



To: DEEP Boating Division  
From: Alicea Charamut, Executive Director, Rivers Alliance of Connecticut  
Date: October 22, 2025  
Subject: Comments on the Scope of the Wake Boat & Wakesurf Study

Rivers Alliance of Connecticut appreciates the opportunity to provide comments on the scope of the *Wake Boat & Wakesurf Study*. We are a statewide nonprofit organization that works to protect and enhance the state's rivers, lakes, and watersheds for the benefit of the environment and the public.

We commend DEEP for initiating this study to examine the environmental, safety, and recreational impacts associated with motorized boats operating in wake surfing mode in Connecticut. This is a timely and important effort, as communities across the state are facing increasing challenges of protecting freshwater ecosystems as well as ensuring that our waters can be enjoyed by all.

### Respect for Local Control and the Need for Minimum Standards

The Lake Waramaug process demonstrated both the importance and the difficulty of addressing impacts of motorized boats in wake surf mode at the local level. Communities like Lake Waramaug should be applauded for the years of work they devoted to secure local protections. However, this time and resources could otherwise have been directed to lake management and restoration instead of fighting moneyed and well-connected opposition.

DEEP should continue to recognize and support municipalities in managing wake activity through ordinances and site-specific controls. However, every lake community should not have to fight the same long and expensive battle to protect their waters. Establishing minimum statewide protective standards would create a fair and consistent foundation for all Connecticut lakes and rivers. To this end, DEEP should consider recommending that there be no wake surfing except in waters: (i) more than 1000-foot from shore, (ii) no less than 30-foot depth, and (iii) in areas meeting (i) and (ii) and that are at least 100 contiguous acres with a regular shape and at least a 250-foot operational width, and, (iv) importantly, with the ability for local communities to adopt stronger measures.

## Environmental and Water Quality Impacts

Wake boats are ballast-heavy vessels designed to generate large, surfable waves at low speeds. These waves are far greater in height and energy than typical boating wakes, and when operated in shallow or confined waters, they can cause measurable shoreline erosion, sediment resuspension, and damage to aquatic vegetation and habitat.

Such impacts are not hypothetical; they have been documented by independent scientists in multiple states. These disturbances can degrade water quality, reduce habitat for fish and wildlife, and contribute to nutrient loading that fuels harmful algal blooms.

Watershed-based plans can cost tens of thousands of dollars to prepare and require significant local capacity to develop and implement. Lake and watershed associations spend years leveraging scarce resources to be a productive partner in meeting DEEP's water quality goals. For example, Rivers Alliance has been working closely with the Bantam Lake Protective Association, which has invested decades in addressing persistent algal blooms based on recommendations from the watershed based plan.

If DEEP does not acknowledge and address the well-documented impairments that wake surfing can exacerbate, it will undermine the progress made by these local efforts and by DEEP's own Environmental Quality programs.

We also urge that the Environmental Quality side of the agency be fully involved in reviewing and interpreting the study findings.

## Invasive Species and State Support Limitations

The same is true for the fight against aquatic invasive species (AIS). Lake associations rely heavily on grants funded by the Aquatic Invasive Species (AIS) boat stamp program and other limited funding sources to manage these threats. These grants cannot cover the escalating cost of addressing the Connecticut River strain of Hydrilla, and state support for rapid response is minimal.

Wake boats, which use internal ballast systems that are difficult to clean, impossible to fully drain and, as a practical matter, cannot be inspected, pose an aggravated and heightened risk of spreading aquatic invasives between water bodies. DEEP must account for its limited support for local efforts and lack of robust inspection programs.

Rivers Alliance strongly recommends that DEEP consult with the Connecticut Agricultural Experiment Station (CAES), which serves as the state's leading research agency on aquatic invasive species. We note that Vermont has a 'home lake' rule which requires certification that wake boat owners will not move boats from lake to lake

without undertaking a thorough inspection and decontamination process. Local communities concerned about the overwhelming cost of invasive contamination containment would surely welcome guidance about how to inspect and decontaminate ballast systems, and welcome a “home lake” rule.

## Economic Impact and Tourism

The ecological health of our lakes, rivers and ponds, including water quality, is fundamental to sustaining recreation, tourism, and property values. Degraded water quality, eroded shorelines, and unsafe conditions threaten far greater economic harm than limiting one narrow boating activity.

## Public Access and Environmental Justice

We appreciate DEEP’s stated commitment to balancing recreational access with environmental protection. However, DEEP’s response approving the Lake Waramaug ordinance appears to use access for motorized vessels as a litmus test for “robust public access.” This unintentionally overlooks the many more residents who access and enjoy Connecticut’s waters through non-motorized means such as kayakers, canoers, paddle boarders, swimmers, and families who visit public beaches.

Connecticut is fortunate to have public access to many waterbodies beyond motorized launches. This broader and more inclusive picture of access should be reflected in DEEP’s analysis.

Moreover, public access should be viewed through an Environmental Justice lens. Town and public beaches as well as car-top launches provide vital, affordable access to cooling and recreation, particularly for families and individuals who do not own motorized boats. Wake impacts on these areas must receive equal consideration within what is considered “robust public access.”

## Public Trust in Water and DEEP’s Role

The Connecticut Environmental Protection Act (CEPA) establishes that the state’s air, water, and other natural resources are held in *public trust* for the benefit of all residents. DEEP, as the primary trustee, has a duty to protect these waters from impairment and for all legitimate public uses.

As wake surfing expands on Connecticut’s inland waters, DEEP’s leadership is critical to ensuring that public trust obligations are met through science-based, equitable, and enforceable policy.

## Recommendations

Rivers Alliance respectfully recommends that DEEP:

1. Establishing minimum statewide protective standards of 1,000-foot from shore, 30-foot minimum depth, and a 100 acre, zone with at least a 250-foot operational width, with the ability for local communities to adopt stronger measures
2. Establish clear and effective guidelines to enable communities to prevent motorboats with enhanced wake systems from spreading invasive weeds
3. Implement a “one lake” rule
4. Fully evaluate environmental and safety impacts using independent, peer-reviewed research and input from Environmental Quality division of DEEP.
5. Incorporate perspectives from non-motorized users and Environmental Justice communities into the study’s framework for public access.
6. Engage CAES and local watershed and lake associations as technical partners in the analysis of invasive species risks.
7. Support municipalities through clear guidance and resources for local implementation.

Thank you for your attention to this issue and for the opportunity to contribute to the scope of the *Wake Boat & Wakesurf Study*. Rivers Alliance stands ready to assist DEEP and local partners in identifying practical, science-based solutions that protect both recreation and the long-term health of Connecticut’s waters.

## References for Consideration

### Newer Articles

- A Field Study of Recreational Powerboat Hydrodynamics and their Impacts on the Water Column and Lakebed: <https://conservancy.umn.edu/items/6a47c506-6be5-4c8a-9a96-dfea38f23b2f>
  - Has a nice digital summary as well
- The Effects of Wake Boats on Lake Health: A literature Review: [https://wigreenfire.org/2019/wp-content/uploads/2024/05/WakeBoatsLakeEcosystemHealth\\_WGF-May2024\\_Final.pdf](https://wigreenfire.org/2019/wp-content/uploads/2024/05/WakeBoatsLakeEcosystemHealth_WGF-May2024_Final.pdf)

### Helpful YouTube videos

- [Healthy Waters Initiative Phase 2 Webinar 8. 26. 2025](#)
- [Lake "aging" and the role of enhanced wake](#)

### Organized by state or country

- Connecticut
  - [Terra Vigilis Lake Waramaug Wave Impact Study Final Report](#)
  - [Terra Vigilis Lake Waramaug Shallow Water Environment Wave Impact Study Final Report](#)
  - [Short Video on Two TVES Reports Above](#)
  - [Lake Waramaug User Survey \(From Warren, Washington and Kent\)](#)
- Wisconsin
  - [Terra Vigilis North Lake Management District study](#)
  - Summary of Wake Boat Impact Studies, W. Scott Brown
- Chesapeake Bay
  - [Defining boat wake impacts on shoreline stability toward management and policy solutions](#)
  - [Review of boat wake wave impacts on shoreline erosion and potential solutions for the Chesapeake Bay](#)
- Michigan
  - [Department of Natural Resources, Wake Boats](#): concerns and recommendations related to natural resource management in Michigan Waters, September 2022
- Minnesota
  - [Minnesota Study of Wake Boat Waves](#)
  - [Own Your Wake: Example of a Public Safety Campaign](#)
- New Hampshire
  - [Final Report of the State Wake Boat Commission to Study Wake Boats](#)
  - [Project Evaluation of the Impact of Waves Created by Wake Boats on the Shores of the Lakes Memphremagog and Lovering Wakeboat: Having Fun while Making the Right Choices](#)
- Vermont
  - [Wakeboating and Wakesports in Vermont](#)
- Other

- [A comparison of boat cleaning systems: invasive species removal, boater outreach and engagement, and cost](#)
- [List of regulations across the country:](#)
- [Compilation of “Cotty Fay” Study Critiques](#)

### **Resources Compiled by Protect Lake Waramaug**

[Protect Lake Waramaug Resources Page](#)

### **Pro-Wake Surfing Studies and Advocacy**

- [National Marine Manufacturer’s wake surfing advocacy page](#)
- [The “Cotty Fay” Paper](#)