

To the Legislative Committee on Administrative Rules (LCAR),
As a lifelong resident of Lake Fairlee and a wakeboat owner, I am writing to share my concerns regarding the proposed wakesport regulations. My history with our lakes, from teaching sailing to watching my own children thrive on the water, gives me a deep appreciation for a balanced ecosystem where different activities can coexist peacefully. I believe the current proposal lacks scientific grounding and creates a procedural imbalance that will ultimately hurt public trust.

The Scientific Flaw in Acreage-Based Regulation

The proposed shift to define lake eligibility based on acreage has no real scientific backing. There is no data provided to explain why a 100-acre lake is deemed safe while a 75-acre lake is not. As the Marr et al. (2022) study shows, wake energy and attenuation are based on distance from the boat and water depth—localized physical variables. A 150-acre lake and a 90-acre lake with identical depth produce the exact same wake physics at any given location. Because research ties impact to proximity rather than total surface area, acreage is not a variable that actually protects the environment. By reducing the number of lakes where people can wakesport, the state is simply creating density and congestion on the remaining waterbodies. This "compression" doesn't solve anything; it just makes the lakes more crowded and less safe for everyone.

A Path Forward: Practical Solutions Rather than moving toward arbitrary bans, I ask LCAR to consider a middle ground that balances access with the community's concerns:

- **Capacity Limits (80–120 Acre Lakes):** On lakes of this size, I propose limiting the designated zone to just one boat engaging in enhanced wake sports at a time. This is a simple, enforceable way to prevent a "crowding" feel and reduce the cumulative impact on the water.
- **2,500-Foot Minimum Length:** I suggest a 2,500-foot minimum length for wake zones. This aligns better with how these boats actually operate (the "minute mile" standard) and ensures the rules are practical for boaters to follow.
- **Safety & Right-of-Way:** Real conflict reduction happens when all boaters—not just wakeboats—stick to established U.S. Coast Guard navigation laws. Emphasizing these rules keeps the water predictable for swimmers, paddlers, and powerboaters alike.
- **Focus on Decontamination:** We need to focus on effective decontamination for every watercraft—including the 99% of boats and kayaks that don't use ballast—rather than limiting a specific group that represents only 1% of motorboats in the state.

Wakesports are not a "non-normal" use; recreational towing is an established activity that predates 1993, and modern equipment is just the natural evolution of that technology. I urge you to consider these revisions as a way to ensure that fair access can coexist with a quiet, healthy lake environment.

Thank you for your time and for the hard work you're doing to manage Vermont's waters.

Thank you,

Emily Doe
Lake Fairlee Resident