

CONNECTICUT MARINE TRADES ASSOCIATION

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February 23, 2009

Environment Committee
Legislative Office Building
Hartford, CT 06106

Re: **Proposed Bill No. 5462 AAC The Regulation of Marine Structures**
Proposed Bill No. 5467 AAC The Regulation of Residential Docks By Harbor
Management Commissions

Chairmen Meyer and Roy;

Distinguished members of the Environment Committee, the Connecticut Marine Trades Association (CMTA) urges you to not support **Proposed Bill No. 5462 AAC The Regulation of Marine Structures or Proposed Bill No. 5467 AAC The Regulation of Residential Docks By Harbor Management Commissions**. These reoccurring initiatives address no active problem and will serve to cure no issue. They will be costly to implement and add additional expense to the public, the state as well as the local commissions.

- There is no demonstrated need for these bills or a reason for their acceptance.
- Harbor Management Commissions are generally staffed by lay-people who usually do not have the qualifications to establish any such criteria.
- Any dock specifications developed or regulations promulgated should be standardized across 169 municipalities and not just individual ones. They should be developed by the state (DEP) with appropriate professional input.
- 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 an 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 **Proposed Bills No. 5462 and No. 5467**. 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