

# CONNECTICUT MARINE TRADES ASSOCIATION

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March 7, 2014

Environment Committee  
Legislative Office Building  
Hartford, CT 06106

Re: **S.B. No. 310 (Raised) An Act Concerning Certificates of Permission for the Replacement of Certain Pilings.**

Chairmen Meyer & Gentile, Senator Chapin and Distinguished Members;

The Connecticut Marine Trades Association (CMTA) and our member businesses urge you to support **S.B. No. 310 (Raised) An Act Concerning Certificates of Permission for the Replacement of Certain Pilings**. This would simplify and reduce costs for maintenance of a marine facility by ending the need for a Certificate of Permission, COP, to replace an in-water dock component such as a piling.

Historically 25% of the in-water structures could be replaced each year with a COP. Recently that was amended to allow 50% of the structures to be replaced. Considering the costs of mobilization for a pile driving crew and equipment, significant savings were anticipated. Eliminating the need for a COP, if the replacement structures were a "like" replacement, in the original position, additional savings from paperwork and permits will be realized.

Routine maintenance of marine structures is allowed without a COP. Those repairs or replacements can be made to out-of-water structures such as decks, railings, and surfaces to bridges, piers and wharfs. Further repairs may involve in-water components and thus need a COP.

We urge you again to support **S.B. No. 310 (Raised) An Act Concerning Certificates of Permission for the Replacement of Certain Pilings**. It will simplify the process and be less expensive for a facility owner, allowing him to do additional work and expand the replacement program thereby extending the lifetime and usefulness of the structure.

Thank you for the opportunity to comment on this issue and please know that we are available to discuss them at any time.

Sincerely,

John S. Johnson  
Vice Chairman-Legislative Affairs

Grant W. Westerson  
President

Linda A. Kowalski  
The Kowalski Group