. New Bedford has historically been disproportionately affected by pollution from business. The city's environmental contamination issues have levied emotional and public health impacts on New Bedford residents. New Bedford is also the location of one of the nation's earliest Superfund site designations. New Bedford hosts as many as 572 former or current "brownfields sites" – properties that are abandoned or underused due to contamination presenting potential public health impacts. In a study by Northeastern University titled *'Unequal Exposure to Ecological Hazards: Environmental Injustices in the Commonwealth of Massachusetts'* it reviewed all 351 cities and towns in Massachusetts for how overburdened they were with ecological hazards (industrial facilities, power plants, toxic waste sites, trash transfer stations, landfills, and incinerators). The report placed New Bedford as the #6 worst overburdened town in Massachusetts. The only other local town that even made the top twenty was Fall River at #15.

We need the Massachusetts DEP, State and Federal officials to make a stand for the vulnerable minority justice residents directly affected by this terrible proposal. Everything in the State and Federal level needs to be done before New Bedford is once again a victim of profit over people's health and quality of life. Even in the SFEIR the company admits that the project meets ALL three of the E.J.C. block groups.

TRANSFER STATION

The proposal as explained at the April 29, 2019 meeting at the Pulaski school called for a transfer station that would receive 1500 tons of MSW daily from many outside communities at the rate of 218 trucks a day. The work hours of truck operations were stated from 6am to 7pm. The panel stated that there would be a potential for small nuisance odor from the trash truck and railroad cars. When the panel was asked about pollutants, they stated this would not be an issue. They did not mention any issues with rodents, birds or insects.

Parallel Products has had past violations with the Conservation Commission showing a history of a disregard for the rules and the environment. Their own hired engineering firm admitted during a public Conservation Commission meeting that employees were digging trenches to remove water runoff without commission approval. They were in violation for using the area designated for employee parking and dumping broken bottles for recycling in that area (see photo marked attachment 2 on DEIT Part 2, page 373). They had another violation as the dumped broken bottles over spilled into the storm water catch basins. The fact that they have already had violations should be a warning that future events may continue which could cause tremendous damage to the environment or residents health. As we have seen with the damage from the PCB's in New Bedford, once the mess is made it is too late to go back and correct the damage to the health of the residents and the environment.

ODORS

Mr. Tim Cusson, vice president of business development, stated that odors would not be a problem with the transfer station. This completely defies logic and common sense. Mr. Cusson's Parallel Products has zero experience in MSW transfer process. The SFEIR states that the unloading and loading of the MSW will be all inside. That will not eliminate the odor issue. One of the many examples of an indoor transfer station producing horrific odors was ABC 7 news from Brooklyn . The indoor transfer station was responsible for horrifically offensive odors day and night effecting the entire surrounding residents. Parallel Products knew that odor WILL be a problem so they are listing ways to *minimize the problem to the best of their ability*. Essentially, our children will have to unduly bear offensive smells while pests will undoubtedly be drawn to this place from miles around. In addition to this, the C & D waste material often evolves hydrogen sulfide gas which presents as a rotten egg smell. The company states they have a plan to stop this but they have ZERO experience

The latest information from the SFEIR shows the indoor track for the rail cars as seen on Fig 2-9 Revised Phase 2 Layout that the enclosed rail area for glass and trash loading is 125 feet long. According to the CSX rail car guide, a gondola rail car that is capable of holding 70 to 100 tons of material is around 52 feet long. That means they will only be able to get 3 rail cars maximum indoors at a time. This means that there will most likely be 2 trash and one glass car at a time suggesting that most of the trash at any given point will be outside in the railcars adding to the odor issues. The SFEIR states on page 30 that C & D material will be used to cover the Baled trash. So dangerous silica dust and rotten egg smelling gas from Gypsum will most likely easily emanate from these outside railcars.

BIOLOGICAL VECTORS (PESTS)

As described by the EPA, biological vectors are organisms like rodents and insects that can spread disease by carrying and transferring microscopic pathogens. The EPA document '*Waste Transfer Stations: A Manual for Decision-Making*' highlights the fact that these will draw vectors to the location and list various techniques to reduce the impact. The facts currently in this area of the city is there are no issues with any of the vectors listed (rodents, birds and/or insects).

If this facility was allowed to be built the health consequences of these vectors would be a severe impact on the community. An example of an indoor transfer station ravaging a community is highlighted in the article in wastedive.com. The pests from the facility caused many issues and ruined quality of life and threatened children's health in that effected community. The company is naive if they believe that this will not create a vector problem. The full and empty railcars will be a buffet for the vectors. Biological vectors can fit into tiny openings in the railcars and can easily chew through plastic baled or bagged trash. In addition to the vectors breaching the covered trash, the SFEIR stated that C & D material will be put on top of the baled trash which will also rip open the bales. The company mention a pest control company to try to control the population but how will pesticides effect the water shed?

NOISE

This proposed facility will generate constant noise in very close proximity to a residential area starting at 6am and going into the night and will undoubtedly destroy the normal quality of life in the area. During the public meeting on April 29, Mr. Cusson mentioned that the noise cannot be more than 10 decibels above the normal sound at that location during nighttime operation. The decibel of backup alarms alone is in the range of 97 to 112 decibels. I have personally heard the backup alarms and drove to Phillips Road to see trailers being backed up after 9:30 pm. In addition, many other residents have sent video and given written testimony of the abuse from the noise of the facility so far.

The National Institute of Environmental Health Science reports that tens of millions of Americans suffer from a range of adverse health outcomes due to noise exposure, including cardiovascular disease, sleep disturbance, endocrine effects, and increased incidence of diabetes. This is also highlighted and explained in the World Health Organizations report on noise pollution. The company has proven to make noise as they have on numerous occasions had loud backup alarms on trailers going at all hours of the night keeping people up (from video and emails submitted during the DEIR). The company knows they were exposed for the noise and now they are making new hours of operation. These will quickly be changed if they open up because once they get their foot in the door the hours will be 24/7 non-stop. They state clearly that the long range goal is to handle the waste shed for the region (Bristol, Barnstable and Plymouth).

TRAFFIC

The company has now changed the total number of truck trips by increasing them 9.6% from 436 in the older DEIR to now 478 in the new SFEIR (SFEIR page 88). Under the new SFEIR: 239 trucks times 2 for arrival and departure. This means 478 trips per day were planned. With their expected truck delivery times of 6 am to 7 pm works out to 13 hours or 780 minutes in a scheduled day. By dividing the 780 minutes by the 478 truck movements works out to a truck at the 4-way Industrial Park entrance every 1.63 minutes. As listed in the DEIR Part 2 page 351, the intersections are already at a greater traffic flow than capacity. One of the intersections has a crash ratio higher than state average. This already congested road with hundreds of garbage

trucks a day will lead to massive grid lock and deadly accidents. The SFEIR seemed to cherry pick data and leave out the one with the higher crash average. I suggest before any vote is taken on this, drive by this area during the day when Pulaski school is open and you will understand the traffic nightmare this area has already.

POLLUTION

The health effects from the operation will be extremely damaging to the affected area from this proposed facility. The diesel exhaust pollution alone would increase from the 478 planned individual truck trips (representing a 10% increase in truck traffic as compared to the DEIR) on any given day, not to mention the diesel train engines for the railcars. Diesel exhaust is produced when an engine burns diesel fuel. It is a complex mixture of thousands of gases and fine particles (commonly known as soot) that contains more than 40 toxic air contaminants. These include many known or suspected carcinogens such as benzene, arsenic and formaldehyde.

New Bedford already has an elevated rate of cancer of the laryngeal, liver, bile duct, lung, bronchus, pancreas and stomach. Diesel exhaust also contains other harmful pollutants, including nitrogen oxides (a component of urban smog). As we breathe, the toxic gases and small particles of diesel exhaust are drawn into the lungs. The microscopic particles in the exhaust are less than one-fifth the thickness of a human hair and are small enough to penetrate deep into the lungs, where they contribute to a range of health problems. The SFEIR actually acknowledges the fact that the disease rate within 1 mile of the proposed site compared to statewide rates has a significantly higher rate of disease and morbidity. Any more burden of this area will certainly adversely affect the life expectancy on the underserved residents. The blood will be on their hands.

One of the most acute hazards from this transfer station is mercury. Mercury is a potent neurotoxin that can affect the brain, liver, kidneys and cause developmental disorders in children. Young children and fetuses are especially at risk. Mercury from the transfer station comes from many forms of trash such as batteries, electrical switches, fluorescent bulbs, barometers, and thermometers. The product breaks in the waste stream the mercury escapes and begins to evaporate. This will then pollute the air in the area around the facility.

Children, the elderly, people with preexisting cardiopulmonary disease and people of low socioeconomic status are among those at higher risk for health impacts associated with living near: busy highways, rail yards and industries where pollutants are emitted from multiple sources. In a study by the California Department of Environmental Protection they laid out the impact from living near a busy road. This study was following a group of children for age 10 to 18 and the air pollution effects on them. The report found a 36% increase in low birth weight, a 27% increase in premature births and a 3 times increase in cardiac birth defects. The report also found an 89% increase in asthma and a 5-8% increase in acute respiratory symptoms in schools near the roadway.

The company's analysis is based on estimations and specifications from the equipment. As we all know, estimations and specifications are wonderful but far more often than not they do not past realistic muster. As was seen in the recent documentary 'Three Mile Island', the testing

and data regarding contaminants was taken by the company and they were down playing the danger and taking short cuts. Parallel Products has a proven track record of taking short cuts as evident when they just dumped piles of glass outside over storm drains as noted in the Con Com meetings.

PFAS

A special pollutant that the EPA is starting to roll out testing for is PFAS or perfluoroalkyl and polyfluoroalkyl substances. PFAS chemicals have been widely used since the 1940's and were used in many industrial and consumer products. The chemical bonds are so strong with these chemicals that they are often called "forever chemicals" and can bioaccumulate in the human body. These chemicals are dangerous to human health and the EPA set a health advisory level of 70 parts per trillion (ppt). These "forever chemicals" have been linked to kidney cancer and a range of other diseases. This could make the PCB's in New Bedford harbor pale in comparison to this newly created brownfield site.

The Baker-Polito Administration on December 13, 2019 filed draft regulations on PFAS regulations. This is a serious issue as these dangerous chemicals are found routinely in high concentrations in waste water sludge. Considering the danger of PFAS, like PCBs, a similar track should be taken when looking at the financial assurance mechanism (FAM) for this proposal. Per the EPA on the New Bedford PCB clean up "*The total cost for the harbor PCB cleanup, including agency indirect costs, is **approximately \$1 billion**. Approximately half of that amount has been funded by the federal and State governments' cost recovery efforts*". A similar expense of \$1 billion dollars FAM should be the expected minimum.

This proposed transfer station would super concentrate the drainage from the tipping floor for the MSW. The PFAS chemicals from the trash would be collected from the spraying of the trash and sent to the wastewater stream and over burden the New Bedford sewer plant with even more concentrated PFAS levels and thus making that sludge even more toxic. The plan for Parallel Products is to get their foot in the door with an initial lower level of MSW and then take all of the REGIONS trash as they explained in the SFEIR on page 202. This will lead to a massive concentration of PFAS chemicals in that drainage water from the liquid collected in the tipping area drainage system. As they state on Page 62 of the SFEIR "*Plymouth, Barnstable and Bristol counties are the waste shed areas to use this facility.*"

The SFIER tried to completely dismiss the subject of PFAS (page 61) as the Bio-solids proposal was cancelled. However, MSW is a tremendous source of PFAS chemicals. According to a paper by the American Chemical Society:

"Municipal solid waste contains diverse and significant amounts of per- and polyfluoroalkyl substances (PFAS), and these compounds may transform throughout the "landfilling" process from transport through landfill degradation. Fresh vehicle leachates, from commercial and residential waste collection vehicles at a transfer station, were measured for 51 PFAS."

This leachate from the trash trucks dumping MSW and more importantly the railcars that will leak it into the environment during transportation (gondola railcars are not water tight) will cause a huge environment impact to the wetlands and water supply.

DIRTY MRF

This proposed recycle facility will in fact be a dirty material recycling facility (MRF). It will try to recycle contaminated material for which there is no market for as China will no longer accept low grade recycle material. Think greasy pizza boxes as an example. There is no demand for material with hazardous waste or PFAS contamination. For proper recycling the items must be separated and collected when they are a high grade recycle material. The company claims that they will have a recycle rate of 20% which is very unlikely when compared to the existing Dirty MRF's in existence and that the company has ZERO experience doing ANY Dirty MRF work.

C & D WASTE

The C & D waste will cause more issues than simply smell and contamination. There has been numerous C & D fires in such plants throughout the US and many within the local region. It appears that processing C & D exclusively is the long term goal after this company establishes a foothold and this is especially concerning as C & D waste often may contain asbestos. On the SFEIR Page 28 they state "*At this point in time, the facility does not intend to process C & D on-site*". The ambiguous nature of "*At this point in time...*" heavily suggests they will certainly attempt to expand to on site C& D waste processing if they are able to get their foot in the door. They clearly state on the SFEIR page 228 that "*future solid waste permit(s) will establish a maximum daily tonnage rate*". The company also stated that no roll off C & D containers are anticipated, but they don't state that they will not be accepted. This alone may cause a storage issue with these roll off containers if they are even simply accepted.

FIRE HAZARD

There is an significant danger of a fire at this proposed facility. Unlike other facilities that are separated from residential areas, this one is to be located immediately within one. Threat from toxic smoke poisoning the residents is real and a serious concern. The construction of the Pine Hill Acres and the other developments north and south of Pine Hill has restricted egress routes. A fire at the facility will threaten the residents since the only way to escape these residential neighborhoods is to drive directly towards the facility and take Phillips road (see figure 2-1 from the SFEIR). Residents would be trapped as there is no way to escape except to drive towards the facility. Hundreds of residents lives could be in jeopardy in this case. Recent fires at Transfers Stations and Recycle facilities in Massachusetts include: Everett on 12/8/2021, North Andover on 8/21/2019, Yarmouth on 8/4/2022, Marblehead on 8/1/2022 and right here in New Bedford on 6/7/2022. The risk of a fire mushrooming out of control within a residential area is a serious issue not necessarily faced by any of the other facilities indicated prior.

VULNERABLE COMMUNITY IN THE AFFECTED AREA

SCHOOLS

There are two schools in the immediate affected area that may have the student's health impacted by the proposed plants. Studies have found that the added impact from additional diesel truck exhaust contributes to increased acute respiratory symptoms and asthma. Pollutants have a far greater impact on children as they are more susceptible during their development.

ADULT DAYCARE

The adult day care center is bordering right on the industrial park boundary and the pollutants and smell will be detrimental to these residents. The EPA document states that even low-level air pollutants lead to a higher risk to the elderly.

RESIDENTIAL AREAS

The residents, some of who would have the plant quite literally in their backyards, will have their health, quality of life and economic well-being negatively affected by this proposed plant. A large amount of homes are within a half-mile of the proposed location.



Photo showing homes with part of the proposed plant directly behind them.

ECONOMIC IMPACT ON THE AFFECTED AREA

PROPERTY VALUES

Studies and common sense have shown that living near a trash processing facility that can be seen or smelled will have a significant negative impact on property values. A study by the Center for Health, Environment & Justice found a reduction of property value from 2.5 to 12.9% near trash facilities. The average home value in New Bedford is \$374,740 as of June 2022. This

means that homeowners could lose \$48,341 off their family's life savings while the company makes a fortune. The residents living the closest to the transfer station would suffer the greatest reduction in property value. The impact to other businesses in the industrial park should also be addressed as the impact of odorous garbage trucks and pollutants may cause businesses to leave which would impact tax revenues to the city. This means that the vast amount of hard working blue collar residents in the already overburdened city will be burdened with another economic injustice. Now these long suffering environmental victims will be again burdened with the loss of thousands in equity that will impact them and their generations that follow for decades after.

CONCLUSION

The State and Mass DEP should reject this proposed plant based on the health, safety and environment justice factors that were discussed. That this is proposed right on top of a residential area with thousands of resident's health and mental wellbeing hanging in the balance should be enough to halt this horrible proposal. This completely unproven facility which would be as the company stated "*the first attempt of this type of facility*" has no track record. Their claims on mitigation are meaningless because they have no experience to point to or data for a compatible facility. New Bedford residents are diverse, but we are not guinea pigs to deal with health and quality of life issues.

The City of New Bedford has long suffered from numerous hazardous waste sites and has borne a large brunt of the health impacts. The City of New Bedford is already the 6th most overburdened town in the Commonwealth of Massachusetts with ecological hazards. Many of the residents do not have the economic means to move if this gets approved or if they do manage to move will take a loss in market value and further exacerbate their financial stability. Why should the minority communities in this New Bedford area be unnecessarily affected by this proposed plant by being victimized physically, emotionally, and financially? The fact that Parallel Products has zero experience in running a MSW facility is a serious concern. An experiment for a large financial gain should not place vulnerable residents at risk. This company has already had violations with the Conservation Commission for failure to follow procedures. We don't need this business creating a new contamination site like the PCB sites businesses created in the past.

Sincerely,

Ken Costa
Resident of New Bedford

From: [k Costa](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: EEA NO 15990
Date: Tuesday, August 16, 2022 8:58:25 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Strysky,

I am requesting that you extend the comment period for 30 day to 90 days to allow the proper time to review the SFEIR for the EEA NO 15990. This is far to much information to go over in such a short period of time and the plan from the original DEIR has changed to.

Thanks,
Ken Costa
New Bedford Resident

From: [Kevin Barboza](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 9:51:08 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

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[_ga=2.95911068.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Kevin Barboza

kbarboza362@comcast.net

50 Cottonwood Rd.

New Bedford , Massachusetts 02745

From: [Kimberly Wallace](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 16, 2022 8:22:59 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by South Coast Renewables LLC (f.k.a. Parallel Products of New England LLC) herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

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Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Kimberly Wallace

klinds0903@gmail.com

199 3rd Ave

Milford , Connecticut 06460

From: [Lori Silveira](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 9:24:45 PM

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
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Boston, MA 02114
Email: alexander.strysky@mass.gov

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

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Lori Silveira

lsilveira@newbedfordschools.org

30 Bryant Lane

New Bedford, Massachusetts 02719

From: [Meghan Rogers](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 7:44:34 PM

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Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
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Email: alexander.strycky@mass.gov

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The basis of these findings are as follows:

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Meghan Rogers

meglynerogers@gmail.com

22 Elizabeth street

Dartmouth, Massachusetts 02747

From: [Michelle Dacosta](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: Say No
Date: Tuesday, August 16, 2022 10:29:36 PM

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Have you ever seen the traffic around 7:15 in the morning!!!! Horrible my child has to wait for a bus on a busy busy corner do you know how many times my own mother almost got hit !!! No you don't because you don't live in this area so take the business to your neighborhood!!! I sometimes sit in traffic for about 7 mins to get to work !!! When I just work 6 mins away !!! Please please don't let this company come to the industry park ... there are school right down the street that my child has to get bussed to because of the traffic never mind with out this company!!! And don't even want to talk about the smell!!!

From: [Michelle Dacosta](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 16, 2022 10:22:34 PM

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Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
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Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Michelle Dacosta

mimidacosta77@gmail.com

85 ivy rd

New Bedford , Massachusetts 02745

From: [Michelle Dacosta](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 10:21:17 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
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to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

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- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
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References:

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85 ivy rd

New Bedford , Massachusetts 02745

From: [Michelle Da Costa](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 16, 2022 10:19:05 PM

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Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

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New Bedford Resilience Plan: <https://kladashboard->

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Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Michelle Da Costa

mimidacosta77@gmail.com

85 ivy rd

New Bedford , Massachusetts 02745

From: [Mireille Bejjani](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 16, 2022 9:07:18 PM

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Mireille Bejjani

mireille@slingshotaction.org

92 Peabody Lane

Greenfield, Massachusetts 01301

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mireille@slingshotaction.org

92 Peabody Lane

Greenfield, Massachusetts 01301

From: [Rachel Pires](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 16, 2022 8:54:29 PM

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- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

The data contained in this letter can be found in the following source:

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Rachel Pires

teamodios26@gmail.com

940 Crescent St

new bedford, Massachusetts 02745

From: [Rachel Pires](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 8:53:49 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

<https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?>

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

<https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?>

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Rachel Pires

teamodios26@gmail.com

940 Crescent St

new bedford, Massachusetts 02745

Date: 8-16-2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

This letter is to bring the attention of the MEPA Office to the blatant disregard of Environmental Justice regulations and guidelines by South Coast Renewables LLC (f.k.a. Parallel Products of New England LLC), herein referred to as the Project Proponent, in the process of their seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park.

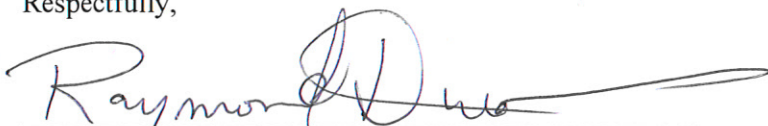
The basis of these findings are as follows:

- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- Repeated attempts to contact the City Solicitor's Office with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, 2 weeks after the submission of the SFEIR and announcement of the signed host agreement.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
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- Virtual meetings are held as PowerPoint presentations followed with a Q&A at the end. Allowing for minimal community participation.

- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and established community groups, one of which was South Coast Neighbors United.
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- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

Under state Executive Office of Energy and Environmental Affairs guidelines, Environmental Justice populations have been “determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable.” The community is being strategically and deliberately left out of communication regarding this project. This is in direct opposition to Environmental Justice regulations. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

Respectfully,


(Signature)

RAYMOND DUBOIS
(Printed Name)

107 RIDGEWOOD RD
(Street Address)

NEW BEDFORD, MA 02745
(City/Town, State, Zip Code)

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From: [Richard Fournier](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 16, 2022 9:28:11 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
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- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
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- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Richard Fournier

ricof4@comcast.net

862 Pine Hill Drive

New Bedford, Massachusetts 02745

From: [Ron Cabral](#)
To: [Strysky, Alexander \(EEA\)](#)
Cc: [Antonio.Cabral@mahouse.gov](#); [Christopher.Markey@mahouse.gov](#); [Paul.Schmid@mahouse.gov](#); [chris.hendricks@mahouse.gov](#); [Mark.Montigny](#); [Mayor.Mitchell@newbedford-ma.gov](#); [ian.abreu@newbedford-ma.gov](#); [Derek.Baptiste@newbedford-ma.gov](#); [Shane.Burgo@newbedford-ma.gov](#); [Naomi.Carney@newbedford-ma.gov](#); [Hugh.Dunn@newbedford-ma.gov](#); [Maria.Giesta@newbedford-ma.gov](#); [Brian.Gomes@newbedford-ma.gov](#); [Scott.Lima@newbedford-ma.gov](#); [brad.markey@newbedford-ma.gov](#); [Linda.Morad@newbedford-ma.gov](#); [Ryan.Pereira@newbedford-ma.gov](#)
Subject: Re: South Coast Renewables a/k/a Parallel Products
Date: Tuesday, August 16, 2022 9:02:36 PM

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I write to advise you that I was not informed by Parallel Products, d/b/a South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPPP Committee.

I am expressing my opposition and concerns regarding the Parallel Products project the company has **NOT** met the EJ requirements I as well as my neighbors stand to be impacted by this facility if it were to be built.

There was never a Community meeting with Parallel Products, The City of New Bedford and the Community advising the Community as to a possible agreement with the City of New Bedford and Parallel Products.

It was not until there was an announcement in the local newspaper that there was an agreement with the City of New Bedford and Parallel Products.

Seems like there was a backroom deal done by the city and South Coast Renewables a/k/a Parallel Products. Therefore, the company I feel is in violation of the 2017 Environmental Justice enhanced participation policy.

***Ronald R. Cabral
67 Blaze Road
New Bedford, MA 02745***

From: [Tracy Wallace](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 16, 2022 8:00:16 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

The data contained in this letter can be found in the following source:

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Tracy Wallace

wallacetracy99@gmail.com

75 Stephanie Place

New Bedford, Massachusetts 02745

From: [Tracy Wallace](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 7:46:35 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

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The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

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Tracy Wallace

wallacetracy99@gmail.com

75 Stephanie Place

New Bedford, Massachusetts 02745

From: [Vincent Carolan](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 16, 2022 8:54:31 PM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.

- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?

- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....

- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.

- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?

- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.

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Vincent Carolan

Vincent.H.Carolan3@gmail.com

75 Stephanie Place

New Bedford, Massachusetts MA

From: [Vincent Carolan](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 16, 2022 8:54:24 PM

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Vincent Carolan

Vincent.H.Carolan3@gmail.com

75 Stephanie Place

New Bedford, Massachusetts MA

From: [A Honore](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 1:20:53 PM

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- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

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A Honore

aehmoto@gmail.com

61 House Rock Road

Weymouth, Massachusetts 02188

From: [Angela Days](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 12:42:19 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
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Angela Days

angelapin@comcast.net

1 Manuel St

Fairhaven, Massachusetts 02719

From: [Arlindo Caetano](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 2:08:08 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

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Arlindo Caetano

sodonnell1472@gmail.com

93 Lafayette Street

New Bedford, Massachusetts 02745

August 17, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs EEA
Attn: MEPA Office
Alex Stryisky – EEA No. 15990
100 Cambridge Street
Suite 900
Boston, MA 02114

Dear Mr. Stryisky:

We are registered residents of the City of New Bedford and live near the New Bedford Business Park. We are in opposition to the proposed project of Parallel Products of New England, d/b/a South Coast Renewables.

We believe that if this project is approved, it will create conditions that will be a hazard to our health, quality of life, and decrease in property values of the community surrounding this business park. Many of the residents who live in this area, including us, believe that our concerns must be addressed. We do not wish to have a trash plant located in such proximity to our neighborhood.

Please consider us, the tax paying citizens of New Bedford, before allowing this project to be approved because we believe that we should have a say about what goes on in our back yard!!!!

Thank you for your consideration.

Sincerely,


Carl E. Roza & Michelle Roza

28 Angelica Avenue

New Bedford, MA 02745

From: [Carmen Rodriguez](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 1:16:11 PM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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The reasons for this opposition include but are not limited to the following:

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over 80% to landfill, a very costly and shortsighted approach.

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Carmen Rodriguez

lachulitadepr2000@yahoo.com

9 BEDFORD ST, Apt 40

New Bedford, Massachusetts 02740

From: [Cheryl Souza](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 8:18:36 PM

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Alex Strysky - EEA No. 15990
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- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

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Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Cheryl Souza

clsouza@comcast.net

80 Keene Rd

Acushnet, Massachusetts 02743

From: [Christopher Santos](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 6:56:12 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Christopher Santos

jaimechris23@comcast.net

58 Garrison Rd

New Bedford, Massachusetts 02745

From: [Debra Jardin](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 12:57:05 PM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
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Email: alexander.strysky@mass.gov

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This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
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The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

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Northeastern University Environmental Justice Study:

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Debra Jardin

quimbytwo@comcast.net

12 Freetown Street

Lakeville, Massachusetts 02347

From: [Donna Poyant](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 2:09:05 AM

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Attn: MEPA Office
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100 Cambridge Street, Suite 900
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The basis of these findings are as follows:

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Donna Poyant

dmpeko@comcast.net

39 Ridgewood Rd

New Bedford, Massachusetts 02745

From: [Dorene Mchugh](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 11:14:13 AM

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This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

Being a neighbor of this proposed site, I live within close distance of it. We are a community of middle class homeowners that strive to make a healthy living. It is our misfortune to find out this deal was made by no input of our own. Thanks to SCNU (South Coast Neighbors United) and CAPP (Citizens Against Parallel Products) informing our community it gave us our deserved opportunity to express our concerns. Please hear our voices.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
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decreased property values, long-term health issues, to loss of business in the community.

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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

The data contained in this letter can be found in the following source:

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:
<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

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New Bedford Resilience Plan: <https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf>

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:
<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Dorene Mchugh
dorene.art@gmail.com
86 Ridgewood Rd. New Bedford
New Bedford, Massachusetts 02745

From: [Dorvalino deMedeiros](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: RE: Parallel Products
Date: Wednesday, August 17, 2022 9:32:05 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good Morning-

I write to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

Sincerely, Dorvalino deMedeiros

From: [Dorvalino Demedeiros](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 9:20:38 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
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- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.

- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?

- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....

- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.

- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?

- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.

- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.

- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.

- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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Dorvalino Demedeiros

demedeiros58@yahoo.com

1242 East Rodney French Boulevard

New Bedford, Massachusetts 02744

From: [Dorvalino Demedeiros](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 9:19:59 AM

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Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
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100 Cambridge Street, Suite 900
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Email: alexander.strycky@mass.gov

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

<https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?>

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

<https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?>

[_ga=2.95911068.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Dorvalino Demedeiros

demedeiros58@yahoo.com

1242 East Rodney French Boulevard

New Bedford, Massachusetts 02744

From: [Betty Saulnier](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: EEA # 15990 Parallel Products aka SouthCoast Renewables
Date: Wednesday, August 17, 2022 8:56:39 AM

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I have a number of concerns about this project located less than a mile from my home. The Proponent has NOT done outreach to the neighbors despite their claims that they have. I was registered for an informational meeting that they cancelled. They didn't reach out to me to notify me that they rescheduled months later. I attended the Zoom meeting by phone. Greg Wirsen had a problem with his audio during his presentation so his voice broke up and I caught every few words. All of us were muted so there was no way to communicate this to the speaker. Much later in the meeting, Tim Cusson mentioned the problem to Mr Wirsen to see if he could correct the problem to answer questions. When a question was not clear to the moderator, he asked for clarification but again, all of the participants were muted so no one could reply. Then they ran out of time after their monologue and the meeting ended. The next meeting was scheduled for Sept. 21, 2022 a month AFTER the Aug 22, 2022 deadline for comments. Last night, I learned from SouthCoast Neighbors United that Parallel has scheduled another informational session for tomorrow 8/18/22. Some members of that group were invited, I was not. The New Bedford City Council is meeting for their regularly scheduled meeting on 8/18/22 so that excludes them from attending all of our city representatives from participating.

Southcoast Neighbors United has been my informational source for information on this proposed project.

My question at the meeting I did attend was about fire evacuation plan. The brief answer was that the proponent would be installing a fire pump system due to lower water pressure in this area. My follow up question would have been, will this system be able to extinguish the 1500 tons of waste, or on a weekend, 3000 tons of waste with their system? Some of the waste will come into the facility baled, Is a bale of solid waste harder to extinguish than waste that can be spread out to extinguish? Is there an evacuation plan for the over 654 children grades pre-K to grade 5 attending the Pulaski Elementary School plus staff on Braley Rd? Is there an evacuation plan for the 265 pre-k - grade 5 students Campbell Elementary school plus staff on Phillips Rd ? Both schools within 2 miles away from the facility. I have attempted to contact the New Bedford Fire Department to answer these questions but haven't gotten a response yet. New Bedford is an Environmental Justice area. It is 24.1 square miles. New Bedford has 2 Superfund sites, a closed landfill, a toxic dump called Parker St dump that resulted in 4 homes being purchased by the City due to contaminants in the soil. The Crapo Hill landfill is located within in the same Business Park as Parallel. It is on land owned by the Town of Dartmouth and is located less than 2 miles from Parallel Products. The waste collected in New Bedford and Dartmouth is handled by the CrapoHill Landfill so Parallel will not be a solution for New Bedford's waste problem.

Gov. Baker's Transportation & Climate Initiative Program hopes to reduce vehicle pollution by 26%. How will New Bedford be expected to meet that goal if 418 truck trips per day arrive in the city with solid waste from communities across the state, Rhode Island and Connecticut? As you know, the SEIR & NPC is 997 pages long, so as I read through it again, I will probably have additional comments and concerns.

Elizabeth Saulnier

94 Birchwood Dr.
New Bedford, MA 02745

From: [Irene Duprey-Gutierrez](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 3:35:51 PM

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References:

Supplemental Final Environmental Impact Report (SFEIR):

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Irene Duprey-Gutierrez

iredupreygutierrez@gmail.com

1940 Phillips Rd., #14

NEW BEDFORD, Massachusetts 02745

From: [Jacqueline Pina](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 11:48:14 AM

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Executive Office of Energy and Environmental Affairs (EEA)
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https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Jacqueline Pina

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123 Bedford St

New Bedford, Massachusetts 02740

From: [Jamie Berberena](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 9:28:34 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.

- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?

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- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.

- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?

- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.

- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.

- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.

- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

The data contained in this letter can be found in the following source:

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Jamie Berberena

JamieBerberena.chw@gmail.com

63 Pierce Street

New Bedford, Massachusetts 02740

From: [Jamie Berberena](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 9:28:11 AM

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Attn: MEPA Office
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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
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Jamie Berberena

JamieBerberena.chw@gmail.com

63 Pierce Street

New Bedford, Massachusetts 02740

From: [KAREN VILANDRY](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 5:53:49 PM

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References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

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KAREN VILANDRY

harcgnb@gmail.com

34 Huttleston Avenue,

Fairhaven, Massachusetts 02719

From: [KAREN VILANDRY](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 5:52:52 PM

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https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

KAREN VILANDRY

harcgnb@gmail.com

34 Huttleston Avenue,

Fairhaven, Massachusetts 02719

From: [Katherine Fisher](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 9:06:41 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Katherine Fisher

kath.fisher@gmail.com

5 Apple Ridge, Unit 6

Maynard, Massachusetts 01754

From: [Katherine Fisher](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 9:05:38 PM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
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to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

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Katherine Fisher

kath.fisher@gmail.com

5 Apple Ridge, Unit 6

Maynard, Massachusetts 01754

From: [Kathleen Verkade](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 9:14:28 AM

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Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
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Email: alexander.strysky@mass.gov

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Kathleen Verkade

bobkat616@icloud.com

14 Wildwood Ter

Mattapoisett, Massachusetts 02739

From: [MARLENE POLLOCK](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford! What I think is outrageous is that this agreement was signed without input from a very robust community organization that formed in opposition to processing bio-solids at this location; to ignore these active citizens b...
Date: Wednesday, August 17, 2022 2:45:48 PM

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Executive Office of Energy and Environmental Affairs (EEA)
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continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future, over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
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- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp->

<content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

MARLENE POLLOCK

marlenepollock929@gmail.com

156 Ryan Street

New Bedford, Massachusetts 02740

From: [Melissa Brito](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 9:34:40 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
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- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:
[https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?
_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

[https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?
_ga=2.95911068.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Melissa Brito

melissab8122@yahoo.com

29 ARAUJO CT

NEW BEDFORD, Massachusetts 02745-4299

From: [Michael McHugh](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 11:04:11 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

First off, I would like to thank South Coast Neighbors United and Citizens Against Parallel Products Projects for their outreach informing us of this proposed municipal solid waste dump going in across the street from our house. Without them we would never had known about this. Parallel Products did nothing to inform us about it.

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.

- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future, over 80% to landfill, a very costly and shortsighted approach.
- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

The data contained in this letter can be found in the following source:

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

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MOU with Brockton and Fall River: https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf>

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Study on PFAS in MSW and Transport Vehicle Leachates: <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Michael McHugh
mjmchugh1@comcast.net
86 Ridgewood Rd
New Bedford , Massachusetts 02745

From: [Michael McHugh](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 10:44:19 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

My wife and I live DIRECTLY across the street from the proposed municipal solid waste dump, and for the following reasons we oppose this project.

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Michael McHugh

mjmchugh1@comcast.net

86 Ridgewood Rd

New Bedford , Massachusetts 02745

From: [Michelle Roza](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 2:30:45 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

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The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
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- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

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Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Michelle Roza

shelley0228@aol.com

28 Angelica Avenue

New Bedford, Massachusetts 02745

From: [Paul Schofield](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 5:51:24 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
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Paul Schofield

ptschofield@comcast.net

881 Pine Hill Dr

NEW BEDFORD, Massachusetts 02745

From: [Sean Deandrade](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Urgent
Date: Wednesday, August 17, 2022 11:17:17 AM
Importance: High

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

I write to advise you that I was not informed by Parallel Products, dba South Coast Renewables, of any project updates, and that the only reason I am aware of the project, its developments, and the MEPA process is due to the outreach efforts made by members of South Coast Neighbors United and the CAPP Committee. Therefore, the company is in violation of the 2017 Environmental Justice enhanced participation policy.

Sean DeAndrade,
New Bedford MA registered voter&life-long resident

From: shiny2187@ymail.com
To: [Strysky, Alexander \(EEA\)](#)
Subject: Re: Parallel Products
Date: Wednesday, August 17, 2022 9:34:04 AM

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-Sheena deMedeiros

[Sent from Yahoo Mail on Android](#)

From: [Sheena Demedeiros](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 9:18:27 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

<https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?>

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

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Northeastern University Environmental Justice Study:

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Sheena Demedeiros

Shiny2187@ymail.com

69 Seaview Terrace,

New Bedford, Massachusetts 02744

From: [Sheena Demedeiros](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 9:18:10 AM

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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The reasons for this opposition include but are not limited to the following:

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- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
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over 80% to landfill, a very costly and shortsighted approach.

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- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
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- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

The data contained in this letter can be found in the following source:

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Sheena Demedeiros

Shiny2187@ymail.com

69 Seaview Terrace,

New Bedford, Massachusetts 02744

From: [STEVEN R HASHIM](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Parallel Products
Date: Wednesday, August 17, 2022 7:15:06 PM

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From: [Susan O'Donnell](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 2:06:36 PM

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Susan ODonnell

sodonnell1472@gmail.com

10 Nancy St

New Bedford, Massachusetts 02745

From: [Wendy Graca](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 17, 2022 11:43:27 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

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to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

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References:

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Northeastern University Environmental Justice Study:

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Wendy Graca

info@scnu.us

3 Dr Braley Rd

New Bedford, Massachusetts

From: [Wendy Graca](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 17, 2022 11:43:11 AM

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100 Cambridge Street, Suite 900
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Email: alexander.strycky@mass.gov

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This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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Wendy Graca

info@scnu.us

3 Dr Braley Rd

New Bedford, Massachusetts

From: [Carl Gilbert](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Thursday, August 18, 2022 6:17:00 PM

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Carl Gilbert

cg02337@gmail.com

180 Flagswamp Rd

Dartmouth, Massachusetts 02747

From: [Carl Gilbert](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Thursday, August 18, 2022 6:16:23 PM

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Carl Gilbert

cg02337@gmail.com

180 Flagswamp Rd

Dartmouth, Massachusetts 02747

From: [Charles Kennedy](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Thursday, August 18, 2022 1:59:06 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Charles Kennedy

cfkennedy1956@gmail.com

106 Birchwood Drive

New Bedford, Massachusetts 02745

From: [Charles Kennedy](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Thursday, August 18, 2022 1:57:48 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
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- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

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Northeastern University Environmental Justice Study:
https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Charles Kennedy
cfkennedy1956@gmail.com
106 Birchwood Drive
New Bedford, Massachusetts 02745

From: [Strysky, Alexander \(EEA\)](#) on behalf of [MEPA \(EEA\)](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Fw: EEA #15990
Date: Thursday, August 25, 2022 8:36:45 PM

From: Mango the bird & Bella the dog <trezon657@gmail.com>
Sent: Friday, August 19, 2022 6:45 PM
To: MEPA (EEA) <mepa@mass.gov>; Mango the bird & Bella the dog <trezon657@gmail.com>
Subject: EEA #15990

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To whom can address my concern,

I am writing as a concerned resident of New Bedford Ma. I along with my neighborhood Woodford Estates' oppose project #15990 - project proposed by South Coast Renewables LLC (f.k.a. Parallel Products of New England LLC) to construct and operate a Municipal Solid Waste processing facility down the street from our homes. We, a working class of nurses, teachers to utility workers who have children and beloved pets rely on a cleaner environment to grow and develop, not one that poses more harm. We already are exposed to environmental pollutants as we live right off of a busy trafficked road nevermind living just off rte 140. This area already is burdened with a higher than average rate for cancer, asthma and respiratory disease rates when compared to statewide statistics, as per SFEIR. It is unprecedented to even consider having a solid waste processing center near us. It's not just the noxious odors but also the brought forth of vermin and pests along with the additional trucks, which they plan on driving down our road will cause increased traffic congestion, emissions, noise and environmental toxins in our air. I am even concerned personally as I have disabling an autoimmune disease of which I went partially blind due to. I and people like myself can not be burdened with more pollution.

This is very stressful to be put in this situation as It feels like people like myself who have a disability are not even being considered in this project. I can't afford to move, especially now with this economy, not to mention, I love my neighborhood. I and others like myself or people with children, elderly etc shouldn't have to move because of poor consideration of safety and welfare of its community. Its funny how this project claims themselves as a "Green Energy Center" just because they plan to put up solar panels when they are the actually the opposite and will be polluting our neighborhood with their toxins, including pollution due to leachate discharge contamination, nitrogen oxides, ventilation exhaust stacks and lets not forget the diesel exhaust from all those trucks running night and day (418 trucks per day processing 1,500 tons of Municipal Waste with a total of 130,834 truck trips per year).

Finally, I was not informed by Parallel Products (now known as South Coast Renewables) of any project updates, and the only reason I am aware of any developments and the MEPA process is because of the outreach conducted by members of South Coast Neighbors United and the CAPPP Committee. South Coast Renewables is in violation of the 2017 Environmental Justice enhanced participation policy. Please consider that when you determine eligibility for their application.

- Corie Trezon
50 Stephanie Place
New Bedford, Ma 02745
trezon657@gmail.com

From: [Deanna DeMello](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Friday, August 19, 2022 11:25:40 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

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Deanna DeMello

legald@netzero.net

835 Almy Rd

Somerset, Massachusetts 02726

From: [Dianne Mosher](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Friday, August 19, 2022 8:43:42 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
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- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
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The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

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Dianne Mosher

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93 Slades corner road

South Dartmouth , Massachusetts 02748

From: [Elizabeth Gibbs](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Friday, August 19, 2022 9:10:42 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

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Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Elizabeth Gibbs

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52 Blueberry Terrace

New Bedford , Massachusetts 02745

From: [Kathleen Nelson](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Friday, August 19, 2022 4:31:36 PM

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Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
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Kathleen Nelson

kathynelson359@gmail.com

32 Greenleaves Drive, Apt 126

Hadley, Massachusetts 01035

From: [Lauren Fernandez](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Friday, August 19, 2022 12:43:28 PM

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The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
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- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
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Lauren Fernandez

lfernandez@just-zero.org

1 Wall St, Apt 103

Attleboro, Massachusetts 02703

From: [Linda HEYS](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Friday, August 19, 2022 7:48:28 AM

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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Linda HEYS

grandma@bigredvan.com

45 Briarwood Drive

New Bedford, Massachusetts 02745

From: [Linda HEYS](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Friday, August 19, 2022 7:46:54 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

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- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
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- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

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Linda HEYS

grandma@bigredvan.com

45 Briarwood Drive

New Bedford, Massachusetts 02745

From: [Lisa Field](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Friday, August 19, 2022 5:17:44 PM

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Attn: MEPA Office
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The basis of these findings are as follows:

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Lisa Field

bbfield1@aol.com

PO Box 63, Raynham, MA 02767

Raynham, Massachusetts 02767

From: [Lisa Field](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Friday, August 19, 2022 5:09:14 PM

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Lisa Field

bbfield1@aol.com

4 Rockland Street

Taunton, Massachusetts 02780

From: [Nathalie Bridegam](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford! New Bedford should be supporting wind and zero waste composting by hiring a firm though a bidding process that will pick up compostible material and therefore greatly reduce the major source of waste by turning it into co...
Date: Friday, August 19, 2022 5:11:28 PM

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Executive Office of Energy and Environmental Affairs (EEA)
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Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

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The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR MARK MONTIGNY
Second Bristol and Plymouth District

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Chair
SENATE COMMITTEE ON
STEERING AND POLICY

Vice Chair
EXPORT DEVELOPMENT

SENATE COMMITTEE ON
INTERGOVERNMENTAL AFFAIRS

August 19, 2022

Secretary Bethany A. Card
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 1020
Boston, MA 02114

**RE: EOEEA #15990 Parallel Products of New England-South Coast Renewables
NPC/SFEIR**

Dear Secretary Card:

I am writing to reemphasize my strong opposition to South Coast Renewables' proposal to construct an expanded waste facility in very close proximity to a densely populated residential neighborhood in New Bedford.

The New Bedford Business Park was never intended to serve waste processing operations, and nearby homeowners invested in their properties with this expectation. The business park was always meant to host world-class manufacturing operations as seen today with AHEAD, LLC, Titleist/Acushnet Company, Poyant Signs, and many others. This particular proposal will dramatically alter the nature of the business park and negatively impact a dense residential area just a stone's throw away.

New Bedford is an Environmental Justice community with an unfortunate history of environmental damage by reckless, profit-driven corporations. The deleterious impact of these actions is still on display through continued harbor dredging and various site cleanups. Last month, a tire recycling facility in the city was engulfed in fire despite recent documented health and safety violations in addition to numerous complaints from neighbors about foul odors and runoff from the site. We cannot permit our city to revisit these circumstances through increased air, noise, and odor pollution by a solid waste facility. To put it simply, New Bedford has had enough.

As I previously emphasized in past public comments to your office, South Coast Renewables failed to address deep concerns expressed by my constituents. Given the hundreds of emails and

phone calls received by my office, there seems to be very little progress in alleviating my constituents' fears. Instead, the project's proponent continues to check the boxes of minimal regulatory criteria necessary to advance this solid waste project without regard for the very real and permanent impact their activity will have on hardworking residents. For this reason, I remain staunchly opposed to this project, and believe EOEEA should reject the NPC/SFEIR. Thank you for your consideration of these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Montigny". The signature is written in a cursive style with a large initial "M" and a long, sweeping underline.

Mark Montigny
SENATOR

From: [Justina Perry](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Saturday, August 20, 2022 2:23:32 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

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Justina Perry

jdarosa13@gmail.com

27 Elaine Ave

New Bedford , Massachusetts 02745

From: [Justina Perry](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Saturday, August 20, 2022 2:22:31 AM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
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- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
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- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

<https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?>

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

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Northeastern University Environmental Justice Study:

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Justina Perry

jdarosa13@gmail.com

27 Elaine Ave

New Bedford , Massachusetts 02745

From: [Kendy Capois](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Saturday, August 20, 2022 7:22:51 AM

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Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
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Kendy Capois

kcapois@nuestras-raices.org

329 Main Street

Holyoke, Massachusetts 01040

From: [Rob Vandenabeele](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Saturday, August 20, 2022 6:56:45 PM

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References:

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Rob Vandenabeele

ecofriendlybeerdrinker@gmail.com

40 Inman Street

Cambridge, Massachusetts 02139

From: [Sandra L. Andrade Penn](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Saturday, August 20, 2022 5:53:41 PM

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Mr. Alex Stryisky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Stryisky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.stryisky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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Sandra L Andrade Penn

sandradepenn452@gmail.com

21 Margin St

New Bedford, Massachusetts 02744

From: [Tanya Lobo](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Saturday, August 20, 2022 11:13:41 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Tanya Lobo

tanya@truediversityma.org

140R Fremont St

Taunton, Massachusetts 02780

From: [Tanya Lobo](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Saturday, August 20, 2022 11:13:26 PM

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Executive Office of Energy and Environmental Affairs (EEA)
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Email: alexander.strysky@mass.gov

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Tanya Lobo

tanya@truediversityma.org

140R Fremont St

Taunton, Massachusetts 02780

From: [Adrien Mercier Jr](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Sunday, August 21, 2022 5:30:40 PM

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Adrien Mercier Jr

amercierjr@aol.com

113 Bullock Rd

East Freetown, Massachusetts 02717

From: [Charles Kennedy](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Sunday, August 21, 2022 5:17:14 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
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- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

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- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Charles Kennedy

cfkennedy1956@gmail.com

106 Birchwood Drive

New Bedford, Massachusetts 02745

From: [Jennifer Cote](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Sunday, August 21, 2022 6:55:30 PM

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
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Jennifer Cote

jen@cotehome.com

100 gilmore st

Raynham, Massachusetts 02767

From: [Melanie Nunes](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Sunday, August 21, 2022 5:50:42 PM

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100 Cambridge Street, Suite 900
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Melanie Nunes

melgabriele12@aol.com

18 Circuit St

New Bedford , Massachusetts 02740

From: [Michaelah Nunes](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Sunday, August 21, 2022 5:49:23 PM

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- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

[https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

[https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

[_ga=2.95911068.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Michaelah Nunes

michaelah.nunes@gmail.com

26 elizabeth st

New bedford, Massachusetts 02740

From: [Tracy Wallace](#)
To: [Strysky, Alexander \(EEA\); MEPA \(EEA\)](#)
Subject: EEA #15990 - Comment Submission
Date: Sunday, August 21, 2022 7:51:55 PM
Attachments: [Appendix A - 20221115-Plan-Set-Stamped-Signed-1.pdf](#)

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Executive Office of Energy and Environmental Affairs

Attn: MEPA Office EEA No 15990

100 Cambridge St. Suite 900

Boston, MA 02114

Dear Secretary Card,

I would like to express my opposition to the proposed MSW trash depot proposed by South Coast Renewables LLC, (f.k.a. Parallel Products of New England LLC) at 100 Duchaine Blvd. in the City of New Bedford.

I would first like to address the Notice of Project Change and Supplemental FEIR submission. The Secretary's certificate dated April 2, 2021 requested a Supplemental FEIR, the company is now entering a Notice of Project Change, both reports were submitted together which is out of line with policy. A Notice of Project Change should have been submitted, allowing a 20 day comment period by the community. The fact that these reports were submitted in conjunction is robbing the community of 20 days commenting time and knowledge of changes made to the project by the company. The company in fact became a new entity when submitting the Notice of Project Change, as well as increased the size of its MSW building from 48,900 square feet to 63,317 square feet. The original ENF was not submitted with an increase in size for the MSW building and was not submitted with an option for excluding the biosolids processing plant. Based on Notice of Project Change regulations, the company now must start the process over and submit a new ENF for review by MEPA. New updated noise, odor, air, and traffic, etc... analyses must be conducted to provide for an accurate assessment of impact, not just projected updates from old analyses that were based on a different project.

The SFEIR is not in compliance with the 2017 Environmental Justice enhanced public participation policy outlined in section 16. The community has been purposely left out of communication regarding this project. Notification by the company was sent to Massachusetts State and New Bedford City officials. The SFEIR Includes language "and/or" when listing the community groups. No community organization or activist group was notified. South Coast Neighbors United, in existence since 2015 has never been notified as a community group regarding this project nor is it listed as an organization to be notified within any filings, only members who have commented on previous filings are notified as required by MEPA. The only reason members of the community know about this project is due to the outreach of South Coast Neighbors United. The company nor the city made any attempt to contact community organizations between May 5th 2021 and July 14th 2022. The company entered into a host agreement with the city unaware of by any community groups or any members of the City Council. Multiple attempts were made by South Coast Neighbors United to the city solicitor's office for updates of information from January 2022 to July 2022, with no response. The city solicitor's signature is on the host agreement. The company made no attempts at community meetings or project updates between the dates of May 5th 2021 to July 14th 2022. Both

the SFEIR and the host agreement were released on July 14th 2022. These are blatant acts to keep the community out of any involvement. Most recently a virtual meeting was conducted on Aug 3rd 2022, after the SFEIR filing and signing of the host agreement, with an additional meeting on Sept 21st, after the comment deadline. Just recently an additional meeting was added for Aug 18th which conflicted with the City Council meeting, so none could attend. On Aug 12th, the company emailed some members of the community notifying them of the Aug 18th meeting, however other members we left out of that notification. The last-minute notice of these meetings is unacceptable for community awareness and participation. The Aug 3rd virtual meeting was conducted as a power-point presentation with a question and answer session at the end. Translators were requested by members of the community when registering prior and were told at the meeting that due to the lateness of the request for translators, they were unable to provide that service. The company said that it would invite those who need translators to their facility for a one on one meeting for any questions needing answers. This is exclusionary, intimidating and unacceptable. During the question and answer session at the end of their 55 min presentation, members of the community were talked over and spoken to in a derogatory manner. I have requested a video recording of the meeting to attach to this submission, please see mp4 attachment for viewing. At 4:41pm on August 12th, 10 days before the comment deadline, the company's outreach consultant emailed myself and Wendy Morrill for a meeting. This is the first time we have been asked to a meeting with the company in over two years. I responded to the email request accepting a future meeting invite and requesting a copy of the video from Aug 3rd, to which I have not received a reply. No date was proposed and no video sent. The video of the Aug 3rd meeting was obtained by my husband only when requesting it at the Aug 18th virtual meeting through the zoom chat function. Again, attached is the mp4 of that video and I recommend viewing the Q&A section starting at 1 hour 18 min mark. The representative misrepresented the Conservation Law Foundation when speaking about them. The representative gaslighted the community members on the call stating that the community should be the one keeping trucks off Philips Rd, that it is not the company's responsibility. He cites tipping fees and the rising rates of tipping fees again highlighting the costly band aid approach the state will be locking municipalities into. The company states within the SFEIR that one of the community outreach events it sponsored was the New Bedford Chowderfest in 2019. The Chowderfest is a paid community event, one must pay to attend it, it is not a free event, in the opposite end of the city than where it plans to locate its facility, this is purposely exclusionary and absolutely absurd to include as environmental justice community outreach.

The SFEIR is not in compliance with the scope issued in the Secretary's certificate from April 2, 2021. The Secretary required an outline of a Public Involvement Plan (PIP). The SFEIR only reiterates what the Secretary requested, failing to provide an outline, only saying they will develop this with MassDEP. Within the scope it does acknowledge that the PIP will be developed with MassDEP, however an outline was required to be provided in the SFEIR, which did not happen.

Within the Supplemental FEIR, there is mention of limited sub-surface investigations that were done at the site in 2014 and 2016 reviewing a collection of soil and groundwater data and compared with then current MCP standards. MCP standards and regulations were updated in 2019 to include PFAS, therefore new updated testing must be conducted at the site. Six-year-old data is out of date and not in compliance.

New construction on Phillips Rd was sited and approved by the City's Conservation Commission, see appendix A, the land has been cleared and construction is scheduled. The company's traffic analysis does not factor in this additional build and the traffic it will create. The updated traffic analysis only collected data from two additional days April 10th and April 13th 2021. Two additional days of data when the company has taken 16 months to submit its SFEIR is neither reliable nor valid, they have had ample opportunity to collect sufficient data. The company again has failed to meet the scope of the certificate issued by the Secretary. A \$5,000 donation to the city for traffic study is not appropriate. The community has reached out to the city's traffic ordinance committee on several occasions with no reply or action. The self-regulated fining system the company plans to put in place

for its vendor trucks is virtually impossible to enforce, leaving the community to suffer and having to police the area. Please see attached photos 1 and 2 of current truck examples on a morning commute in August 2022.


The company states on several occasions that the facility will be fully enclosed, please see attached photos 3 and 4, note the circled areas, taken from page 27 of the SFEIR. The rail lines extend ending outside the facility uncovered. Doors will be opening and closing and rails moving in and out, creating noise and odor, on the area of the parcel closest to the residential community. The wind moves out of the west drawing it up into the residential community. Additionally, closest to the east side of the lot, Phillips Rd and residential communities, truck bays with solar canopies are located outside company's proposed MSW handling zone, within 500 ft of residential houses, not in compliance with solid waste siting MA law, please see attached photo 5 taken from page 24 of the SFEIR, noting 21 trailer parking spaces. The company's hours of operation include tipping hours of 6am to 7pm M-F, this is still not in compliance with City of New Bedford's noise ordinance. Please note that trucks and rail will queue earlier than 6am, which is stated in the SFEIR, in preparation to begin tipping at 6am. This is a huge nuisance to the surrounding residential community and again, not in compliance with the City of New Bedford's noise ordinance.

418 truck trips per day are estimated to be generated by the facility, 130,834 trips per year. Since the company cannot speak to whom their vendors will be, there is no way to know if these trucks will be open air trucks. Open air trucks could spill tons of trash a year over the surrounding roads. Trucks carrying waste and trash do produce vehicle leachate. Vehicle leachate is known to have 51 different types of PFAS. On page 32 of the SFEIR the company states "The liquid collected in this system will be gravity fed into the City's sanitary sewer system or stored in a wastewater holding tank to be periodically pumped out and trucked offsite for disposal at a wastewater treatment plant. Sewer is available on-site and permits will be sought through the City to allow this discharge to enter the New Bedford Sanitary Sewer." Therefore it may discharge this leachate into the city's sewer system. How does the company plan to remove the PFAS from this discharge? Within the scope issued by the Secretary the company was required to discuss how it will mitigate PFAS contamination. Again, the company has failed to comply with the scope as it only states that PFAS will not be an issue now that biosolids processing has been removed from the project. MSW is known to contain several different PFAS, therefore the company has failed to meet the requirements of the scope.

Noted within the SFEIR page 55 "the rate of disease in areas within 1 mile of the Proponent project were compared to statewide rates to assess whether these areas experience a higher rate of disease. Broadly, the baseline health analysis in the MEPA filings indicate that New Bedford has a higher rate of disease when compared to statewide rates." Therefore, any further exposure to increased air pollution or contaminants is blatant exploitation of a community and environmental injustice and social injustice.

The above stated information shows South Coast Renewables (f.k.a. Parallel Products of New England) failed to meet the scope required of them, and should therefore be held to do so or withdraw their filing.

Sincerely,
Tracy L. Wallace M.Ed.
Vice President, South Coast Neighbors United
New Bedford Resident

 [video1770598204.mp4](#)

PROPOSED COMMERCIAL BUILDING PHILLIPS ROAD NEW BEDFORD, MASSACHUSETTS

SITE SUMMARY

ASSESSORS MAP 136 LOT 468
ZONING DISTRICT: INDUSTRIAL C
PROPOSED USE: COMMERCIAL BUILDING

DEED REFERENCE: BOOK 13336, PAGE 226

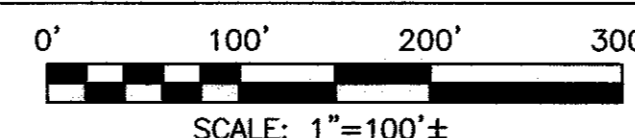
PLAN REFERENCE: PLAN BOOK 182, PAGE 53

ZONING REQUIREMENTS TABLE

	REQUIRED	PROPOSED
LOT AREA	—	82,428 SF
LOT FRONTAGE	0'	504.45'
FRONT SETBACK (BLDG.)	25'	26'
SIDE SETBACK (BLDG.)	25'	72'
REAR SETBACK (BLDG.)	25'	60'
FRONT SETBACK (PARKING)	0'	0'
SIDE SETBACK (PARKING)	0'	130'
REAR SETBACK (PARKING)	0'	52'
BUILDING HEIGHT	100'	<35'
LOT COVERAGE	50%	21%
GREEN SPACE	20%	79%
SCREENING BUFFERS	N/A	N/A
OFF STREET PARKING	18	26



LOCUS MAP

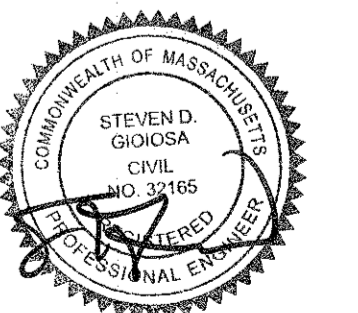


PLAN INDEX

SHEET NO.	TITLE	DATE	REVISED
—	COVER SHEET	MARCH 26, 2021	NOVEMBER 15, 2021
1 OF 9	SITE LAYOUT	MARCH 26, 2021	NOVEMBER 15, 2021
2 OF 9	LOCUS MAP	MARCH 26, 2021	NOVEMBER 15, 2021
3 OF 9	SITE GRADING	MARCH 26, 2021	NOVEMBER 15, 2021
4 OF 9	LANDSCAPING AND LIGHTING PLAN	MARCH 26, 2021	NOVEMBER 15, 2021
5 OF 9	SITE UTILITIES	MARCH 26, 2021	NOVEMBER 15, 2021
6 OF 9	EXISTING CONDITIONS	MARCH 26, 2021	NOVEMBER 15, 2021
7 OF 9	EROSION CONTROL PLAN	MARCH 26, 2021	NOVEMBER 15, 2021
8 OF 9	DETAIL SHEET #1	MARCH 26, 2021	NOVEMBER 15, 2021
9 OF 9	DETAIL SHEET #2	MARCH 26, 2021	NOVEMBER 15, 2021
—	FLOOR PLAN & BUILDING ELEVATIONS		

OWNER:

MICHAEL PANAGAKOS
133 FAUNCE CORNER ROAD
DARTMOUTH, MA 02747



APPLICANT:

PANAGAKOS DEVELOPMENT
133 FAUNCE CORNER ROAD
DARTMOUTH, MA 02747



DATE: MARCH 26, 2021

REVISED: NOVEMBER 15, 2021

Part of Civil & Environmental Consultants, Inc.
449 Faunce Corner Road - Dartmouth, MA 02747
Ph: 508-998-2125 Fax: 508-998-7854
www.cecinc.com

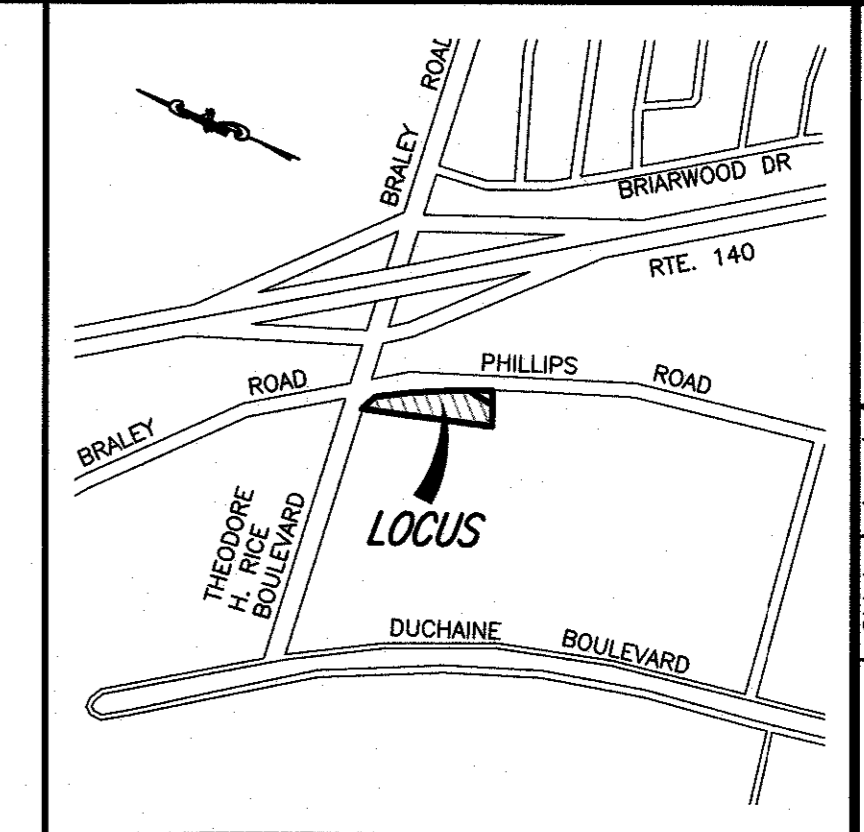
NOTES:

- I HEREBY CERTIFY THAT THE PROJECT AS DESIGNED MEETS THE APPLICABLE PROVISIONS OF THE AMERICANS WITH DISABILITIES ACT (ADA) AND THE MASSACHUSETTS ARCHITECTURAL ACCESS BOARD.
- DRIVEWAY PERMIT SUBJECT TO TRAFFIC COMMISSION APPROVAL.
- PERMITS FOR SIDEWALK, DRIVEWAYS, WATER & SEWER MUST BE OBTAINED FROM THE DEPARTMENT OF PUBLIC INFRASTRUCTURE ENGINEERING DIVISION.
- ANY MINOR MODIFICATIONS (AS DETERMINED BY THE CITY PLANNER AND CITY ENGINEER) TO THE INFORMATION SHOWN ON THE APPROVED SITE PLANS SHALL BE SUBMITTED TO THE CITY PLANNER AND CITY ENGINEER AS A MINOR PLAN REVISION FOR APPROVAL PRIOR TO THE WORK BEING PERFORMED.
- ANY WORK AND MATERIAL WITHIN THE CITY RIGHT-OF-WAY SHALL CONFORM TO THE CITY OF NEW BEDFORD REQUIREMENTS.
- ALL EROSION CONTROL MEASURES SHALL BE IN PLACE PRIOR TO CONSTRUCTION.
- ALL PAVEMENT MARKINGS AND SIGNS SHALL CONFORM TO MUTCD REQUIREMENTS.

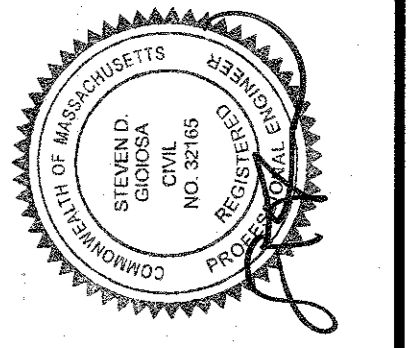
DATE

LEGEND

- PROPERTY LINE
- - - - - EXISTING CONTOUR
- |—|— GUARDRAIL
- O—O— OVERHEAD WIRES
- G— GAS MAIN
- G_o— GAS GATE VALVE
- G_s— GAS SERVICE
- LP— LIGHT POLE
- UP— UTILITY POLE
- MW— MONITORING WELL
- T— TREE LINE
- EM— ELECTRICAL MANHOLE
- 2-17 2-18 EDGE OF BORDERING VEGETATED WETLANDS
- DYLL— DOUBLE YELLOW LANE LINE

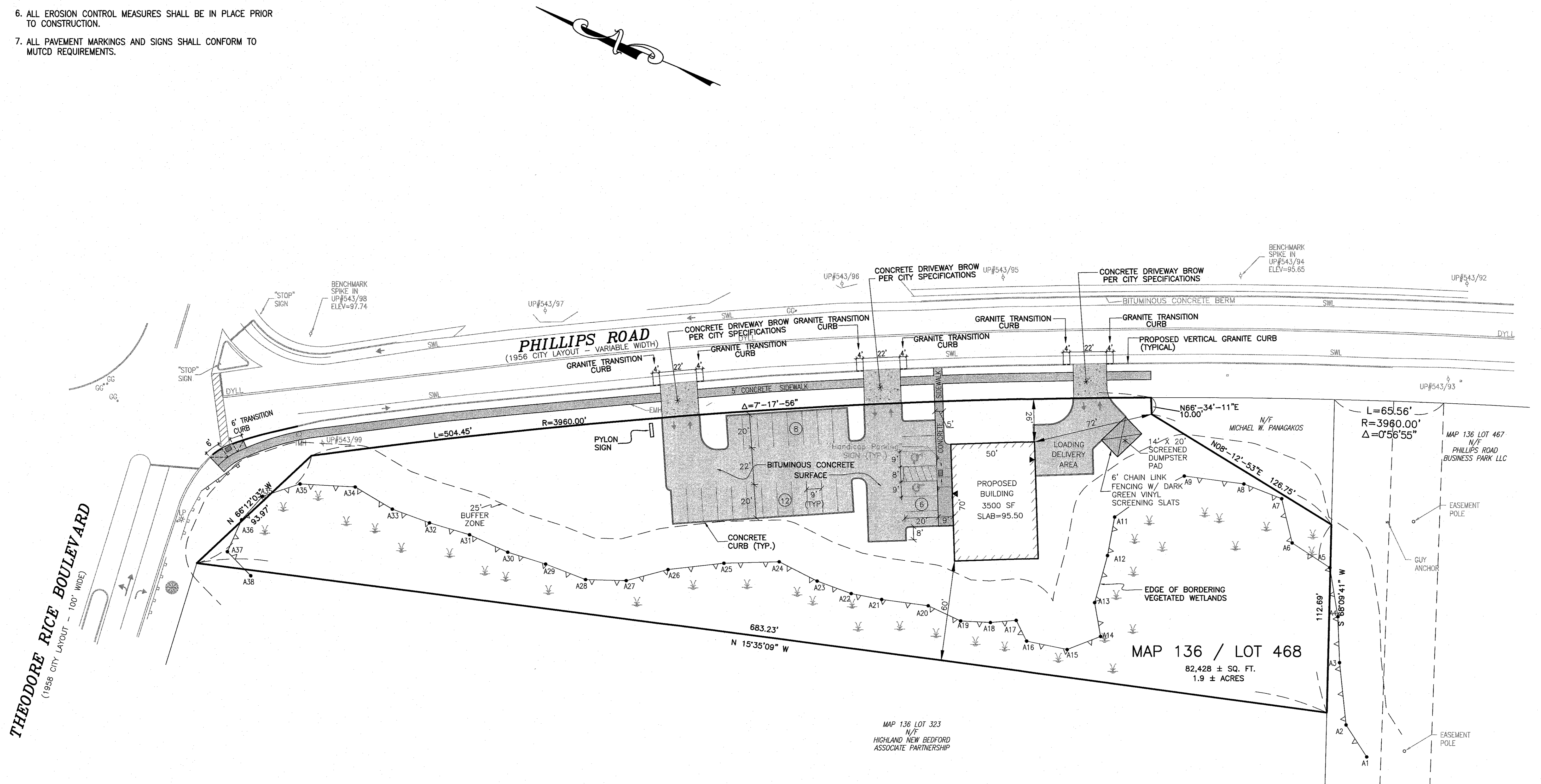


LOCUS MAP
SCALE: 1"=1,000'±

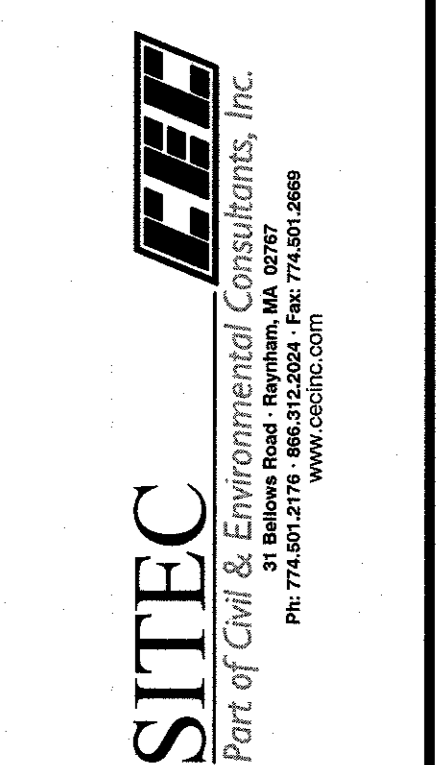


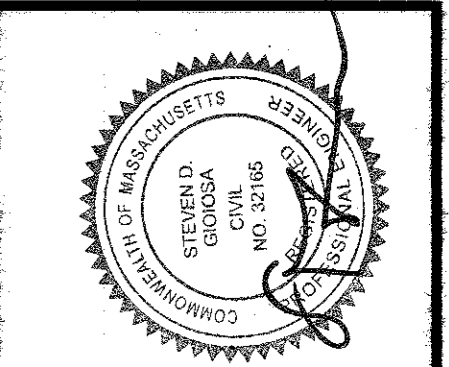
No.	Date	Revision Description
5	NOV. 15, 2021	DPI COMMENTS
4	SEPT. 17, 2021	GRADING REDESIGN
3	AUG. 17, 2021	PLANNING BOARD NOTICE OF DECISION DATED 6/23/2021
2	JULY 12, 2021	NITTSCH ENGINEERING COMMENT LETTER - JULY 6, 2021
1	JUNE 15, 2021	CON. COM. & PLANNING BOARD REVIEW

scale: 1"=30'
date: MARCH 26, 2021
drawn: KJ
checked: SDG
approved: SDG
sheet 1 of 9
drawing number: SL-1



Project: ASSESSOR'S MAP 136 - LOT 468
PHILLIPS ROAD
NEW BEDFORD, MASSACHUSETTS
client: PANAGAKOS DEVELOPMENT
drawing title: SITE LAYOUT





No.	Date	Revision Description	Checked By	Approved By
5	NOV. 15, 2021	DPI COMMENTS	SDG	SDG
4	SEPT. 17, 2021	GRADING REDESIGN	SDG	SDG
3	AUG. 17, 2021	PLANNING BOARD NOTICE OF DECISION DATED 8/23/2021	SDG	SDG
2	JULY 12, 2021	PLANNING BOARD COMMENT LETTER - JULY 6, 2021	SDG	SDG
1	JUNE 15, 2021	CON. COM. & PLANNING BOARD REVIEW	SDG	SDG

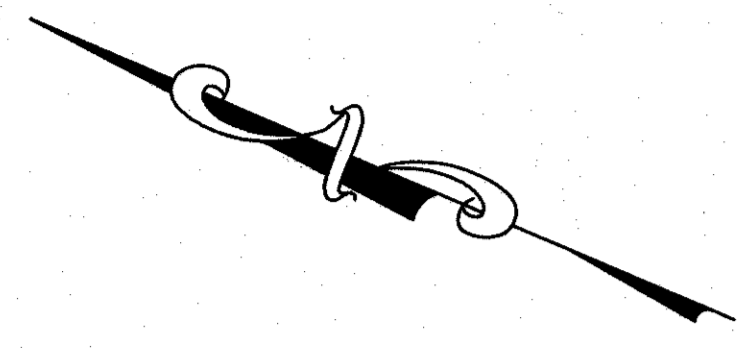
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 date: MAR. 26, 2021
 drawn: KJ
 checked: SDG
 approved: SDG
 sheet 2 of 9
 drawing number: LM-1

project: ASSESSOR'S MAP 136 - LOT 468
 PHILLIPS ROAD
 NEW BEDFORD, MASSACHUSETTS
 client: PANAGAKOS DEVELOPMENT
 drawing title: LOCUS MAP

SITEC, Inc.
 468 Phillips Road
 New Bedford, MA 01945
 (508) 998-2125
 FAX (508) 998-7554
 WWW.SITEC-ENGINEERING.COM

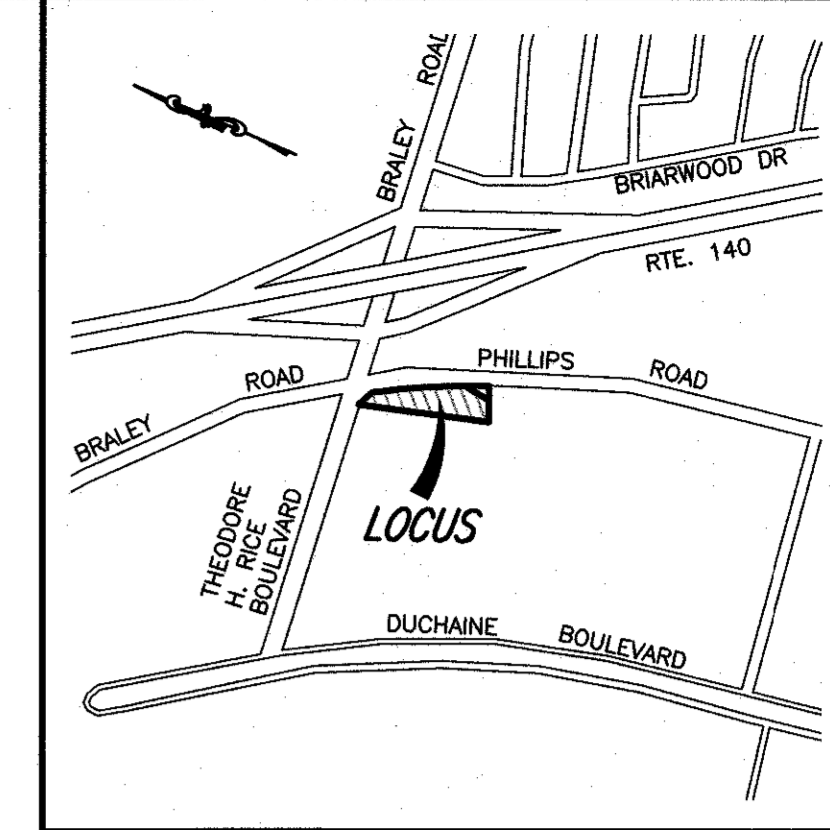
SITEC
 Civil and Environmental Engineering
 Land Use Planning

Acad No. 20210917-LocusMap.DWG
 File No. 20-7638

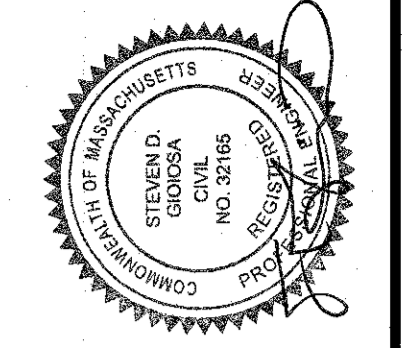


LEGEND

- PROPERTY LINE
- - - 94 - - - EXISTING CONTOUR
- GUARDRAIL
- OVERHEAD WIRES
- GAS MAIN
- WATER MAIN
- SEWER LINE
- DRAINAGE LINE
- CB □ CATCH BASIN
- DMH ○ DRAIN MANHOLE
- SMH ○ SEWER MANHOLE
- HYD ○ FIRE HYDRANT
- WG ○ WATER GATE VALVE
- GG ○ GAS GATE VALVE
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- UP ○ UTILITY POLE
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- TREE LINE
- EMH ○ ELECTRICAL MANHOLE
- 2-17 2-18 EDGE OF BORDERING VEGETATED WETLANDS
- DYLL DOUBLE YELLOW LANE LINE
- 95 PROPOSED CONTOUR
- 95.8 PROPOSED SPOT GRADE
- CB ■ PROPOSED CATCH BASIN



LOCUS MAP
SCALE: 1"=1,000'±

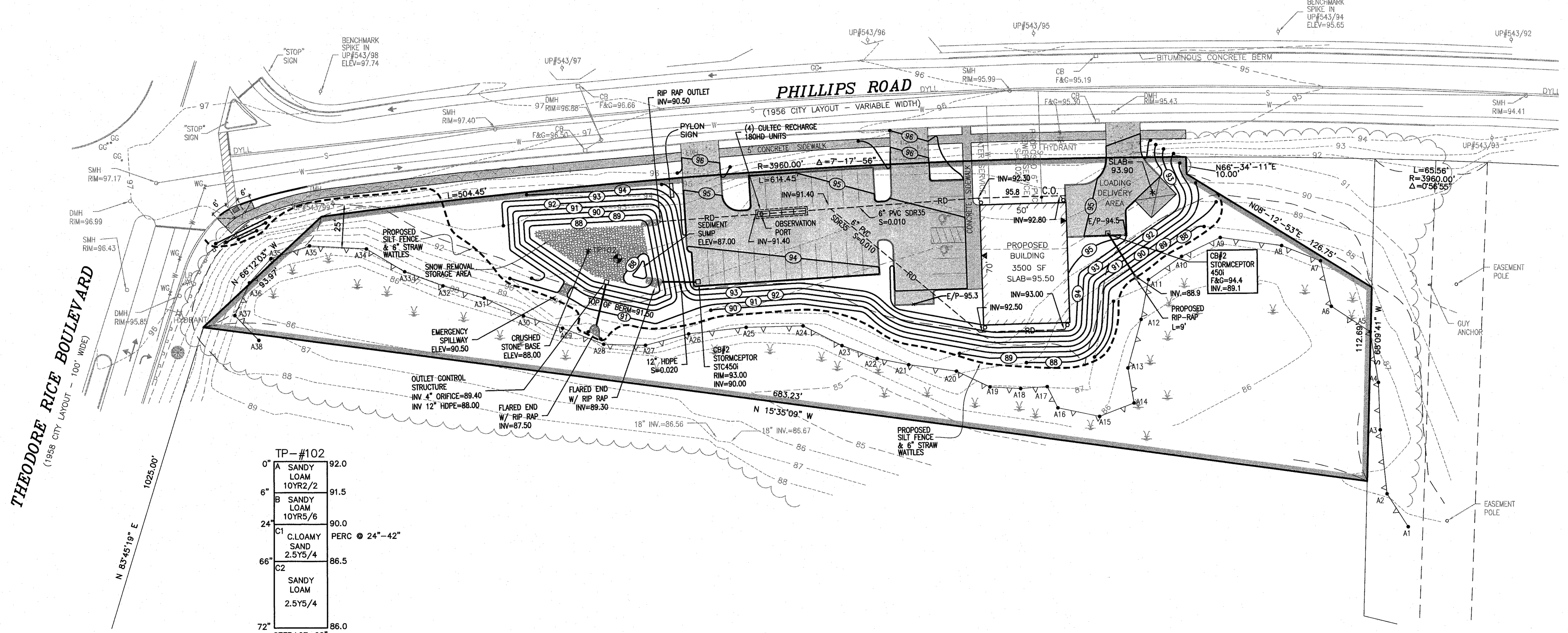


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scale: 1"=30'
date: MARCH 26, 2021
drawn: KJ
checked: SDG
approved: SDG
sheet 3 of 9
drawing number: SG-1

project: ASSESSOR'S MAP 136 - LOT 468
PHILLIPS ROAD
NEW BEDFORD, MASSACHUSETTS
client: PANAGAKOS DEVELOPMENT
drawing title: SITE GRADING

SITEC
Part of Civil & Environmental Consultants, Inc.
PH: 774.601.2111 FAX: 774.601.2888
www.sitecinc.com



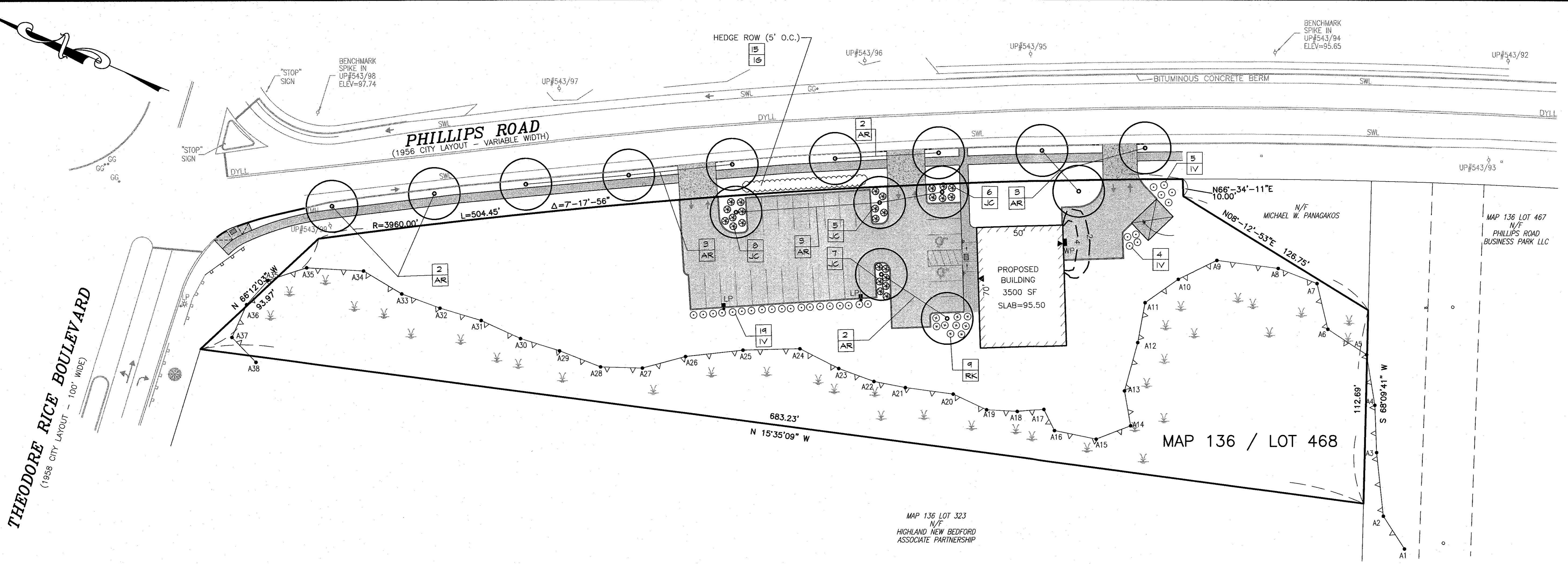
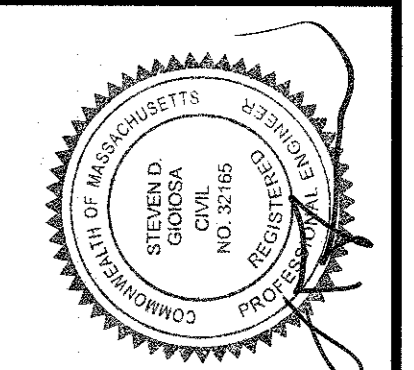
THEODORE RICE BOULEVARD
(1958 CITY LAYOUT - 100' WIDE)

TP-#102

0"	A SANDY LOAM 10YR2/2	92.0
6"	B SANDY LOAM 10YR5/6	91.5
24"	C1 C.LOAMY SAND 2.5Y5/4	90.0
66"	C2 SANDY LOAM 2.5Y5/4	86.5
72"		86.0

SEEPAGE=66"
ELEV=86.5
RATE: 1" IN 2 MIN

DATE: 1/13/06
PERFORMED BY: RICHARD R. RICCIO III, P.E.



THEODORE RICE BOULEVARD
(1958 CITY LAYOUT - 100' WIDE)

PHILLIPS ROAD
(1956 CITY LAYOUT - VARIABLE WIDTH)

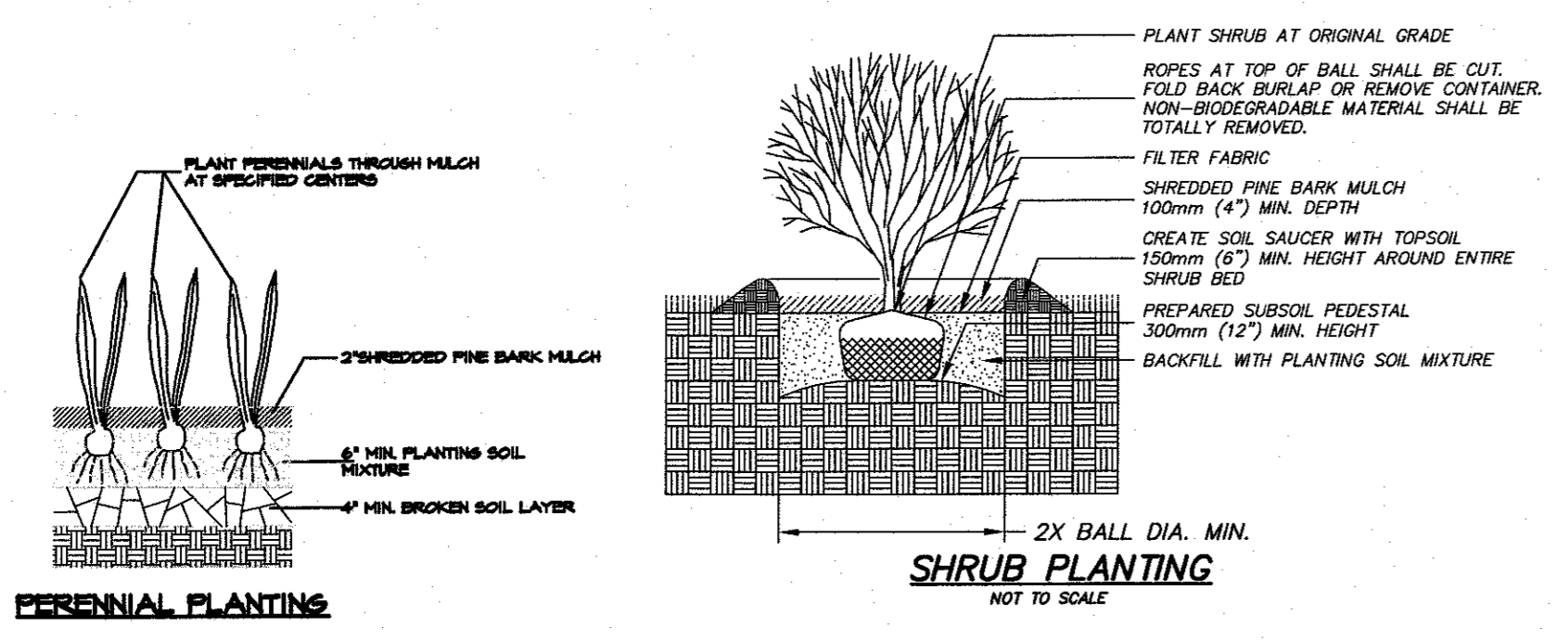
PROPOSED BUILDING
3500 SF
SLAB=95.50

MAP 136 / LOT 468

MAP 136 LOT 323
N/F
HIGHLAND NEW BEDFORD
ASSOCIATE PARTNERSHIP

LIGHTING NOTES:

- POLE LIGHTS SHALL BE RAB LIGHTING MODEL #ALED3T260/D10, BRONZE COLOR, 18' MOUNTING HEIGHT, OR APPROVED EQUAL.
- WALL PACKS SHALL BE E-CONOLIGHT MODEL #E-WPB SERIES LED LIGHTING OR APPROVED EQUAL.

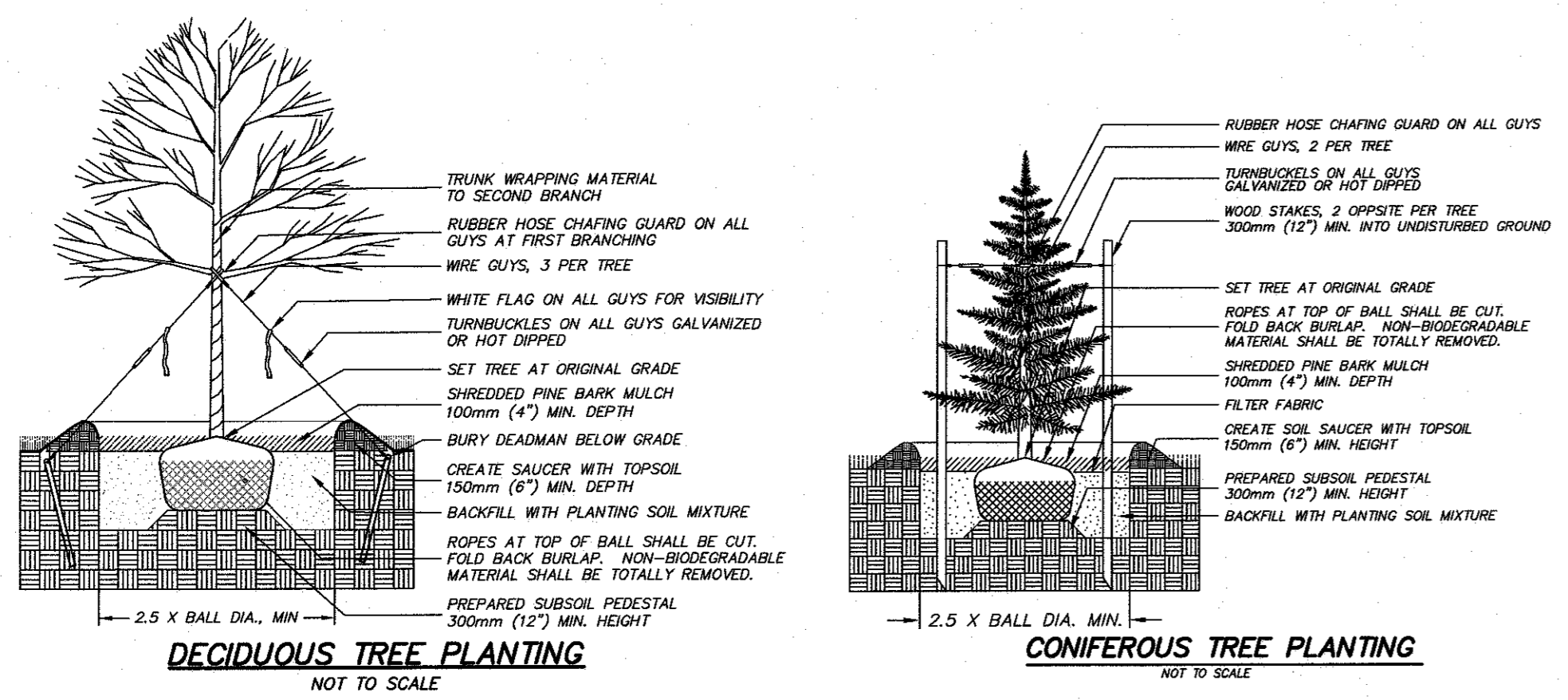


PLANTING NOTES

- All new lawn areas shall receive a minimum of 6 inches topsoil of the proper pH and organic content suitable for the healthy growth of lawns. These areas shall be seeded with a fine blade lawn grass seed.
- All tree and shrub pits shall be at least 2 feet wider and 1 foot deeper than the tree or shrub root ball to be planted in it. Backfill shall be high quality loam of the proper pH and organic content suitable for the healthy growth of plant materials.
- All areas to be mulched shall receive 4 inches minimum 100% shredded bark mulch within 48 hours of planting. Unless otherwise noted in planting details.
- All plants shall be nursery grown and conform to the latest edition of "ANSI Z60.1, American Standard for Nursery Stock."
- Plants shall conform to the botanical name as indicated in the latest edition of "American Joint Committee of Horticultural Nomenclature, Standardized Plant Names."
- Plants shall be handled at all times in accordance with the best horticultural practices. Plants in-leaf shall be sprayed with anti-desiccant before digging. Plants shall be dug with firm natural balls and shall conform to the ratios and sizes specified in ANSI Z60.1. B & B plants shall be wrapped in burlap and tied firmly. Plant materials shall be delivered immediately prior to placement, shall be kept moist and shall be protected from sun and wind. Plants having broken or cracked balls prior to or during planting will not be accepted.
- All trunks of deciduous trees shall be wrapped immediately after planting with tree wrap. Wrap shall be wound spirally, from the bottom of the trunk to the second branches. All trees shall be staked or guyed immediately after planting in accordance with best horticultural practices.
- The periods for planting shall be from March 15 to May 15 and from September 15 to November 15, weather permitting.
- All disturbed areas shall be loamed and seeded as directed in note #1 above.
- All locations of existing utilities may not be shown on this plan. See other plan sheets for utility locations. Contractor shall be solely responsible for determining actual locations of existing utilities. Utility conflicts may require adjustments to proposed construction. Contractor shall be responsible for repair of any utilities damaged during construction.
- Planting beds adjacent to the building shall contain a mix of perennials.

PLANT LIST

Symbol	Quantity	Name	Size
AR	15	ACER RUBRUM 'OCTOBER GLORY'	2"-2.5" cal.
		October Glory Red Maple	B&B
JC	26	JUNIPERUS CH. PFITZERIANA 'COMPACTA'	2 Gallon
		Compact Pfitzer Juniper	Container
IV	26	ITEA VIRGINICA 'LITTLE HENRY'	2 Gallon
		Little Henry Sweetspire	Container
RK	9	ROSA 'KNOCKOUT'	2 Gallon
		Knockout Rose	Container
IG	15	ILEX GLABRA 'COMPACTA'	2'-2.5'
		Compact Inkberry	

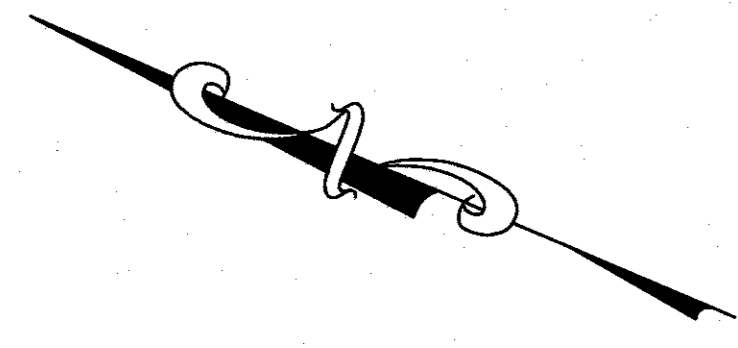


No.	Date	Revision Description
5	NOV. 15, 2021	DPL COMMENTS
4	SEPT. 17, 2021	GRADING REDLINES
3	AUG. 17, 2021	PLANNING BOARD NOTICE OF DECISION DATED 6/23/2021
2	JULY 12, 2021	PLANNING BOARD COMMENT LETTER - JULY 6, 2021
1	JUNE 15, 2021	CON. COM. & PLANNING BOARD REVIEW

Scale: 1"=30'
Date: MARCH 26, 2021
Drawn: KJ
Checked: SDG
Approved: SDG
Sheet: 4 of 9
Drawing Number: [P-1]

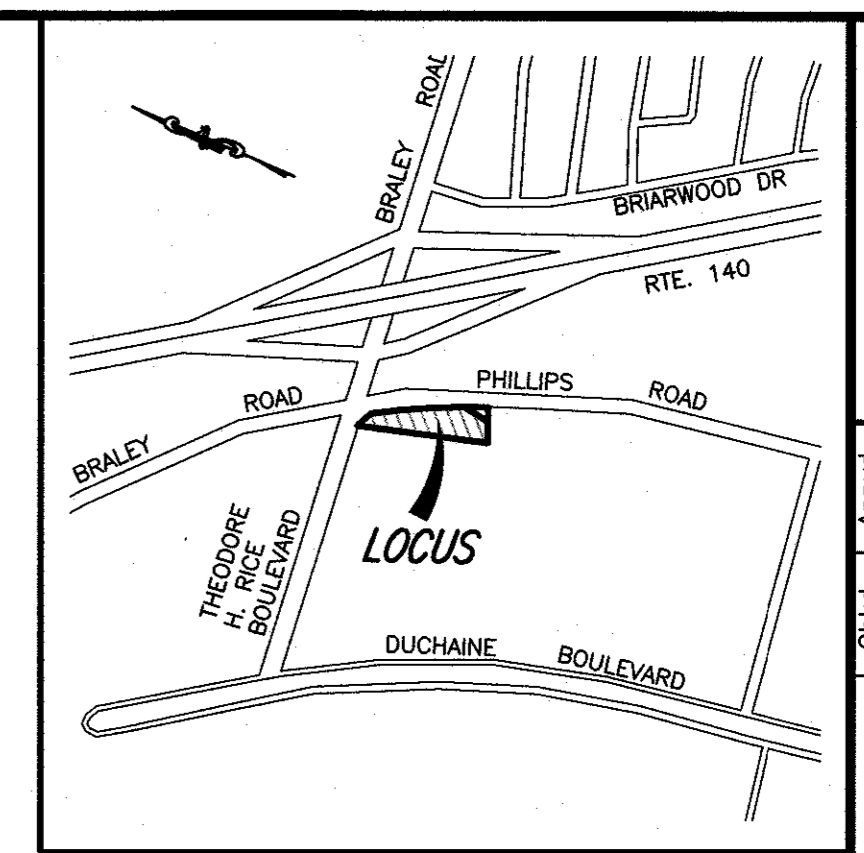
PROJECT: ASSESSOR'S MAP 136 - LOT 468
PHILLIPS ROAD
NEW BEDFORD, MASSACHUSETTS
CLIENT: PANAGAKOS DEVELOPMENT
DRAWING TITLE: LANDSCAPING AND LIGHTING PLAN



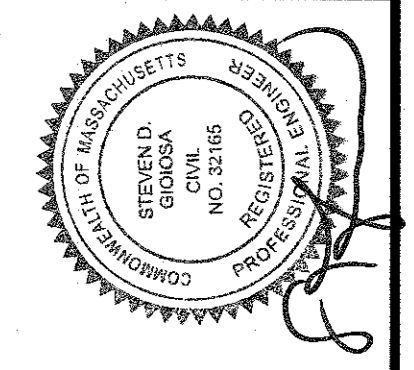


LEGEND

- PROPERTY LINE
- - - 94 - - - EXISTING CONTOUR
- GUARDRAIL
- OHW — OVERHEAD WIRES
- G — GAS MAIN
- W — WATER MAIN
- S — SEWER LINE
- D — DRAINAGE LINE
- CB □ CATCH BASIN
- DMH ○ DRAIN MANHOLE
- SMH ○ SEWER MANHOLE
- HYD ☼ FIRE HYDRANT
- WG ⊞ WATER GATE VALVE
- GG ⊙ GAS GATE VALVE
- GS ⊙ GAS SERVICE
- LP ⊙ LIGHT POLE
- UP ⊙ UTILITY POLE
- TP-1 ⊙ TEST PIT
- TREE LINE
- EMH ○ ELECTRICAL MANHOLE
- 2-17 2-18 — EDGE OF BORDERING VEGETATED WETLANDS
- DYLL — DOUBLE YELLOW LANE LINE



LOCUS MAP
SCALE: 1"=1,000'±

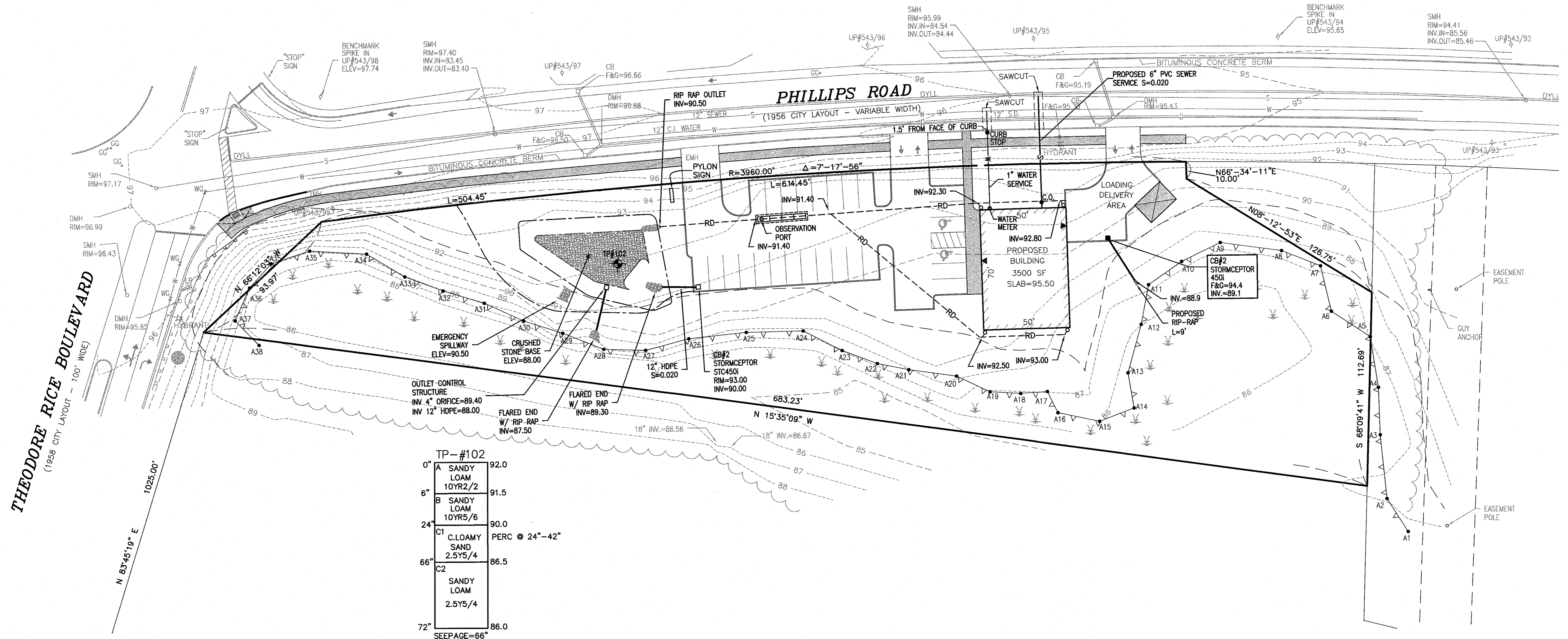


No.	Date	Revision Description
1		
2		
3		
4		
5	NOV. 15, 2021	DPI COMMENTS
6	SEPT. 17, 2021	GRADING REDESIGN
7	AUG. 17, 2021	PLANNING BOARD NOTICE OF DECISION DATED 6/23/2021
8	JULY 12, 2021	INTSCH ENGINEERING COMMENT LETTER - JULY 6, 2021
9	JUNE 15, 2021	CON. COM. & PLANNING BOARD REVIEW

scale: 1"=30'
date: MARCH 26, 2021
drawn: KJ
checked: SDG
approved: SDG
sheet 5 of 9
drawing number: SU-1

project: ASSESSOR'S MAP 136 - LOT 468
PHILLIPS ROAD
NEW BEDFORD, MASSACHUSETTS
client: PANAKAKOS DEVELOPMENT
drawing title: SITE UTILITIES

SITEC
Part of Civil & Environmental Consultants, Inc.
Ph: 774.871.2179 Fax: 774.871.2058 www.sitec.com



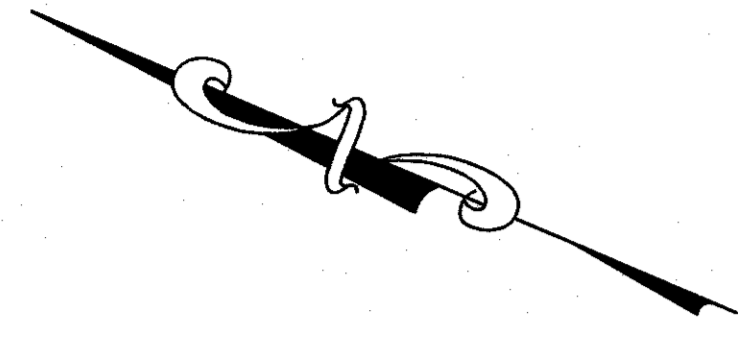
TP-#102

0"	A	SANDY LOAM	10YR2/2	92.0
6"	B	SANDY LOAM	10YR5/6	91.5
24"	C1	C.LOAMY SAND	2.5Y5/4	90.0
66"	C2	SANDY LOAM	2.5Y5/4	86.5
72"				86.0

SEEPAGE=66"
ELEV=86.5
RATE: 1" IN 2 MIN
DATE: 1/13/06
PERFORMED BY: RICHARD R. RICCIO III, P.E.

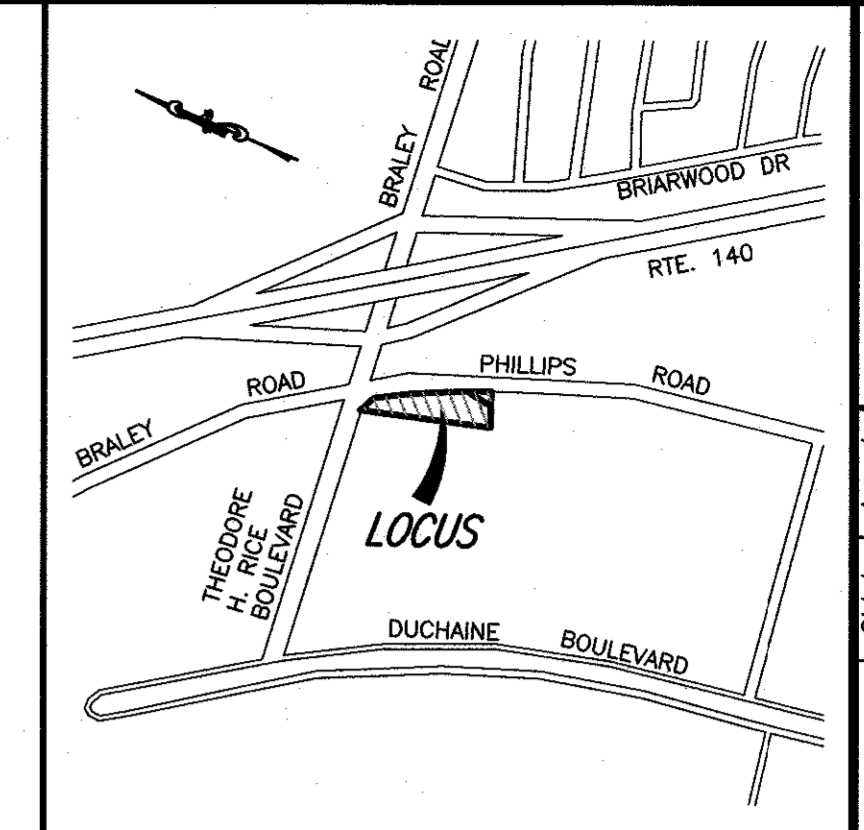
THEODORE RICE BOULEVARD
(1958 CITY LAYOUT - 100' WIDE)

PHILLIPS ROAD
(1956 CITY LAYOUT - VARIABLE WIDTH)

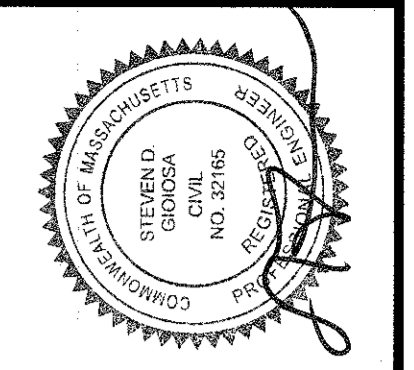


LEGEND

- PROPERTY LINE
- - - - - EXISTING CONTOUR
- +—+—+— GUARDRAIL
- O—O—O— OVERHEAD WIRES
- G— GAS MAIN
- W— WATER MAIN
- S— SEWER LINE
- D— DRAINAGE LINE
- CB □ CATCH BASIN
- DMH ○ DRAIN MANHOLE
- SMH ○ SEWER MANHOLE
- HYD ✕ FIRE HYDRANT
- WG ✕ WATER GATE VALVE
- GG ○ GAS GATE VALVE
- GS ○ GAS SERVICE
- LP ✕ LIGHT POLE
- UP ○ UTILITY POLE
- TP#102 ✕ TEST PIT
- TREE LINE
- EMH ○ ELECTRICAL MANHOLE
- 2-17 2-18 EDGE OF BORDERING VEGETATED WETLANDS
- DYLL DOUBLE YELLOW LANE LINE



LOCUS MAP
SCALE: 1"=1,000'±

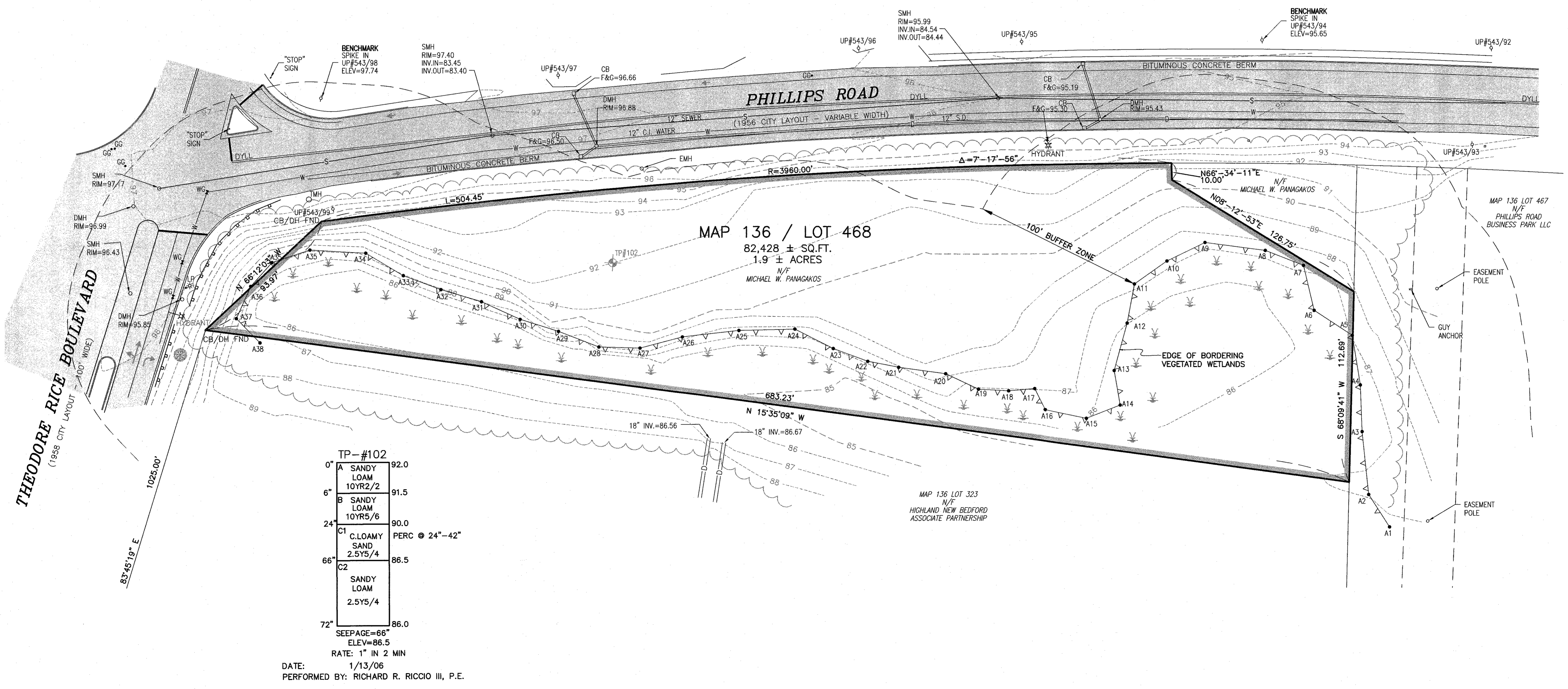


No.	Date	Revision Description
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3	AUG. 17, 2021	PLANNING BOARD NOTICE OF DECISION DATED 6/23/2021
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1	JUNE 15, 2021	CON. COM. & PLANNING BOARD REVIEW

Scale:	1"=30'
Date:	MARCH 26, 2021
Drawn:	KJ
Checked:	SDG
Approved:	SDG
Sheet:	6 of 9
Drawing Number:	EC-1

Project:	ASSESSOR'S MAP 136 - LOT 468
Client:	PHILLIPS ROAD NEW BEDFORD, MASSACHUSETTS
Client:	PANAGAKOS DEVELOPMENT
Drawing Title:	EXISTING CONDITIONS

SITEC
Part of Civil & Environmental Consultants, Inc.
440 Franklin Street
New Bedford, MA 01905
Tel: 508.998.4128 Fax: 508.998.1858
www.sitec.com



TP-#102

0"	A SANDY LOAM 10YR2/2	92.0
6"	B SANDY LOAM 10YR5/6	91.5
24"	C1 C.LOAMY SAND 2.5Y5/4	90.0
66"	C2 SANDY LOAM 2.5Y5/4	86.5
72"		86.0

SEEPAGE=66"
ELEV=86.5
RATE: 1" IN 2 MIN

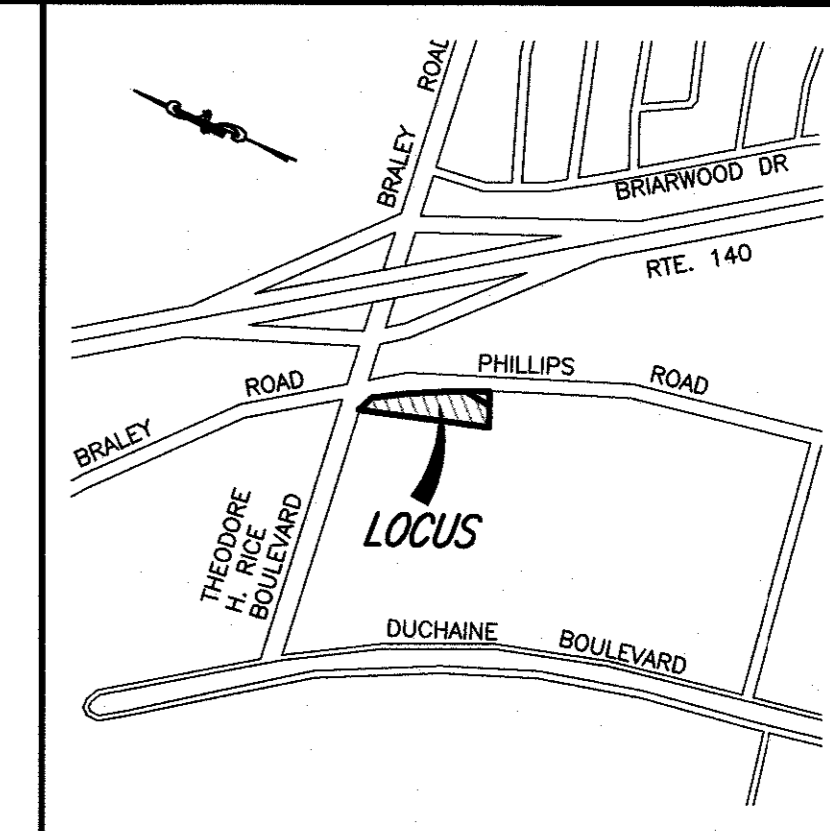
DATE: 1/13/06
PERFORMED BY: RICHARD R. RICCIO III, P.E.

NOTES:

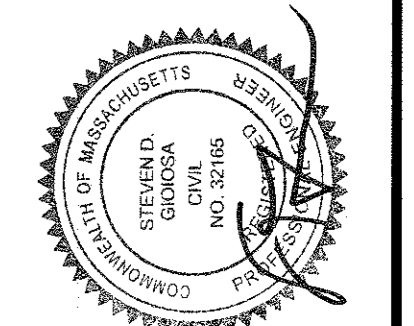
- ALL BMP EROSION CONTROL MEASURES SHALL BE IN PLACE PRIOR TO ANY SITE WORK.
- EROSION CONTROL BMP'S SHALL CONFORM TO THE US EPA, NPDES, MA DEP AND MASSACHUSETTS EROSION AND SEDIMENTATION CONTROL GUIDELINES FOR URBAN AND SUBURBAN AREAS.
- CONTRACTOR SHALL HAVE WATER AVAILABLE FOR DUST CONTROL OR, AS AN ALTERNATIVE, AN APPROVED DUST CONTROL AGENT CAN BE UTILIZED.
- MATERIAL STOCKPILE SHALL BE AS NOTED. SAFETY FENCING SHALL BE USED AROUND STOCKPILES THAT EXCEED 10' IN HEIGHT.
- SILT FENCE SHALL BE SET ON DOWNGRADIENT EDGE OF ANY STOCKPILE.

LEGEND

- PROPERTIES LINE
- - - - - EXISTING CONTOUR
- - - - - GUARDRAIL
- - - - - OVERHEAD WIRES
- - - - - GAS MAIN
- - - - - WATER MAIN
- - - - - SEWER LINE
- - - - - DRAINAGE LINE
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- 2-17 2-18 EDGE OF BORDERING VEGETATED WETLANDS
- DYLL DOUBLE YELLOW LANE LINE



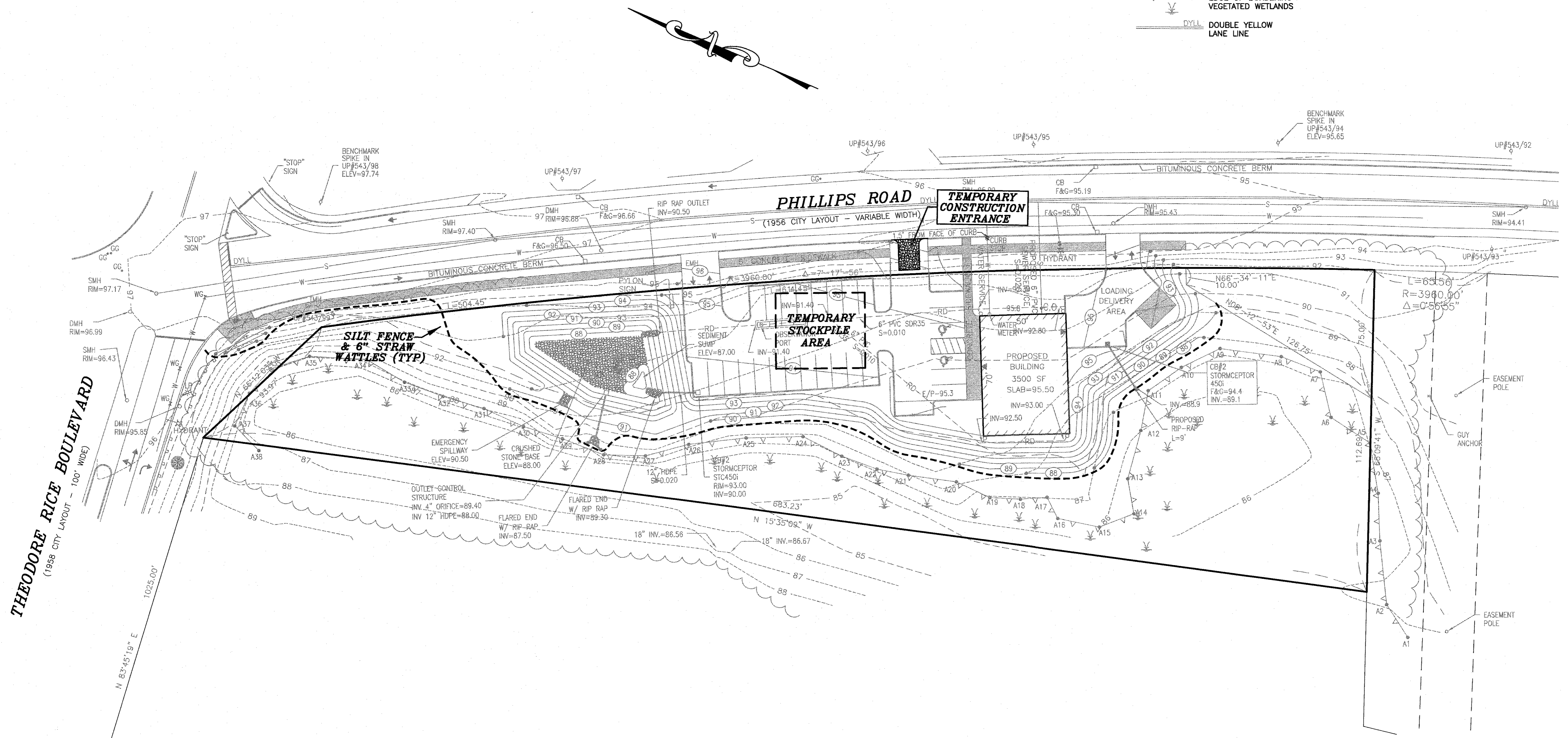
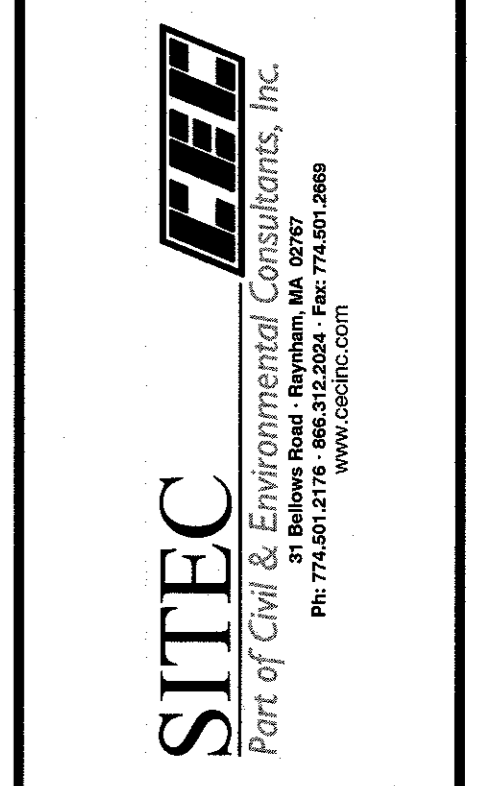
LOCUS MAP
SCALE: 1"=1,000'±



No.	Date	Revision Description
5	NOV. 15, 2021	DPL COMMENTS
4	SEP. 17, 2021	GRADING REDESIGN
3	AUG. 17, 2021	PLANNING BOARD NOTICE OF DECISION DATED 6/23/2021
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1	JUNE 15, 2021	CON. COM. & PLANNING BOARD REVIEW

scale: 1"=30'
 date: MARCH 26, 2021
 drawn: KJ
 checked: SDG
 approved: SDG
 sheet 7 of 9
 drawing number: ER-1

PROJECT: ASSESSOR'S MAP 136 - LOT 468
 PHILLIPS ROAD
 NEW BEDFORD, MASSACHUSETTS
 CLIENT: PANAGAKOS DEVELOPMENT
 DRAWING TITLE: EROSION CONTROL PLAN

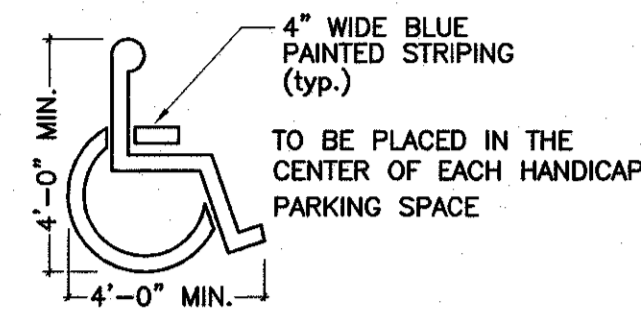


SIGN PANEL SHALL BE FABRICATED FROM ALUMINUM SHEETING ASTM B209 ALLOY 6061-T6, 0.080" THICK. SIGNS SHALL HAVE TYPE D PERMANENTLY APPLIED LEGEND WITH "E" SILK SCREEN PROCESSED LEGEND SUPERIMPOSED THEREON.

INSTALL SIGNS ON 2 SIDES OF POST WHERE PARKING STALLS FACE EACH OTHER.

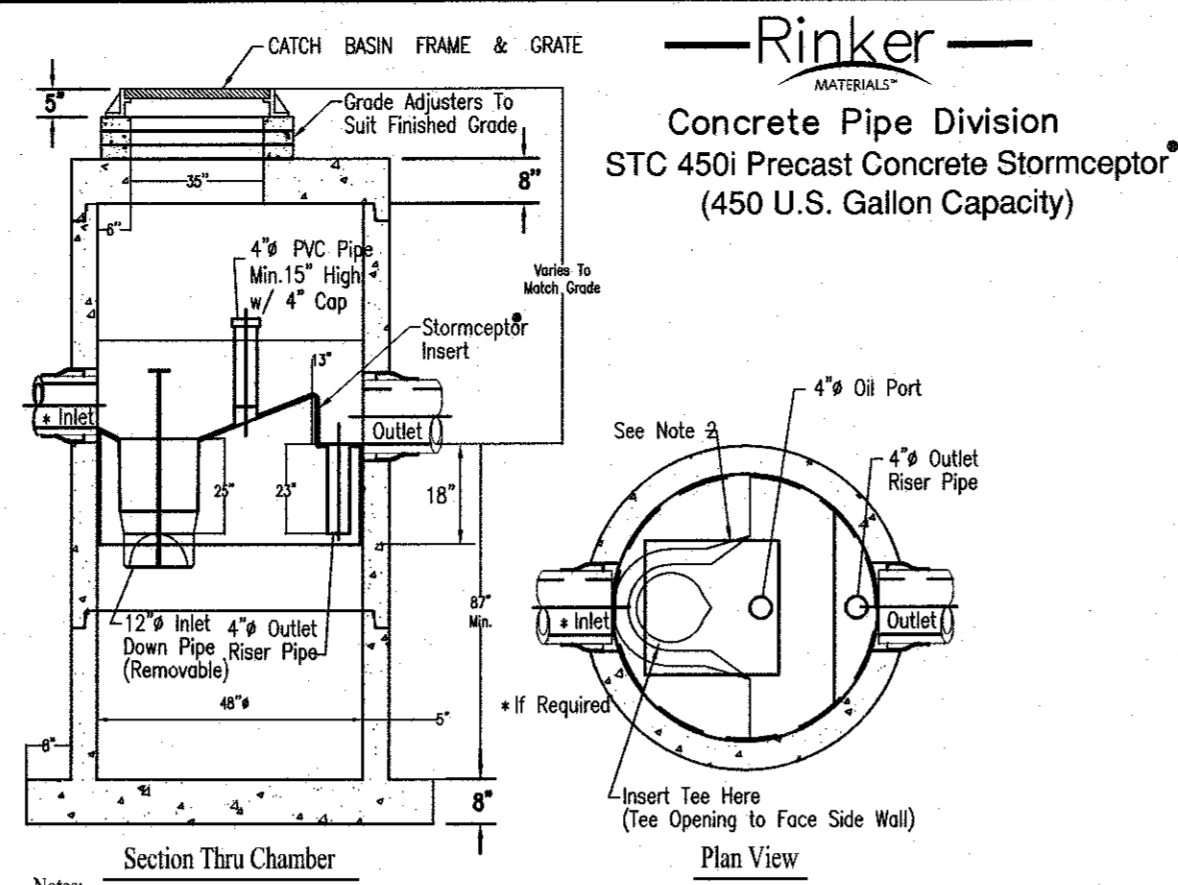
P-5 CHANNEL POST (AS SPECIFIED IN THE MASS. STANDARD FOR SIGNS AND SUPPORTS).

POST TO BE SET IN CONCRETE (18" DIA., MIN. 2 CU. FT.)



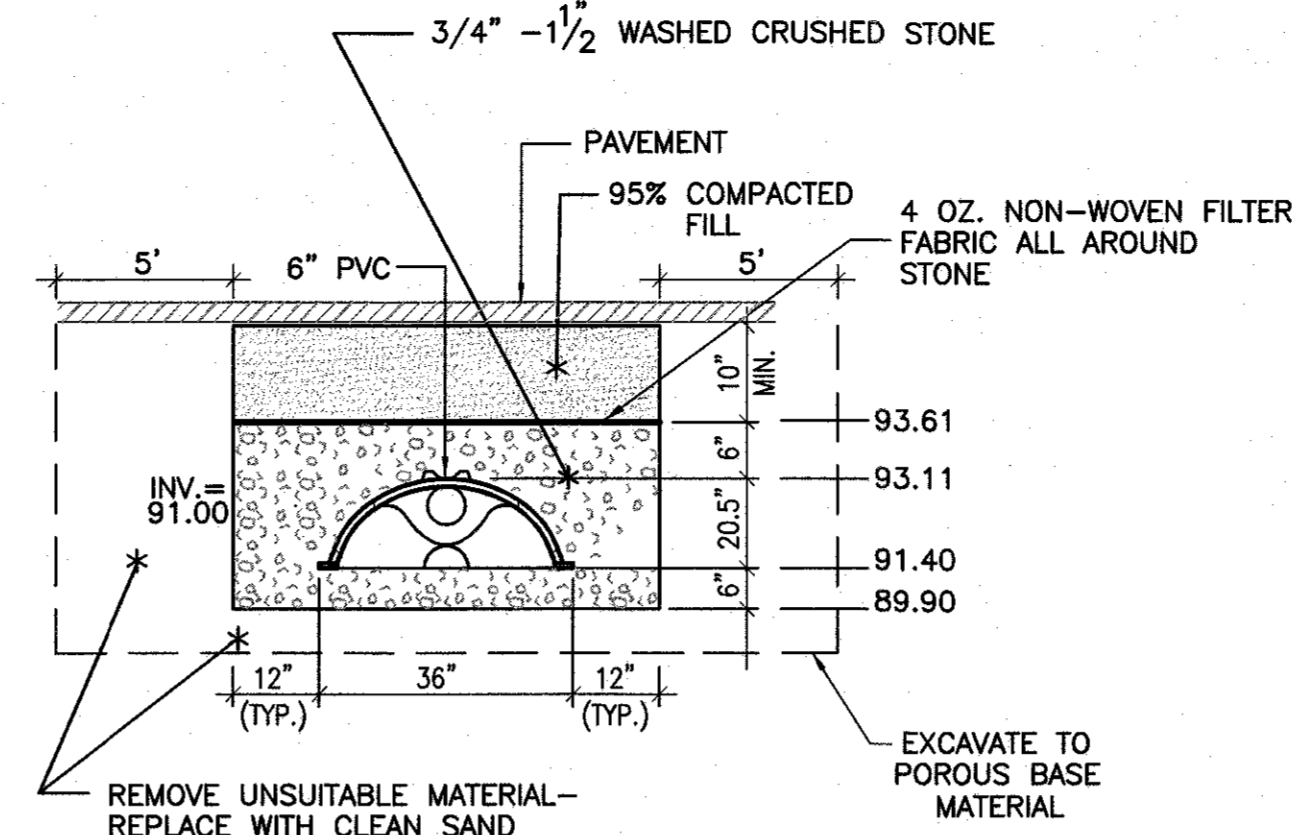
HANDICAP PARKING SPACE INDICATOR
NOT TO SCALE

HANDICAP PARKING SPACE SIGN
NOT TO SCALE

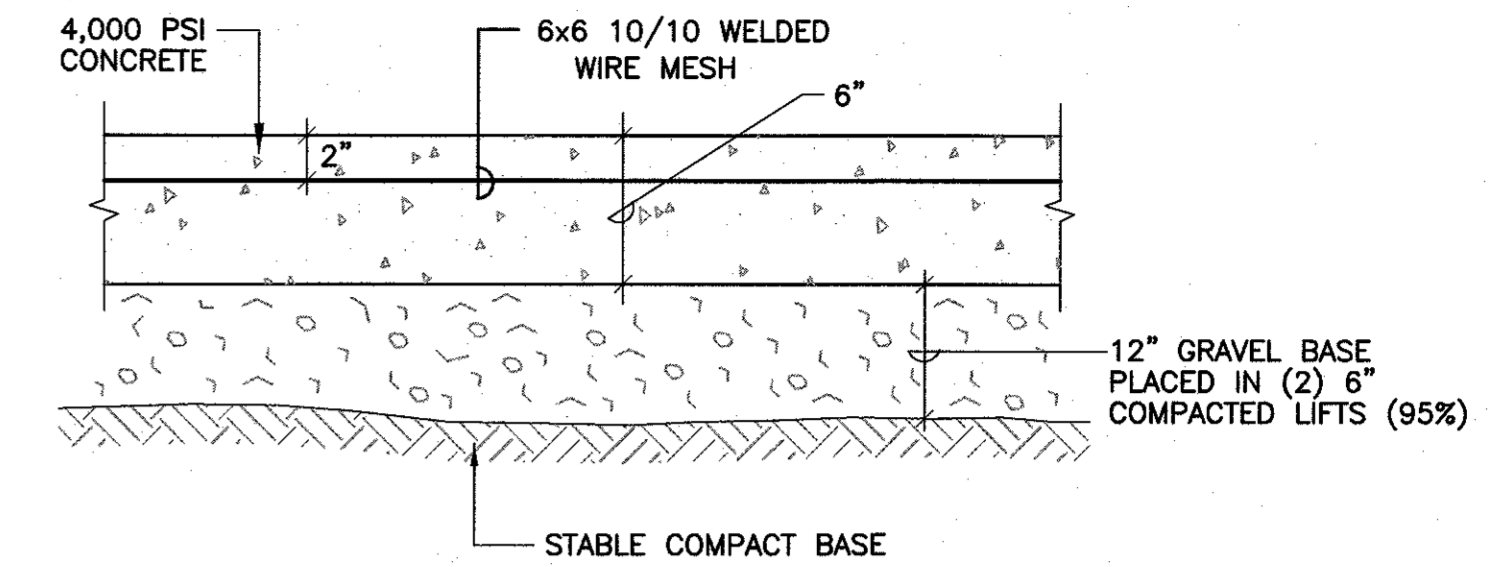


Notes:
1. The Use of Flexible Connection is Recommended at the Inlet and Outlet Where Applicable.
2. The Cover Should be Positioned Over The Inlet Drop Pipe and The Oil Port.
3. The Stormceptor System is protected by one or more of the following U.S. Patents: #4985148, #5498331, #5725760, #5733115, #5849181, #6068765, #6371690.
4. Contact a Concrete Pipe Division representative for further details not listed on this drawing.

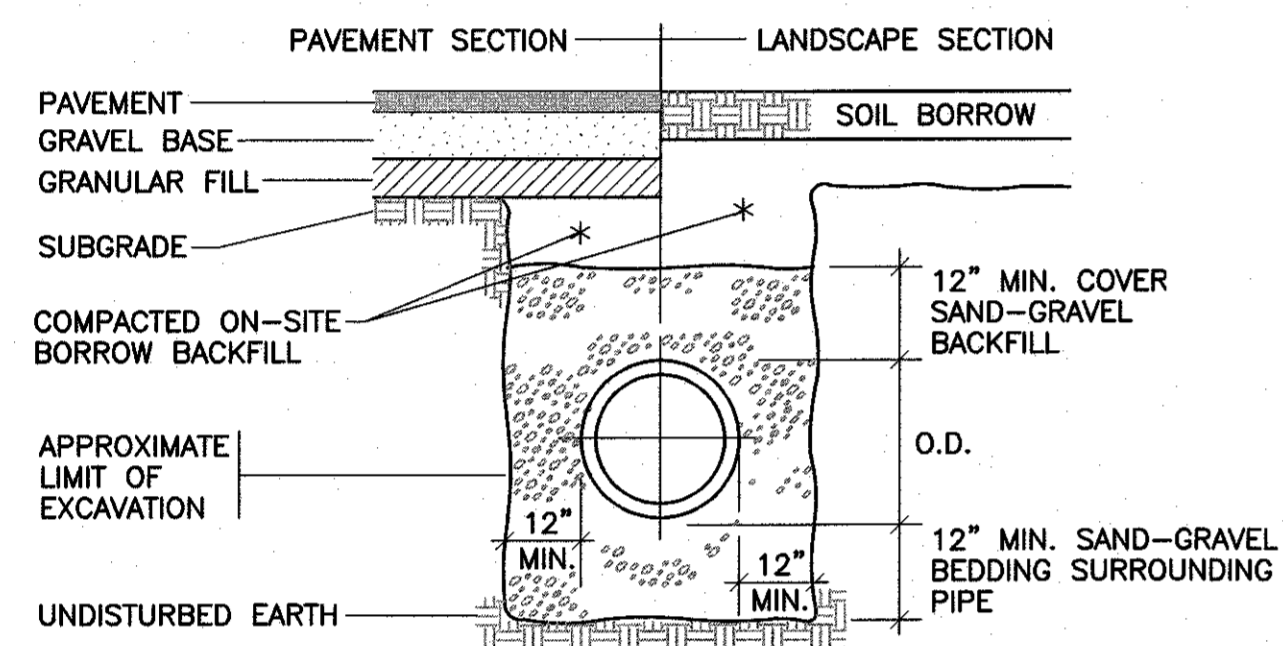
PRECAST STORMCEPTOR SYSTEM
(NOT TO SCALE)



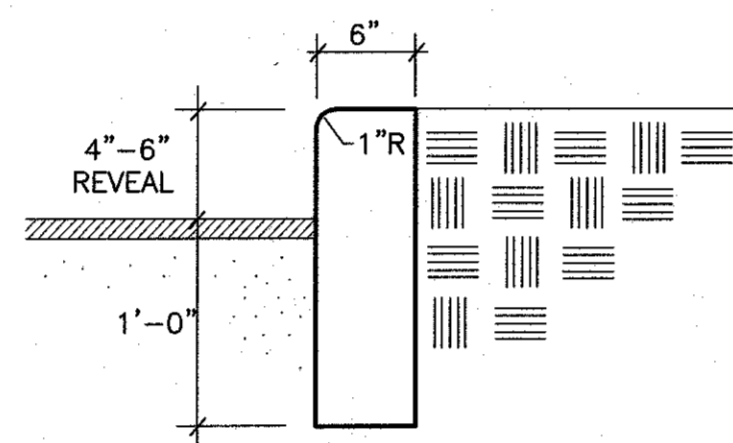
CULTEC CONTACTOR R-180 TYPICAL CROSS SECTION DETAIL RECHARGE CHAMBER SYSTEM
NOT TO SCALE



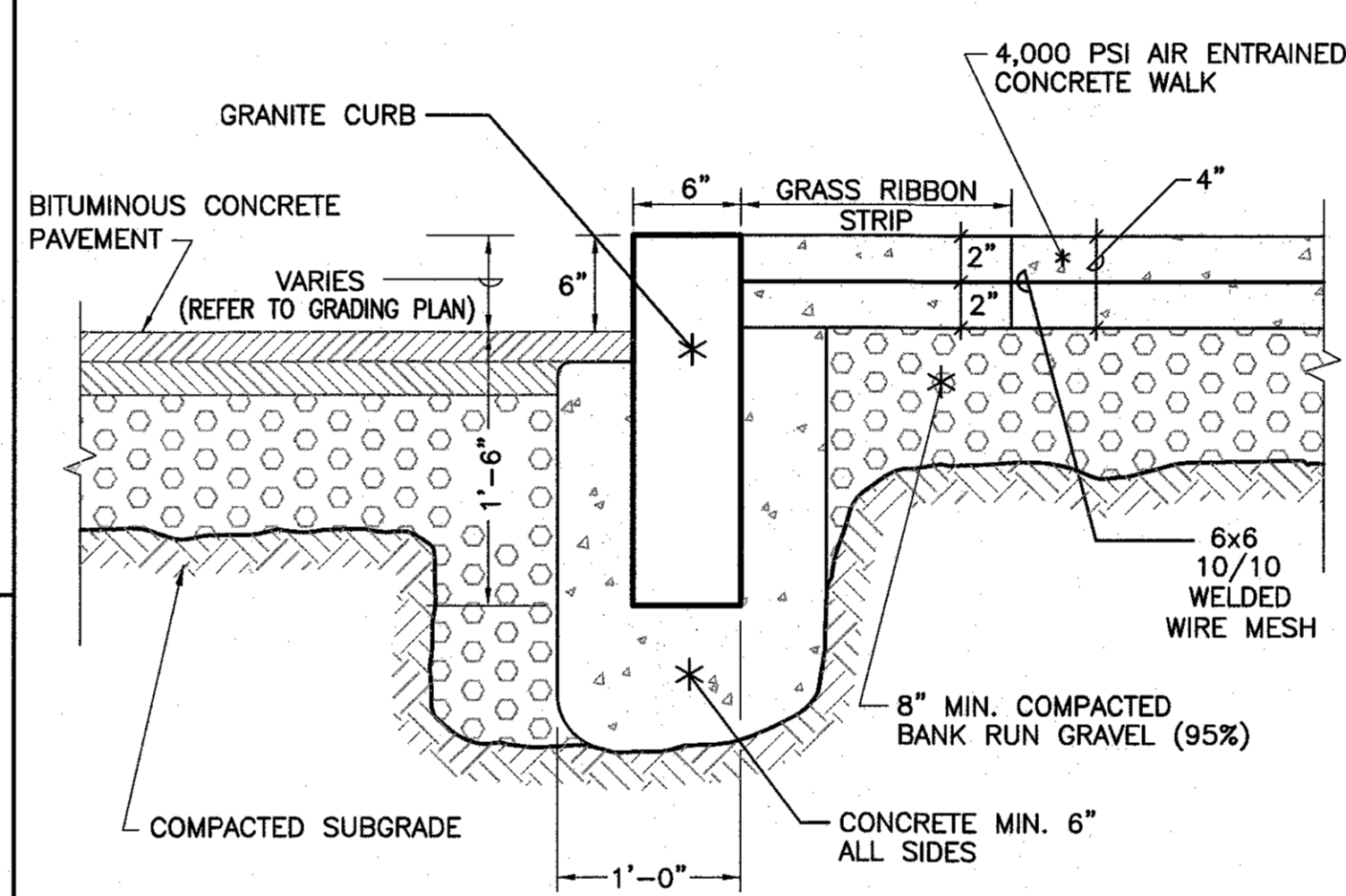
TRASH ENCLOSURE PAD
NOT TO SCALE



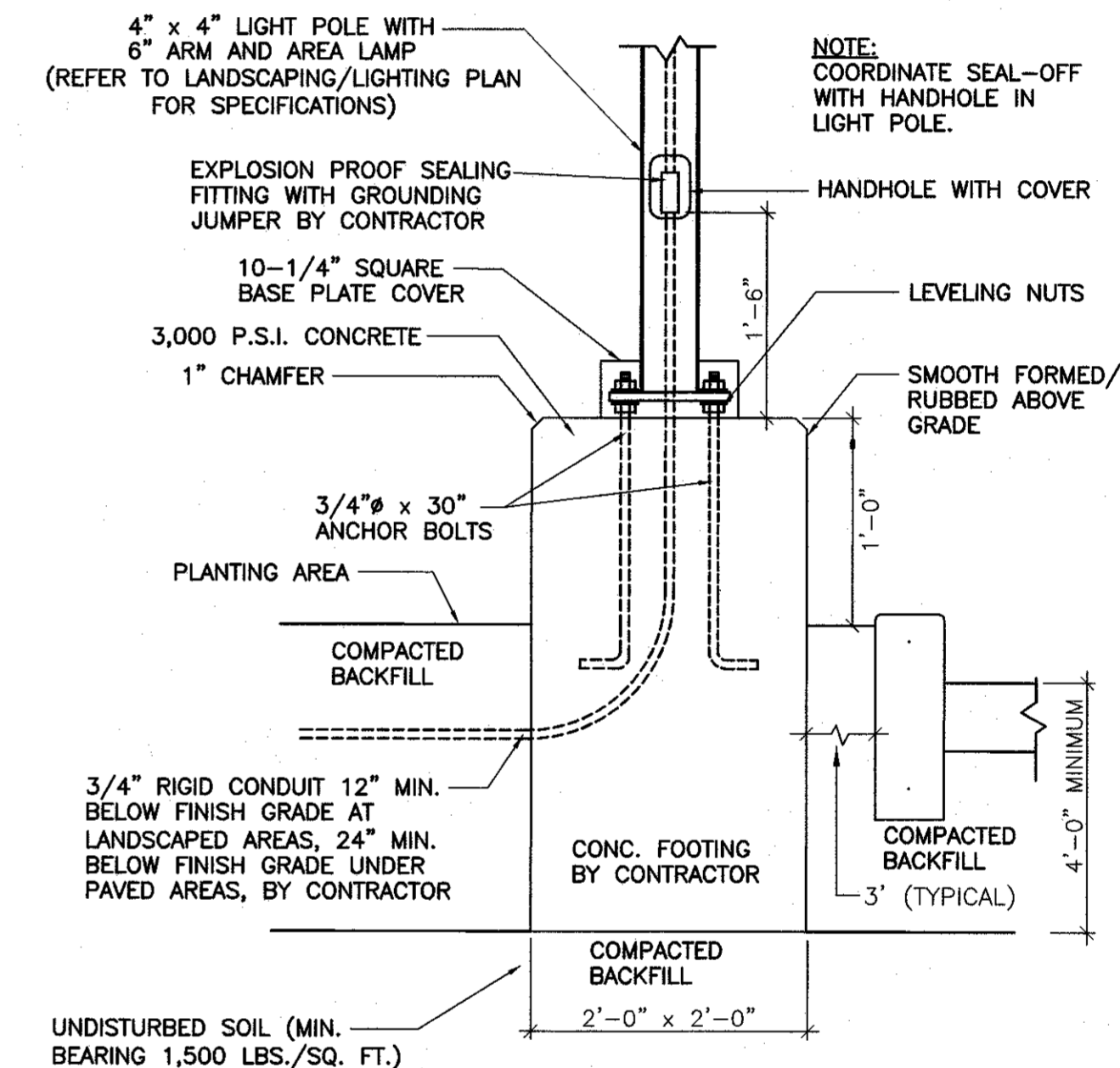
TYPICAL STORM DRAIN TRENCH SECTION
NOT TO SCALE



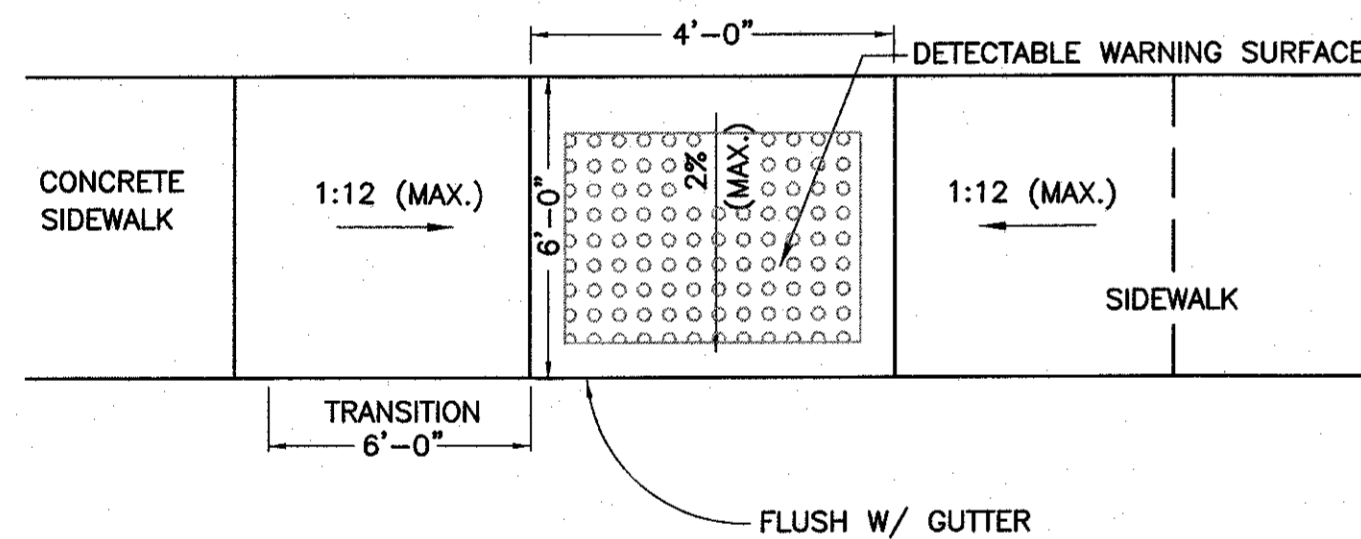
PRECAST CONCRETE CURB
NOT TO SCALE



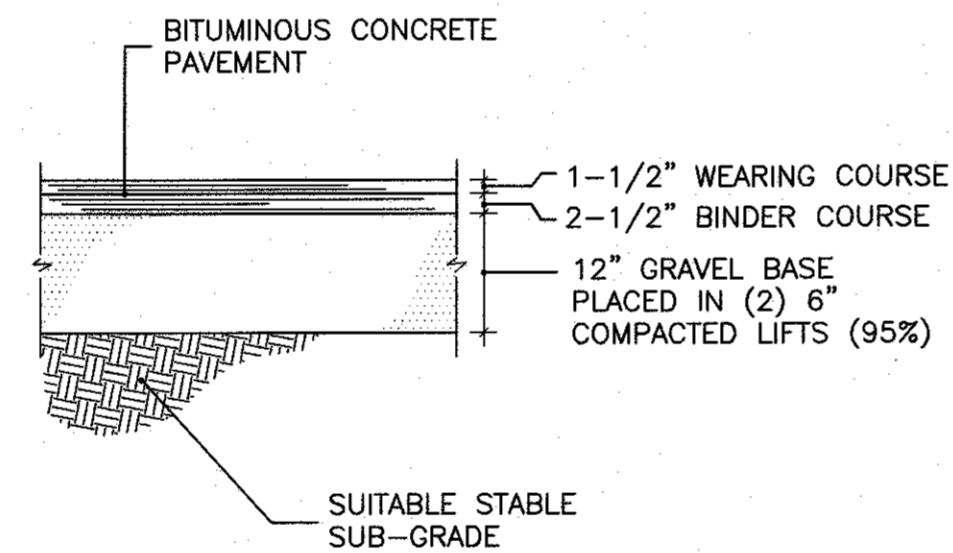
TYPICAL CONCRETE WALK-CURB DETAIL
NOT TO SCALE



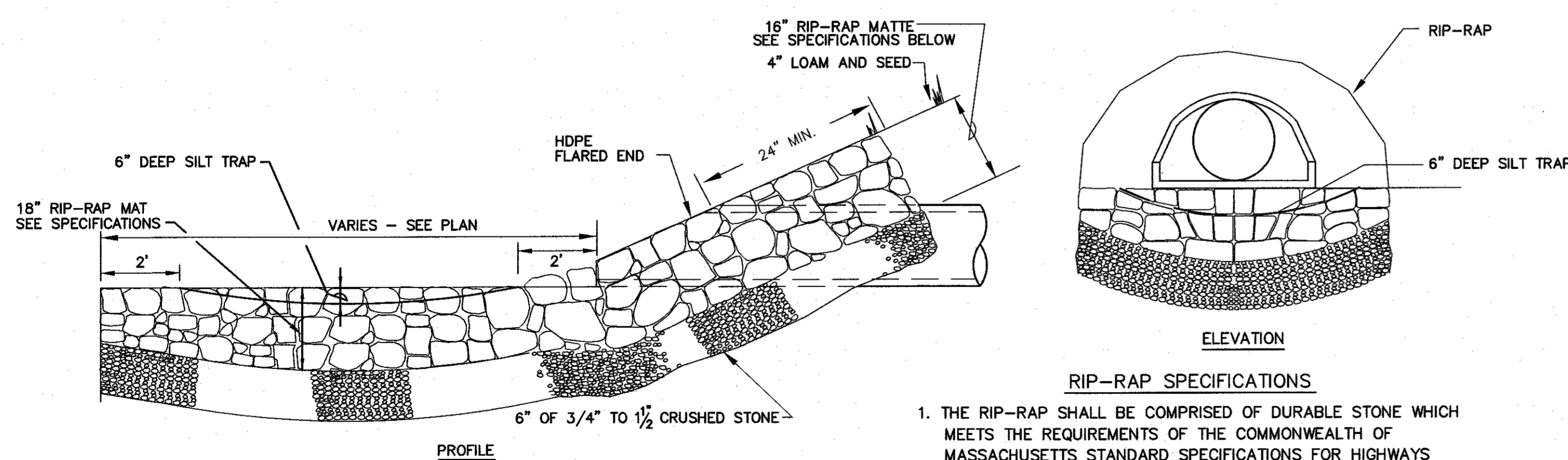
LIGHT POLE DETAIL
NOT TO SCALE



HANDICAP RAMP DETAIL
(NOT TO SCALE)

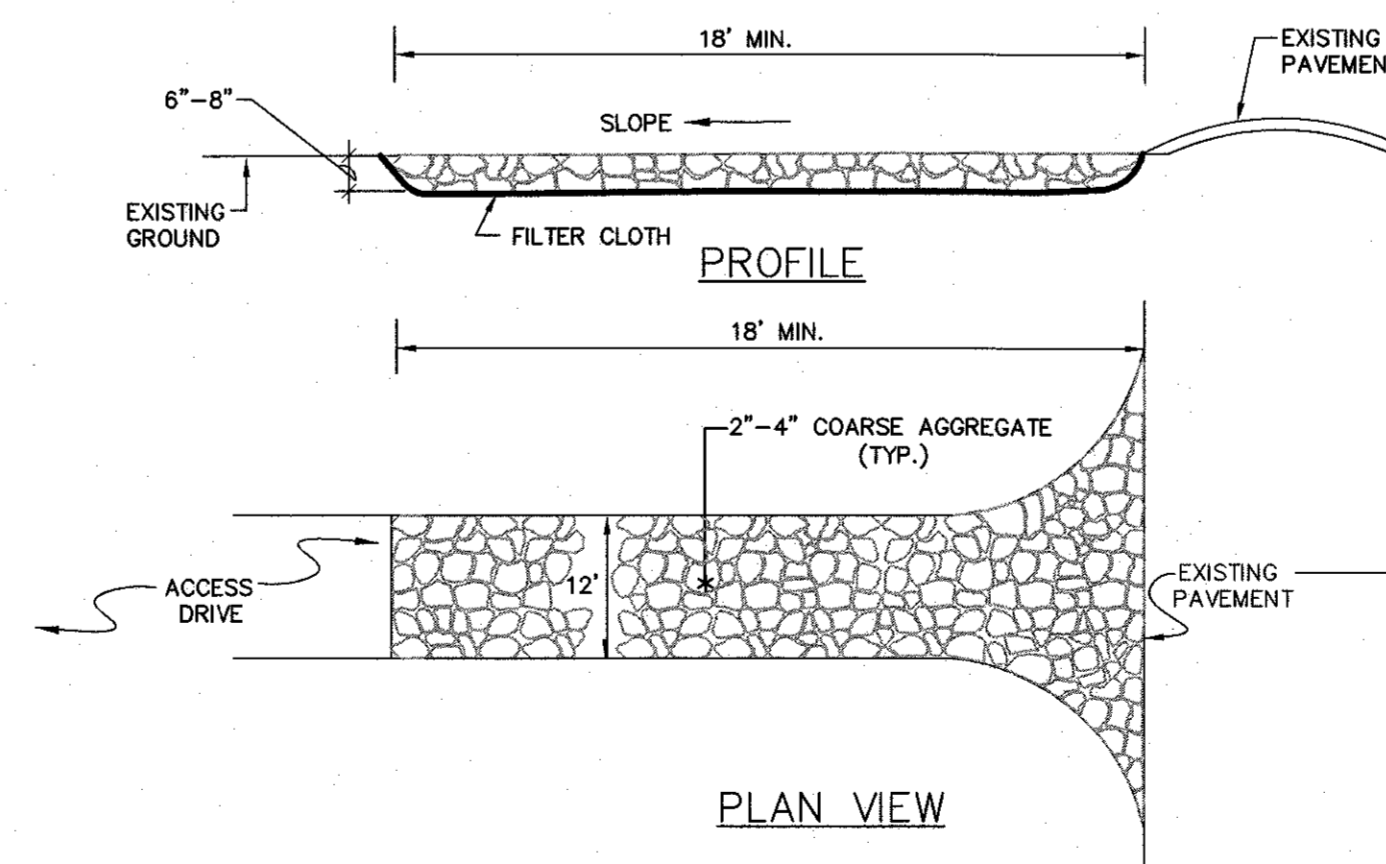


PAVING SECTION
NOT TO SCALE

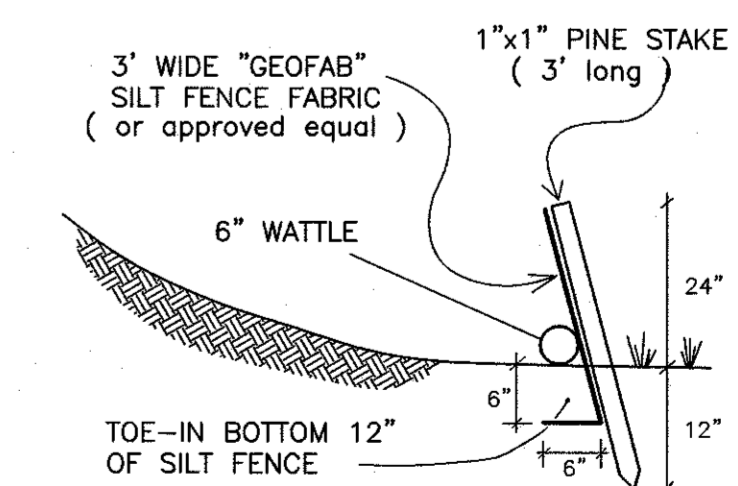


FLARED END W/RIP-RAP DETAIL
NOT TO SCALE

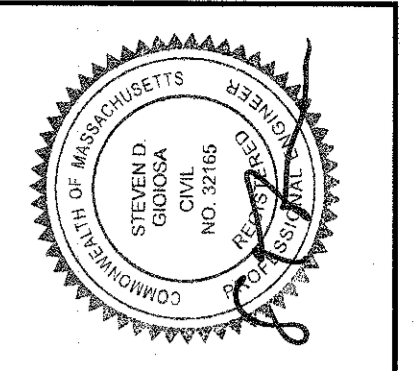
- RIP-RAP SPECIFICATIONS**
1. THE RIP-RAP SHALL BE COMPRISED OF DURABLE STONE WHICH MEETS THE REQUIREMENTS OF THE COMMONWEALTH OF MASSACHUSETTS STANDARD SPECIFICATIONS FOR HIGHWAYS AND BRIDGES M2.02.3 (STONE FOR PIPE ENDS.)
 2. THE RIP-RAP SHALL BE UNDERLAYED WITH A FILTER BLANKET CONSISTING OF 3/4" TO 1/2" CRUSHED STONE.
 3. THE FILTER BLANKET NEED NOT BE COMPACTED, BUT SHALL BE GRADED TO A UNIFORM SURFACE WITH A MINIMUM THICKNESS OF 6".



TEMPORARY CONSTRUCTION ENTRANCE/EXIT
N.T.S.



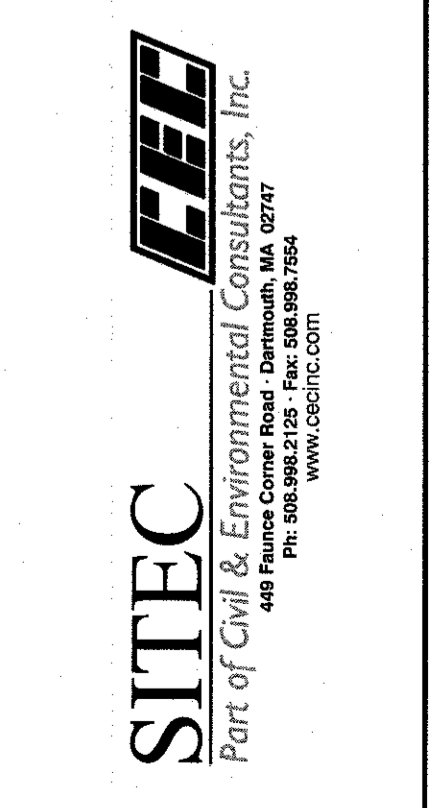
SILT / EROSION CONTROL FENCING
NOT TO SCALE

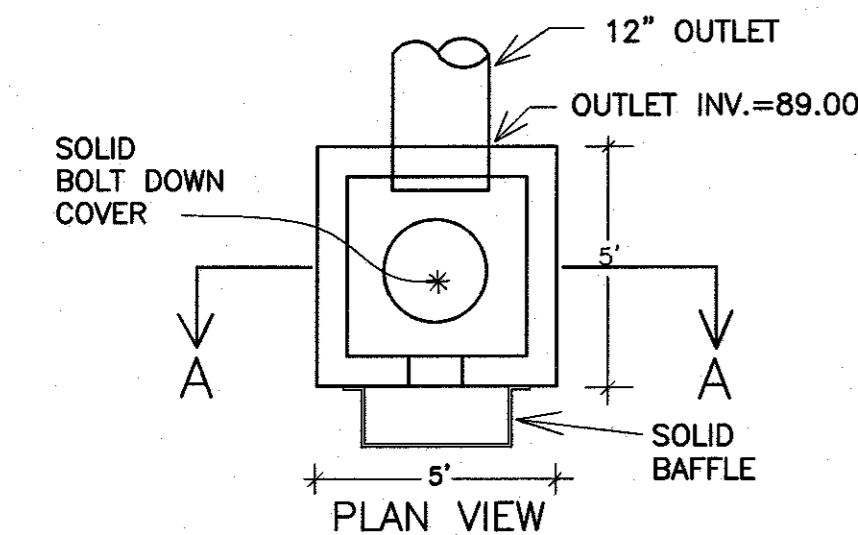
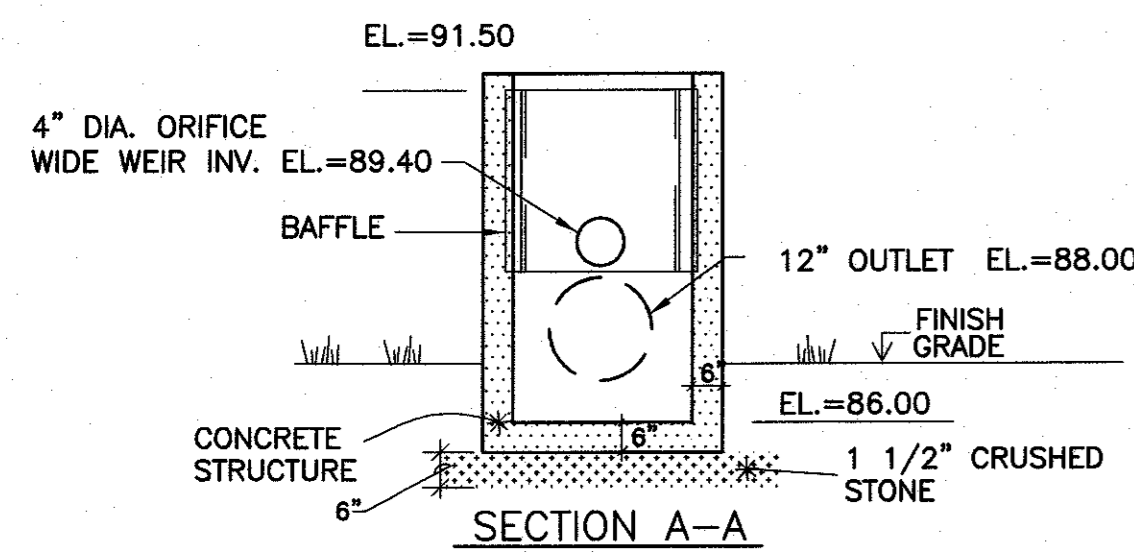


No.	Date	Revision Description
1	JUNE 15, 2021	CON. COM. & PLANNING BOARD REVIEW
2	JULY 12, 2021	NITSCHE ENGINEERING COMMENT LETTER - JULY 6, 2021
3	AUG. 17, 2021	PLANNING BOARD NOTICE OF DECISION DATED 6/23/2021
4	SEP. 17, 2021	GRADING REDSIGN
5	NOV. 15, 2021	DPL COMMENTS

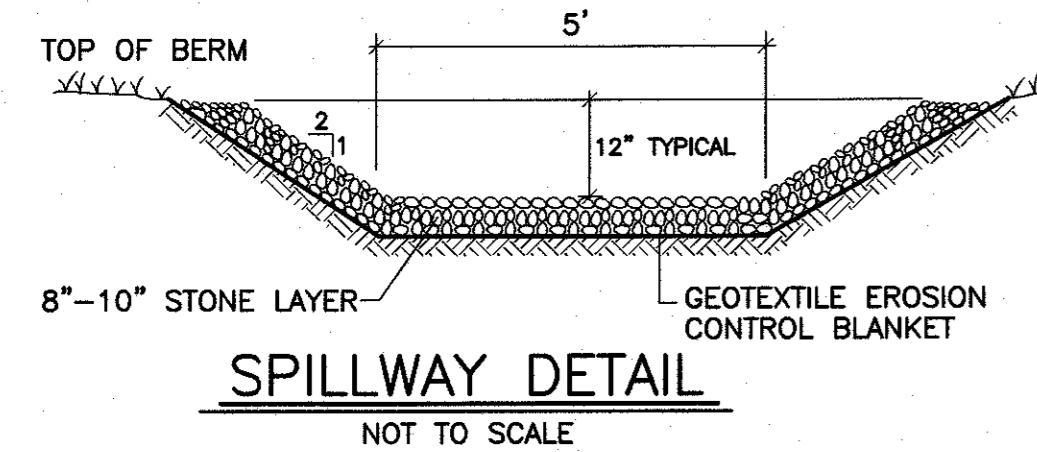
AS NOTED
DATE: MARCH 26, 2021
DRAWN: NAD
CHECKED: SDG
APPROVED: SDG
SHEET 8 OF 9
DRAWING NUMBER: DET-1

PROJECT: ASSESSOR'S MAP 136 - LOT 468
PHILLIPS ROAD
NEW BEDFORD, MASSACHUSETTS
CLIENT: PANAGAKOS DEVELOPMENT
DRAWING DATE: DETAIL SHEET #1





**DETENTION POND
OUTLET CONTROL STRUCTURE**
(NOT TO SCALE)



SPILLWAY DETAIL
NOT TO SCALE

GENERAL NOTES:

- CONTRACTOR SHALL NOTIFY DIG SAFE AT LEAST 72 HOURS PRIOR TO THE START OF CONSTRUCTION.
- CONTRACTOR SHALL VERIFY THE LOCATION AND ELEVATION OF ALL UTILITIES PRIOR TO THE START OF CONSTRUCTION. THESE PLANS ARE BASED ON FIELD AND RECORD INFORMATION AND, THEREFORE, MAY NOT COMPLETELY DEPICT ALL EXISTING UTILITIES.
- CONTRACTOR SHALL NOTIFY THE OWNER AND ENGINEER IMMEDIATELY IF FIELD CONDITIONS ARE FOUND TO DIFFER WITH THESE DRAWINGS.
- THE CONTRACTOR SHALL PROVIDE ADEQUATE PROTECTION OF THE ABUTTING AREA AND UTILITIES IN THE CONSTRUCTION OF THIS SITE. REPAIR OF DAMAGED PROPERTY SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR AT NO COST TO THE OWNER.
- THE SITE CONTRACTOR SHALL BE RESPONSIBLE FOR COMPLETING ALL CONSTRUCTION.
- ALL WORK SHALL BE IN ACCORDANCE WITH THE DEPARTMENT OF PUBLIC INFRASTRUCTURE CONSTRUCTION SPECIFICATIONS, LATEST REVISION.
- ALL CONSTRUCTION SHALL COMPLY WITH THE CITY OF NEW BEDFORD DPI STANDARDS.
- DEVELOPER SHALL INSPECT EXISTING WATER AND SEWER SERVICES PRIOR TO USE.
- THE PROPOSED CONCRETE SIDEWALK AND DRIVEWAY APRONS MUST MEET CURRENT A.D.A. AND CITY STANDARDS. THE PROPOSED DRIVEWAYS SHALL BE 6" CEMENT CONCRETE WITH 6"x6" GAUGE WIRE MESH.
- ALL DRIVEWAY PERMITS ARE SUBJECT TO TRAFFIC COMMISSION APPROVAL. THE CONTRACTOR SHALL NOTIFY THE ENGINEERING DIVISION 24 HOURS IN ADVANCE TO ENSURE THE PROPOSED SIDEWALK AND DRIVEWAY APRONS AND WHEELCHAIR RAMPS WILL MEET THE CURRENT A.D.A. AND CITY OF NEW BEDFORD STANDARDS.
- PERMITS FOR DRAINAGE, WATER, SIDEWALKS AND DRIVEWAYS MUST BE OBTAINED FROM THE DEPARTMENT OF PUBLIC INFRASTRUCTURE (DPI) ENGINEERING DIVISION BY OWNER.
- ALL UTILITY WORK TO BE CONDUCTED PER DPI SPECIFICATION.
- THE DEVELOPER AND SITE CONTRACTOR MUST SCHEDULE A PRE-CONSTRUCTION MEETING WITH THE DEPARTMENT OF PUBLIC INFRASTRUCTURE PRIOR TO START OF CONSTRUCTION.
- UPON COMPLETION OF THE PROJECT, THE ENGINEER MUST SUBMIT AS-BUILT DRAWINGS IN CADD FORMAT PRIOR TO THE ISSUANCE OF A CERTIFICATE OF OCCUPANCY.

**OPERATION & MAINTENANCE PLAN
STORMWATER MANAGEMENT SYSTEM**

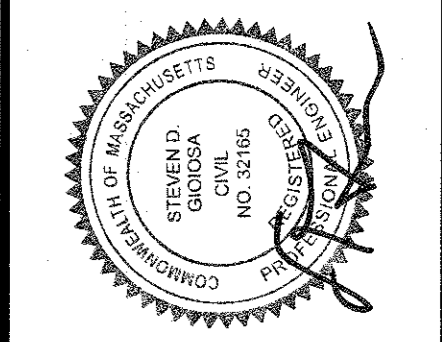
- Stormwater Management Owner:
PANAGAKOS DEVELOPMENT
133 FAUNCE CORNER ROAD
DARTMOUTH, MA 02747
- Responsible Parties:
During the construction period, the Owner's contractor will be responsible for the Operation/Maintenance of the system. When the construction is accepted, the responsibility for the maintenance will shift to the System Owner.
- Schedule for Inspection/Maintenance:
 - The Stormwater Management System shall be inspected annually and cleared of debris, sediment and vegetation when they affect the functioning and/or design capacity of the system. The inspection should be made during wet weather conditions.
 - Where lack of maintenance is causing or contributing to a water quality problem, immediate action shall be taken by the Owner to correct the problem.
 - Catch basins shall be inspected twice per year and cleaned as needed. Stormceptor units shall be maintained in accordance with the manufacturer's recommendations.
 - All actions required to maintain the stormwater management system for the purpose it was designed and constructed must be performed within 30 days following the maintenance inspection.
 - During construction, the contractor shall inspect all erosion control barriers and drainage structures after every rainfall event. The erosion control barriers shall be repaired as needed and accumulated silt and debris shall not be allowed to wash into the adjacent resource area. After all construction is completed, the project area shall be cleared of any sediment or debris.
 - All drainage basin slopes shall be checked twice per year for slope integrity, soil moisture, vegetative health, soil stability, soil compaction, ponding, and sediment accumulation. Repair and sediment removal shall occur as needed.
- Access
Access to the stormwater system will be available from the upland portion of the site.
- Public Safety
The Contractor will comply with all OSHA regulations during construction. Competent and trained personnel will accomplish the cleaning of the drainage swales.
- Illicit Discharge Compliance
The project, as designed, does not include any illicit discharges to the stormwater management system or the environment in general. There will be no hazardous materials stored in the project area and there are no wastewater discharge streams associated with this project.
- Funding for O/M
The cost of maintenance shall be the responsibility of the owner. The projected annual inspection / maintenance cost is approximately \$1,000.

LONG TERM POLLUTION PREVENTION PLAN

- Waste Disposal**
All waste materials will be collected and stored in a securely lidded metal dumpster from a licensed contractor. The dumpster will be emptied a minimum of once per week or as necessary until construction waste is to be buried on site. All personnel will be instructed regarding the correct procedure for waste disposal. The individual, who manages the day-to-day site operations, will be responsible for seeing these procedures are followed.
- Hazardous Waste**
All hazardous waste materials will be disposed of in a manner specified by Local, State, Federal regulation and in accordance with any manufacturer's recommendations.
- Sanitary Waste**
All sanitary waste will be collected in portable units installed on site. The portable units will be cleaned and emptied by a qualified licensed contractor.
- Concrete Waste**
All concrete washings will be disposed of in a designated area away from wetlands and any property line. When the concrete hardens it will be removed from the site.
- Good Housekeeping Practices**
 - Store only enough products on site to do the job.
 - All materials stored outside will be stored in a neat, orderly manner in the original containers.
 - Products will be kept in their original container with the original manufacturer's label.
 - The site contractor will inspect daily to ensure proper use and disposal of materials onsite.
- Product Specific Practices**
 - Petroleum Products:**
 - Refueling vehicles will be DOT Certified and have SPCC Plans in place and contain emergency equipment to contain and clean up small spills.
 - All on site construction vehicles will be inspected for leaks and receive regular preventative maintenance to reduce the chance of leakage.
 - Petroleum products will be stored in tightly sealed containers, which are properly marked.
 - Fertilizers:**
 - All fertilizers will be stored in a dry protected area and only used according to manufacturer's recommendation.
 - Concrete Trucks:**
 - The site contractor is responsible for designating a safe area, away from abutting property and resource areas, for excess concrete disposal.
- Spill Control Practices**
In addition to the good housekeeping and material management practices discussed in the previous sections of this plan, the following practices will be followed for Spill Prevention and clean up during construction:
 - Manufacturer's recommended methods for spill clean up will be clearly posted and site personnel will be made aware of the procedures and the location of the information and cleanup supplies.
 - All spills will be cleaned up immediately after discovery.
 - If any threat of explosion or life threatening condition, all personnel will be evacuated from the area to a safe location and the site supervisor shall contact the local fire department for assistance.
 - The spill area will be ventilated and personnel will wear appropriate protective clothing to prevent injury from contact with a hazardous substance.
 - The site contractor responsible for day-to-day operations will be the spill prevention and clean up coordinator. He will designate at least three other site personnel who will receive spill prevention and cleanup training. These individuals will each become responsible for a particular phase of prevention and cleanup.

EROSION & SEDIMENTATION CONTROL PROGRAM

- All Sediment and Erosion Control measures shall be executed in accordance with the following requirements and the NPDES Stormwater Pollution Prevention Plan. (SWPPP).
- Those areas undergoing actual construction will be left in an untreated or unvegetated condition for a minimum time. Areas shall be permanently stabilized within 15 days of final grading and temporarily stabilized within 30 days of initial disturbance if the disturbance is within 100 feet of a wetland resource area.
- Sediment barriers (Silt Fence) shall be installed prior to any soil disturbance of the upgradient contributing drainage area. Mulch netting shall be used to anchor mulch in all areas with slopes greater than 8.0% after October 1st if permanent stabilization has not occurred. Silt fencing shall be anchored to supplemental steel posts set 8 feet on center.
- Construction to commence in a phased manner as appropriate.
- All control measures will be inspected at least once each week and following any storm event of 0.5 inches of precipitation or greater.
- All measures will be maintained in good working order; if repair is necessary, it will be initiated within 24 hours of report.
- Built up sediment will be removed from the erosion control silt fence when it has reached one-third the height of the fence or bale.
- Silt fence will be inspected for depth of sediment, tears and to see if fabric is securely attached to the fence posts, and the posts are firmly in the ground.
- Any temporary sediment basin used will be inspected for depth of sediment. Any build up of sediment will be removed when it reaches 10% of the design capacity or at the completion of the project.
- Temporary and permanent seeding and planting will be inspected for bare spots, washouts and healthy growth. Reseed as necessary.
- No slopes, either permanent or temporary, shall be steeper than two to one (2 to 1) unless noted otherwise. All final vegetated slopes shall be 3:1 or less.
- If final seeding of the disturbed areas is not completed 45 days prior to the first killing frost, use temporary mulch or dormant seeding to protect the site and delay seeding until the next recommended seeding period.
- Temporary seeding of disturbed areas that have not been final graded shall be completed 45 days prior to the first killing frost to protect from spring runoff problems.
 - The topsoil shall have sandy loam texture relatively free of subsoil material, stones, roots, lumps of soil, tree limbs, trash or construction debris, and shall be placed to a minimum depth of four (4) inches on all loam and seed areas or as specified on the drawings.
 - Apply fertilizer at a rate of 650 lb per acre or 14.9 lb per 1,000 SF Apply ground limestone (equivalent to 50% calcium plus magnesium oxide) at manufacturer's recommended rate.
 - The design mix for seeding shall be in accordance with Landscape Plan Design. The seed mix shall be inoculated twenty-four (24) hours before mixing and planting, with appropriate inoculum for each variety.
- All temporary erosion control measures shall be removed once the site is stabilized to the satisfaction of the Project Engineer and the Conservation Commission.
- The contractor must repair or reseed any areas that do not develop within the period of one year and shall do so at no additional expense to the owner.
- The normal acceptable seasonal seeding dates are April 1st through June 15th and August 15th through September 30th.
- Stockpiles of topsoil shall not be located near the wetlands. They shall have side slopes no greater than 1:1. An erosion control barrier shall be set on the down gradient edge of all stockpile areas.
- A maintenance and inspection report will be made after each inspection. A copy of the report form completed by the inspector shall be kept on site.
- Construction site supervisor will be responsible for training workers in all inspection and maintenance practices necessary for keeping erosion and sediment controls in good working order.



No.	Date	Revision Description
5	NOV. 15, 2021	DPI COMMENTS
4	SEP. 17, 2021	GRADING REDISIGN
3	AUG. 17, 2021	PLANNING BOARD NOTICE OF DECISION DATED 6/23/2021
2	JULY 12, 2021	NITISCH ENGINEERING COMMENT LETTER - JULY 6, 2021
1	JUNE 15, 2021	CON. COM. & PLANNING BOARD REVIEW

PROJECT: ASSESSOR'S MAP 136 - LOT 468
PHILLIPS ROAD
NEW BEDFORD, MASSACHUSETTS

CLIENT: PANAGAKOS DEVELOPMENT

DRAWING TITLE: DETAIL SHEET #2

SCALE: AS NOTED
DATE: MARCH 26, 2021
DRAWN: NAD
CHECKED: SDG
APPROVED: SDG

SHEET 9 OF 9
DRAWING NUMBER: DET-2











Pine Boulevard

Phillips Road

Ridge Road

Birch

Ivy Road

Pine Hill

Green



From: [Andrew Griffith](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 1:08:31 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Andrew Griffith

andydgriff@gmail.com

5 Collins Street

5 Collins Street, Massachusetts 01950-2138

From: [Bambi Good](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 12:25:07 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

Below is a paragraph which cuts to the chase on the issue of the New Bedford proposal. We can't continue ignoring issues of environmental justice!!!!!! If the shoe were on the other foot!!!

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

Bambi Good, privileged to live in
Brookline
but I can almost imagine living in Bedford.. and I would be furious

Bambi Good
bambigood@gmail.com
74 Craftsland Rd.
Chestnut Hill, Massachusetts 02467

From: [Betsy Bizarro](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 3:12:26 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

I was born in Fall River and have family living in and around New Bedford.

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.

- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.
- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
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- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

[https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?
_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

[https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?
_ga=2.95911068.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Betsy Bizarro

bethbizanalog@gmail.com

10 Willey Road

Monroe, Massachusetts 01350



alexander.strysky@mass.gov

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View Comment

Comment Details

EEA #/MEPA ID 15990	First Name Charles	Address Line 1 106 Birchwood Drive	Organization --
Comments Submit Date 8-22-2022	Last Name Kennedy	Address Line 2 --	Affiliation Description Individual
Certificate Action Date 8-22-2022	Phone --	State MASSACHUSETTS	Status Opened
Reviewer Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	Email cfkennedy1956@gmail.com	Zip Code 02745	

Comment Title or Subject

Topic: Health and Environmental Concerns with Proposed Site Location

Comments

↶ ↷ **B** *I* U Segoe UI 10 pt **A** X₂ X² **t** **T** Paragraph

The proposed project site location abuts 360 residential homes to the east known as Pine Hill Acres. Parallel Products should be required to find a site location that is much farther removed from residential homes. I am concerned with the nuisance conditions this project will create. Dust, particulate matter, and odors will impact air quality and affect the health of abutting residents. Please note that the prevailing winds in that area are out of the west quadrant, southwest in the summer and northwest in the winter. There are several residential communities downwind of this location, and a large elementary school! If this project is permitted to be developed it will negatively impact the lives of thousands of New Bedford residents! This type of industry should not be allowed to be situated near any residential community.

Other nuisance concerns include litter, noise and vermin. Undoubtedly, this trash transfer station will draw rats and other scavenging animals which will spread throughout the surrounding area.

To the west and south of the proposed site location is the Acushnet Cedar Swamp, a state-owned preserve holding the largest Atlantic White Cedar preserve in Massachusetts. Storm water runoff will ultimately drain into this swamp.

I am a retired Assistant Superintendent of the New Bedford, Department of Public Infrastructure, Water Division, managing the Quittacas Water Treatment Plant for 22 years. I just completed two years of working on the UMASS/Mass DEP, PFAS Team as a Technical Assistance Provider. It is well known that there is PFAS contamination in groundwater throughout the state especially around trash landfill areas. This site location is in a sensitive location both to residents and ecologically as it is adjacent to the Acushnet Cedar Swamp. Undoubtedly, it will negatively impact both.

There should be consideration of more remote site locations for this type of industry.

Attachments

Update Status

Status

Opened

SUBMIT

Share Comment

SHARE WITH A REGISTERED USER

[BACK TO SEARCH RESULTS](#)

From: [claudia Koska](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 7:06:39 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
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- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:
[https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?
_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

[https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?
_ga=2.95911068.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

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For a thriving New England

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August 22, 2022

Secretary Bethany A. Card
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Subject: South Coast Renewables, LLC (f.k.a. Parallel Products of New England LLC), 100 Duchaine Boulevard, New Bedford, Massachusetts, Supplemental Environmental Impact Report and Notice of Project Change EEA No. 15990

Dear Secretary Card and MEPA Director Kim:

The undersigned express serious concerns regarding the project proposed by South Coast Renewables, LLC (the “Proponent”) to be sited at 100 Duchaine Boulevard, New Bedford, (the “Site”) and described in the Notice of Project Change and Supplemental Environmental Impact Report (the “NPC/SFEIR”) described above (the “Proposed Facility”). The Proponent, while claiming to overhaul the Proposed Facility in accordance with comments from the undersigned and members of the community, has not addressed two underlying problems the Proposed Facility would pose. Namely, that the Proposed Facility would further entrench the Commonwealth of Massachusetts in a burn and bury waste system, and the Proposed Facility would unduly burden the residents of New Bedford, an environmental justice population.

We commend the Proponent for abandoning the idea of building a sewage sludge drying facility at the Site for now, especially given that the market for dried sludge to be spread on land is greatly constricted due to national and regional per- and polyfluoroalkyl substances (“PFAS”) concerns.¹ As we have stated in the past, handling sewage sludge is neither a safe nor profitable business concept.

We urge the Proponent come to a similar realization regarding the Garbage Depot/Dirty Materials Recovery Facility that it plans to build on the Site. Shipping trash out of state by rail is

¹ Ecology Center and Sierra Club, “Sludge in the Garden: Toxic PFAS in Home Fertilizers from Sewage Sludge, May 2021, [2408 PFAs in the Garden Sludge Report 07.pdf - Google Drive](#).

not sustainable, and does not solve our waste problem, even if an operator is “hopeful” that it will be able to extract a small percentage of recyclables from that waste.

Conservation Law Foundation (“CLF”) is a non-profit, member supported regional environmental organization working to conserve natural resources, protect public health, and promote thriving communities in New England. Through CLF’s Zero Waste Project in the Environmental Justice Program, CLF aims to protect New England communities from the dangers posed by unsustainable waste generation and disposal. CLF’s Massachusetts members include residents with a deep interest in protecting our natural resources and in reducing the need for landfills and incinerators and promoting Zero Waste programs in the Commonwealth.

Just Zero (“Just Zero”) is a national non-profit organization that works alongside communities, policy makers, scientists, educators, organizers, and others to implement just and equitable solutions to climate-damaging and toxic production, consumption, and waste disposal practices. Just Zero’s goal is to help create a world that relies on community-centered Zero Waste solutions with zero climate-damaging emissions and zero toxic exposures. We focus on policies and answers that put human and ecosystem health over polluter profits.

South Coast Neighbors United, Inc. is a non-profit, grassroots organization of concerned residents who came together in 2015 in opposition to Access Northeast, a project proposed to expand and construct unnecessary and dangerous natural gas infrastructure in South Coast communities. SCNU shares factual information with the public about the true risks that this, and other similar projects, pose to their community’s health, safety, financial security, and the environment.

Slingshot is an organization that works side by side with the communities most impacted by environmental threats to hold polluters accountable and build community power. Slingshot has the organizing know-how, the deep relationships, and the flexibility to grow into the fullest potential. Slingshot will show up for communities and organize with compassion, humility, fierce love, and joy to build a more just world.

As per the NPC and SFEIR,² the Proposed Facility includes:

- An existing glass processing plant that crushes, sizes, and separates glass by color that has been collected through the Massachusetts bottle deposit system. The Proposed Facility does not accept glass from curbside recycling or trash collection. It is inconsistent for the Proposed Facility to not accept glass to contribute recyclable content to the existing glass processing plant. This glass cullet should be sold for the production of new glass products;
- Rail sidetrack to be built from the existing rail line adjacent to 100 Duchaine Boulevard;
- Solar canopies to be constructed on a canopy system; and,
- Transfer station for Municipal Solid Waste (“MSW”) and Construction and Demolition (“C&D”) materials, with some processing (“Proposed Dirty MRF”) that will accept

² [sfeir.pdf \(parallelproductssustainability.com\)](#)

about 450,000 tons of trash a year, (1,500 tons a day, 300 days a year) and ship almost all of that waste out for disposal by rail.

For now the Proposed Facility does not include a sewage sludge drying facility.

A. The Proposed Facility Will Have a Negative Impact on our Waste Disposal Systems.

As detailed in the comment letter submitted to the MEPA Office by the undersigned on March 26, 2021 regarding the FEIR,³ the Proposed Facility will not improve the Commonwealth's solid waste system, just further invest in shipping the waste out of state.

1. The Commonwealth of Massachusetts has not decreased its waste disposal over the last decade. In fact, in 2019 Massachusetts disposed of 100,000 tons more trash than in 2010. Expanding landfills and exporting trash has not negatively impacted the creation of trash. ***The Proposed Facility would make it easier and cheaper to ship our waste out of state and out of mind, thus burdening other communities without contributing to benefits for residents of New Bedford.***
2. The adoption of single stream recycling has resulted in an expensive system and little actual recycling. Many single stream materials are not recycled, but downcycled, or worse, disposed of and used as landfill cover. Plastic beverage containers that are not covered by deposit systems are unlikely to be recycled. The national recycling rate for plastic beverage containers collected curbside is only 28%, while the national recycling rate for plastic containers in bottle bill states is 72%. According to the National Waste and Recycling Association, 25% of what is placed into single-stream recycling is too contaminated to go anywhere other than a landfill -- only 40% of glass placed into single-stream recycling collections actually gets recycled. ***In other words, even the bottles, cans, cardboard, and paper in curbside systems are NOT getting purchased by recycling companies after they leave the material recycling facilities to be made into new bottles, cans, cardboard, and paper.***
3. The Proponent is proposing to construct a "Transfer Station" but operate parts of it like a "Dirty MRF." A Dirty MRF is a facility that accepts trash, and the operator picks out items to be recycled. To our knowledge, all of the Material Recovery Facilities in Massachusetts are "clean" MRFs, meant to optimize recycling by requiring recyclables to be kept separate from trash from point of generation. Massachusetts regulations, 310 CMR 16.02, defines a "Transfer Station," as a "handling facility where solid waste is brought, stored, and transferred from one vehicle or container to another vehicle or container for transport off-site to a solid waste handling or disposal facility." Some of the waste at the Proposed Facility would be delivered baled to the Proposed Facility, and then it will be loaded directly onto rail cars to be shipped off-site for disposal. ***None of the baled MSW would be recycled, and very little, if any, of the unbaled trash would be.***
4. The Proposed Facility would also accept C&D residuals and C&D bulky waste. The Proponent will not extract recyclables from the C&D. ***In regards to the baled MSW and C&D waste, the Proposed Facility would be a Transfer Station.***

³ Id. at p. 515

5. While the Proponent said in their response to comments to the FEIR that it is “hopeful” that it will be able to extract 20% of the 450,000 tons of trash flowing through the Proposed Facility to be recycled, none of the SFEIR or NPC explain how, or which materials could possibly be recycled. Most of the waste, as explained above, would be C&D or baled waste. The Proponent does not accept curbside glass in its glass processing facility. It certainly could not use glass taken from the trash. ***The Proponent will not even recycle the glass from its own Dirty MRF.***
6. The MassDEP has a very clear picture as to what materials are in the trash by weight, yet the Proponent has not used these detailed waste characterizations to estimate how they would divert trash from disposal. A 20% diversion rate is a baseless guess that will never be achieved. ***The Proponent should be required to detail its plans to achieve such a diversion rate.***
7. ***The Proposed Facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, at least 450,000 tons a year, out of state for disposal for the foreseeable future.***
8. ***The Secretary should require the Proponent to identify what materials the Proponent is targeting, how they will be extracted, and if a market actually exists to recycle these contaminated waste streams.***

B. The Proposed Facility Will Have a Negative Impact on Environmental Justice Populations.

The Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations. State law and policy now require that the MEPA Office assess impacts to an environmental justice population located within five miles of an environmental justice population and consider whether the project results in an equitable distribution of energy and environmental benefits and environmental burdens.⁴ An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) requires the Secretary to find whether the assessment shows existing unfair or inequitable environmental burdens and related public health consequences.⁵ Additionally, the Roadmap Law requires the Proponent to identify any adverse short-term and long-term environmental and public health consequences that cannot be avoided and reasonable alternatives to the proposed project. The NPC and SFEIR do not meet these requirements.

New Bedford is designated as an environmental justice population.⁶ The city is rife with existing environmental burdens, extensive environmental degradation due to the legacy of those early industrial years adding high levels of lead, polychlorinated biphenyls, and other contamination in their neighborhoods. The New Bedford Harbor Superfund site is among the

⁴ St. 2021, c. 8, §§ 56-60; M.G.L. c. 30, §§ 62, 62B, 62K.

⁵ M.G.L. c. 30, § 62B.

⁶ Massachusetts Environmental Justice Viewer, “New Bedford”, available at <https://mass-eoeea.maps.arcgis.com/apps/webappviewer/index.html?id=1d6f63e7762a48e5930de84ed4849212>.

worst contamination in the region, and local residents and advocacy groups have been fighting for a fair and effective cleanup of that site for decades.⁷ These contaminants and exposures have public health consequences.

The Roadmap Law and 2021 Environmental Justice Policy requires the Proponent to do enhanced outreach to residents of New Bedford about the project. The Proponent has failed to meet the outreach requirements.⁸ The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR. The Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022. A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford. The Proponent has held no in-person community meetings since January 2020. The Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement, with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022. The Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.

Given the new environmental justice standards this project must meet, and the burdens the community is already experiencing, the undersigned request *again* that the Secretary require an enhanced environmental review and analysis of impacts which should include, at a minimum, baseline public health conditions within New Bedford and nearby communities, and on-site and off-site mitigation to reduce impacts on this frontline population. A more comprehensive review of the Commonwealth's solid waste infrastructure is also warranted before siting yet another large facility in an environmental justice population, especially considering that six of the state's seven solid waste incinerators are already in environmental justice populations. Consequently, we urge the Secretary to find that the filing does not adequately and properly comply with MEPA.

C. Leachate-Contaminated Wastewater at the Proposed Transfer Station Poses a Risk to Water Quality.

The leachate at the Proposed Facility should be tested and treated prior to sending it into a waste water treatment plant, and the Secretary should require that the SFEIR detail how the leachate would be tested and handled.

D. There is a Long Toxic History at the Site.

⁷ Conservation Law Foundation, "New Bedford, Massachusetts: Environmental Justice in the Twenty-First Century," pg. i, (August 2016), available at <https://www.clf.org/wp-content/uploads/2016/08/New-Bedford-EJ-Assessment-2016.pdf>.

⁸ M.G.L. c. 30, § 62I; Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs: https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318.

Proponent notes that this site was previously owned by Multilayer Coating Technologies, and before that by the Polaroid Corporation. The Site was used by both previous owners to manufacture film. ***We also recommend an environmental assessment be conducted and submitted by Proponent as part of a supplemental FEIR, to not only establish a baseline, but to ensure that there are not existing conditions that would endanger the surrounding community due to the development and operation of the Proposed Facility.***

Thank you for your consideration.

Respectfully submitted,

Staci Rubin, Vice President, Environmental Justice
Conservation Law Foundation

Kirstie L. Pecci, Executive Director
Just Zero

Wendy M. Graca, President
South Coast Neighbors United, Inc.

Mireille Bejjani, Co-Executive Director
Slingshot

From: [Cynthia Costa](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Sunday, August 21, 2022 9:05:48 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Cynthia Costa

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78 James St. #1

Acushnet, Massachusetts 02743

From: [DAVID BUTCHER](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 10:07:54 PM

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Secretary of Energy and Environmental Affairs
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Attn: MEPA Office
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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

DAVID BUTCHER

ledsled1950@aol.com

12 ROTCH ST I have been with Alexion Ins for Manny Many years and Have always been treated very well ! no complaints all , well maybe a little cheaper ins cuz I am Old geezer ! lol
ACUSHNET, Massachusetts 02743

From: [David Greenberg](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 3:33:47 PM

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over 80% to landfill, a very costly and shortsighted approach.

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- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

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Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

David Greenberg

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227 W. Leyden Rd.

Colrain, Massachusetts 01340

From: [David Michalski](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 6:39:53 PM

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Mr. Alex Stryisky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Stryisky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.stryisky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
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The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

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https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

David Michalski

xiski@msn.com

332 Old Fall River Rd

Dartmouth, Massachusetts 02747

From: david.greenberg3@gmail.com
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 3:33:25 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

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227 W. Leyden Rd.

Colrain, Massachusetts 01340

From: [Deborah Valianti](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 12:37:12 PM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Deborah Valianti

dlvalianti@gmail.com

8 OAK SQUARE AVE

Brighton, Massachusetts 02135

From: [Deborah Valianti](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 12:36:35 PM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
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The basis of these findings are as follows:

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Deborah Valianti

dvalianti@gmail.com

8 OAK SQUARE AVE

Brighton, Massachusetts 02135

From: [Debra Hopwood](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 9:38:50 AM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

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Debra Hopwood

debhop2397@aol.com

54 Garrison Rd

New Bedford, Massachusetts 02745-4215

From: [Eileen M Brennan](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 12:33:33 PM

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The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
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- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
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- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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Eileen M Brennan

eileenbrennan66@aol.com

35 Pleasant Street

Fairhaven, Massachusetts 02719

From: [Elizabeth Murphy](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 12:53:55 PM

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Elizabeth Murphy

elizmurphy22@gmail.com

22 Delano Way

Dartmouth, Massachusetts 02748

From: [Elizabeth Murphy](#)
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Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 12:53:19 PM

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Northeastern University Environmental Justice Study:

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Elizabeth Murphy

elizmurphy22@gmail.com

22 Delano Way

Dartmouth, Massachusetts 02748

From: [Elizabeth Saulnier](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 11:16:28 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
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Elizabeth Saulnier

bsmrc2@comcast.net

94 Birchwood Dr

New Bedford, Massachusetts 02745

From: [Emily Reckard-Mota](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 9:19:10 AM

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Mr. Alex Stryisky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Stryisky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.stryisky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

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Emily Reckard-Mota

emily@groundworksomerville.org

138 South St.

Somerville, Massachusetts 02143



alexander.strysky@mass.gov

[Dashboard\(javascript:void\(0\);\)](#) > [View Comment\(javascript:void\(0\);\)](#)

View Comment

Comment Details

EEA #/MEPA ID 15990	First Name Heidi	Address Line 1 1617 Phillips RD	Organization --
Comments Submit Date 8-22-2022	Last Name Stanley	Address Line 2 --	Affiliation Description --
Certificate Action Date 8-22-2022	Phone +17748368888	State MASSACHUSETTS	Status Opened
Reviewer Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	Email hlynr@aol.com	Zip Code 02745	

Comment Title or Subject

Topic: Stop EEA# 15990

Comments

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I was not informed about this project in any way. The only reason I now know about it is because South Coast Neighbors United and the CAPPP committee brought by information on this project as I live close by to the proposed location. I am outraged that there has been no communication by Parallel Products to their potential neighbors on this project which is in violation of the 2017 Environmental Justice enhanced participation policy. I am extremely concerned about what this project will do to our quality of living.

- Noise and air pollution
- odors, vermin & pest infestations
- traffic congestions, emissions and dangers
- water quality
- loss in property value
- health issues

Allowing this project to move forward would make us prisoners in our home without being able to enjoy our yards and unable to sell our homes. For the health, safety, and well-being of the citizens of our community, I implore you to take immediate action to halt this project in the City of New Bedford.

Attachments

Update Status

Status

Opened ▼

SUBMIT

Share Comment

SHARE WITH A REGISTERED USER

[BACK TO SEARCH RESULTS](#)

From: [Strysky, Alexander \(EEA\)](#) on behalf of [MEPA \(EEA\)](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: Fw: EEA# 15990
Date: Thursday, August 25, 2022 8:36:26 PM

From: Heidi Stanley <hlynr@aim.com>
Sent: Monday, August 22, 2022 8:46 AM
To: MEPA (EEA) <mepa@mass.gov>
Subject: EEA# 15990

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I am writing to request a 60- day extension of the comment period deadline. I was not informed about this project in any way. The only reason I now know about it is because South Coast Neighbors United and the CAPP committee brought by information on this project as I live close by to the proposed location. I am outraged that there has been no communication by Parallel Products to their potential neighbors on this project. This is in violation of the 2017 Environmental Justice enhanced participation policy. I am extremely concerned about what this project will do to our quality of living.

- Noise and air pollution
- Odors, vermin & pest infestations
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Allowing this project to move forward would make us prisoners in our home without being able to enjoy our yards and unable to sell our homes. For the health, safety and well-being of the citizens of our community I implore you to take immediate action to halt this proposed project in the City of New Bedford.

Sincerely,
Heidi Stanley
1617 Phillips Rd.
New Bedford, MA 02745

From: [Ida DelVecchio](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 5:58:25 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford. THIS KIND OF THING MAKES ME WONDER HOW MUCH YOUR PALMS WILL BE COLORED GREEN. THIS IS VERY SUSPICIOUSLY GRAFTLIKE

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

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Study on PFAS in MSW and Transport Vehicle Leachates: <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Ida DelVecchio
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Quincy, Massachusetts 02169

From: [Jacob Chin](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: EEA No. 15990
Date: Monday, August 22, 2022 7:56:18 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Stryisky,

The commonwealth of Massachusetts should not approve the waste facility in New Bedford proposed by Parallel Products of New England, d/b/a South Coast Renewables.

This project poses many health concerns for air quality, noise, pests and rodents, roads and traffic, and effects to wet lands and waters in area. The only studies that have been done thus far look at each issue- air, noise, roads, etc individually and separately. But as new policy around environmental Justice has explicitly stated, the impact on the environment in its totality should be assessed. What is the combined effects of this project on the environment?

Further, this project has continued to exclude the community. Their public meetings are only advertised in English and you must have technology and internet to even register. So only literate English speakers with devices with internet can even access the registration. None of the public meetings have had interpreters. This project entered a host agreement with the city without the community's input. How can the state approve a project with lack of accessibility and input to the community?

Please deny this project.

Jacob Chin, Esq.
J.D. / M.P.P.

From: [Jacob Chin](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 1:29:53 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
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- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
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- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Jacob Chin

jacob.w.chin@gmail.com

26 Garrison Road

New Bedford, Massachusetts 02745

From: [Janet Billane](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 12:40:19 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

<https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?>

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

<https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?>

[_ga=2.95911068.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Janet Billane

jmbillane@gmail.com

7 Fulton Street

Attleboro, Massachusetts 02703

From: [Bambi Good](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 12:25:07 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

Below is a paragraph which cuts to the chase on the issue of the New Bedford proposal. We can't continue ignoring issues of environmental justice!!!!!! If the shoe were on the other foot!!!

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

Bambi Good, privileged to live in
Brookline
but I can almost imagine living in Bedford.. and I would be furious

Bambi Good
bambigood@gmail.com
74 Craftsland Rd.
Chestnut Hill, Massachusetts 02467

From: [Janet Cason](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 12:08:06 PM

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Email: alexander.strysky@mass.gov

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The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
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- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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Janet Cason

janetqcason@verizon.net

40 Westbrook Rd

Northborough, Massachusetts 01532

From: jenwexshayndle@gmail.com
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 11:40:58 AM

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Secretary of Energy and Environmental Affairs
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Attn: MEPA Office
Alex Strysky - EEA No. 15990
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- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

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Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

jenwexshayndle@gmail.com

182 Turnpike st

Canton , Massachusetts 02021

From: jenwexshayndle@gmail.com
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 11:39:15 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
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The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

jenwexshayndle@gmail.com

182 Turnpike st

Canton , Massachusetts 02021

From: [Jill Poisson](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 10:13:59 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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Jill Poisson

jillpoisson@gmail.com

19 Armington Ave

Providence , Rhode Island 02908

From: [Karen Boutin](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 11:35:58 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
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- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

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Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Karen Boutin

Karen_boutin@Yahoo.com

1018 Ivers St

New Bedford, Massachusetts 02745

From: [Karen Chin](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: EEA No. 15990
Date: Monday, August 22, 2022 8:30:48 PM

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Dear Mr. Strysky,

The commonwealth of Massachusetts needs to protect the residents of New Bedford along with the surrounding towns by not approving the waste facility in the city New Bedford proposed by Parallel Products of New England, d/b/a South Coast Renewables.

This project raises many health concerns to a city already burden with environmental justice New Bedford is an environmental justice community, please answer the following questions:

- * Will Massachusetts consider the historical patterns of exposure to environmental hazards in New Bedford?
- * Has Has the state Recognized the interrelated cultural, social, occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed action?
- * What is the cumulative exposure to human health or environmental hazards in the affected population?
- * How will the state remedy the lack of effective public participation?

There are many health concerns that must be considered for those who live in New Bedford and the surrounding towns. These are a few- air quality, noise, pests and rodents, roads and traffic, and effects to wet lands and waters in area. Please understand thAt we as residents have been fighting together to clean up our city for such a long time and can not go through this again because this company Parallel Products of New England, d/b/a South Coast Renewables.only concern is to make money for themselves!

Please deny this project.

Thank you for you time,
Karen Chin
A life long citizen of NB, an educator and a mother.

Sent from my iPhone

From: [Larry Stoodt](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 2:34:11 PM

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Alex Strysky - EEA No. 15990
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Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

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The basis of these findings are as follows:

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Larry Stoodt

schlangeme@rcn.com

615 Belknap Road

Framingham, MA, Massachusetts 01701

From: [Laura Gardner](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 12:10:37 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

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to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

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References:

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Laura Gardner

lauratruff@gmail.com

17 Cottage St

Fairhaven, Massachusetts 02719

From: [Laurel Facey](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 12:47:15 PM

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Attn: MEPA Office
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Laurel Facey

lfacey01349@gmail.com

47 Davis Road

Millers Falls, Massachusetts 01349

From: [Laurel Facey](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 12:47:00 PM

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

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Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Laurel Facey

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47 Davis Road

Millers Falls, Massachusetts 01349



alexander.strysky@mass.gov

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Comment Details

EEA #/MEPA ID 15990	First Name Leonard	Address Line 1 177 Deerfield Road	Organization --
Comments Submit Date 8-22-2022	Last Name Rapoza	Address Line 2 --	Affiliation Description Individual
Certificate Action Date 8-22-2022	Phone --	State MASSACHUSETTS	Status Opened
Reviewer Alexander Strysky (857)408-6957, alexander.strysky@mass.gov	Email rapozafamily177@aol.com	Zip Code 02745	

Comment Title or Subject

Topic: Concerned Homeowner

Comments

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To Whom It May Concern,

This is a letter of opposition to the building and operating of a Municipal Solid Waste Station by Parallel Products. I would like to express my concerns regarding the Parallel Products Project a homeowner who resides in Pine Hill Acres which connect to what is now known as New Bedford Industrial Park where Parallel Products intends on building and running a Municipal Solid Waste Station.

Concerns are but not limited to....

- Odors, vermin & pest infestations
- Additional traffic congestion, emissions and dangers
- Noise and Air pollution
- Water quality and use, and impact on the city's aging sewer system
- Health issues for residents and especially children attending nearby elementary schools and endangered species
- Excavation of a contaminated site
- Cost for road repairs / maintenance
- Decreased property values

But the impact on the environment and animals in the surrounding habitat.

Personal Note.....There was a time while living within Pine Hill Acres, you could look out your window and spot wild deer, wild turkey, opossums and other animals native to this area. A beautiful but small development perfect to raise a family and live out your retirement years. Sounds of children playing, birds chirping and crickets in the evening. The area was rich in vegetation to support all manner of creature. To my heartbreak, those times are gone. As the years have passed, businesses and development have destroyed more and more of this area, not to mention the damage done to the animal's habitat by building and encroaching on their living space. Thirty years ago we purchased our home in the North End of New Bedford for a reason. Slowly but ever so steadily, the businesses and developments that profess they will not make an impact on the area always do. Caring not about the people and the area of New Bedford.... as they only care about their own personal profit and gain no matter what the cost. There is less and less vegetation... water table tainted... air quality and pollution... business has taken over inch by inch of the habitable space leaving poison and decay in its wake. Now Parallel Products wants to develop a waste disposal site in this area.... this is the last thing the people of New Bedford need... How much pollution do you need in what once was a beautiful and pristine area... Those that do not learn from history are destined to repeat it! Businesses damaged and polluted our oceanfront and harbor almost to the brink of destruction and now Parallel Products wants to take over more of our beautiful forested area? What next.... I Say NO!

Attachments

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Status

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BACK TO SEARCH RESULTS

From: [Dorothy Weitzman](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 1:56:27 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

[https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

[https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

[_ga=2.95911068.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Dorothy Weitzman

weitzmandorothy@gmail.com

20 Philmore Rd

Newton, Massachusetts 02458

From: [Maiyim Baron](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 12:32:48 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

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Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Bethany A. Card
Secretary

Martin Suuberg
Commissioner

August 22, 2022

Bethany A. Card,
Secretary of Environment and Energy
Executive Office of Energy &
Environmental Affairs
100 Cambridge Street, Suite 900,
ATTN: MEPA OFFICE
Boston, MA 02114

RE: NPC/SFEIR Review EOEEA #15990
NEW BEDFORD. South Coast Renewables,
LLC (FKA Parallel Products of New
England) at 100 Duchaine Boulevard

Dear Secretary Card,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Notice of Project Change (NPC)/Supplemental Final Environmental Impact Report Form (SFEIR) for the South Coast Renewables, LLC (FKA Parallel Products of New England) Project at 100 Duchaine Boulevard, New Bedford, Massachusetts (EOEEA # 15990). The Project Proponent provides the following information for the Project:

An Affiliate of the Proponent, SMRE 100 LLC owns the properties located at 100 Duchaine Boulevard, New Bedford, MA. Prior to the purchase of the 100 Duchaine Boulevard site, the Proponent operations were located at 969 Shawmut Avenue, New Bedford.

Subsequent to the purchase of the site, the Proponent has relocated its operations from Shawmut Avenue to 100 Duchaine Boulevard, New Bedford.

Selected sheets of the plan set that depict design features that are addressed as required by the FEIR Certificate, including revised Phase 2 design plans, are included in this NPC-SFEIR when the specific design features are discussed in the text. Full-sized drawings with revisions to the Phase 2 design plans are included as Exhibit 6. For reference, full-sized versions of the Phase 2 design plans previously submitted with the FEIR are included as Exhibit 7 for ease of reference.

The proposed project (Phase 1 and Phase 2) is to be located at 100 Duchaine Boulevard, New Bedford. The site is an approximate 71-acre parcel identified by the New Bedford Tax Assessor as Lot 5 on Assessor's Plat 134. The site to be developed is located within a zoned Industrial C area. A locus plan of the site is included as Figure 2-1, presented on the following page. The site is located within the New Bedford Business Park. The site was previously owned by Multilayer Coating Technologies, and before that by the Polaroid Corporation. The site was used by both previous owners to manufacture film. The site as developed by Polaroid included access

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roads, parking areas, stormwater management features and numerous buildings. Existing conditions of the site are presented in Figure 2-2, Figure 2-3, and Figure 2-4 on the following pages. The Site Plans include dimensions of existing and proposed buildings as requested in the Secretaries DEIR Certificate. Additional plans have been added to the plan set to delineate wetland areas and impervious surfaces for the existing site. The Proponent intends to utilize the existing infrastructure to the fullest extent possible in developing the proposed project.

The site, as purchased by the Proponent affiliates included a 92,220 square foot building. A 27,500 square foot glass processing building has been constructed as part of the Phase 1 project development. This building was completed in January of 2020, and the Proponent moved their operations over to the facility in February of 2020. With the construction of the glass processing building, the two buildings have a combined total of 119,720 square feet. Existing wetland areas and areas of impervious surfaces are shown on Figure 2-2 presented on the following pages. Under predevelopment existing conditions, the site has 876,331 square feet of wetlands and 771,119 square feet of impervious surfaces. The total area of the site is 71 acres (3,092,760 square feet). Impervious lot coverage is approximately 25%.

Wetlands. The Proponent has identified the need to file with the New Bedford Conservation Commission for work that will take place in the Buffer Zone.

Underground Injection Control. The Proponent acknowledges the Project is subject to the requirements of the Underground Injection Program.

Wastewater. The Proponent should contact the New Bedford Department of Public Infrastructure Industrial Pretreatment Program to determine any need of permitting for any non-sanitary wastewater that will be discharged into sewer system

Drinking Water Program. The Proponent is reminded that Cross Connection devices will be necessary where there is a potential for backflow into the Public Water Supply system. The New Bedford Department Public Infrastructure manages the Cross Connection Program. The Cross Connection regulations can be found here: <https://www.mass.gov/doc/310-cmr-2222-cross-connection-regulations-0/download>

Bureau of Waste Site Cleanup Comments

Based upon the information provided, the Bureau of Waste Site Cleanup (BWSC) searched its databases for disposal sites and release notifications that have occurred at or might impact the proposed Project area. A disposal site is a location where there has been a release to the environment of oil and/or hazardous material that is regulated under M.G.L. c. 21E, and the Massachusetts Contingency Plan [MCP – 310 CMR 40.0000].

There are no listed MCP disposal sites located at or in the vicinity of the site that would appear to impact the proposed Project area. Interested parties may view a map showing the location of BWSC disposal sites using the MassGIS data viewer (Oliver) at:

http://maps.massgis.state.ma.us/map_ol/oliver.php Under “Available Data Layers” select “Regulated Areas”, and then “DEP Tier Classified 21E Sites”. MCP reports and the compliance status of specific disposal sites may be viewed using the BWSC Waste Sites/Reportable Release Lookup at: <https://eeaonline.eea.state.ma.us/portal#!/search/wastesite>

The Project Proponent is advised that if oil and/or hazardous material are identified during the implementation of this Project, notification pursuant to the Massachusetts Contingency Plan (310 CMR 40.0000) must be made to MassDEP, if necessary. A Licensed Site Professional (LSP) should

be retained to determine if notification is required and, if need be, to render appropriate opinions. The LSP may evaluate whether risk reduction measures are necessary if contamination is present. The BWSC may be contacted for guidance if questions arise regarding cleanup

Bureau and Air and Waste Comments

Solid Waste Management. MassDEP Solid Waste staff (Solid Waste) has reviewed the Notice of Project Change and Supplemental Final Environmental Impact Report (“NPC/SFEIR”) for the South Coast Renewables, LLC (FKA Parallel Products of New England) Project at 100 Duchaine Blvd in New Bedford (“Project” or “Site” or “facility”) EEA No. 15990.

Based on its review of the NPC/SFEIR for the South Coast Renewables, LLC (FKA Parallel Products of New England) Project at 100 Duchaine Blvd, EEA No. 15990, the Massachusetts Department of Environmental Protection (MassDEP) Solid Waste Management Section has determined that the Proponent has adequately addressed its comments previously provided in the Final Environmental Impact Report except where comments have been expanded and/or reiterated as discussed below.

1. MassDEP advised the Proponent to schedule a pre-application meeting to discuss previously provided comments. Additional detail will be required in the site assignment (BWP SW 01) permit application and authorization to construct (BWP SW 05) permit application should the Project site receive a positive site determination from the MassDEP and be granted a site assignment by the City of New Bedford Board of Health.
2. *Traffic:* MassDEP would like to note the following:
 - a. Potential impacts to delay time and queue lengths at some study area intersections under the 2028 Build conditions.
 - b. Potential impacts to volume-to-capacity (v/c) ratio for some study area intersections under the 2028 Build conditions.

During permitting process, MassDEP may require the Proponent to consider monitoring traffic levels and perform a post-development traffic impact study to determine if the actual traffic volumes are consistent with what was evaluated in the traffic study.

3. *Noise:* MassDEP would like to note the following:
 - a. Additional information and details will be required in MassDEP permit application submittals.
 - b. As part of the revised design included in the FEIR, a noise wall was proposed at end of rail spurs to mitigate noise associated with rail operations. However, the noise wall is no longer proposed in the SFEIR. The Proponent provided rationale as to why the noise wall is no longer proposed including, but not limited to, that locomotive activity is expected only once per day. The Proponent did not appear to consider noise associated with moving full railcars from the building to the rail spurs and moving empty railcars from the rail spurs into the building, which will occur throughout the day as part of regular operations. For this reason and others, MassDEP would like to discuss a noise wall in detail during pre-application.
 - c. The Bureau of Air and Waste Solid Waste section requested additional justification why July 3, 2018 sound data was excluded in comment 10.d. In their response, the Proponent appears to maintain that the July 3, 2018 data should be excluded.

MassDEP would like to advise the Proponent that it does not agree with the reasoning to exclude the data. MassDEP recommends that the Proponent revise the sound study to include the July 3, 2018, data in any subsequent sound study submitted to MassDEP as part of the site assignment permit application.

- d. Pursuant to 310 CMR 7.00 Air Pollution Control Section 7.10: U Noise, MassDEP regulates all sounds emanating from a solid waste facility operation, including waste delivery vehicles on-site and outside the building. MassDEP previously commented that the Proponent should revise their sound study to include waste delivery vehicles. The revised sound study presented in the FEIR and SFEIR did not appear to evaluate waste delivery vehicles as a sound source – except independently using the Federal Highway Administration (FHWA) Traffic Noise Model (TNM). During MassDEP permitting, the Proponent must demonstrate that the sound study evaluates the cumulative noise impacts from the proposed Project, including waste delivery vehicles on-site both inside and outside the building.
 - e. MassDEP asks that as part of the site assignment permit application, the Proponent prepare noise isopleth maps to depict No Build and Build (with and without mitigation) noise levels in the Project area.
 - f. It should be noted that a complete noise analysis was presented in the FEIR, however the noise analysis in the SFIER mainly consisted of a response to comments. Since there have been changes to the Project including eliminating the biosolids facility and the rail sound wall, the noise analysis in the FEIR may not entirely applicable. MassDEP requests further presentation of data and discussion of the modeled impacts as part of the site assignment permit application. The Proponent will be required to mitigate sound impacts to the maximum extent practical using a Best Available Control Technology (BACT)-like approach. See the MassDEP's AQ Sound at this link for guidance:
4. *Environmental Justice:* MassDEP would like to note the following:
- a. As part of MassDEP's Solid Waste permitting processes for SW01, the Proponent will be required to conduct robust outreach activities that enhance public participation opportunities as established in the most recent Environmental Justice (EJ) Policy. MassDEP intends to develop a Public Involvement Plan (PIP) that will enhance community enhancement and meaningful public involvement.
 - b. MassDEP will consult with the Proponent to assist with the development of the DEP-produced PIP. The Proponent will be responsible for developing the related Fact Sheets in consultation with the community. It is recommended that draft Fact Sheets be shared with the community/advocates to included them in the process. This will ensure the community understands the document and allows them to weigh in and be a part of the process. It also ensures that documents are not written in technical/scientific terms but in plain language that is easily understood.
 - c. This effort will be helpful in identifying the hard-to-reach populations. Engaging with the community and this Project's advocates will ensure those impacted are part of the conversation. The Proponent should rely on the community/advocates to help identify others that should be part of the conversation. The development of any educational materials produced by the Proponent must be in plain language to ensure the community understands the Project and can participate fully in the process. Meaningful public involvement ensures collaboration with the community and can help to identify:

- Location (virtual or in-person)
- Date of public meetings, if applicable.
- Time of meeting
- Information Repositories
- Posting of Notices in Traditional and Non-English media outlets

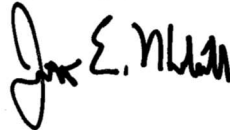
MassDEP recommends that the Proponent consult MassDEP's Environmental Justice Director at deneen.simpson@mass.gov to identify and coordinate outreach activities that meet the EEA EJ Policy.

If you have any questions regarding the Solid Waste Management Section comments above, please contact Mark.Dakers@mark.dakers@mass.gov or (508) 946-2847.

Other Comments/Guidance

The MassDEP Southeast Regional Office appreciates the opportunity to comment on this proposed Project. If you have any questions regarding these comments, please contact George Zoto at George.Zoto@mass.gov or Jonathan Hobill at Jonathan.Hobill@mass.gov.

Very truly yours,



Jonathan E. Hobill,
Regional Engineer,
Bureau of Water Resources

JH/GZ

Cc: DEP/SERO

ATTN: Millie Garcia-Serrano, Regional Director
Gerard Martin, Deputy Regional Director, BWR
John Handrahan, Acting Deputy Regional Director, BWSC
Seth Pickering, Deputy Regional Director, BAW
Jennifer Viveiros, Deputy Regional Director, ADMIN
Daniel Gilmore, Chief, Wetlands and Waterways, BWR
Deneen M. Simpson, Environmental Justice Director & Program Manager/Boston
Daniel Gilmore, Wetlands and Waterways, BWR
Mark Dakers, Chief, Solid Waste, BAW
Elza Bystrom Solid Waste, BAW
Alison Cochrane, Solid Waste, BAW
Thomas Cushing, Chief, Air Quality Permitting, BAW
Allen Hemberger, Site Management, BWSC



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Secretary & CEO



August 22, 2022

Bethany A. Card, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: New Bedford – 100 Duchaine Boulevard – SFEIR
(EEA #15900)

ATTN: MEPA Unit
Alexander Strycky

Dear Secretary Card:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Supplemental Final Environmental Impact Report filed for the recycling and waste processing facility project formerly referred to as “Parallel Products of New England” in New Bedford as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please contact J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (857) 368-8862.

Sincerely,

David J. Mohler
Executive Director
Office of Transportation Planning

DJM/jll

cc: Jonathan Gulliver, Administrator, Highway Division
Carrie Lavalley, P.E., Chief Engineer, Highway Division
Mary-Joe Perry, District 5 Highway Director
James Danila, P.E., State Traffic Engineer
Southeastern Regional Planning and Economic Development District (SRPEDD)
Planning Department, City of New Bedford



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Secretary & CEO



MEMORANDUM

TO: David J. Mohler, Executive Director
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E., Manager
Public/Private Development Unit

DATE: August 22, 2022

RE: New Bedford – 100 Duchaine Boulevard – SFEIR
(EEA #15900)

The Public/Private Development Unit (PPDU) has reviewed the Supplemental Final Environmental Impact Report (SFEIR) for the recycling and waste processing facility formerly referred to as “Parallel Products of New England” in New Bedford (the “Project”) submitted by Green Seal Environmental, LLC on behalf of the new ownership South Coast Renewables, LLC (collectively, the “Proponent”).

This SFEIR is intended to address commentary from the FEIR Certificate issued April 2, 2021, which identified additional information required in order to find that the Project complied with the Massachusetts Environmental Protection Act (MEPA).

MassDOT originally provided commentary regarding this Project in a comment letter on the Expanded Environmental Notification Form (EENF) in March 2019. The two phases of the Project were together anticipated to generate 418 truck trips, which could be reduced by up to 110 truck trips if a proposed rail access were established for the site. MassDOT offered no objection to the Phase 1 Waiver sought by the Proponent and recommended Transportation Demand Management (TDM) measures intended to reduce single-occupancy vehicle trips by employees to and from the Project site. These recommendations have been included in the Draft Section 61 Findings included in the SFEIR, including the provision of a striped bicycle lane on Duchaine Boulevard and sharrows on Theodore Rice Boulevard, contingent upon City’s approval.

The SFEIR includes an updated Transportation Impact Analysis (TIA) which includes a reduced truck trip estimation of 328 total daily truck trips under conservative projections in which all outbound material from the Project site is transported by truck rather than rail and without the use of “backhauls.” The Project is anticipated to include 150 employees, representing an additional 300 vehicle trips per day.

The updated TIA reports that under normal traffic operations, Project-generated trips are not anticipated to result in substantial decreases in Level of Service (LOS) at study area intersections. Right turns from the Route 140 Southbound ramps onto Braley Road are

anticipated to decline from LOS B to LOS C (0.7 seconds of additional delay) and right turns from Braley Road to Phillips Road are anticipated to decline from LOS A to LOS B (0.3 seconds of additional delay) under the 2028 Build condition as compared to the No-Build Condition. Left turns from both northbound and southbound Route 140 ramps are anticipated to operate at LOS F under both 2028 No-Build and Build conditions. Substantially longer delays (214.6 seconds and 460.8 seconds) are anticipated during peak hours, including during dismissal and arrival at the nearby Casimir Pulaski Elementary School and shift changes at the New Bedford Business Park. MassDOT requests that the Proponent schedule truck deliveries and departures to occur during off hours and avoid periods of maximum congestion.

Given that anticipated Project transportation impacts have not increased since the filing of the original FEIR, that said impacts do not appear to significantly degrade conditions at surrounding roadways and intersections if truck trips are scheduled during off-peak hours, and that the Proponent has committed to congruent mitigation, MassDOT recommends that no further environmental review for transportation impacts be required. The Proponent should continue dialogue with the City of New Bedford and appropriate MassDOT units, including District 5 and Highway Safety, in order to complete mitigation and minimize traffic impacts during construction and operation. If you have any questions, please contact *curtis.b.wiemann@dot.state.ma.us*.

From: [Michele O'Leary](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 1:09:45 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

[https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

[https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Michele O'Leary

mickeymariah@aol.com

901 May Street

New Bedford , Massachusetts 02745

From: [Michele O'Leary](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 1:09:03 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

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Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

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MOU with Brockton and Fall River:

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Michele O'Leary

mickeymariah@aol.com

901 May Street

New Bedford , Massachusetts 02745

From: [michelle perry](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 2:02:03 AM

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

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City of New Bedford
MASSACHUSETTS

OFFICE OF THE CITY CLERK
133 WILLIAM STREET
NEW BEDFORD, MA 02740-6182
Tel: 508-979-1450 • Fax: 508-991-6225

DENNIS W. FARIAS
CITY CLERK

STEPHANIE MACOMBER
ASSISTANT CITY CLERK

SUSAN M. HENRIQUES
ASSISTANT COUNCIL CLERK

August 22, 2022

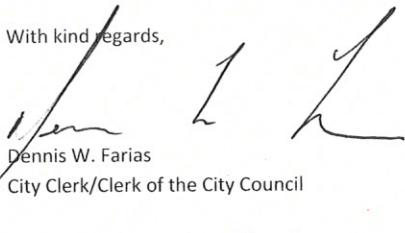
Tori Kim
Director
Mass. Environmental Policy Act
100 Cambridge St., Suite 900
Boston, MA 02114

Dear Ms. Kim:

I am writing to inform you that at a meeting held on August 18, the New Bedford City Council Adopted a Written Motion sponsored by Councillors Gomes, Giesta, Lima, Abreu, Morad, Markey, Baptiste and Carney, "Requesting, that the Committee on Appointments & Briefings hold a meeting with Officials from Parallel Products, the Mitchell Administration and the City Solicitor for the purpose of (them) explaining the agreement that the Mayor entered into with Parallel Products (on behalf of the City), which allows Mr. Tim Cusson, CEO of Parallel Products, to move forward with the construction plan in the New Bedford Business Park; and further, that the Committee receive an explanation as to why the residents of the Pine Hill and Sassaquin areas were not notified before the signing of this agreement, which will affect the quality of life for the residents and businesses in the area for many years to come. And further requesting, that the Administration provide the City Council and the affected residents and business owners in the area with an explanation on how this agreement of receiving \$800,000 per year will benefit the abutting area and the City; and whereas the New Bedford City Council signed onto a letter submitted to MEPA on May 10, 2021, along with Mayor Jon Mitchell, expressing strong opposition to the establishment of a glass/solid waste/biosolids processing facility to be operated by Parallel Products at 100 Duchaine Boulevard. Although changes have been made to the project proposal, the City Council will send a letter (to MEPA) expressing its continued opposition to this project in its entirety due to the detrimental impact it would have on the residents, businesses and the community of New Bedford. The City has been subjected to multiple environmental injustices and this project will, in fact, be another one; and furthermore, the City Council would also like to state its opposition to the City's Host Agreement entered into with Parallel Products, and that the New Bedford City Council was unaware of any agreement, as it was entered into solely by Mayor Jon Mitchell."

As such, the Council respectfully requests your support and assistance in its effort to bring about a positive resolution to this important matter. On behalf of the entire City Council, I thank you for your time and attention. Please feel free to contact me directly should you or your office require additional information.

With kind regards,



Dennis W. Farias
City Clerk/Clerk of the City Council

cc: Brian K. Gomes, Councillor at Large
Maria E. Giesta, Councillor Ward Two
Scott J. Lima, Councillor Ward Five
Ian Abreu, Council President
Linda M. Morad, Councillor at Large
Brad Markey, Councillor Ward One
Derek Baptiste, Councillor Ward Four
Naomi R.A. Carney, Councillor at Large
File

From: oriang375@gmail.com
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 12:39:50 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
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The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

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[https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

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Mass.gov Environmental Health:

[https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

oriang375@gmail.com

4 A Martin Street

Maynard, Massachusetts 01754

From: [Peter Fuller](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 9:52:15 AM

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Peter Fuller

pgf_99@yahoo.com

70 White Banks Road

Middleborough, Massachusetts 02346



THE GENERAL COURT OF MASSACHUSETTS
STATE HOUSE, BOSTON 02133-1053

August 22, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - **EEA No. 15990**
100 Cambridge Street, Suite 900
Boston, MA 02114

To whom it may concern,

We write to you today sharing our concern regarding the potential impact that the expansion of the Parallel Products facility in the New Bedford Industrial Park may have on the local community. The City of New Bedford, and specifically the neighborhoods surrounding the industrial park are designated as Environmental Justice Area's by the State of Massachusetts. Furthermore, the City of New Bedford fulfills the qualifications of an Environmental Justice Area under all three metrics including race, income, and language isolation. The state has deemed New Bedford an area that is at high risk for being taken advantage of by industrial projects such as this.

The purpose of Environmental Justice Areas is the protection of at-risk communities like New Bedford. The official Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs, signed on June 24, 2021, states, "working with these EJ populations, EEA will take direct action as part of the implementation of this Policy ... to address environmental and health risks associated with existing and potential new sources of pollution, to appropriately address climate change, and to improve overall quality of life". Furthermore, Article 97 of the Massachusetts Constitution states, "The people shall have the right to clean air and water, freedom from excessive and unnecessary noise, and the natural, scenic, historic, and esthetic qualities of their environment; and the protection of the people in their right to the conservation, development and utilization of the agricultural, mineral, forest, water, air and other natural resources is hereby declared to be a public purpose." It is well established that the Commonwealth has a legal obligation to protect Environmental Justice Areas with heightened vigilance and standards.

While the perceived environmental impact of the current proposal may be within regulatory standards the cumulative environmental damage New Bedford has sustained is intolerable. Throughout the 20th century private companies dumped PCBs into the Acushnet River and subsequently New Bedford Harbor leading to the largest EPA cleanup in the country. Additionally, New Bedford High School was revealed as another contamination site exposing the city's youth to dangerous levels of PCBs. Just this year the Bliss Corner neighborhood on the New Bedford-Dartmouth border is experiencing a massive clean-up entailing the removing of contaminated soil.

Parallel Products' own Environmental Impact Report takes note of the increased presence of health conditions when compared to state averages in the same neighborhoods where this proposed plan would take place. The people living in this area already suffer from pediatric asthma, asthma hospitalizations, cancer and COPD. The Environmental Impact Report does not hide the fact that as a result of the new additions there will be an unescapable increase in air pollution. Dust and emissions will be filling the lungs of people who already suffer from chronic respiratory illness at a far higher rate than their neighbors in predominantly white towns.

This may be an acceptable cost of doing business for Parallel Products, but we urge you to consider the impact this may have on people's lives, health, and families. It is a well-documented that the industries and institutions that are the most dangerous are traditionally housed in marginalized neighborhoods. This is evident by the troubling history of environmental mismanagement and disaster in New Bedford. We write to you today to ask that we break that tradition of abuse. New Bedford has suffered enough, and the people here are tired of the smog. They are tired of the sickness. They are tired of their pleas falling on deaf ears.

Please do not hesitate to contact us with any questions or concerns.

Sincerely,



Christopher Markey
9th Bristol District



William Straus
10th Bristol District



Paul Schmid
8th Bristol District



Christopher Hendricks
11th Bristol District



Tony Cabral
13th Bristol District

From: roslynf@rcn.com
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 2:32:01 PM

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The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

roslynf@rcn.com

1501 Beacon St., Apt 806

Brookline, Massachusetts 02446

From: [Sabrina Davis](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 10:41:15 PM

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- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Sabrina Davis

sab.cndavis@gmail.com

56 hamlet street

Fall River , Massachusetts 02724

From: sarah@massclimateaction.net
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 10:55:19 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

sarah@massclimateaction.net

35 Crescent Street, Apt 620

Waltham, Massachusetts 02453

From: [Seth Evans](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 12:35:58 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

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Northeastern University Environmental Justice Study:

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Seth Evans

setherkim@verizon.net

393 Lee St.

Brookline, Massachusetts 02445

From: [Staci Rubin](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 8:06:05 AM

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Attn: MEPA Office
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100 Cambridge Street, Suite 900
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Staci Rubin
SRubin@clf.org
62 Summer Street
Boston, Massachusetts 02110

From: [Steven Wenner](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 22, 2022 8:30:55 PM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
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The basis of these findings are as follows:

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- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

[https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

Mass.gov Environmental Health:

[https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

[_ga=2.95911068.1096081429.1660317004-416828808.1658765318](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Steven Wenner

srwenner@verizon.net

195 Hull Street

Cohasset, Massachusetts 02025

From: [sylvia.staub](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Monday, August 22, 2022 3:53:55 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

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20 bayon drive, apt. 109

south hadley, Massachusetts 01075

August 22, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Comments on EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

I have written previously in response to the DEIR and FEIR filed by Parallel Products of New England, now d/b/a South Coast Renewables, LLC, for EEA Number 15990, and although the company, which I will refer to as Project Proponent going forward, has removed the biosolids processing plan from the project at this time, I write again now to state that I remain steadfastly opposed to it for many reasons, which I will outline for you as follows:

The most important issue that I feel needs to be highlighted is the clear and blatant violations to environmental justice policies this company has repeatedly committed.

In Massachusetts a community is identified as an Environmental Justice community if any of the following are true:

- Block group whose annual median household income is equal to or less than 65 percent of the statewide median (\$62,072 in 2010); or
- 25% or more of the residents identify as a race other than white; or
- 25% or more of households have no one over the age of 14 who speaks English only or very well - English Isolation

This definition can be found on the state government's website, at: <https://www.mass.gov/info-details/environmental-justice-communities-in-massachusetts>

An interactive map is also available, which clearly outlines the area in and surrounding the proposed site as an environmental justice community, based upon the criteria that 25% or more of the residents identify as a race other than white: http://maps.massgis.state.ma.us/map_ol/ej.php

Under state Executive Office of Energy and Environmental Affairs guidelines, Environmental Justice populations have been “determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable.”

Demonstrated lack of community outreach, engagement and access by Project Proponent

As has been done in the past, the Project Proponent performed bare minimum efforts to contact and inform members of the community, stakeholders, most elected local officials, and community advocacy groups of project updates, the filing of their Supplemental Final Environmental Impact Report (SFEIR), and any informational meetings they were hosting. Registration was required prior to each of their virtual community meetings, which were held AFTER their SFEIR was submitted, and registration had to be done through their website, which was provided only in English. Registrants who indicated they needed interpreters for the meetings were not able to specify the language for which they needed services during registration, and when this was mentioned during the first meeting on August 3, 2022, the Project Proponent responded by saying that those requests were made with too short notice (24 hours) to accommodate. Instead, translated fact sheets were sent to some community members one week after the first community information meeting.

A second and seemingly impromptu community meeting was held on August 18th, 2022, since only certain members of the community were advised of the meeting, with notice of a week or less. Many residents and all City Councilors were not able to attend due to a scheduling conflict with a City Council meeting held that same night and time.

During both virtual meetings, the chat function was set so that attendees could not see anything other attendees posted or asked in the chat. Also, everyone's microphones were muted and controlled by the meeting facilitator, a representative of the Project Proponent. A slideshow presentation was given for the first 40 minutes or so of each of the 60-minute meetings, allowing for minimal participation from attendees. It's safe to say that these meetings have not been planned or conducted with the intent of accommodating a community made up of many non-English speaking, elderly, and working-class residents,.

Another glaring way in which the community has been excluded from any of the decision-making for a project that they will be the most impacted by is the host agreement that was negotiated and entered into between the Project Proponent and the Mayor of New Bedford, Jon Mitchell. The community was blindsided with this news by a press release made by the mayor just days before the Project Proponent submitted their SFEIR, adding insult to injury.

Lack of transparency and compliance with proper procedure by Project Proponent

Incorporated into the SFEIR was a Notice of Project Change (NPC), advising MEPA (and any other interested parties or stakeholders) that the biosolids portion of the project was being shelved, and the building in which solid waste would be delivered and handled would be significantly expanded in size. The proper procedure should have been for the Project Proponent to submit a NPC first, triggering its own 20-day public comment period and a response from MEPA, and then the Supplemental Report should have been submitted, with any MEPA-approved NPC conditions incorporated, followed by a separate 30-day public comment period and MEPA response. By including the NPC in the SFEIR, the Project Proponent combined two processes into one, thereby circumventing protocol and consolidating two separate comment periods into one shorter period.

Another way in which the Project Proponent has failed to comply with the MEPA process is by not including the Public Involvement Plan (PIP) outline in their SFEIR, which was a required and specified condition in the Secretary's Certificate FEIR SCOPE. While the full PIP is a requirement in the DEP step of this application process, an outline was specifically requested by the Secretary, and it was acknowledged by not executed by the Project Proponent.

It should also be noted that the only point of contact in the MEPA office that the public is aware of has been absent from work during the week prior to the public comment period deadline, limiting the public's ability to ask any questions about the process prior to the deadline. Also, it stands to reason that this person will not begin reviewing the comments until after they return, which gives them a short period of time to read through the letters, conduct any necessary research, and address the concerns raised prior to issuing the official response.

All of these things compound the lack of trust this community has had all along in the process, and the feeling of continued marginalization and exploitation. As a gesture of good faith to mitigate this, the public comment period deadline should be extended.

Details of this project which raise concerns for the health, safety and sanctity of this community

Additional truck traffic

The reported addition of 400+ truck trips per day (a number which seems to vary between project documents) on these already congested, unmaintained and unrepaired local roads significantly raises the risk of accidents, which in turn, increases the risk of property damage, bodily injury and even death for the citizens living and traveling in the area. This is especially worrisome for children who attend the

elementary school less than a mile away, located on Braley Road. The neighborhoods through which they'll travel will also be exposed to the pollution caused by these diesel vehicles.

Proposals to "ban" the trucks from traveling on Philips Road to and from the facility (as suggested in the host agreement) are not legally enforceable and therefore do not guarantee that the health and safety of the community members will be protected.

Air quality

Construction of this facility would entail the excavation of a site that has previously been contaminated (and not remediated) by the former occupant, Polaroid. This will undoubtedly stir, kick up and circulate toxics from the contaminated soil, exposing people to dangerous chemicals, all of which will cause health issues for citizens living and working nearby and children attending the local elementary school.

In its project filings, the Project Proponent refers to subsurface investigation studies conducted in 2014 and 2016, indicating that the results rendered were acceptable, however, it should be noted that:

1. The results are not provided or found anywhere and therefore that claim cannot be substantiated, and
2. Those studies would no longer valid, as the standards for such investigations were updated in the 2019 [Massachusetts Contingency Plan](#) to include testing for PFAS (per-and polyfluoroalkyl substances).

There are more than 80,000 chemicals in the USA, most of which are never tested for health impacts. Recently, a national movement has pointed out a new chemical that should be banned, like asbestos and PCBS- it's called PFAS. PFAS is a category of chemicals containing multiple fluorine atoms that bond to a chain of carbon atoms and **is incredibly toxic to human health**. There are thousands of these chemicals used in business and in the consumer market. Most easily able to bioaccumulate in air-breathing organisms, PFAS are absorbed by plants, animals, and people. Chemical manufacturers like DuPont and 3M have [covered up evidence](#) of the negative human and environmental impacts of PFAS since the 1960s. But mounting research [links](#) PFAS to a wide range of health problems.

Studies of the best-known PFAS, called PFOA and PFOS, show links to kidney cancer and testicular cancer, as well as human endocrine disruption targeting the liver and thyroid. Other health reports associated w/ PFAS chemicals include metabolic & developmental effects, neurotoxicity and immunotoxicity. This facility would be built on land that was the site of several chemical spills in the past. Excavating that soil could release PFAS into the air of New Bedford, and be carried as far and wide as the wind can travel, impacting all of New Bedford and the surrounding communities. Given what is now coming to light about the toxicity of these chemicals, the Project Proponent should be required to conduct new studies on the soil located at that property.

Water quality

As part of the daily business operations, this facility (and/or the trucks traveling to and from it) will inevitably produce wastewater that updated project filings claim will be captured in tight tanks and trucked off site **OR** discharged into the City of New Bedford's sewage system, which already has problems with overflow during certain times of year and weather. Additionally, leachates from the trucks traveling through our community will leak onto the ground, and studies conducted show this contains more than 50 PFAS. This places the local water ways and resources at risk, and the verbiage, if approved as written, allows the Project Proponent to use whichever method they choose, which will most likely be the easiest and least costly option. Either way, the community pays the ultimate cost with their health.

I think it's vital that we also address the smokescreen narrative touted by the Project Proponent and its supporters. The claim this will help solve the waste crisis in the Commonwealth, and that "these types of facilities are needed and have to be built and operated SOMEWHERE," is absolutely false. The truth is, THIS type of facility is NOT needed, for anything other than to make this company money. This facility will only perpetuate the waste crisis, not help improve it. The more waste produced and delivered to the facility, the more money they can make. It will bring waste into New Bedford, already overburdened with pollution, from other cities and towns in the Commonwealth, to be sifted through so that a small amount of

viable recyclables can be extracted from it, and the remaining waste (easily 90% or MORE of what comes into the facility) will be shipped out to landfills or gasification facilities to be burned. This project is just a trash transfer station, and will make New Bedford the regional trash depot – a “layover” in the waste’s travel to its final destination.

Because so much is NOT known about long-term effects of these kinds of business operations on a residential community OR the environment, I think it is the responsibility and obligation of any agency of authority, when considering approval of such a business, to exercise the precautionary principle: “the principle that the introduction of a new product or process whose ultimate effects are disputed or unknown should be resisted”. If you cannot guarantee protection of the health and safety of the local residents, or their homes and property, the accountability rests on YOU to not allow them to be put in harm’s way to begin with.

The existing facility owned and operated at that location is already causing disruption to the quality of life for residents in the area, in the forms of noise and light pollution, and additional truck traffic to already highly traveled roads. This renders no cause to believe or hope that things will get any better if they are allowed to expand, only worry and stress about what’s to come. The citizens of this community deserve better. I believe that the proponent of this project needs to provide more substantial information, proving how they will not mitigate, but rather, PREVENT the construction and 24/7 operation of this facility from having a negative impact on the community. They’ve already proven in their host agreement with the city and their project filings with the term “unquantifiable impacts” that they are not capable of predicting the impacts, and therefore cannot guarantee preventing them.

I call upon you, as an agent tasked with protecting the public, to hold the Project Proponent to the highest standards and requirements possible, to protect this community from further pollution, corruption, marginalization and exploitation.

Sincerely,

A handwritten signature in black ink that reads "Wendy Morrill". The signature is written in a cursive, flowing style.

Wendy Morrill, President
South Coast Neighbors United
Resident of New Bedford

From: [Andrea Stone](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 10:44:50 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
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- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
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- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
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Andrea Stone

AndreaStone12@gmail.com

1123 Sassaquin Ave

New Bedford , Massachusetts 02745

From: [Andrea Stone](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 10:43:38 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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Andrea Stone

andreastone12@gmail.com

1123 Sassaquin Ave

New Bedford, Massachusetts 02745

From: [Betsy Sowers](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 8:46:26 PM

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Attn: MEPA Office
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Betsy Sowers

revbetsy1@gmail.com

48 Sandtrap Cr.

Wrymouth, Massachusetts 02190

From: [Candace Vaughan](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 8:30:41 PM

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Alex Strysky - EEA No. 15990
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Candace Vaughan

luvpiink285@gmail.com

160 Aquidneck St

New Bedford, Massachusetts 02744

From: [Carlee Moser](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 9:45:14 PM

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Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
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Carlee Moser

carlee.moser@gmail.com

4 trayer rd

Canton, Massachusetts 02021

From: [Cynthia Blanchette](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 6:49:19 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

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Cynthia Blanchette

clblanchette@comcast.net

242 Richmond St

New Bedford, Massachusetts 02740

From: [Cynthia Roy](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 5:48:49 PM

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

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Cynthia Roy

cindyanneroy@gmail.com

63 calumet st

New Bedford , Massachusetts 02744

From: [Dianne Bolen](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 10:15:49 AM

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Attn: MEPA Office
Alex Stryisky - EEA No. 15990
100 Cambridge Street, Suite 900
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Email: alexander.stryisky@mass.gov

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Dianne Bolen

graced0213@gmail.com

98 Midland Rd

Somerset, Massachusetts 02726

From: [Emily Follett](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 4:27:03 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

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Emily Follett

emily.follett@gmail.com

114 Heritage Dr

New Bedford , Massachusetts 02745

From: [Fran Ludwig](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 3:04:48 PM

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Fran Ludwig

fludwig12@yahoo.com

19 Wyman Rd.

Lexington , Massachusetts 02420

From: [Ida Almeida](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 9:25:30 AM

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Ida Almeida

ialmeida@umassd.edu

549 Cottage St

New Bedford, Massachusetts 02740

From: [Jadilyn Kagan](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 4:21:20 PM

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https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Jadilyn Kagan

sunnydreams77@gmail.com

314 North Front Street

New Bedford , Massachusetts 02746

From: [Karen Chin](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 23, 2022 7:18:13 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Karen Chin

karen.a.chin@gmail.com

26 Garrison Road

New Bedford , Massachusetts 02745

From: [Kelly Haggerty](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 5:28:59 PM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
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Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
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Kelly Haggerty

khaggerty86@gmail.com

85 Fairmount St

New Bedford, Massachusetts 02740

From: [Laura Orlando](#)
To: [Strycky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 7:03:21 AM

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Secretary of Energy and Environmental Affairs
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Attn: MEPA Office
Alex Strycky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

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The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
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Laura Orlando

lauraforlando@gmail.com

16 Ackers Terrace

Brookline, Massachusetts 02445

From: [Linda Rose](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 5:02:09 PM

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Secretary of Energy and Environmental Affairs
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Alex Strysky - EEA No. 15990
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- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

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Northeastern University Environmental Justice Study:

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Linda Rose

deblinrose2006@comcast.net

38 Clifford st

Acushnet, Massachusetts 02743

From: [Linda Sullivan](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 2:17:15 PM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
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Linda Sullivan

linsullivan717@gmail.com

243 Crescent View Av D214

Riverside, Rhode Island 02915

From: [Lori Rodrigues](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 23, 2022 2:34:54 PM

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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

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Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

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Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

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New Bedford Resilience Plan: <https://kladashboard->

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Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Lori Rodrigues

l_rod1071@msn.com

13032 Scissorbill Ave

Brooksville, Florida 34614

From: [Michael Niemczyk](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford! We not need here.fall river . Industrial Park has no homes around it it be beneficial to be there
Date: Tuesday, August 23, 2022 2:37:03 PM

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Michael Niemczyk

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123 briarwood dr.

New bedford, Massachusetts 02745

From: [MP Feitelberg](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 23, 2022 5:45:46 PM

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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

MP Feitelberg

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749 Purchase St.

New Bedford, Massachusetts 02740

From: [MP Feitelberg](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 5:37:53 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
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to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

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The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

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Mass.gov Environmental Health:

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

MP Feitelberg

mpfeitelberg@gmail.com

749 Purchase St.

New Bedford, Massachusetts 02740

From: [Raymond D Milici](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 9:06:38 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

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This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

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The basis of these findings are as follows:

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Northeastern University Environmental Justice Study:

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Raymond D Milici

raymilici1199@gmail.com

75 Grey Wolf

Franklin , Massachusetts 02038

From: [Roger Cabral](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 7:03:52 AM

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Mr. Alex Stryisky ,

Secretary of Energy and Environmental Affairs
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Attn: MEPA Office
Alex Stryisky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.stryisky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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Roger Cabral

fourcabrals@comcast.net

12 Westview Dr

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From: [Rosemary Wessel](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 23, 2022 10:04:03 AM

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Mr. Alex Strysky ,

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

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- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Rosemary Wessel

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90 Trow Road

Cummington, Massachusetts 01026

From: [Rosemary Wessel](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 10:04:00 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

[https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?](https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318)

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Mass.gov Environmental Health:

[https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?](https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318)

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Rosemary Wessel

rose@thebeatnews.org

90 Trow Road

Cummington, Massachusetts 01026

From: [Roxanne Boga](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 23, 2022 8:46:25 PM

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Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

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Roxanne Boga

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New Bedford, Massachusetts 02745

From: [Sharon Rua](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 23, 2022 6:20:14 PM

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Sharon Rua

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From: [Sonya Kinney](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Tuesday, August 23, 2022 11:02:04 AM

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Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Sonya Kinney

soleki16@yahoo.com

5 Mattos Ave

Wareham, Massachusetts 02571

From: [Sonya Kinney](#)
To: [Stryisky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 11:00:55 AM

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Mr. Alex Stryisky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Stryisky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.stryisky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

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Sonya Kinney

soleki16@yahoo.com

5 Mattos Ave

Wareham, Massachusetts 02571

From: [Stephanie Marques](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 7:07:36 PM

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Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
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Stephanie Marques

sm122485@yahoo.com

205 Court St

New Bedford, Massachusetts 02740

From: [Tracy Manzella](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 7:54:57 AM

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Attn: MEPA Office
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Tracy Manzella

tmanzella.carc@gmail.com

214 Chestnut Street

Rehoboth, Massachusetts 02769

From: [Veronica Surges](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Tuesday, August 23, 2022 8:57:04 AM

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Veronica Surges

surgesveronica@gmail.com

202 Terrace St

Duluth, Minnesota 55811

From: [Erica Scott](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 24, 2022 8:34:10 AM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
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to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

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Erica Scott

easp3001@gmail.com

55 Devon St

Dorchester , Massachusetts 02121

From: [Tali Smookler](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Wednesday, August 24, 2022 9:21:51 AM

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Mr. Alex Strysky ,

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Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

Supplemental Final Environmental Impact Report (SFEIR):

<https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: [http://s3.amazonaws.com/newbedford-ma/wp-](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

[content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf](http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf)

Neighbors raising a stink over smelly garbage transfer station in Brooklyn:

<https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River:

https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtnD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard->

[clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf](https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf)

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Tali Smookler

tsmookler@uumassaction.org

18 Vermont St

Boston, Massachusetts 02132

From: tsmookler@uumassaction.org
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Wednesday, August 24, 2022 9:21:23 AM

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tsmookler@uumassaction.org

18 Vermont St

Boston, Massachusetts 02132

From: [Bethany Fauteux](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Thursday, August 25, 2022 1:59:10 PM

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- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future,

over 80% to landfill, a very costly and shortsighted approach.

- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
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- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

References:

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Study on PFAS in MSW and Transport Vehicle Leachates:

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Bethany Fauteux

Bethfauteux22@gmail.com

36 Dewolf St

New Bedford, Massachusetts 02740

From: [Raymond D Milici](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Saturday, August 27, 2022 8:50:00 PM

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Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

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Raymond D Milici

raymilici1199@gmail.com

75 Grey Wolf

Franklin , Massachusetts 02038

From: [Ann Dupont](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No Trash Plant in New Bedford!
Date: Sunday, August 28, 2022 1:24:58 AM

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Mr. Alex Strysky ,

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Executive Office of Energy and Environmental Affairs (EEA)
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Ann Dupont

anniedupes@yahoo.com

27 Brigham st

New Bedford , Massachusetts 02740

From: [Christine Manns](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Sunday, August 28, 2022 12:05:32 AM

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Attn: MEPA Office
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100 Cambridge Street, Suite 900
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Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.

- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

References:

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

<https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?>

[_ga=2.65950638.1096081429.1660317004-416828808.1658765318](#)

Mass.gov Environmental Health:

<https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?>

[_ga=2.95911068.1096081429.1660317004-416828808.1658765318](#)

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Christine Manns

jcmanns79@verizon.net

18 Dover Cir

Franklin , Massachusetts 02038

From: [MEPA \(EEA\)](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: FW: EEA #15990
Date: Monday, August 29, 2022 2:10:59 PM

From: Athena Tetrault <atetrault@rosehomesrealestate.com>
Sent: Monday, August 29, 2022 11:07 AM
To: MEPA (EEA) <mepa@mass.gov>
Subject: EEA #15990

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As a concerned resident of a nearby property I am requesting a 30 day extension of the comment period deadline to allow ample time for us citizens to review the nearly 1000 page report.

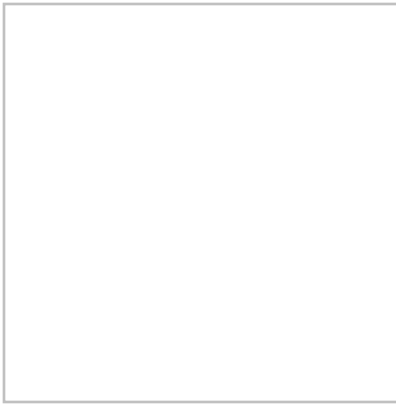
In addition, I was only made aware of this project from outreach through South Coast Neighbors United and the CAPP committee. I was not notified by the company . I strongly believe that this company is in violation of the 2017 Environmental Justice enhanced participation policy.

As a 20yr Realtor, I am deeply concerned about our property values moving ahead. We are considered to be the most desirable section of the city. It is my duty and obligation to alert and inform my buyers of any detrimental effects in the community. Every single buyer decided not to pursue properties in the Pine Hill section due to this project.

This project is not deep into the industrial park. It is feet from the main road and residential homes. While I understand if you purchase near an industrial park you should expect industry, but this project will greatly negatively affect our neighbors.

I'm sure I do not need to tell you about concerns over noise and air pollution, health issues and heavier traffic (project is close to an elementary school).

--



Athena Tetrault

Rose Homes Real Estate/ Laer Realty

Cell: 508-951-0450

From: [Brian Cass](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 29, 2022 8:13:41 AM

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- The Project Proponent lists as one of its community outreach event sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been "determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable." The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

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Brian Cass

bcass@berklee.edu

34 Bryant Ln

Fairhaven, Massachusetts 02719

From: [Jennifer DeBarros](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: No More Environmental Injustice in New Bedford!
Date: Monday, August 29, 2022 12:08:54 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Mr. Alex Strysky ,

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997-page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period.
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days

to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.

- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
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Jennifer DeBarros

jennifer.e.debarros@gmail.com

1990 Shawmut Ave

N Dartmouth, Massachusetts 02747

Date: 8/20/2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future, over 80% to landfill, a very costly and shortsighted approach.
- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?

- The Project Proponent surreptitiously calls their facility a “Green Energy Center” due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent’s de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a “good neighbor” and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State’s recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,

Madeline M. Walsh
(Signature)

Madeleine M. Walsh
(Printed Name)

11 Longview Rd.
(Street Address)

New Bedford MA 02745
(City/Town, State, Zip Code)

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Study on PFAS in MSW and Transport Vehicle Leachates: <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Date: 19 April 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

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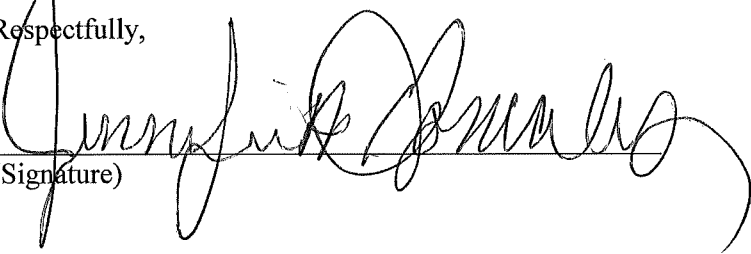
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Respectfully,



(Signature)

JENNIFER CONSOLES

(Printed Name)

59 BRANWELL DR

(Street Address)

NEW BEDFORD MA 02745

(City/Town, State, Zip Code)

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Date: 8/18/22

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Respectfully,

Adriana Kennedy
(Signature)

Adriana Kennedy
(Printed Name)

106 Birchwood Drive
(Street Address)

New Bedford, MA. 02745
(City/Town, State, Zip Code)

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Date: August 18, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

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The reasons for this opposition include but are not limited to the following:

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Respectfully,


 (Signature)

JO-ANNE CHEVALIER
 (Printed Name)

73 Joy Rd.
 (Street Address)

New Bedford, MA 02745
 (City/Town, State/Zip Code)

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Respectfully,

Richard Chevalier
(Signature)

RICHARD CHEVALIER
(Printed Name)

73 Ivy Rd.
(Street Address)

New Bedford MA 02745
(City/Town, State, Zip Code)

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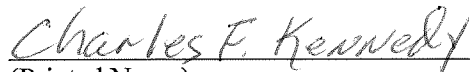
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(Printed Name)



(Street Address)



(City/Town, State, Zip Code)

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Respectfully,


 (Signature)

Bernice Sylvia
 (Printed Name)

102 IVY Rd.
 (Street Address)

New Bedford MA. 02745
 (City/Town, State, Zip Code)

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Respectfully,

Robin A. Grimes

(Signature)

ROBIN A. GRIMES

(Printed Name)

50 BIRCHWOOD DR

(Street Address)

NEW BEDFORD, MA. 02745

(City/Town, State, Zip Code)

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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,

Michelle Torres
(Signature)

Michelle Torres
(Printed Name)

19 Ivy Rd.
(Street Address)

New Bedford, MA 02745
(City/Town, State, Zip Code)

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Date: August 18, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,

Joan J. Poisson
(Signature)

JOAN T. POISSON
(Printed Name)

37 Ivy Rd.
(Street Address)

New Bedford, MA. 02745
(City/Town, State, Zip Code)

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Date: _____

8/19/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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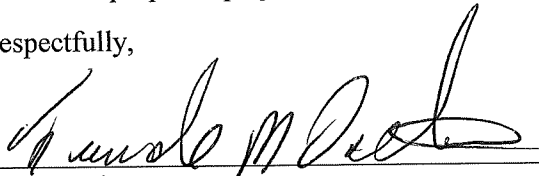
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Respectfully,



(Signature)

Fernando M De Silva

(Printed Name)

18 Birchwood Drive

(Street Address)

New Bedford MA 02745

(City/Town, State, Zip Code)

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Date: 8/20/2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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Respectfully,

Madeleine M. Walsh
(Signature)

MADELINE M. WALSH
(Printed Name)

11 Longview Rd
(Street Address)

New Bedford MA 02745
(City/Town, State, Zip Code)

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Date: August 21, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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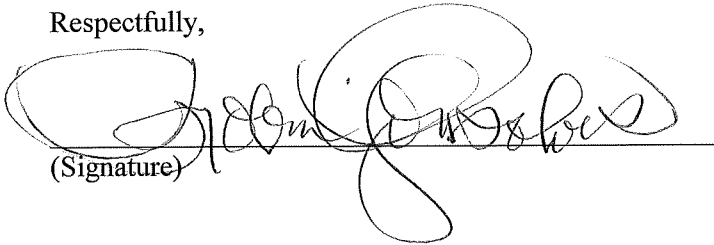
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Respectfully,



(Signature)

Robin Gonsalves
 (Printed Name)

93 Ivy Rd.
 (Street Address)

New Bedford MA 02745
 (City/Town, State, Zip Code)

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Date: 8/21/22

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- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,

Sandra J. Lefever
(Signature)

Sandra J. Lefever
(Printed Name)

9 Tobey Lane
(Street Address)

New Bedford, MA 02745
(City/Town, State, Zip Code)

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Date: 8-20-22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

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Respectfully,

Dean Galera

(Signature)

Dean Galera

(Printed Name)

3610 Acushnet AVE

(Street Address)

New Bedford ma 02745

(City/Town, State, Zip Code)

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Date: 8/28/2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,

Doris J. Richard
(Signature)

DORIS J. RICHARD
(Printed Name)

123 LONGVIEW RD.
(Street Address)

NEW BEDFORD, MA 02745
(City/Town, State, Zip Code)

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Date: 8/21/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,


 (Signature)

Mark D LeFever
 (Printed Name)

9 TOBEY LANE
 (Street Address)

New Bedford, MA 01945
 (City/Town, State, Zip Code)

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Date: August 19, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

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Respectfully,

Nelson Brum
(Signature)

Nelson Brum
(Printed Name)

82 Longview Rd.
(Street Address)

New Bedford MA 02945
(City/Town, State, Zip Code)

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Date: 8-20-22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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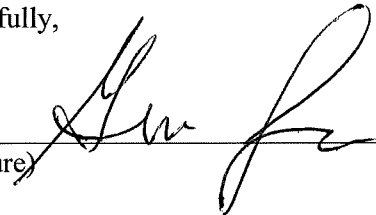
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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,



 (Signature)

Gina Galarza

 (Printed Name)

3610 Acushnet Ave

 (Street Address)

New Bedford Ma 02745

 (City/Town, State, Zip Code)

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Date: Aug. 19, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

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The reasons for this opposition include but are not limited to the following:


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Date: 8-19-22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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Respectfully,



 (Signature)

CHRISTINE DZIOPA

 (Printed Name)

82 IVY RD

 (Street Address)

NEW BEDFORD MA 02745

 (City/Town, State, Zip Code)

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Date: 8/19/2022

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
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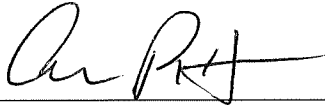
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Respectfully,



(Signature)

Allison Baxter

(Printed Name)

29 Birchwood Dr.

(Street Address)

New Bedford, MA 02745

(City/Town, State, Zip Code)

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Date: 8/18/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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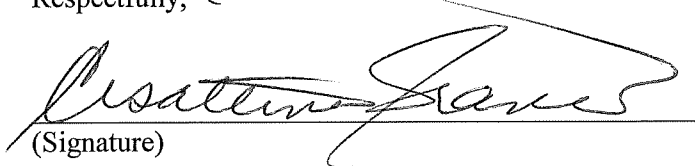
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 (Signature)

Cisaltina Branco
 (Printed Name)

307 Earle St #1
 (Street Address)

New Bedford MA 02746
 (City/Town, State, Zip Code)

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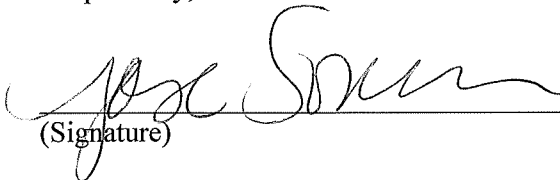
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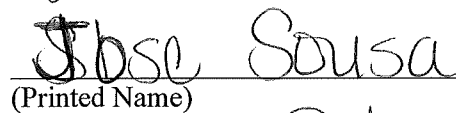
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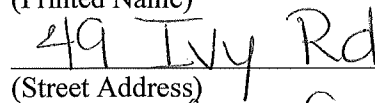
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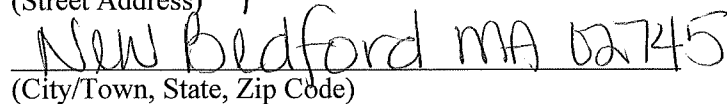
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Date: August 19, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

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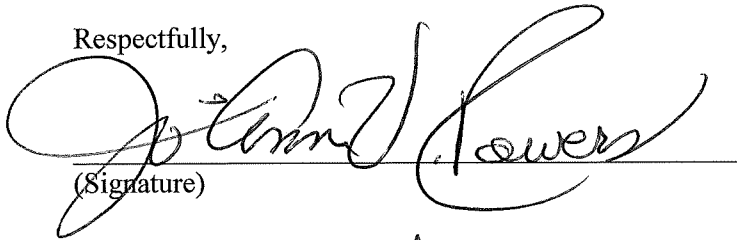
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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,



(Signature)

Jo-Ann V. Powers

(Printed Name)

70 Ivy Rd

(Street Address)

New Bedford, MA 02745

(City/Town, State, Zip Code)

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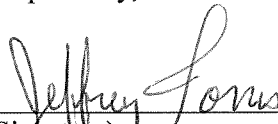
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 (Signature)

Jeffrey Torres

 (Printed Name)

19 Ivy Rd.

 (Street Address)

New Bedford, Ma. 02745

 (City/Town, State, Zip Code)

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Normand Cabral
(Signature)

NORMAND CABRAL
(Printed Name)

72 BIRCHWOOD DR.
(Street Address)

NEW BEDFORD, MA 02745
(City/Town, State, Zip Code)

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Respectfully,



 (Signature)

Arleen E. Medeiros

 (Printed Name)

61 Ivy Rd.

 (Street Address)

New Bedford, MA 02745

 (City/Town, State, Zip Code)

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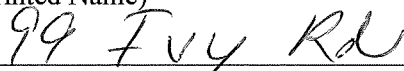
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Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
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- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,

Jeanne A. Blanchard
(Signature)

Jeanne A. Blanchard
(Printed Name)

24 Birchwood Drive
(Street Address)

New Bedford, Ma. 02745
(City/Town, State, Zip/Code)

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Date: 8-18-2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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Respectfully,



(Signature)



(Printed Name)



(Street Address)



(City/Town, State, Zip Code)

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X WE ARE A SOCIAL JUSTICE AREA

Date: 8-20-22

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Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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Respectfully,

Francisco J. Amaral
(Signature)

Francisco J. Amaral
(Printed Name)

189 Deerfield Rd
(Street Address)

New Bedford MA 02745-1923
(City/Town, State, Zip Code)

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Respectfully,

Maria A Amaral
(Signature)

MARIA A AMARAL
(Printed Name)

189 Deerfield Rd
(Street Address)

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Date: 8/19/22

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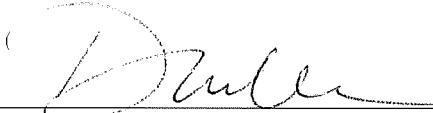
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Respectfully,



(Signature)

Donna L. Wooten

(Printed Name)

31 Greenbrier Ct.

(Street Address)

New Bedford, MA 02745

(City/Town, State, Zip Code)

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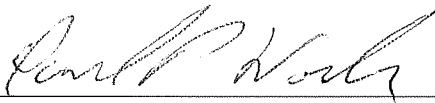
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Respectfully,



(Signature)

DAVID P. WOOLER

(Printed Name)

31 GREENBRIER CT.

(Street Address)

NEW BEDFORD, MA 02745

(City/Town, State, Zip Code)

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Supplemental Final Environmental Impact Report (SFEIR): <https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

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Study on PFAS in MSW and Transport Vehicle Leachates: <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Date: 8-20-22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

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Respectfully,



 (Signature)

JOHN FRIZADO

 (Printed Name)

65 LAUREN DRIVE

 (Street Address)

New Bedford MA 02745

 (City/Town, State, Zip Code)

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Date: 9/18/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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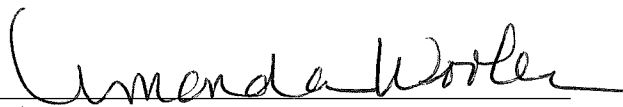
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Respectfully,



 (Signature)

Amanda Woolen

 (Printed Name)

31 GreenOwer Ct.

 (Street Address)

New Bedford, MA 02743

 (City/Town, State, Zip Code)

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Date: 8/19/2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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Respectfully,

Joanna Couto
(Signature)

Joanna Couto
(Printed Name)

969 Hillcrest Rd
(Street Address)

New Bedford MA 02745
(City/Town, State, Zip Code)

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Date: _____

8/14/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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Respectfully,



(Signature)

Nuno Da Costa

(Printed Name)

83 Greenbrier Dr

(Street Address)

New Bedford MASS

(City/Town, State, Zip Code)

02745

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Date: _____

8/16/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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Respectfully,

Keith Da Costa
(Signature)

Keith Da Costa
(Printed Name)

83 Greenbrier DR.
(Street Address)

New Bedford MA
(City/Town, State, Zip Code) 02745

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Study on PFAS in MSW and Transport Vehicle Leachates: <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Date: Aug. 21, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

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The reasons for this opposition include but are not limited to the following:

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- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,



 (Signature)

JEANNE MOTYL

 (Printed Name)

1053 Bracey Rd.

 (Street Address)

NEW BEDFORD, MA 02745

 (City/Town, State, Zip Code)

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Date: _____



Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strycky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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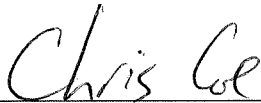
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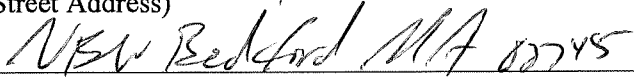
(Signature)



(Printed Name)



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Date: 8/2/12

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Attn: MEPA Office
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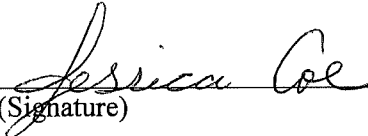
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Respectfully,


 (Signature)

Jessica Coe
 (Printed Name)

1145 Bunkley Rd
 (Street Address)

New Bedford MA 02745
 (City/Town, State, Zip Code)

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Date: _____

8 / 18 / 22

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
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Boston, MA 02114

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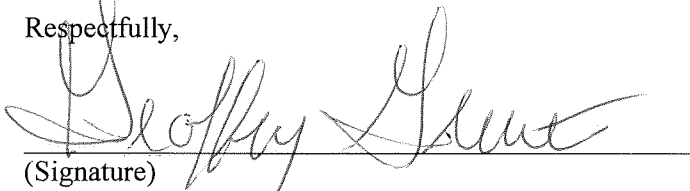
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 (Signature)

Geoffrey Grant
 (Printed Name)

85 Heritage Drive
 (Street Address)

New Bedford MA 02745
 (City/Town, State, Zip Code)

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Date: August 15, 2022

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Respectfully,

Leroy Vargas
(Signature)

Leroy Vargas
(Printed Name)

404 Valley Rd.
(Street Address)

New Bedford, MA 02745
(City/Town, State, Zip Code)

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Respectfully,

Linda D. Vargas
(Signature)

LINDA D. VARGAS
(Printed Name)

404 Valley Rd.
(Street Address)

New Bedford, Mass.
(City/Town, State, Zip Code) 02745

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Date:

Aug 17, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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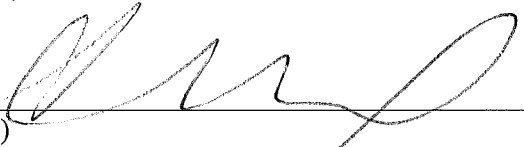
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 (Signature)

Suzanne Blain

 (Printed Name)

91 Stephani Dr

 (Street Address)

New Bedford MA 02745

 (City/Town, State, Zip Code)

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8/15/22

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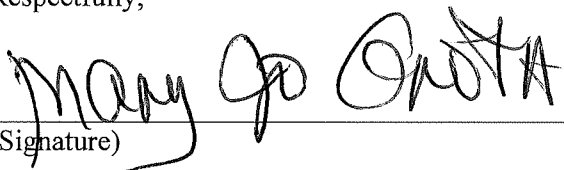
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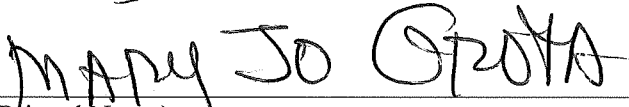
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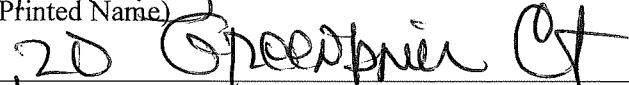
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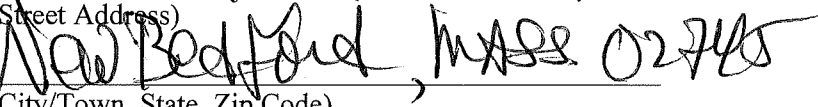
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Gale Ordowski
(Signature)

Gale Ordowski
(Printed Name)

41 Heritage Dr.
(Street Address)

New Bedford, Ma - 02748
(City/Town, State, Zip Code)

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Date: August 20, 2022

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For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,



 (Signature)

Maxine A. Bonneau

 (Printed Name)

790 Pine Hill Drive

 (Street Address)

New Bedford, MA 02745

 (City/Town, State, Zip Code)

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Study on PFAS in MSW and Transport Vehicle Leachates: <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Date: 8-18-22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

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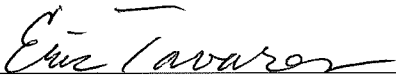
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Respectfully,



(Signature)

ERIC TAVARES

(Printed Name)

85 ANGELICA AVE

(Street Address)

NEW BEDFORD MA 02745

(City/Town, State, Zip Code)

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Date: August 18, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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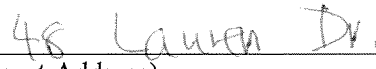
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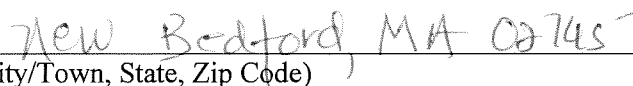
 (Signature)



 (Printed Name)



 (Street Address)



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Date: August 19, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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Respectfully,

Donna M Boutin

(Signature)

Donna M Boutin

(Printed Name)

190 Heritage Drive

(Street Address)

New Bedford MA 02745

(City/Town, State, Zip Code)

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Date: 8/19/2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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Respectfully,

Maria D. Lima
(Signature)

I ask for an extension
for 60-90 days.

MARIA D. LIMA
(Printed Name)

15 HERITAGE CT.
(Street Address)

NEW BEDFORD, MA 02745
(City/Town, State, Zip Code)

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8/14/22

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Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
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Boston, MA 02114

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Respectfully,

Melina Da Costa
(Signature)

Delra Da Costa
(Printed Name)

83 Greenbrier Dr.
(Street Address)

New Bedford MA 02745
(City/Town, State, Zip Code)

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Date: August 20, 2012

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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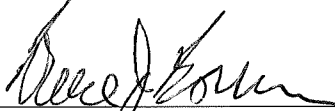
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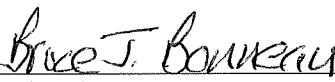
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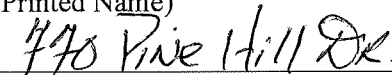
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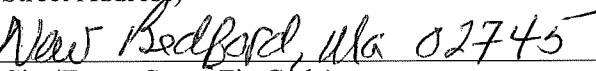
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 (Printed Name)



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Date: 8/15/22

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100 Cambridge Street, Suite 900
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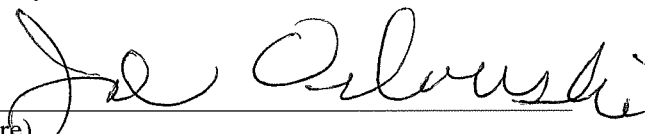
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Respectfully,


 (Signature)

Joseph Orłowski
 (Printed Name)

41 Heritage Dr.
 (Street Address)

New Bedford, Ma. 02745
 (City/Town, State, Zip Code)

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Date: _____

Aug 17, 2022

Secretary of Energy and Environmental Affairs
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Boston, MA 02114

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Respectfully,


 (Signature)

Andrew Mellody
 (Printed Name)

91 Stephanie Pl
 (Street Address)

New Bedford MA 02745
 (City/Town, State, Zip Code)

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 (Signature)

Mr. Daniel Tavares
 25 Greenbrier Ct
 New Bedford, MA 02745-2004

 (City/Town, State, Zip Code)

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Respectfully,

Carole Sherman
(Signature)

CAROLE SHERMAN
(Printed Name)

19 GREENBAIER CT
(Street Address)

NEW BEDFORD MA. 02745
(City/Town, State, Zip Code)

I was not aware of the PP project until notified by our Southeast group.
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Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

Neighbors raising a stink over smelly garbage transfer station in Brooklyn: <https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

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Study on PFAS in MSW and Transport Vehicle Leachates: <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Date: 8-19-20

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.


The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future, over 80% to landfill, a very costly and shortsighted approach.
- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?

- The Project Proponent surreptitiously calls their facility a “Green Energy Center” due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....
- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent’s de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a “good neighbor” and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State’s recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,



 (Signature)

STEVE SYLWIN

 (Printed Name)

78 Birchwood Dr.

 (Street Address)

New Bedford MA

 (City/Town, State, Zip Code)

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Date: 8-20-22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to express opposition to a project proposed by Parallel Products of New England, d/b/a South Coast Renewables, LLC herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.

The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
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- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future, over 80% to landfill, a very costly and shortsighted approach.
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- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State’s recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,


 (Signature)

Luis Rodriguez
 (Printed Name)

54 Longview Rd.
 (Street Address)

New Bedford, mn 02745
 (City/Town, State, Zip Code)

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Date: AUGUST 18, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

This letter is to bring the attention of the MEPA Office to the blatant disregard of Environmental Justice regulations and guidelines by South Coast Renewables LLC (f.k.a. Parallel Products of New England LLC), herein referred to as the Project Proponent, in the process of their seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park.

The basis of these findings are as follows:

- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- Repeated attempts to contact the City Solicitor's Office with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, 2 weeks after the submission of the SFEIR and announcement of the signed host agreement.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.
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- Virtual meetings are held as PowerPoint presentations followed with a Q&A at the end. Allowing for minimal community participation.

- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and established community groups, one of which was South Coast Neighbors United.
- The Project Proponent lists as one of its community outreach events as sponsorship of the New Bedford Chowderfest in 2019, in the opposite end of the city, to educate the community, which is unacceptable, inadequate and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

Under state Executive Office of Energy and Environmental Affairs guidelines, Environmental Justice populations have been “determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable.” The community is being strategically and deliberately left out of communication regarding this project. This is in direct opposition to Environmental Justice regulations. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

Respectfully,



(Signature)

ERIC TAVARES

(Printed Name)

85 ANGELICA AVE

(Street Address)

NEW BEDFORD MA 02745

(City/Town, State, Zip Code)

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Date: August 18, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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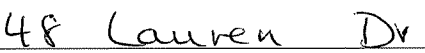
Respectfully,



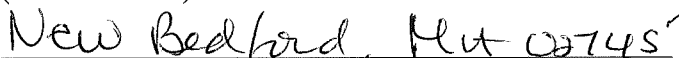
 (Signature)



 (Printed Name)



 (Street Address)



 (City/Town, State, Zip Code)

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Date: 8/19/2022

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Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
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100 Cambridge Street, Suite 900
Boston, MA 02114

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Respectfully,

*I ask for an extension
for 60-90 days!*

Joe M. Lima
(Signature)

JOE M. LIMA
(Printed Name)

15 HERITAGE CT.
(Street Address)

NEW BEDFORD, MA 02745
(City/Town, State, Zip Code)

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Date: _____

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Respectfully,



 (Signature)

Mr. Daniel Tavares
 25 Greenbrier Ct
 New Bedford, MA 02745-2004

 (City/Town, State, Zip Code)

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:
https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318

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Northeastern University Environmental Justice Study:
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Date: _____

8/15/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

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Respectfully,

Carole Sherman
(Signature)

CAROLE SHERMAN
(Printed Name)

19 GREENBAIER CT
(Street Address)

NEW BEDFORD MA 02745
(City/Town, State, Zip Code)

I was not aware of Parallel project until notified by our Southeast group.

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Date: August 15, 2022

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Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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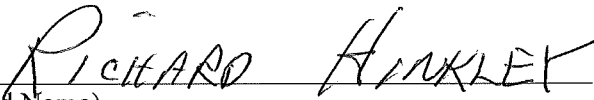
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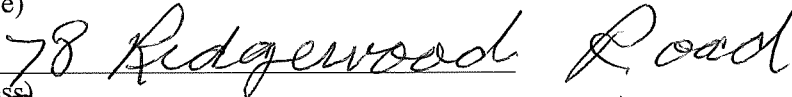
Respectfully,




 (Signature)



 (Printed Name)



 (Street Address)



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Date: AUGUST 14, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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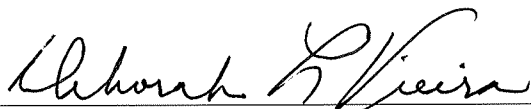
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Respectfully,



(Signature)

DEBORAH H. VIEIRA

(Printed Name)

108 RIDGEWOOD RD

(Street Address)

NEW BEDFORD, MA - 02745

(City/Town, State, Zip Code)

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8/15/22

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x Thomas C. Groya
(Signature)

Thomas C. Groya
(Printed Name)

20 Speedbrier Ct
(Street Address)

New Bedford, Mass 02745
(City/Town, State, Zip Code)

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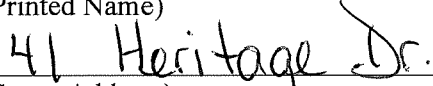
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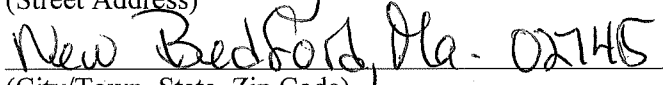
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 (Signature)

Joseph Orlowski

 (Printed Name)

41 Heritage Dr.

 (Street Address)

New Bedford, Ma. 02745

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Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Date:

Aug 17, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

This letter is to bring the attention of the MEPA Office to the blatant disregard of Environmental Justice regulations and guidelines by South Coast Renewables LLC (f.k.a. Parallel Products of New England LLC), herein referred to as the Project Proponent, in the process of their seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park.

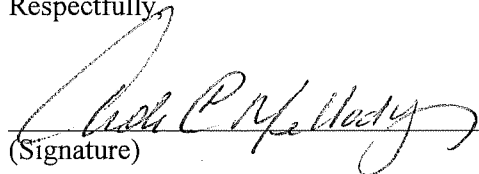
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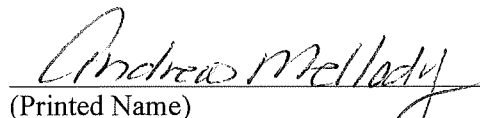
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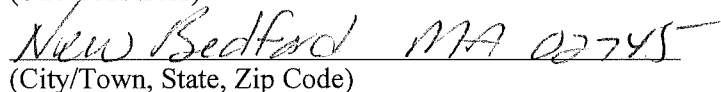
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Respectfully,


 (Signature)


 (Printed Name)


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Date:

July 17, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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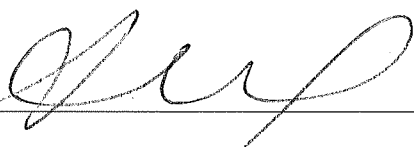
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Respectfully,



 (Signature)

Suzanne Blain

 (Printed Name)

91 Stephanie Pl

 (Street Address)

New Bedford MA 02745

 (City/Town, State, Zip Code)

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Date: _____

8/18/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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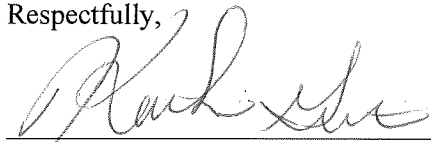
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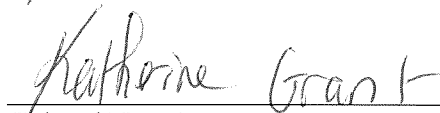
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Respectfully,




 (Signature)



 (Printed Name)



 (Street Address)



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*Req. 60-90 day
EXTENSION!*

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8/18/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

This letter is to express opposition to a project proposed by South Coast Renewables LLC (f.k.a. Parallel Products of New England LLC) herein referred to as the Project Proponent, to construct and operate a Municipal Solid Waste (MSW) processing facility in the New Bedford Business Park.


The reasons for this opposition include but are not limited to the following:

- The proposed facility will further harm a community already burdened by pollution, and poses health risks to New Bedford residents, many of whom are working-class, elderly, and/or people of color. The city has worked hard for years to remediate the environmental damage created by its industrial past, and it cannot afford to reverse this course.
- The Project Proponent failed to seek community input before entering into a host agreement with the City of New Bedford's Mayor. Residents and City Council were deliberately excluded from the process. The agreement was an act committed solely by the Mayor.
- The Project Proponent explicitly admits in the host agreement signed with the Office of the Mayor that this facility will negatively impact roads, infrastructure, and other public services in New Bedford. The unquantifiable impacts, as stated in the agreement, which cannot even be calculated at this time, will be at the costs of residents and may mean anything from decreased property values, long-term health issues, to loss of business in the community.
- The proposed facility will generate up to 418 truck trips per day, and process 1,500 tons of MSW per day, for a total of 130,834 truck trips a year and 469,500 tons of MSW a year.
- The proposed facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, over 450,000 tons a year, out for disposal for the foreseeable future, over 80% to landfill, a very costly and shortsighted approach.
- The Project Proponent claims that they will help solve the city's "waste problems," although they will be accepting waste from OTHER cities and states, to sort through and pick out recyclables for resale, and then ship the residual waste to other destinations. This is not a solution to the waste crisis; it is a continuation of the broken waste system.
- Rather than focusing on sustainable, zero waste solutions, the proposed facility will be a trash depot, and mirror a dirty materials recovery facility. It is unclear how many materials would be recycled there. Some waste will enter baled and not be eligible for recycling, and others will be too contaminated. These unknowns leave too many unanswered questions: How many materials will be eligible for recycling? How will they extract these materials? What is the market for these materials? How much would ultimately be landfilled and incinerated? If the amount of waste that comes into the facility exceeds what is shipped out, what is the plan to handle that surplus waste?
- The Project Proponent surreptitiously calls their facility a "Green Energy Center" due to their proposed use of solar panels. However, they conveniently neglect to acknowledge the many aspects of the business that are NOT GREEN. This facility will pollute via leachate contaminated discharge, diesel exhaust, nitrogen oxides, ventilation exhaust stacks, etc....

- New Bedford already has higher than average cancer, asthma, and respiratory disease rates when compared statewide, as stated in the SFEIR, any further subjection to pollutants is unacceptable.
- What and where is the Project Proponent's de-commissioning plan, in case this business fails? Will the city be left to clear up after them?
- The Project Proponent has a poor track record of being a "good neighbor" and has previously been caught and cited by the New Bedford Conservation Commission for dumping materials in a protected area on the site.
- The proposed facility is in direct contradiction to the goals of the Climate Action and Resilience Plan recently adopted by the City of New Bedford, the State's recently signed Climate Legislation, and updated Environmental Justice regulations.
- The Project Proponent has continued to leave the community out of the public participation process by offering bare minimum access and accommodation to meet language and individual needs, including lack of interpreters, muting the speakers of community members at virtual meetings, and purposely leaving local activist groups off their notification stream.
- The proposed facility acts as a clear exploitation of an Environmental Justice Community.

For the health, safety, security, and well-being of the citizens of our communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this proposed project in the City of New Bedford.

Respectfully,



 (Signature)

Geoffrey Grant

 (Printed Name)

85 Heritage Drive

 (Street Address)

New Bedford MA 02745

 (City/Town, State, Zip Code)

*Requesting
 60-90 day
 extension*

The data contained in this letter can be found in the following sources:

Supplemental Final Environmental Impact Report (SFEIR): <https://parallelproductssustainability.com/wp-content/uploads/2022/07/sfeir.pdf>

Previous violation: <http://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/39/20191219202235/Parallel-Products-enf-ord-1.pdf>

Neighbors raising a stink over smelly garbage transfer station in Brooklyn: <https://abc7ny.com/lawsuit-waste-transfer-station-garbage-foul-odors/2367624/>

MOU with Brockton and Fall River: https://drive.google.com/file/d/10YtaJBpG_QAK_eYBGLmPaYniOtmD1xGT/view?usp=sharing

New Bedford Resilience Plan: <https://kladashboard-clientsourcefiles.s3.amazonaws.com/New+Bedford/NB+Resilient+Plan+-+Final+3-20.pdf>

Massachusetts Climate Legislation: <https://www.mass.gov/news/governor-baker-signs-climate-legislation-to-reduce-greenhouse-gas-emissions-protect-environmental-justice-communities>

Study on PFAS in MSW and Transport Vehicle Leachates: <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00819>

Date: _____

8/18/22

Secretary of Energy and Environmental Affairs
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Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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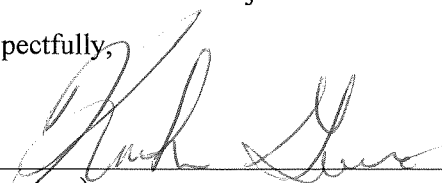
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 (Signature)

Katherine Grant

 (Printed Name)

85 Heritage Drive

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Date: 8/19/2022

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Respectfully,

Joanna Couto
(Signature)

Joanna Couto
(Printed Name)

968 Hillcrest Rd
(Street Address)

New Bedford MA 02745
(City/Town, State, Zip Code)

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Northeastern University Environmental Justice Study:

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Date: _____

8/14/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

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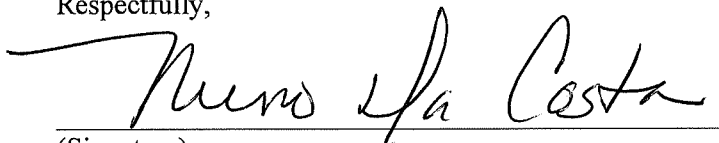
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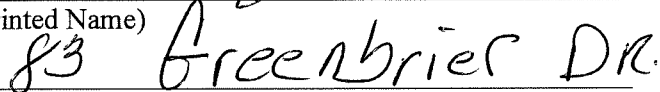
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(Signature)



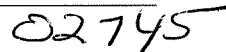
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Date: _____

8/16/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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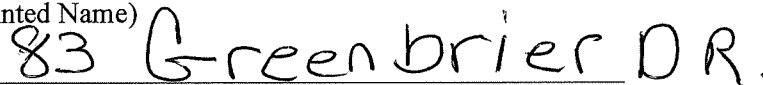
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Respectfully,


 (Signature)


 (Printed Name)


 (Street Address)


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Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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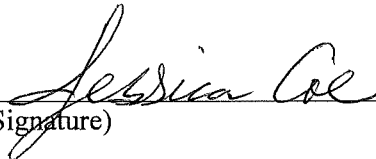
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Respectfully,



 (Signature)

Jessica Coe

 (Printed Name)

1145 Banley Rd

 (Street Address)

New Bedford MA 02745

 (City/Town, State, Zip Code)

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Date: _____

8/21/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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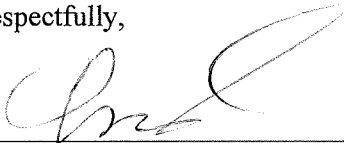
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Respectfully,



(Signature)

Chris Cole

(Printed Name)

1145 Braley rd

(Street Address)

New Bedford MA 02745

(City/Town, State, Zip Code)

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Just build the facility near the old landfill.
Duh.

Date: _____

August 21, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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 (Signature)

JEANNE MOTIL

 (Printed Name)

1053 BRADY RD.

 (Street Address)

NEW BEDFORD, MA. 02745

 (City/Town, State, Zip Code)

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Respectfully,



 (Signature)

EDWARD MOTTYL

 (Printed Name)

1053 BRACEY RD

 (Street Address)

NEW BEDFORD, MA 02745

 (City/Town, State, Zip Code)

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:
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Northeastern University Environmental Justice Study:
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Date: 8-18-2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

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Respectfully,

Mary M Flinn
(Signature)

Mary M Flinn
(Printed Name)

39 Little Oak Rd
(Street Address)

New Bedford, MA 02745-2021
(City/Town, State, Zip Code)

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* WE ARE A SOCIAL JUSTICE AREA

Date: 8-20-22

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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Respectfully,



 (Signature)

JOHN FRIZADO

 (Printed Name)

65 LAUREN DR.

 (Street Address)

New Bedford MA 02745

 (City/Town, State, Zip Code)

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Date: _____

8/19/22

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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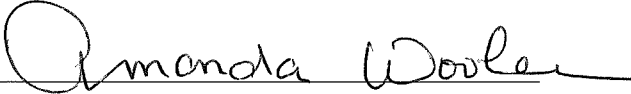
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Respectfully,


 (Signature)

Amanda Woolen
 (Printed Name)

31 Greenbriar Ct
 (Street Address)

New Bedford, MA 02745
 (City/Town, State, Zip Code)

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Date: _____

8/19/22

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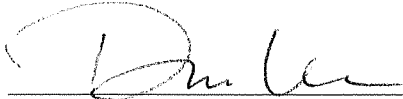
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(Signature)

Doreen L. Wooten

(Printed Name)

31 Greenprier Ct.

(Street Address)

New Bedford, MA 02745

(City/Town, State, Zip Code)

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Date: 8/19/22

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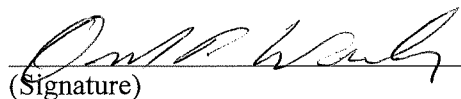
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DAVID P. WOOLER
 (Printed Name)

31 GREENBRIER CT.
 (Street Address)

NEW BEDFORD, MA 02745
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Respectfully,

Francisco J. Amaral
(Signature)

Francisco J. Amaral
(Printed Name)

189 Deerfield Rd
(Street Address)

New Bedford, MA 02745-1923
(City/Town, State, Zip Code)

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Northeastern University Environmental Justice Study:
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Date: 8-20-22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

This letter is to bring the attention of the MEPA Office to the blatant disregard of Environmental Justice regulations and guidelines by South Coast Renewables LLC (f.k.a. Parallel Products of New England LLC), herein referred to as the Project Proponent, in the process of their seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park.

The basis of these findings are as follows:

- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- Repeated attempts to contact the City Solicitor's Office with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
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- The Project Proponent held a virtual information meeting on August 3, 2022, 2 weeks after the submission of the SFEIR and announcement of the signed host agreement.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
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Under state Executive Office of Energy and Environmental Affairs guidelines, Environmental Justice populations have been “determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable.” The community is being strategically and deliberately left out of communication regarding this project. This is in direct opposition to Environmental Justice regulations. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

Respectfully,

Maria A Amaral
(Signature)

MARIA A AMARAL
(Printed Name)

189 Deerfield Rd
(Street Address)

New Bedford, MA 02745-1923
(City/Town, State, Zip Code)

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Date: 08-19-22

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Executive Office of Energy and Environmental Affairs (EEA)
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Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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Respectfully,

Jennifer L. Vargas
 (Signature)

Jennifer L. Vargas
 (Printed Name)

41 Longview Road
 (Street Address)

New Bedford, MA 02745
 (City/Town, State, Zip Code)

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8-30-22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

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The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been “determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable.” The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

Respectfully,

Dean Galarza

(Signature)

Dean Galarza

(Printed Name)

3610 Acushnet Ave

(Street Address)

New Bedford Ma 02745

(City/Town, State, Zip Code)

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Date: 8/21/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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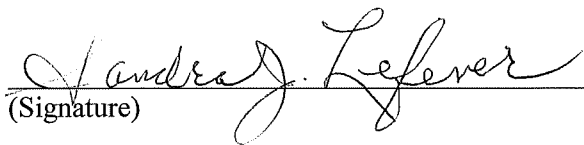
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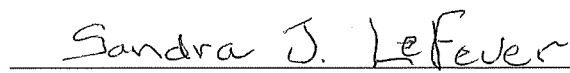
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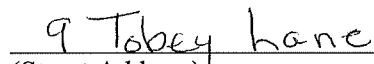
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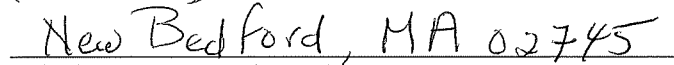
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(Signature)


(Printed Name)


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Date: 8/20/2022

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Executive Office of Energy and Environmental Affairs (EEA)
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Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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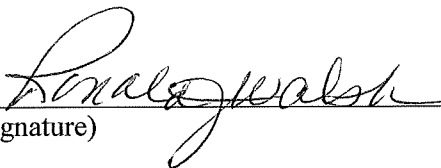
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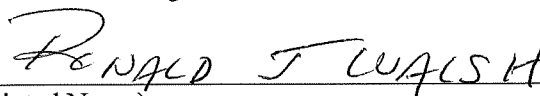
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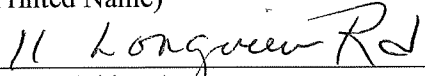
Respectfully,




(Signature)



(Printed Name)



(Street Address)



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Northeastern University Environmental Justice Study:

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Date: 8/20/2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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Respectfully,


(Signature)

RONALD J WALSH
(Printed Name)

11 Longview Rd.
(Street Address)

New Bedford MA 02745
(City/Town, State, Zip Code)

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Date: Aug 18, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

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(Signature)

Richard CHEVALIER
(Printed Name)

73 IVY Rd
(Street Address)

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Date: 8/20/2022

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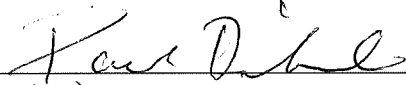
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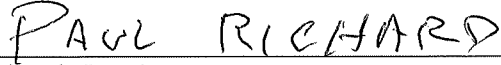
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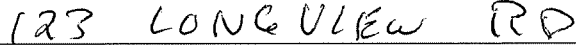
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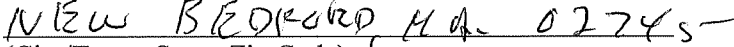
(Signature)



(Printed Name)



(Street Address)



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Date: 8-18-22

Secretary of Energy and Environmental Affairs
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Respectfully,


(Signature)

Bernice Sylvia
(Printed Name)

102 IVY Rd.
(Street Address)

New Bedford MA. 02745
(City/Town, State, Zip Code)

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Date: 8-18-22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

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The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997 page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period
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Respectfully,

Michelle Torres
(Signature)

Michelle Torres
(Printed Name)

19 Ivy Rd.
(Street Address)

New Bedford, MA 02745
(City/Town, State, Zip Code)

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Date: August 19, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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The basis of these findings are as follows:

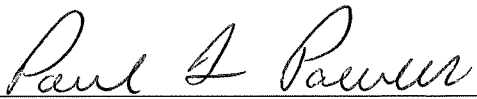
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(Signature)



(Printed Name)



(Street Address)



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Date: 8-19-22

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Alex Strysky - EEA No. 15990
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Email: alexander.strycky@mass.gov

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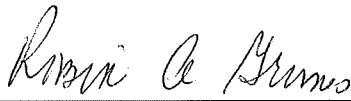
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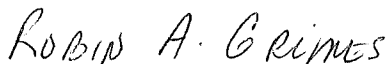
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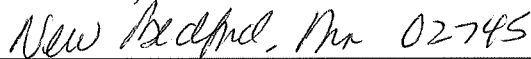
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Date: August 18, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
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Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

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(Signature)

JO-ANNE CHEVALIER

(Printed Name)

73 Aug Rd.

(Street Address)

New Bedford, MA 02745

(City/Town, State, Zip Code)

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Date: _____

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Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
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Email: alexander.strycky@mass.gov

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Normand Cabral
(Signature)

NORMAND CABRAL
(Printed Name)

72 BIRCHWOOD ST
(Street Address)

NEW BEDFORD, MA 02745
(City/Town, State, Zip Code)

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Date: August 18, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
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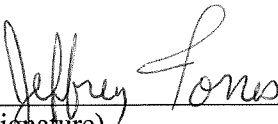
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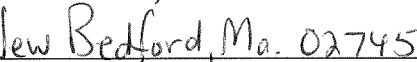
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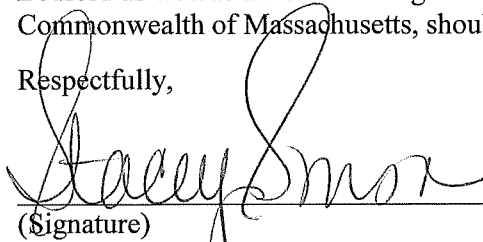
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Respectfully,



(Signature)

Stacey Sousa

(Printed Name)

7 Ava Way

(Street Address)

New Bedford MA 02745

(City/Town, State, Zip Code)

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Date: August 19, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

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Respectfully,


(Signature)

Sherri-Lynn Schoorens
(Printed Name)

30 Birchwood Drive
(Street Address)

New Bedford, MA 02745-2102
(City/Town, State, Zip Code)

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(Signature)

Allison Baxter

(Printed Name)

29 Birchwood Drive

(Street Address)

New Bedford, MA 02745

(City/Town, State, Zip Code)

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Date: 8/18/22

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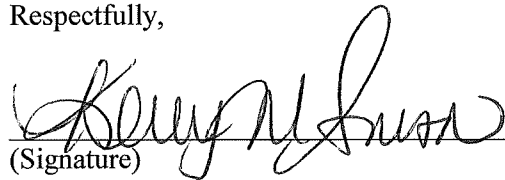
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(Signature)

Kelly M Sousa
(Printed Name)

307 Earle St #2
(Street Address)

New Bedford MA 01946
(City/Town, State, Zip Code)

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Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

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The basis of these findings are as follows:

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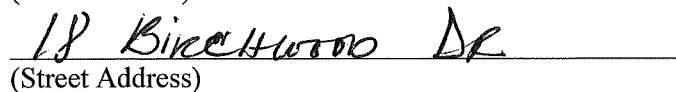
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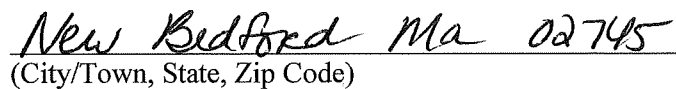
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(Signature)


(Printed Name)


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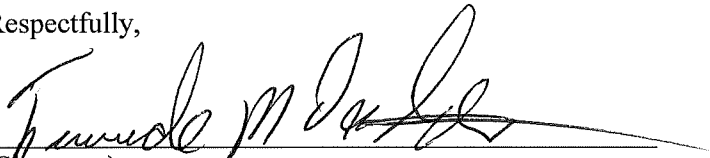
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(Signature)

Fernando M DaSilva
(Printed Name)

18 Birchwood Drive
(Street Address)

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(City/Town, State, Zip Code)

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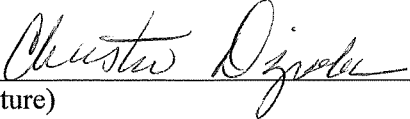
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(Signature)

CHRISTINE DZIOPA

(Printed Name)

82 IVY RD

(Street Address)

NEW BEDFORD, MA 02745

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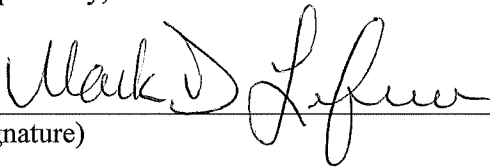
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(Signature)

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(Printed Name)

9 TOBEY LANE

(Street Address)

New Bedford, MA 02745

(City/Town, State, Zip Code)

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318

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Northeastern University Environmental Justice Study:

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Date: August 19, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

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Respectfully,

Nelson Brum
(Signature)

Nelson Brum
(Printed Name)

82 Longview Rd.
(Street Address)

New Bedford MA 02745
(City/Town, State, Zip Code)

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Date: 8-20-22

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The basis of these findings are as follows:

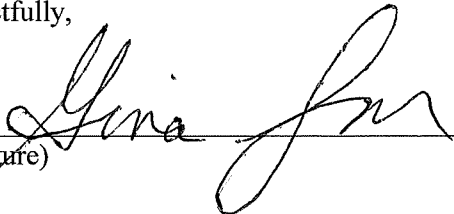
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Respectfully,



(Signature)

Gina Galarza

(Printed Name)

3610 Acushnet Ave

(Street Address)

New Bedford Ma 02745

(City/Town, State, Zip Code)

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Date: 8/19/2022

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Respectfully,


(Signature)

ROGER P. BLANCHARD
(Printed Name)

24 BIRCHWOOD DR.
(Street Address)

NEW BEDFORD, MA #02745
(City/Town, State, Zip Code)

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Date: 8/18/2022

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(Printed Name)

99 Toy Rd

(Street Address)

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(City/Town, State, Zip Code)

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Northeastern University Environmental Justice Study:

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Date: 8/18/2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

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Respectfully,



(Signature)

AILEEN MEDEIROS

(Printed Name)

61 Ivy Rd

(Street Address)

New Bedford, MA 02745

(City/Town, State, Zip Code)

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Date: Aug. 18, 2022

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Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
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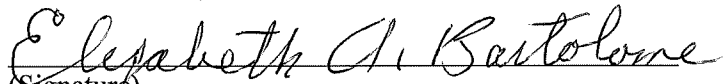
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Respectfully,


(Signature)

ELIZABETH A. BARTOLOME
(Printed Name)

35 Birchwood Dr.
(Street Address)

New Bedford, Ma. 02745
(City/Town, State, Zip Code)

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Date: 8-20-22

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Respectfully,

Diane Rodrigues
(Signature)

DIANE Rodrigues
(Printed Name)

54 Longview Rd.
(Street Address)

New Bedford, MA 02745
(City/Town, State, Zip Code)

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Doreen M Sylvia
(Signature)

DOREEN SYLVIA
(Printed Name)

78 BIRCHWOOD DR
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NEW BEDFORD MA 05745
(City/Town, State, Zip Code)

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https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318

Mass.gov Environmental Health:

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Date: August 20, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Card;

This letter is to bring the attention of the MEPA Office to the blatant disregard of Environmental Justice regulations and guidelines by South Coast Renewables LLC (f.k.a. Parallel Products of New England LLC), herein referred to as the Project Proponent, in the process of their seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park.


The basis of these findings are as follows:

- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- Repeated attempts to contact the City Solicitor's Office with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, 2 weeks after the submission of the SFEIR and announcement of the signed host agreement.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
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- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
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- The Project Proponent lists as one of its community outreach events as sponsorship of the New Bedford Chowderfest in 2019, in the opposite end of the city, to educate the community, which is unacceptable, inadequate and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.
- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.

Under state Executive Office of Energy and Environmental Affairs guidelines, Environmental Justice populations have been “determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable.” The community is being strategically and deliberately left out of communication regarding this project. This is in direct opposition to Environmental Justice regulations. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

Respectfully,



 (Signature)

Maxine A. Bonneau

 (Printed Name)

770 Pine Hill Drive

 (Street Address)

New Bedford, MA 02745

 (City/Town, State, Zip Code)

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Northeastern University Environmental Justice Study:
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Date: August 10, 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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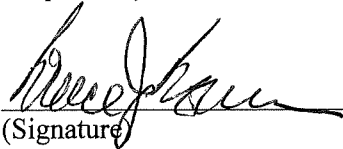
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Respectfully,



(Signature)

Bruce J. Bourque

(Printed Name)

770 Pine Hill Dr.

(Street Address)

New Bedford, N.H. 02745

(City/Town, State, Zip Code)

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Date: 8/16/22

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114

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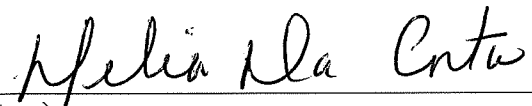
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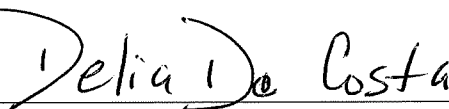
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Respectfully,




 (Signature)



 (Printed Name)



 (Street Address)



 (City/Town, State, Zip Code)

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Northeastern University Environmental Justice Study:
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Date: 19 August 2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

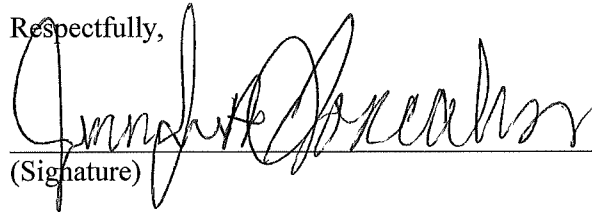
- A 30-day comment period is an unacceptable time limit to offer for review of a 997 page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.
- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
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- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
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The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been “determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable.” The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

Respectfully,



(Signature)

JENNIFER GONZALEZ

(Printed Name)

59 BARKHILL DR

(Street Address)

NEW BEDFORD MA 02741

(City/Town, State, Zip Code)

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Date: 8/18/2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strycky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

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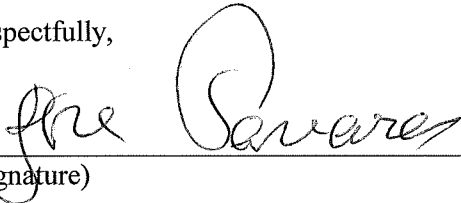
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(Signature)

Jose Tavares

(Printed Name)

99 Ivy Rd.

(Street Address)

New Bedford, MA 02745

(City/Town, State, Zip Code)

Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs:

https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318

Mass.gov Environmental Health:

https://www.mass.gov/files/documents/2017/10/04/MDPH%202017%20SHA%20Chapter%203.pdf?_ga=2.95911068.1096081429.1660317004-416828808.1658765318

Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Date: 8/18/2022

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Alex Strysky - EEA No. 15990
100 Cambridge Street, Suite 900
Boston, MA 02114
Email: alexander.strysky@mass.gov

Subject: Joint Comments on Parallel Products of New England, EEA Number 15990

Dear Secretary Card and MEPA Director Kim:

This letter is to bring the attention of the MEPA Office to the blatant disregard of environmental justice laws, regulations, and guidelines by Parallel Products of New England, d/b/a South Coast Renewables, LLC, herein referred to as the Project Proponent, in the process of it seeking approval to construct and operate a Municipal Solid Waste (MSW) and Construction and Demolition (C&D) transfer station in the New Bedford Business Park. The Project Proponent has failed to meet the requirements of An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) and 2017 Environmental Justice Policy, outlined in Section 16 of the EOEEA's Environmental Justice Policy.

The Project Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations.

The basis of these findings are as follows:

- A 30-day comment period is an unacceptable time limit to offer for review of a 997 page filing. It is unreasonable to expect the community, many of whom are non-native English speakers and working-class residents, to review a document that is almost 1000 pages with appendices, data, technical terminology, etc. It is for those reasons that we respectfully request a 30-day extension of the public comment period
- The Notice of Project Change (NPC) incorporated into the SFEIR circumvented the separate review and 20-day comment period required for an NPC, resulting in the community losing 20 days to review and comment upon the proposed changes to the project. This is a clear manipulation of the process by the Project Proponent in which they deliberately did not follow proper MEPA procedures.
- The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR.
- These comments are being submitted as a result of outreach conducted by the community organization South Coast Neighbors United, and not the Project Proponent's outreach.
- The Project Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022.

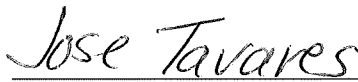
- A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford.
- The Project Proponent has held no in-person community meetings since January 2020.
- The Project Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022.
- Registration for the August 3, 2022, community meeting was required to attend, and was available on their website, in English only.
- Registrants were able to indicate if translation services were needed but were not given within the online registration an option to indicate the language for which services would be needed.
- When lack of translation services was addressed during the virtual meeting, the Project Proponent's representative responded by saying that those requests were submitted too short notice to accommodate. It is the company's responsibility to know the demographics of the community with whom they are supposed to be engaging and interacting. Moreover, the MEPA Office has been willing to meet with project proponents to advise on environmental justice requirements and translation and interpretation obligations.
- As an alternative, the Project Proponent stated that they would be happy to have those community members who required translators or accommodations meet with them at their facility, one on one. This is exclusionary and intimidating, and therefore is not a viable or acceptable offer.
- Another alternative to translation services offered by the Project Proponent was written on their fact sheets, instructing people to email them with those requests. This does not accommodate a person who cannot read English and would therefore not understand how to submit that request.
- Throughout the virtual community meeting on August 3, 2022, attendees could post questions in the chat, but were not able to view anything written in the chat by anyone else.
- Attendees of the virtual community meeting on August 3, 2022, were not able to unmute themselves during the meeting. When asked by the Project Proponent to clarify questions posted in the chat, attendees were not able to unmute themselves and provide the requested clarification, so their questions went unanswered.
- All of the Project Proponent's virtual meetings are held as PowerPoint presentations followed with a Q&A at the end, resulting in minimal community participation.
- On or after August 12th, 2022, the Project Proponent sent emails to advise some folks in the community that they were holding a virtual open house on Thursday, August 18th, at 6:30 PM. This event was in direct conflict with the New Bedford City Council meeting starting at 7:00 PM that same night, once again illustrating their lack of timely, effective, and inclusive communication with this community and all of its elected representatives.
- The Project Proponent has not gone door-knocking in the community since 2019, when they were attempting to gather signatures on a petition they drafted in favor of the project, nor have they mailed any project updates to the surrounding community. Only people who submitted comments on previous project filings or have attended a virtual meeting have received notifications.
- The Project Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.
- Repeated attempts to contact the City Solicitor's Office by email and telephone with questions from members of the community since January 2022, went without response. The City Solicitor's signature was on the host agreement.
- The Project Proponent lists as one of its community outreach events sponsorship of the New Bedford Chowderfest in 2019, held in the opposite end of the city, to "educate" the community, which is unacceptable, inadequate, and simply absurd.
- As stated in the SFEIR, most meetings were held with business stakeholders and local vendors, not community members.


- The Project Proponent has acted in an increasingly less than transparent way regarding this project since its initial filing in 2019.


The Roadmap Law requires MEPA filings to assess and report existing unfair or equitable environmental burdens and related public health consequences. Under state guidelines, environmental justice populations have been “determined to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources, or are especially vulnerable.” The community is being strategically and deliberately left out of communication regarding this project, and is also being given an inadequate and unreasonable amount of time to review 997 pages of project filings, and then formulate and submit their questions and concerns. This is in direct opposition to Environmental Justice law, regulations, and policy. To stop all further exploitation of the residents in the City of New Bedford as well as the surrounding communities, all elected and appointed officials and agencies in the Commonwealth of Massachusetts, should immediately take action to halt this injustice.

Respectfully,


(Signature)


(Printed Name)


(Street Address)


(City/Town, State, Zip Code)

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Northeastern University Environmental Justice Study:

https://drive.google.com/file/d/1Uf6_t8Dyn79TXP_SFTOP4MaMwLX5Kmw5/view

Attachment B: Parallel Products Registration Form

Attachment B: Recent Parallel Products Registration Form for Public Meeting with Instructions for Requesting Interpretation Services in English Only

A screenshot of a web browser displaying a registration form. The browser's address bar shows the URL: <https://form.jotform.com/222345186516153>. The form has a dark green background and white text. At the top, the title is "Attend the Parallel Products Community Meeting". Below the title, there is a paragraph of text: "Learn about the new South Coast Green Energy Center and ask our in-house experts your questions. The meeting will take place in-person on Wednesday, March 1, 2023 at 6:30 p.m. at 100 Duchane Blvd, New Bedford, MA 02745." The form contains several input fields: a "Name" field with two sub-fields for "First Name" and "Last Name", an "Email" field, a radio button selection for "Would you like to request an interpreter or translator service at the meeting?" with options "Yes" and "No", and a text area for "Ask a question:" with a placeholder "Type here...". A "Submit" button is located at the bottom center of the form. The Windows taskbar is visible at the bottom of the screen, showing the time as 9:01 PM on 2/17/2023.

Attend the Parallel Products Community Meeting

Learn about the new South Coast Green Energy Center and ask our in-house experts your questions. The meeting will take place in-person on Wednesday, March 1, 2023 at 6:30 p.m. at 100 Duchane Blvd, New Bedford, MA 02745.

Name *

First Name Last Name

Email *

example@example.com

Would you like to request an interpreter or translator service at the meeting? *

Yes

No

Ask a question:

Type here...

Submit

**Attachment C: Letter to EEA Secretary from CLF, Just Zero, SCNU, and Slingshot
(August 22, 2022)**



For a thriving New England

CLF Massachusetts 62 Summer Street
Boston MA 02110
P: 617.350.0990
F: 617.350.4030
www.clf.org

August 22, 2022

Secretary Bethany A. Card
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Subject: *South Coast Renewables, LLC (f.k.a. Parallel Products of New England LLC), 100 Duchaine Boulevard, New Bedford, Massachusetts, Supplemental Environmental Impact Report and Notice of Project Change EEA No. 15990*

Dear Secretary Card and MEPA Director Kim:

The undersigned express serious concerns regarding the project proposed by South Coast Renewables, LLC (the “Proponent”) to be sited at 100 Duchaine Boulevard, New Bedford, (the “Site”) and described in the Notice of Project Change and Supplemental Environmental Impact Report (the “NPC/SFEIR”) described above (the “Proposed Facility”). The Proponent, while claiming to overhaul the Proposed Facility in accordance with comments from the undersigned and members of the community, has not addressed two underlying problems the Proposed Facility would pose. Namely, that the Proposed Facility would further entrench the Commonwealth of Massachusetts in a burn and bury waste system, and the Proposed Facility would unduly burden the residents of New Bedford, an environmental justice population.

We commend the Proponent for abandoning the idea of building a sewage sludge drying facility at the Site for now, especially given that the market for dried sludge to be spread on land is greatly constricted due to national and regional per- and polyfluoroalkyl substances (“PFAS”) concerns.¹ As we have stated in the past, handling sewage sludge is neither a safe nor profitable business concept.

We urge the Proponent come to a similar realization regarding the Garbage Depot/Dirty Materials Recovery Facility that it plans to build on the Site. Shipping trash out of state by rail is

¹ Ecology Center and Sierra Club, “Sludge in the Garden: Toxic PFAS in Home Fertilizers from Sewage Sludge, May 2021, [2408 PFAs in the Garden Sludge Report 07.pdf - Google Drive](#).

not sustainable, and does not solve our waste problem, even if an operator is “hopeful” that it will be able to extract a small percentage of recyclables from that waste.

Conservation Law Foundation (“CLF”) is a non-profit, member supported regional environmental organization working to conserve natural resources, protect public health, and promote thriving communities in New England. Through CLF’s Zero Waste Project in the Environmental Justice Program, CLF aims to protect New England communities from the dangers posed by unsustainable waste generation and disposal. CLF’s Massachusetts members include residents with a deep interest in protecting our natural resources and in reducing the need for landfills and incinerators and promoting Zero Waste programs in the Commonwealth.

Just Zero (“Just Zero”) is a national non-profit organization that works alongside communities, policy makers, scientists, educators, organizers, and others to implement just and equitable solutions to climate-damaging and toxic production, consumption, and waste disposal practices. Just Zero’s goal is to help create a world that relies on community-centered Zero Waste solutions with zero climate-damaging emissions and zero toxic exposures. We focus on policies and answers that put human and ecosystem health over polluter profits.

South Coast Neighbors United, Inc. is a non-profit, grassroots organization of concerned residents who came together in 2015 in opposition to Access Northeast, a project proposed to expand and construct unnecessary and dangerous natural gas infrastructure in South Coast communities. SCNU shares factual information with the public about the true risks that this, and other similar projects, pose to their community’s health, safety, financial security, and the environment.

Slingshot is an organization that works side by side with the communities most impacted by environmental threats to hold polluters accountable and build community power. Slingshot has the organizing know-how, the deep relationships, and the flexibility to grow into the fullest potential. Slingshot will show up for communities and organize with compassion, humility, fierce love, and joy to build a more just world.

As per the NPC and SFEIR,² the Proposed Facility includes:

- An existing glass processing plant that crushes, sizes, and separates glass by color that has been collected through the Massachusetts bottle deposit system. The Proposed Facility does not accept glass from curbside recycling or trash collection. It is inconsistent for the Proposed Facility to not accept glass to contribute recyclable content to the existing glass processing plant. This glass cullet should be sold for the production of new glass products;
- Rail sidetrack to be built from the existing rail line adjacent to 100 Duchaine Boulevard;
- Solar canopies to be constructed on a canopy system; and,
- Transfer station for Municipal Solid Waste (“MSW”) and Construction and Demolition (“C&D”) materials, with some processing (“Proposed Dirty MRF”) that will accept

² [sfeir.pdf \(parallelproductssustainability.com\)](#)

about 450,000 tons of trash a year, (1,500 tons a day, 300 days a year) and ship almost all of that waste out for disposal by rail.

For now the Proposed Facility does not include a sewage sludge drying facility.

A. The Proposed Facility Will Have a Negative Impact on our Waste Disposal Systems.

As detailed in the comment letter submitted to the MEPA Office by the undersigned on March 26, 2021 regarding the FEIR,³ the Proposed Facility will not improve the Commonwealth's solid waste system, just further invest in shipping the waste out of state.

1. The Commonwealth of Massachusetts has not decreased its waste disposal over the last decade. In fact, in 2019 Massachusetts disposed of 100,000 tons more trash than in 2010. Expanding landfills and exporting trash has not negatively impacted the creation of trash. ***The Proposed Facility would make it easier and cheaper to ship our waste out of state and out of mind, thus burdening other communities without contributing to benefits for residents of New Bedford.***
2. The adoption of single stream recycling has resulted in an expensive system and little actual recycling. Many single stream materials are not recycled, but downcycled, or worse, disposed of and used as landfill cover. Plastic beverage containers that are not covered by deposit systems are unlikely to be recycled. The national recycling rate for plastic beverage containers collected curbside is only 28%, while the national recycling rate for plastic containers in bottle bill states is 72%. According to the National Waste and Recycling Association, 25% of what is placed into single-stream recycling is too contaminated to go anywhere other than a landfill -- only 40% of glass placed into single-stream recycling collections actually gets recycled. ***In other words, even the bottles, cans, cardboard, and paper in curbside systems are NOT getting purchased by recycling companies after they leave the material recycling facilities to be made into new bottles, cans, cardboard, and paper.***
3. The Proponent is proposing to construct a "Transfer Station" but operate parts of it like a "Dirty MRF." A Dirty MRF is a facility that accepts trash, and the operator picks out items to be recycled. To our knowledge, all of the Material Recovery Facilities in Massachusetts are "clean" MRFs, meant to optimize recycling by requiring recyclables to be kept separate from trash from point of generation. Massachusetts regulations, 310 CMR 16.02, defines a "Transfer Station," as a "handling facility where solid waste is brought, stored, and transferred from one vehicle or container to another vehicle or container for transport off-site to a solid waste handling or disposal facility." Some of the waste at the Proposed Facility would be delivered baled to the Proposed Facility, and then it will be loaded directly onto rail cars to be shipped off-site for disposal. ***None of the baled MSW would be recycled, and very little, if any, of the unbaled trash would be.***
4. The Proposed Facility would also accept C&D residuals and C&D bulky waste. The Proponent will not extract recyclables from the C&D. ***In regards to the baled MSW and C&D waste, the Proposed Facility would be a Transfer Station.***

³ Id. at p. 515

5. While the Proponent said in their response to comments to the FEIR that it is “hopeful” that it will be able to extract 20% of the 450,000 tons of trash flowing through the Proposed Facility to be recycled, none of the SFEIR or NPC explain how, or which materials could possibly be recycled. Most of the waste, as explained above, would be C&D or baled waste. The Proponent does not accept curbside glass in its glass processing facility. It certainly could not use glass taken from the trash. ***The Proponent will not even recycle the glass from its own Dirty MRF.***
6. The MassDEP has a very clear picture as to what materials are in the trash by weight, yet the Proponent has not used these detailed waste characterizations to estimate how they would divert trash from disposal. A 20% diversion rate is a baseless guess that will never be achieved. ***The Proponent should be required to detail its plans to achieve such a diversion rate.***
7. ***The Proposed Facility would do nothing but ensure that the Commonwealth of Massachusetts continues to ship trash, at least 450,000 tons a year, out of state for disposal for the foreseeable future.***
8. ***The Secretary should require the Proponent to identify what materials the Proponent is targeting, how they will be extracted, and if a market actually exists to recycle these contaminated waste streams.***

B. The Proposed Facility Will Have a Negative Impact on Environmental Justice Populations.

The Proponent seeks to erect a polluting facility in an environmental justice population that will harm public health, the climate, and the environment. Residents of New Bedford, surrounding cities and towns, and a substantial number of advocates oppose the facility. As a result, we request that the MEPA Office extend the comment deadline which will give stakeholders and the MEPA Office time to find that the MSW and C&D transfer station result in a disproportionate environmental burden negatively affecting environmental justice populations. State law and policy now require that the MEPA Office assess impacts to an environmental justice population located within five miles of an environmental justice population and consider whether the project results in an equitable distribution of energy and environmental benefits and environmental burdens.⁴ An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy (Roadmap Law) requires the Secretary to find whether the assessment shows existing unfair or inequitable environmental burdens and related public health consequences.⁵ Additionally, the Roadmap Law requires the Proponent to identify any adverse short-term and long-term environmental and public health consequences that cannot be avoided and reasonable alternatives to the proposed project. The NPC and SFEIR do not meet these requirements.

New Bedford is designated as an environmental justice population.⁶ The city is rife with existing environmental burdens, extensive environmental degradation due to the legacy of those early industrial years adding high levels of lead, polychlorinated biphenyls, and other contamination in their neighborhoods. The New Bedford Harbor Superfund site is among the

⁴ St. 2021, c. 8, §§ 56-60; M.G.L. c. 30, §§ 62, 62B, 62K.

⁵ M.G.L. c. 30, § 62B.

⁶ Massachusetts Environmental Justice Viewer, “New Bedford”, available at <https://mass-eoeea.maps.arcgis.com/apps/webappviewer/index.html?id=1d6f63e7762a48e5930de84ed4849212>.

worst contamination in the region, and local residents and advocacy groups have been fighting for a fair and effective cleanup of that site for decades.⁷ These contaminants and exposures have public health consequences.

The Roadmap Law and 2021 Environmental Justice Policy requires the Proponent to do enhanced outreach to residents of New Bedford about the project. The Proponent has failed to meet the outreach requirements.⁸ The Project Proponent has failed to produce an outline of a Public Involvement Plan (PIP) as required by the Secretary in the certificate issued April 2, 2021. Within the SFEIR, the Project Proponent stated that the PIP will be developed with MassDEP, thereby only reiterating the requirements stated within the SCOPE. This is a failure to meet the requirements of the SCOPE for the submission of the SFEIR, as a PIP outline was specifically required and should have been included in the SFEIR. The Proponent conducted no community outreach or meetings between the dates of May 5, 2021, and July 14, 2022. A demonstrated lack of community outreach and/or involvement regarding any updates to the project or the host agreement entered into by the Project Proponent and the Mayor of New Bedford. The Proponent has held no in-person community meetings since January 2020. The Proponent held a virtual information meeting on August 3, 2022, two weeks after the submission of the SFEIR and announcement of the signed host agreement, with no language interpretation. The Project Proponent first distributed translated fact sheets on August 10, 2022. The Proponent sent notification to state and city officials only, omitting stakeholders and community groups, one of which is South Coast Neighbors United, established since 2015.

Given the new environmental justice standards this project must meet, and the burdens the community is already experiencing, the undersigned request *again* that the Secretary require an enhanced environmental review and analysis of impacts which should include, at a minimum, baseline public health conditions within New Bedford and nearby communities, and on-site and off-site mitigation to reduce impacts on this frontline population. A more comprehensive review of the Commonwealth's solid waste infrastructure is also warranted before siting yet another large facility in an environmental justice population, especially considering that six of the state's seven solid waste incinerators are already in environmental justice populations. Consequently, we urge the Secretary to find that the filing does not adequately and properly comply with MEPA.

C. Leachate-Contaminated Wastewater at the Proposed Transfer Station Poses a Risk to Water Quality.

The leachate at the Proposed Facility should be tested and treated prior to sending it into a waste water treatment plant, and the Secretary should require that the SFEIR detail how the leachate would be tested and handled.

D. There is a Long Toxic History at the Site.

⁷ Conservation Law Foundation, "New Bedford, Massachusetts: Environmental Justice in the Twenty-First Century," pg. i, (August 2016), available at <https://www.clf.org/wp-content/uploads/2016/08/New-Bedford-EJ-Assessment-2016.pdf>.

⁸ M.G.L. c. 30, § 62I; Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs: https://www.mass.gov/doc/environmental-justice-policy6242021-update/download?_ga=2.65950638.1096081429.1660317004-416828808.1658765318.

Proponent notes that this site was previously owned by Multilayer Coating Technologies, and before that by the Polaroid Corporation. The Site was used by both previous owners to manufacture film. ***We also recommend an environmental assessment be conducted and submitted by Proponent as part of a supplemental FEIR, to not only establish a baseline, but to ensure that there are not existing conditions that would endanger the surrounding community due to the development and operation of the Proposed Facility.***

Thank you for your consideration.

Respectfully submitted,

Staci Rubin, Vice President, Environmental Justice
Conservation Law Foundation

Kirstie L. Pecci, Executive Director
Just Zero

Wendy M. Graca, President
South Coast Neighbors United, Inc.

Mireille Bejjani, Co-Executive Director
Slingshot