

# Willamette RIVERKEEPER®

September 1, 2008

Ms. June LeTarte  
Oregon State Marine Board  
PO Box 14145  
Salem, OR 97309

Re: Proposed Rules Relating to Wake Enhancing Devices

Ms. Letarte:

On behalf of Willamette Riverkeeper, I write in support of the new rules to curb the impact of Wake Enhancing Devices along a stretch of the Willamette River. We feel that the Marine Board should take this action to curb the negative impacts caused by wake enhancing devices on wake board/ski boats. Voluntary efforts are inadequate and in this case regulation is necessary.

Willamette Riverkeeper works to protect and restore the Willamette River's habitat and water quality. Over the past few years, Willamette Riverkeeper has been listening carefully to those voicing concern about large wakes in the Newberg Pool area of the Willamette River. We have also spent countless hours on the river, typically in canoes, examining the use of wake enhancing devices by the public, and the related impact on habitat. We conclude that these very large wakes indeed cause erosion, and may well damage property. Simply put, very large wakes continuously washing up on the riverbanks during the low water period of the year causes erosion that increases turbidity in the water, and often results in the bank to falling in as well.

Landowners along this section of river have documented the impact to their property with photos and careful notes over the years. It stands to reason that these wakes that collide with the shoreline loosen the riverside soils, causing erosion, and bank sloughing. There is a pretty basic and intuitive impact on the riverside area.

It stands to reason that the Oregon State Marine Board, in its ability to regulate boating use by the public, should institute rules that eliminate the use of wake enhancing devices in this stretch, and take other measures to protect river users.

Willamette Riverkeeper supports:

- 1) A Congestion Zone along the Willamette from the Newberg Bridge to Canby.
- 2) The prohibition of 180 degree turns at speed.
- 3) Boats to stay at least 200 feet away from skiers.
- 4) Prohibiting the use of wake enhancing devices, including ballast tanks, wedges or hydrofoils or other mechanical devices, or uneven loading of persons or gear on boats within the congestion zone – and some other areas frankly.
- 5) Keeping boats at a no wake speed within 200 feet of docks.

These measures are sensible, and timely. The Marine Board should take these reasonable steps in light of the significant interest by landowners along this stretch, the interest of river users in that area including those who paddle canoes and kayaks, and the growing interest of those concerned with the impacts to habitat along this stretch of the Willamette River.

Given that the Willamette River is a public resource, and is appreciated by a variety of users, one user group with a high impact on the environment and property should not be allowed to continue in its present state. One user group, in this case those utilizing wake enhancing devices, does not have a special right to impact the Willamette's habitat and private property.

It is also important to understand that boats without wake enhancing devices can be utilized for wake boarders, and a range of other motorized

boat recreational activity. If the rules are applied, wake boarders and water skiers will be able to continue their form of recreation.

As a State Agency that is becoming increasingly aware of the impact of certain types of motorized recreation on our rivers and their habitat, we are optimistic that the Oregon State Marine Board will do the right thing and institute the new rule as proposed – in full. Anything short of this represents a lost opportunity and a failure to take the appropriate level of action.

We appreciate your consideration of these comments. If you would like additional information about the wide array of habitat restoration work being funded by the State of Oregon and other entities along the Willamette, feel free to contact us at 503-223-6418 for more information.

Sincerely,

*Travis Williams*

Travis Williams

Riverkeeper & Executive Director