

## Lindsey Schreier

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**From:** grantfs@aol.com  
**Sent:** Tuesday, May 12, 2026 7:55 PM  
**To:** Lindsey Schreier  
**Subject:** [External] 25-P045- Vermont Use of Public Waters Rules

[External]

Dear Ms. Schreier,

PLEASE Distribute to entire LCAR Committee- Thank you

I am writing to provide comment on Rule 25-P045, *Vermont Use of Public Waters*, and to express my strong opposition to any additional restrictions on wake boats. While I appreciate the intent to balance recreation with environmental stewardship, the proposed changes introduce significant enforcement challenges, safety concerns, legal inconsistencies, and unnecessary economic and operational impacts on Vermont residents, tourists, and businesses who participate in water sports recreation.

**1. Lack of Enforcement Capacity for New Rules** Vermont already struggles to adequately enforce existing boating regulations. Adding new, highly specific wake-boat-only rules, such as expanded distance requirements or zone limitations, creates expectations that simply cannot be met with current staffing and resources. Regulations that cannot be enforced do not improve safety or environmental outcomes; they only create confusion and selective compliance. Before layering on new restrictions, the state should demonstrate that it can adequately enforce the latest, effective wakesports rules which are already in place.

**2. Safety Concerns Created by the Proposed Rules** Ironically, several of the proposed changes may *increase* safety risks. Requirements that force wake boats into narrow or artificially constrained operating patterns can push operators into unfamiliar or less suitable areas, increasing the likelihood of conflict with other users. Overly broad “distance from any object” rules are also unworkable in real-world conditions and could lead to erratic maneuvering as operators attempt to comply with ambiguous standards. Safety improves through clarity, consistency, and education, not through rules that are difficult to interpret or follow.

**3. Confusion and Inconsistency in the Proposed Regulations** The proposed language introduces vague and inconsistent terminology that will be difficult for boaters, law enforcement, and even local municipalities to interpret. Terms such as “any object,” “non-normal use,” and undefined reinstatement timelines create regulatory uncertainty. Regulations must be clear, measurable, and uniformly applicable. These proposals fall short of that standard and risk creating more confusion on the water rather than less.

**4. Conflicts With Existing Laws and Established Boating Standards** Vermont’s current wake sport regulations were developed through a rigorous, science-based process and are already among the most restrictive in the country. The new proposals conflict with established statewide boating laws that apply uniformly to all vessels. Singling out one type of boat for additional restrictions without clear evidence of harm sets a troubling precedent and undermines the consistency of Vermont’s broader boating framework. Any rule that contradicts or complicates existing law will create enforcement conflicts and legal ambiguity.

**5. Operational and Economic Impacts on Wakesports in Vermont** Wakesports contribute meaningfully to Vermont’s outdoor recreation economy. Additional restrictions, especially those

that reduce the number of viable lakes or limit operational areas, will have direct negative impacts on small businesses, guides, marinas, youth programs, and tourism. Families who have invested in equipment and local recreation will be disproportionately affected. These proposals risk shrinking an entire sector of Vermont's recreation economy without evidence that such restrictions are necessary or effective.

For these reasons, I respectfully urge the Department to reject the proposed additions to Rule 25-P045. Vermont's current wake sport regulations already provide strong safeguards, and there is no demonstrated need for further restrictions. Instead, the state should focus on consistent enforcement, education, and collaborative stewardship, approaches that support both environmental protection and equitable access to Vermont's public waters.

Thank you for your consideration.

Sincerely,

Grant Smith

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