



November 23, 2022

Secretary Bethany Card
Executive Office of Energy and Environmental Affairs (EEA)
Massachusetts Environmental Policy Act (MEPA) Office
Attn: Alex Strycky, EEA No. 16618
100 Cambridge St, Suite 900
Boston, MA 02114

Dear Secretary Card,

Salem Alliance for the Environment (SAFE) appreciates this opportunity to submit comments in response to the October 17, 2022 Expanded Environmental Notification Form issued by Crowley Wind Services Inc. for the Salem Wind Port. SAFE addresses local environmental challenges in Salem through a mostly all-volunteer membership model.

The port of Salem is bordered by multiple Environmental Justice communities. As we transition our energy systems to renewable options, it is imperative we center those disproportionately impacted by the climate crisis. We believe that the following requests of Crowley Wind Services for sustainable practices and community needs will make our port a shining example of the Offshore Wind future.

- We notice a number of references to local, stable jobs for the project, but we would like to see specifics. Please share what commitments are being made to those often not seen in these jobs—women, BIPOC, English isolated, and lower income residents in Salem and the region—to support their entering this new industry. The EEA should ensure Crowley formalizes its equitable workforce commitments in a contract or memorandum of understanding with interested parties.
- Please share how workforce development efforts (field trips, webinars, employment portals, etc.) tied to this construction will be rolled out, to our EJ communities in particular.
- Crowley must demonstrate an understanding of the Community Benefits Agreement established by Footprint Power and the City of Salem—specifically to Sec. II. D. 4—regarding a tie-in location preserved to land offshore wind energy in the future. Indicate the area where land is set aside for this transmission hub. Crowley should show that it understands the encumbrance and it is taking steps to ensure it does not preclude allowing a wind power interconnection in the future.
- Considering the poor air quality in Essex County and its impact on our EJ communities, we expect to see a commitment to all-electric operations at our port. We know that cold ironing practices, for example, are used elsewhere on Crowley projects. We do not want to see diesel vessels operating in our waters or diesel- or gasoline-powered vehicles on the work site. The emissions from carbon power vessels or vehicles can be prevented by shore to ship powering and electric and hybrid vehicles. Please share your commitments to an all-electric operation during development and operation of the port, and if there is cause for delay, please clarify why and the timeline for seeing a zero emissions port development.

- We understand the area will be raised 2 feet. It is not clear to us how the raising of this area impacts water runoff into neighborhoods, Blaney wharf, and places along the coast like the House of Seven Gables. Share your plan for protecting historic treasures.
- For stormwater management and drainage, please provide further plans and calculations. These plans should include Green Infrastructure features like bioretention.
- The EENF had a relatively small amount of the total acreage as impervious both before and after construction; however, it is our understanding that areas of compacted gravel should be treated as impervious. Can you clarify this point? The EENF says that no infiltration is possible throughout the site because it is all compacted urban fill and marine clay – this indicates that the whole site is impervious. It seems the whole site would need a stormwater system to treat runoff.
- The EENF says the site is not subject to rules for Land Uses with Higher Potential Pollutant Loads, but the Wetlands Regulations defines LUHPPL in such a way that it seems to be one. Can you further explain?
- Provide further details on the temporary structures for sewage and shelter for the expected 200 workers that will be needed. As written, it isn't clear where workers would take breaks and have access to water.
- Please state clearly the intent to transport everything by water whenever possible. While there is a detailed report on traffic and impacts, we are hoping to see a commitment to electric transport for workers in the form of carpool vehicles or a bus to ensure less emissions and traffic.
- We believe public engagement is critical to sparking excitement and enthusiasm for the coming offshore wind industry, particularly for the EJ community. First-hand exposure to the coming offshore wind port will spark interest in offshore wind jobs. We request a public viewing area be established that gives visibility to the work happening at our port, as we are proud of this 21st century industry landing at our shore. Please provide plans for observation decks, etc.
- Share the ways in which the buffer zones to the neighborhood and the ferry terminal will be improved and maintained. For instance, where possible, consider alternatives with green stormwater infrastructure and natural plantings. The existing drainage channel is hardened rip rap now and might be modified.
- A number of abbutters shared concerns about lighting and sound. Please be specific about what remediation efforts will be in place to minimize the impacts of lighting and sound during construction and operations. Provide specifics on the technology you will be using.
- Construction inevitably means more rats in our streets, as many reside at the pier. We ask for details on a commitment to ethical extermination practices such as traps rather than poisons so as not to harm other wildlife.
- Provide a detailed plan to address maintaining the integrity of foundations of all buildings in the Historic Derby Street Neighborhood. Before construction begins, Crowley should publicize the protocol for inspection and documentation of the condition of foundations before, during, and after construction. Residents and business owners should be given timely alerts to when detonation or pile-driving will commence.
- Please provide a clear and publicly available number to contact for issues concerning the plant that is copied to the city to monitor for increased issues and resolution.

SAFE was founded over 20 years ago in an effort to close the coal-fired power plant on our shores and see an investment in renewable energy. Wind has been our vision for over two decades. Revitalizing the waterfront while simultaneously catalyzing the clean energy sector will have a transformational environmental and economic impact throughout the region and the Commonwealth as a whole if done correctly. We thank you for reviewing our comments and we are here to support next steps.

Sincerely,

Patricia A. Gozemba & Jim Mulloy
 Co-Chairs
 Salem Alliance for the Environment