



September 29, 2025

Deputy Commissioner Mason Trumble
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

Re: Support for Approval of Lake Waramaug Ordinance Regulating Wake Surfing

Dear Deputy Commissioner Trumble:

We, Rivers Alliance and the undersigned organizations dedicated to protecting Connecticut's waters, respectfully urge the Department of Energy and Environmental Protection (DEEP) to approve the ordinance adopted by the towns surrounding Lake Waramaug that would prohibit the operation of motor boats in "wake surf" mode on the lake.

Lake Waramaug is one of Connecticut's most treasured natural resources, supporting recreation, fisheries, and wildlife habitat. In recent years, local stakeholders have raised serious concerns about the impacts of wake-enhanced boating on shoreline erosion, environmental health of the lake, and public safety. To address these concerns, an independent scientific study was commissioned, which found that wake-enhancing activities produce disproportionately large waves and propeller downwash, re-suspending sediments and threatening nearshore ecosystems.

The ordinance is a carefully considered response that reflects both scientific evidence and community consensus. It is narrowly tailored to address a specific type of boating activity that poses unique risks to the lake. Importantly, boaters will continue to have full access to Lake Waramaug for conventional boating, fishing, paddling, and other forms of recreation, and owners of wake boats will themselves be able to continue to operate their boats in "non-wake surfing" mode.

We are aware that some wake boat owners and industry groups have argued that such an ordinance infringes on boaters' "rights" or is unnecessarily restrictive. However, under Conn. Gen. Stat. § 15-136, towns are explicitly authorized to adopt ordinances regulating vessel operation within their territorial waters, subject to DEEP review. The law directs DEEP to disapprove only those ordinances that are arbitrary, duplicative, or inconsistent with statewide policy. In this case, the ordinance is supported by independent data, is targeted to a single activity with outsized impacts, and is consistent with long-standing precedent of DEEP approving local regulations—such as no-wake zones, horsepower limits, and seasonal restrictions—where site-specific conditions warrant. Uniformity in boating law does not mean uniform permissiveness; it means consistent application of reasonable protections across diverse waterbodies.

Some have also raised concerns about economic impacts. Yet protecting the lake's ecological health, 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. Millions of dollars have been invested over decades to address water quality issues on Lake Waramaug. Disapproval of this ordinance would undermine this investment and reverse progress made in improving the ecological health of the lake.

For these reasons, among others, DEEP has clear grounds to approve the Lake Waramaug ordinance. Doing so would affirm the Department's role in safeguarding Connecticut's waters, uphold statutory authority granted to municipalities, and demonstrate leadership in balancing recreation with long-term protection of our natural resources.

We respectfully ask DEEP to move promptly to approve this ordinance.

Thank you for your consideration.

Sincerely,

Alicea Charamut, Executive Director, Rivers Alliance of Connecticut
Rae Ettenger, New England Conservation Policy Coordinator, Appalachian Mountain Club
Denise Savageau, President, Connecticut Association of Conservation Districts
Lori Brown, Executive Director, Connecticut League of Conservation Voters
Rhea Drozdenko, River Steward in CT, Connecticut River Conservancy
Aimee Petras, Executive Director, Farmington River Watershed Association
Jean C. Speck, Chair, Kent Conservation Commission
Mary Pelletier, Board Secretary, Park Watershed
John Correia, President, Pequabuck River Watershed Association
Carol Haskins, Executive Director, Pomperaug River Watershed Coalition
Bill Lucey, LIS Soundkeeper, Save the Sound
Samantha Dynowski, State Director, Sierra Club Connecticut
John Hall, Executive Director, The Jonah Center for Earth and Art

Cc:

Katie Dykes, Commissioner, Department of Energy and Environmental Protection
Justin Davis, Bureau Chief, Bureau of Natural Resources
Mike Lambert, Bureau Chief, Bureau of Outdoor Recreation
Peter Francis, Director, Boating Division
Office of Governor Ned Lamont