

**COMMERCIAL MARINE CONSTRUCTION CO.
2540 Westlake Ave. North
Seattle, WA. 98109**

December 23, 2011

Maggie Glowacki
Senior Land Use Planner
Department of Planning and Development
City of Seattle
700 5th Ave., Ste. 2000
Seattle, WA 98124

RE: Comments on 2011 2nd Draft Shoreline Master Program

Dear Ms. Glowacki

Our family is the owner of Commercial Marine Construction Co, a company that was started by my father 65 years ago. The company owns two properties affected by the Shoreline Master Program. The first one is a marina on Westlake (UC) and the second a 4 acre parcel in Ballard (UI). I am following this complex issue closely and appreciate the extra time allowed for comments. While I take issue with many of the proposals in the SMP Draft, the following are at the top of my list:

- 1) Public Access on private property. This oversteps the intended purpose of the State of Washington requirements (RCW 90.58.100) Why not improve access to existing public lands?
- 2) Replacement of a section of a creosote treated piling that is supporting a dock. (23.60.152) "Creosote treated pilings can be repaired if the piling is under a structure..." Please include the words "or under a dock". (23.60.020)Permits and Exemptions allowed if market value does not exceed \$5,718. This is an unrealistic amount as dock repairs/bulkhead repairs often require use of barges, divers, cranes and other expensive equipment. The exemption amount should be around \$25,000 to \$30,000.
- 3) Mitigation should not be required if replacement, maintenance or repair work is to be done. (23.60.150) The unintended consequences of this will discourage property owners from keeping their docks, etc. in good repair.
- 4) Non-conforming uses in UC. I am very concerned that if our building becomes a non-conforming use as defined in the SPD Draft and is destroyed by fire or other natural cause, we would not be able to rebuild the structure as it currently exists.

Thank you for your consideration of my concerns.

Suzanne Dills, President
Commercial Marine Construction Co.

emailed and mailed to: Maggie Glowacki