



To: DEEP.Boating.Gov

From: Betsy Gara, Executive Director, CT Council of Small Towns

Date: April 30, 2026

RE: Draft Wake Boat & Wakesurf Study

The Connecticut Council of Small Towns (COST) appreciates the opportunity to submit the following comments on the State Department of Energy & Environmental Protection's Wake Board & Wakesurf Study.

COST appreciates that the study examines the impact of wakesurfing on Connecticut's inland waterbodies and recommends options for managing this recreational activity in a way that balances environmental protection, public safety, and outdoor recreation.

As noted in the report, wake surfing can negatively impact water quality and wildlife habitats, contribute to shoreline erosion, and create public safety issues. Municipalities devote considerable resources to ensuring that recreational lakes and other water bodies are properly maintained to provide recreation and enjoyment to residents and visitors.

Towns have invested considerable resources to protect the water quality of lakes in their communities, including addressing toxic algal blooms, invasive species, and other water quality issues. According to the report, "DEEP's review of available research concludes that the operation of wake boats can cause impacts to water quality of lakes through turbidity, phosphorus resuspension, and changes to the natural water column stratification process. These impacts can be addressed through management approaches which require operation of wake boats in deeper water." COST agrees with DEEP's conclusion that depth restrictions on wake boat operation will help minimize water quality impacts.

In addition, municipalities and lake associations actively strive to protect wildlife habitats. During certain times of the year, municipalities may place restrictions on boating and other activities to protect nesting or spawning sites and other wildlife habitats. The large waves created by wake surfing boats can undermine these efforts.

Accordingly, COST supports DEEP's findings that restrictions limiting the operation of wake boats in wakesurfing mode to a minimum distance from shore and minimum depth are necessary to protect wildlife habitats.



Distance restrictions would also help prevent shoreline erosion and damage to docks and other structures. Such restrictions are also important in protecting the safety of other boaters, kayakers, swimmers, etc.

As noted in the report, Connecticut contains 2,267 lakes and ponds greater than ten acres in size. Most of these lakes and ponds are small and cannot accommodate large power boats, including wake surfing boats. Any statewide regulation should include a ban on wakesurfing based on the size and acreage of a lake.

COST supports a statewide wake surfing regulation that includes 1) distance restrictions, 2) depth restrictions, and 3) size and acreage restrictions. Such restrictions should be based on sound science and data to ensure the protection of water quality, wildlife habitats, and public safety.

In addition to a statewide wake surfing regulation, however, municipalities should continue to retain statutory authority to adopt ordinances to regulate boating, including wake surfing, within their communities. Municipalities are in the best position to determine if wake surfing is negatively affecting water quality, wildlife habitats, and public safety. There may be times when a statewide regulation, depending on how it is crafted, is not sufficient to address these issues.

Thank you for the opportunity to comment.