



CHESAPEAKE BAY COMMISSION

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September 27, 2017

Nicholas DiPasquale
U.S. Environmental Protection Agency
Chesapeake Bay Program Office
410 Severn Avenue, Suite 109
Annapolis, MD 21403

Dear Director DiPasquale:

In response to concerns expressed by our members, the Chesapeake Bay Commission (CBC) requested in January 2016 the Bay Program's Scientific and Technical Advisory Committee (STAC) conduct a technical review of the relevant information on the potential impacts of boat generated waves on shoreline stability, and provide advice on available policy actions to minimize any adverse effects. STAC completed their assessment and provided the results to the Bay Program this past spring, and we thank them for the thoroughness of their review and analysis.

During our September 2017 meeting, CBC staff briefed the Commission members on the results of the assessment, and the Commission adopted a resolution requesting the Bay Program consider how to best incorporate vessel-induced shoreline erosion and turbidity into Chesapeake Bay Program planning. The report demonstrates, and the Commission concurs, that there is a need to quantify boat wake-related sediment inputs to the Bay, both through erosion and turbidity, and for the analysis of options to ameliorate such impacts as approved best management practices (BMPs).

As noted in the STAC report, the dearth of quantified information on the effects of boat wakes on Chesapeake Bay shoreline erosion severely limits any potential accounting within the Bay model in the near-term, and any efforts to develop new policies (e.g., BMPs) are similarly hampered by a lack of specific evidence of the extent and magnitude of the impacts of boating on shoreline erosion and turbidity. Nonetheless, the STAC report clearly demonstrates unequivocal evidence that boat wakes can and do have negative impacts to the Bay's water quality, so in the view of the Commission they should be addressed.

The STAC reported elucidated four primary recommendations for further action (page 52):

- 1) Develop predictive models to quantify the relative contribution of boat wake induced erosion to overall shoreline erosion to inform water quality, habitat restoration, and shoreline protection management strategies.

- 2) Collect data necessary to identify shores vulnerable to erosion from boating, and to calibrate and validate predictive models. Data needs identified in this report include recreational boating usage patterns, boat generated wave energy and currents, shallow-water bathymetry, shoreline slope and vegetation characteristics, suspended sediment concentration as a measure of potential erosion, and shoreline erosion rates. Then, develop a definition for, and classification scheme of, small tidal waterways with the greatest likelihood for significant boat wave shoreline erosion.
- 3) Incorporate boat wake induced turbidity and erosion when siting Bay Restoration activities (e.g., wetland/submerged aquatic vegetation (SAV) restoration).
- 4) Investigate the opportunities within the Bay states to implement no-wake zones or other wake reduction strategies (navigation buffers from shore, speed limits, boat size restrictions, boat bans) for addressing shoreline erosion where public safety is not also a concern. In Virginia, current implementation of a no-wake zone requires a finding of a public safety concern and erosion is a second consideration. Empanel an expert group from the appropriate Bay jurisdictions to develop and recommend a uniform boat wake policy in the Chesapeake Bay.

Hence, the Commission, consistent with the action taken at the September meeting, requests the Bay Program determine a strategy to move forward on these recommendations, or alternatively, if some other course of action is determined to be more desirable in the near-term, elucidate that approach. We are cognizant of the many competing priorities and initiatives before the program at present, and do not want to detract from those efforts if the time and resources are not well spent.

The Commission stands ready to lend it support however necessary to continue to address this issue as a component of Chesapeake Bay restoration.

Sincerely,



Ann Swanson
Executive Director

cc: Jim Edwards, Chesapeake Bay Program, EPA
Rich Batiuk, Chesapeake Bay Program, EPA
James Davis-Martin, Virginia Department of Environmental Quality
Lisa Wainger, Chair, Chesapeake Bay Program, STAC