



357 Brown's Hill Road
Valencia, Pennsylvania 16059
(724)898-2168
Fax (724)898-9664
davidawebb@aol.com

December 23, 2011

Maggie Glowacki
City of Seattle
Department of Planning and Development
700 5th Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019

e-mail transmittal: Margaret.glowacki@seattle.gov

RE: PROPOSED SHORELINE MASTER PROGRAM - 2nd DRAFT

Dear Ms. Glowacki,

The Creosote Council (www.creosotecouncil.org) is a product stewardship and joint data development group representing the interests of companies that produce and/or use creosote, a wood preservative that the U.S. Environmental Protection Agency (EPA), following a comprehensive review, recently approved for continued pressure-treatment of railroad ties, marine and foundation piling, structural sawn wood timbers, posts, and wood utility poles.

The Creosote Council and its members have an interest specifically in regulations that will affect the use of creosote treated wood, which long has been approved by EPA for preservation and conservation of wood piling materials.

The Creosote Council supports the WWPI (Western Wood Preservers Institute) comments to the Proposed Shoreline Master Program, which will restrict the use of creosote treated wood. It is, however, recognized that your 2nd Draft does allow for "limited" use of creosote treated wood as replacement material.

To comment further, unlike other non-wood structural materials, there has been research conducted on the use of preservative wood in aquatic and marine environments. In addition, risk assessment tools and recommended best management practices (BMP's) have been developed to help determine and manage the level of environmental risk in-water and over-water.

There is also scientific evidence, as stated in the October 12, 2009 NOAA Fisheries – Southwest Region treated wood guidelines for use in aquatic environments, that when the risks are assessed on a site specific basis the use of preservative wood in most cases could be acceptable. Further, economically, preservative wood is consistently the most cost effective material to use as it is typically 2 to 3 times less expensive than alternative materials.

It is important to consider that wood as a structural engineered material is the only renewal resource. Trees are grown, harvested, and replanted to produce more trees (wood) for piling, utility poles, railroad crossties and lumber. These wood products treated with preservatives will as stated above provide an economical material lasting longer than more expensive steel, concrete or plastic (oil based) materials.

It is just plain common sense to make use of a renewable resource.

Thank you for considering our comments. If you have questions, please do not hesitate to make contact.

Sincerely,

David A. Webb
Administrative Director