

# CONNECTICUT MARINE TRADES ASSOCIATION

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March 4, 2009

Environment Committee  
Legislative Office Building  
Hartford, CT 06106

Re: **Raised Bill No. 6346 AAC the Regulation of Marine Structures**

Chairmen Meyer and Roy;

Distinguished members of the Environment Committee, the Connecticut Marine Trades Association (CMTA) urges you to **not** support **Raised Bill No. 6346 AAC the Regulation of Marine Structures**. This bill virtually mirrors two other bills, R.B.923 and P.B.5462, one of which has already been to public hearing on February 23<sup>rd</sup>. These reoccurring initiatives address no active problem and will serve to cure no issue despite how many iterations of them there are. They will be very costly to implement and add additional expense to the public, the state as well as the local harbor commissions.

- There is no demonstrated need for these bills or a reason for their acceptance. There is no history of dock failure in the State of Connecticut
- The Commissioners of Public Safety and Environment, the State Building Inspector and the State Fire Marshall do not currently have the resources nor can they better administer the issues than the current licensed engineers that are required to seal all permit plans for marine structures permits that are submitted to DEP.
- DEP currently has jurisdiction for issuing marine construction permits state-wide. They have the ability to comment on and change the construction parameters and any authorizations should remain in their hands to be universal across the state.
- Most projects submitted to DEP today must have a licensed engineer seal the plans. This process has served well for years and need not be changed.

The only assessment of risks for using treated wood in dock construction (5462) was published by New York State, Department of Environmental Conservation, Division of Fish Wildlife & Marine Resources in March 2000. That Executive Summary stated: "the use of pressure treated wood in water is unlikely to have significant impacts on aquatic life". Furthermore "creosote and CCA treated wood does not present a hazard to marine organisms...and utility poles are unlikely to cause adverse ecological impacts after the poles have been in place."

We urge you to **not** support **Raised Bill No. 6346 AAC the Regulation of Marine Structures**. Thank you for the opportunity to comment on these issues and please know that we are available to discuss them at any time.

Sincerely,

John S. Johnson  
Legislative Chair

Grant W. Westerson  
Executive Director

Linda A. Kowalski  
The Kowalski Group