Salem Alliance for the Environment
81 Washington Street, Suite 308, Salem, MA 01970
salemsafe.org

COMMENTS OF SALEM ALLIANCE FOR THE ENVIRONMENT ON THE APPEAL OF BUILDING PERMIT B-26-355

To the Members of the Board,

I am writing on behalf of Salem Alliance for the Environment (SAFE), and as a Salem resident, regarding Prime Group's appeal to reinstate Building Permit B-26-355 at Shetland Park.

This appeal centers on fundamental issues of regulatory integrity, local control, housing safety, and Environmental Justice.

Under Commonwealth of Massachusetts policy, Environmental Justice (EJ) is the right of all people to be protected from disproportionate environmental burdens and to live in a healthy environment. Shetland Park sits directly on the border of El Punto (the Point), a state-designated EJ community and one of Salem's most densely populated neighborhoods, where residents have spent the past two years organizing their own heat mitigation work.

The Building Permit issued in May 2026 authorized an 8,691-square-foot tenant build-out for an IT Services company, including a modest server rack room, pump room, and UPS room, backed by a single generator rated at 1 megawatt. By the time revised plans were submitted in June, the project had grown to 12,690 square feet, a 46 percent increase, with the server rack area more than doubling, three generators totaling 6 megawatts of capacity, and two new 3,000-gallon chilled water storage tanks requiring structural reinforcement of the building to support the added weight. During a walkthrough with city inspectors, the applicant's own site superintendent described the project as an Artificial Intelligence Data Center. This is no longer the modest IT office space the city originally reviewed and approved.

This unpermitted utility load carries severe, tangible consequences for all of Salem:

- **Housing & Public Health:** Urban heat mapping by researchers at Salem State University, in partnership with SAFE, confirms El Punto is Salem's hottest neighborhood. In a dense community where many residents live in older housing without central air conditioning, adding this scale of continuous waste heat directly threatens indoor housing safety.
- **Grid & Infrastructure Burden:** High-density data centers place immense strain on local energy and water infrastructure, threatening to shift long-term utility costs and grid instability onto everyday Salem ratepayers and residents.

For the past two years, SAFE has partnered with community anchors like the North Shore CDC and resident leaders in the Point on neighborhood-led heat mitigation, work that residents themselves have driven. Introducing heavy industrial utility infrastructure directly adjacent to residential homes increases the heat in a neighborhood already warmer than the rest of the city. The Salem Building Department acted appropriately when it revoked Permit B-26-355, citing both the scale of changes to the project and its determination, under Section 3.1, Principal Uses, of the Salem Zoning Ordinance, that a data center is not a permitted use in this district.

We urge the Zoning Board of Appeals to protect municipal self-determination, center environmental equity, and uphold the Building Department's revocation of Permit B-26-355. SAFE stands ready to support the Board in ensuring that development in Salem remains transparent, safe, and accountable to the public.

Sincerely,
Bonnie Bain
Executive Director, Salem Alliance for the Environment (SAFE)