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November 23, 2022

Via email: alexander.strysky@mass.gov

Ms. Bethany A. Card, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: Alex Strysky

Re: Salem Wind Port Expanded Environmental Notification Form

Dear Mr. Strysky,

Boston Harbor Now respectfully submits the following comments on the *Salem Wind Port Expanded Environmental Notification Form* submitted by Crowley Wind Services, Inc. Our organization has reviewed the October 17th, 2022 Expanded Environmental Notification Form and recently attended the November 11th, 2022 site visit.

Boston Harbor Now has been long-time champions of working waterfronts, with their unique geography and specialized jobs, and we are committed to ensuring that the waterfront we build today is designed for a more resilient and inclusive future. We envision that Designated Port Areas (DPAs) around the Commonwealth will support the existing and future marine industries that strengthen our region and prepare for the challenges climate change will bring. We expect that robust working port areas will work in tandem with their neighboring communities and provide local residents with job and educational opportunities that allow both to flourish.

We believe that the Salem Wind Port exhibits these qualities and underscores how important DPAs are, and will be, to ensuring the success of the region. The Wind Port, and other coastal land uses that support the offshore wind industry, will be vital to providing the Commonwealth with clean electricity in the future and has the potential to bring hundreds of new green jobs to the area and thousands of jobs statewide. We hope that this industry continues to flourish and expand in Massachusetts, and we understand that to do so we must also preserve the spaces that support these projects. Large contiguous DPAs with deep water must be protected to fully capitalize on the benefits of this emerging industry and move Massachusetts into the future. Meanwhile, unique adaptation strategies will need to be deployed to keep water dependent uses connected to the water sheet but out of harm's way.



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An Exemplary Use for DPAs

The Salem Wind Port provides a model for modernizing DPAs in order to take advantage of a unique coastal asset, fulfill the region's future energy needs, and create new green jobs. Like its predecessor, the 750-megawatt coal and oil-fired power plant that resided on site, the proposed Wind Port will contribute to the area's energy demand, but this time it will do so with clean and renewable electricity. Although the Wind Port will not generate power locally, it will support Massachusetts' offshore wind industry by providing assembly space for the wind turbines. This new use will help reactivate this site, which has been dormant since the demolition of the power plant.

In addition to bringing a marine industrial use to the DPA, the Wind Port will be vital to supporting the region's expanding demand for renewable energy. The Massachusetts Executive Office of Energy and Environmental Affairs recognizes the need to significantly expand the region's clean electricity supply to decarbonize the state and has identified offshore wind as being key to implementing their plan. Landside uses that help site and construct offshore wind, such as the proposed Wind Port, are therefore vital to achieving the Commonwealth's decarbonization goals.

The Wind Port, and other DPA land uses that support offshore wind, will also result in the expansion of new job opportunities. The proposed Wind Port in particular is expected to create 200 full time jobs in Salem during the construction phase and an additional 200 full time jobs once it's fully operational. In conjunction with jobs, the proponent has stated that they intend to work with local colleges, non-profits, and academies to provide Global Wind Offshore certified training and are committed to fair and safe work practices.

Expanding Wind Requires DPA Protections

Given the importance of the offshore wind industry described above, we hope that measures will be taken to preserve and expand this sector. This includes protecting Designated Port Areas. Wind Ports such as Salem's require certain conditions to function properly, principally large areas of contiguous Designated Port Area space, to run their operations. In order to carefully maneuver large, heavy, and very expensive wind turbine parts without damaging them, ample space is vital. Without at least 25 acres of land, wind turbine assembly of this type becomes infeasible.

Given the water dependency of these operations, the offshore wind industry will need access to deep water berthing for vessels to load and unload their supplies and cargo at the port facility. For wind turbine assembly specifically, it is vital that there be a clear path to the open ocean with no height clearances. Therefore, DPAs with these characteristics will be vital to expanding offshore wind.

To ensure the success of the offshore wind industry in Massachusetts it will be important that we are especially mindful of protecting DPAs that exhibit these characteristics. Losing critical DPAs such as these may result not only in the failure to expand clean energy in Massachusetts, but a loss of green jobs for the region.



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Balancing Public Waterfront Access with Port Operations

Part of what makes DPAs particularly vulnerable is the desire to provide new public and private uses that take advantage of the value people place on being by the water. While we are strong advocates for public waterfront access and an overall welcoming waterfront, we understand that a working waterfront comes with constraints. Although the proposed project is not able to provide public access to the waterfront on their site due to safety concerns, we appreciate that the proponents will continue to maintain pedestrian access to the Salem Wharf and cruise ship terminal for water transportation. Similarly, the new multi-use trails affiliated with the natural gas-fired power plant presently located in the middle of the proposed site, will not be affected by the proposed Wind Port, still allowing for public enjoyment of the area and an opportunity to be surrounded by significant infrastructure in a welcoming open space.

We suggest that in lieu of public access the proponent provides some sort of public educational programming on site, perhaps modeled on the tours of the Deer Island Wastewater Treatment facility in Winthrop—educating the public about the value of this technology. Interpretive signage and exhibits along the edges of the site or at the entrance can further serve as a buffer and an educational benefit. We further hope that the port will support educational efforts to train a new diverse workforce for green jobs.

Preparing for Climate Change Impacts

We appreciate that the Wind Port will be elevated to 12 feet (NAVD88) with aggregate to keep operations above present and near term high tides while still maintaining port operations along the water across a range of present tidal levels. With this configuration, the site can be further elevated at a later date as sea level rise increases the high tide elevation and to protect against storm surge. An elevated berm along the inland edge of the site can support flood protection for the neighborhood and may serve as a public pathway.

Should further bulkhead modifications or wave attenuation measures be necessary in the future as climate change impacts call for further coastal adaptation, designs should consider opportunities for protecting other nearby wharves in the Salem Harbor.

We appreciate the opportunity to comment on this project, and are excited to see such an exemplary DPA use come to the harbor in Greater Boston. Offshore wind will be vital to the Commonwealth's pursuit of decarbonization, and we hope that DPAs are protected accordingly. We would be happy to speak with you further if there are additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott".

Katherine F. Abbott
President and CEO
Boston Harbor Now