



Western Wood Preservers Institute

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December 22, 2011

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

RE: PROPOSED SHORELINE MASTER PROGRAM - 2nd DRAFT

Dear Ms. Glowacki,

The Western Wood Preservers Institute (WWPI) appreciates the opportunity to once again comment on the proposed Shoreline Master Program (SMP) regulations. While we believe the preponderance of science does not support the exclusion of material preserved with creosote, pentachlorophenol, and chromium copper arsenate (CCA) and other preserved material from use in aquatic environments we are pleased the proposed regulations have been somewhat modified to provide for use of creosote preserved material and consideration of other preserved wood materials.

GENERAL COMMENTS

WWPI is still concerned with the fact the proposed regulations fail to adequately define what constitutes durable, non toxic components, as well as the arbitrary priority preference given without explanation or scientific justification. Just because material may have toxic components does not necessarily make them environmentally unsafe when properly produced to standard and applied for its intended use. To properly compare the environmental benefits it is important the overall environmental risks be evaluated throughout a product materials life. One way this can be done is through use of Life Cycle Assessment (LCA) practices that follow principles and guidance for performing an LCA, as defined by the International Organization for Standardization (ISO) in its 14000 series of standards.

On December 14, 2010, the Journal of Cleaner Production published a peer-reviewed report on an LCA for alkaline copper quaternary (ACQ) treated wood decking material, which is one of several preserved products available for use in marine applications above water. The report shows that when compared to a primary alternative product, wood plastic composite (WPC), ACQ-treated lumber impacts were *fourteen times less* for fossil fuel use, almost *three times less* for GHG emissions, potential smog emissions, and water use, *four times less* for acidification, and *almost half* for ecological toxicity than those for WPC decking. Impacts were approximately equal for eutrophication. Other preservative wood assessments comparing a variety of applications with

concrete and steel material also similarly conclude preservative wood to be the clear overall environmental winner. The results of the above mention report is a good example of the need to thoroughly evaluate all materials equally suitable for use when formulating regulatory policy. Decisions based on good intentions, precautionary principle, or bias often have unintended consequences that do not necessarily lead to the best environmental choice or desired outcome.

In addition, unlike other materials, there has been a great deal of scientific research conducted on the use of preservative wood in aquatic and marine environments, as well as development of risk assessment tools and recommended best management practices 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.

For all the above reasons we disagree with priority being given solely to undefined durable, non toxic components for which the environmental impacts are unclear nor undergone the same level of environmental scrutiny given to preserved wood.

All preservatives are strictly regulated by the U.S. Environmental Protection Agency requiring registration and approval before use is permitted, as well as the added requirement all material must be preserved in accordance with the American Wood Protection Association (AWPA). Added protection can be provided when material is required to be preserved to the WWPI Best Management Practices (BMPs).

SUGGESTED DOCUMENT EDITS

WWPI would like to offer the following suggested edits to some of the sections pertaining to treated wood.

23.60.152 General development

J. Approved durable components supported by scientific study and/or Life Cycle Assessments are the first priority for use in-water and over-water structures. Cost consideration can be used when determining feasibility. Treated wood used shall be produced to the Western Wood Preservers Institute's (WWPI) BMPs - 2006 or latest revision to assure the minimum amount of needed preservative is applied in accordance with American Wood Protection Association (AWPA) standards for marine use.

23.60.186 Standards for mooring buoys, mooring piles and floating dolphins (Delete)

C. Approved treated wood material can be used for mooring buoys, mooring piles and floating dolphins.

((23.60.204)) 23.60.187 Standards for piers and floats ((piers and floats accessory to residential development.))and overwater structures

14. Use of approved preservative wood material treated to the WWPI BMPs 2006 or latest revision is acceptable, including use of coatings or wrapping material to further reduce migration of preservative.

C. Non-residential development. Piers and floats accessory to non-residential development shall meet the following standards:

4. Use of approved preservative wood material treated to the WWPI BMPs 2006 or latest revision is acceptable, including use of coatings or wrapping material to further reduce migration of preservative.

Again, WWPI thanks you for the opportunity to provide comment. Should you have need for additional materials please do not hesitate to give me a call. I would also ask again that the referenced material submitted with our May 25, 2011 comments be fully evaluated and included as references in the SMP.

Please keep us updated on the process and opportunity for further review and input.

Sincerely,

Ted J. LaDoux

Ted J. LaDoux
Executive Director
Western Wood Preservers Institute