



The Commonwealth of Massachusetts

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January 20, 2006

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS
ON THE
NOTICE OF PROJECT CHANGE

PROJECT NAME : Cordage Seaside
PROJECT MUNICIPALITY : Plymouth
PROJECT WATERSHED : Plymouth harbor
EOEA NUMBER : 12513
PROJECT PROPONENT : Cordage Development, LLC
DATE NOTICED IN MONITOR : December 21, 2005

Pursuant to the Massachusetts Environmental Policy Act (G.L. c. 30, ss. 61-62H) and Section 11.10 of the MEPA regulations (301 CMR 11.00), I have reviewed the Notice of Project Change (NPC) submitted on this project and hereby determine that it **continues to require** the preparation of a Draft and Final Environmental Impact Report (EIR).

As described in the NPC, the project involves a temporary 54-slip marina consisting of three main floats and associated finger piers located on the north side of an existing concrete pier, and a boat launching ramp and associated float located to the south of the pier. The NPC describes the marina, boat launching ramp, and floats that have already been constructed without the required permits and MEPA review and prior to the mandatory full EIR. The proponent is, therefore, requesting an after-the-fact environmental review and authorizations in this NPC. The NPC describes the already constructed project change as temporary in nature because it is intended to support boating activity only until the project originally submitted to MEPA for the entire site is permitted and constructed.

The NPC describes changes to a marina development project originally proposed by the

proponent in an ENF Certificate dated June 22, 2001, which required the development of a Draft and Final EIR for the marina and landside components of the project. A Special Review Procedure was developed in a separate Certificate issued on the same day requiring:

1. Draft Landside EIR/Site Master Plan, with a request from the proponent to allow the redevelopment of Building 16
2. Final Landside EIR/Site Master Plan and Draft Marina EIR
3. Final Marina EIR

On September 24, 2004, the proponent submitted a Chapter 91 Application to the Department of Environmental Protection (DEP) for licensing after-the-fact for this 54-slip marina and a boat ramp. DEP has negotiated an Administrative Consent Order (ACO) with the proponent. The US Army Corps of Engineers has indicated that an individual Section 404 Permit will be required for this project, therefore a 401 Water Quality Certification will also be required from DEP. The Plymouth Conservation Commission has issued an Order of Conditions approving the temporary already completed project. I am disturbed that the construction of the temporary 54-slip marina and boat ramp occurred prior to proper permitting and MEPA review. I am, therefore, requiring that the proponent complete the EIR process for the entire site prior to allowing any other development on the site.

The entire site project as described in the ENF involves the redevelopment and reuse of the former Cordage Company ropeworks. The project proposed in the ENF to develop a mix of residential, office, commercial and marine uses. The overall project site is 21.6 acres of upland, of which 11.3 acres are formerly filled tidelands, containing nine structures. The ENF described two phases, a Landside component and a Marina component. The Marina component includes a 300-slip marina with marine supply store, office and café, an office for the Harbormaster, and a terminal for ferry/excursion boats. The Landside component includes: 160 condominium units; a 275 room hotel; 270,000 square feet (s.f.) of office space, a 19,000 s.f. museum/arts center; and three restaurants with a total of 850 seats. The project also includes 1,430 parking spaces shared between the two components.

The project changes described in the NPC for the already developed temporary 54-slip marina will lead to slight increases in impacts to the overall project reviewed in 2001 and which at this time is still proposed. I have reviewed the scope for the EIR issued June 22, 2001 and I find that the scope continues to provide appropriate guidance for preparation of the Draft and Final EIR. I reaffirm the requirement to prepare an EIR in accordance with the Certificate of June 22, 2001. The EIR should include a full discussion of the already developed temporary 54-slip marina changes, and an updated description of the project in light of these temporary changes.

I have received many comments during the comment period on the NPC. The EIR should include responses to the comments received on the NPC, as well as responses to the comments on the original ENF. The proponent should also work closely with the Office of Coastal Zone

Management (CZM), the Division of Marine Fisheries (DMF) and the Massachusetts Historical Commission to address the issues raised in there comment letters. The proponent should circulate the EIR to those who commented on the ENF and to those who commented on the NPC. The EIR should include copies of both Certificates, and copies of the comments received on both the ENF and NPC.

January 20, 2006

Date



Stephen R. Pritchard

Comments received:

01/06/06	Town of Plymouth, Office of Planning and Development
01/09/06	Old Colony Planning Council
01/10/06	The Plymouth Regional Economic Development Foundation
01/10/06	The Plymouth Area Chamber of Commerce
01/10/06	Representative Vinny deMacedo
01/11/06	Representative Thomas O'Brien
01/11/06	Senator Therese Murray
01/11/06	Office of Coastal Zone Management
01/12/06	Massachusetts Historical Commission
01/17/06	Department of Environmental Protection, SERO
01/17/06	Division of Marine Fisheries

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