

## Lindsey Schreier

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**From:** Steve Wolf <Steve.Wolf@ContechES.com>  
**Sent:** Thursday, May 14, 2026 3:50 PM  
**To:** Lindsey Schreier  
**Subject:** [External] Wakesports rules

[External]

Hi Lindsey, please see my below comments and forward to entire LCAR committee.

May 14, 2026

Dear VT LCAR,

Thank you for reviewing my comments on this final round of rulemaking on 2026 changes to the VT Wakesports rules. I am a senior citizen with a life-long passion for watersports. I have been waterskiing since the 1970's, knee boarded for a while in the 1980's, began wakeboarding in the 1990's and started wake surfing in the early 2000's. Currently my wife, adult children, relatives, friends and I do all three. Water skiing, typically performed at 30-35 MPH is the most dangerous sport that can result in injuries such as blown Achilles tendons, broken Tib/Fibs/Ankles along with a few upper body ailments. Wake boarding, on the other hand, is a much slower towed watersport at about 20 MPH and injuries are less frequent but can be extreme for those that go test their extreme skills with flips, spins, rolls etc. Wake surfing is the least dangerous of all towed watersports since only 10-11 MPH maximum speed and your feet are not connected to the board. Injuries of wake surfers are very rare and hence there is wide participation in all groups from age 5-90 and across many physical conditions and limitations. There are people with disabilities for whom wake surfing is the only way they can enjoy our lakes. Creating wake surfing bans are clearly a taking of people's rights. The pro ban groups are using speculation and extrapolation. That does not rise to the level required to penalize others. The Wake for Warriors is one example of an organization that takes wounded veterans surfing because it is a sport they can participate. Does VT ANR really want to deny wounded veterans access? Tubing, on the other hand, is very dangerous, like water skiing. Please note the recommended speed for children to tube and learn to water ski by WSIA is 10 MPH, so again compare the waves at 10 MPH of all boats and you will find that all heights are similar. Will these folks go after all boats next including large runabouts, pontoons and fishing vessels? The ultimate goal of these extremists is no power boats on what they think are their personal lakes used for non-motorized sports.

As an aging fella in his 60's, I still luckily can slalom ski about 2,000' then stop to catch my breath and reduce the heart rate then eventually get yanked out again rip turns for 2,000' back then call it quits. We then usually surf for many laps enjoying friends and family with many more surf participants. A ski run of 2000' at 32 mph takes no more than 48 seconds of high intensity skiing ( $2000' / 46.9 \text{ fps} = 42.6 \text{ seconds}$  plus say 5 seconds to get up) and I will get into the arbitrary assumed minimum distance proposal in a moment. We participate in all towed watersports (Mostly wake surf) about 120 hours each season from early May until mid-October here in Northern New England.

By way of profession, I am a licensed professional civil engineer with a specialty in hydrology and hydraulics of bridges, culverts, scour protection and stormwater treatment. My wife and I also are

volunteer weed watchers and lake hosts and care deeply about the environment, wildlife, fish, preventing invasive plants, zebra mussels, spiny water flea infestations & cyanobacteria blooms. We also routinely kayak, canoe and paddleboard. Truth be told we don't even use ballast when wake boarding as we seek out smooth glassy water to make buttery turns just like when we are slalom skiing. When wakeboarding we do not want to be forced out into the windy center of a lake because we too want smooth water.

I will provide my professional and practical opinion on these three wakesport specific items:

1. Distance and depth requirements
2. Minimum run length and minimum area for wakesports zone
3. Aquatic Invasive Species (AIS).

### **Distance and depth**

VT already has the most stringent rules in the USA (and North America) at 500' from shore and 20' of minimum depth. That prevent wake sports on 43 of the 73 lakes that allow power boating. The only US state regulation that is even close is ME at 300' and 15' of depth. VT's neighbors in NH have a requirement of headway speed for "all boats" at 150' from shore. (vs just 73 here in VT yet NH has over 1,000 lakes) The entire watersports industry and peer reviewed studies demonstrate that 200' from shore or other vessels and 10' minimum, depth is more than adequate for all wake sports. This has been debated for many years in NH and ME to arrive at their current state laws. In fact, states with far more registered boats, thousands of reservoirs and a 12-month boating season such as AL, GA, TN, SC, KY & VA have adopted 200' min. Would be interesting if VT ANR would prepare and share maps of what both a requirement of 300'/15' and 200'/10' would look like to show the public what that would do to the count on wake eligible lake in VT. Concerning arbitrary minimum depth requirements, the only peer reviewed scientific study to measure actual sediment resuspension (Draeger) shows in 10 -15 feet there is no impact from wake boats. Even basics wave dynamics which have been around for decades suggest the same. The marine engineers use the phrase "practically deep" when the depth is 1/2 the wavelength. That is where the wave no longer feels the impact of the bottom. Wake boat at 11 mph have 20 foot wavelengths so practically deep is 10 feet. Hence if a minimum depth is selected it should be no more than 10'. Yes many folks will tout the newly released St Anthony's Falls MN study (July 2025) calling for 14'-20' min for a Nautique G23 Paragon (a \$450 k, 7,500 lb wake boat) and I doubt any exist in VT! Out of all wake boats that produces the largest wave in the industry. However, this new study by U of MN also show that all boats should travel below headway speed in 10' or less water depth. Are we going to restrict all boats travel at 5 MPH if in less than 10' of water? Or ban all power boating on lakes less than 10' deep? Many anti wake boat groups such as LWA in WI are already downplaying that phase 2 study since it did not conclude the 35' min they demand instead scientifically showing worst case is just 14' - 20' deep for the largest wake boat. Note 97% of all wake boats in existence are smaller than a Nautique G23P!

Yes, there are many studies of wakes by specific boats in circulation, but until one compares a modern 21'- 25' runabout at 10 mph to a 21'- 25' wake boat at 10 mph, none have any credibility. In this latest MN study they compared the smallest Sea Ray Runabout SPX 190 Just 19'-7" and 3,200 lbs). The shortest and lightest in their lineup of 10 models up to 29'. Vs the largest Nautique at 7,200 lbs plus ballast! If any of these authors can obtain and study a modern wake boat they can surly obtain a similar model year runabout of same length and a typical 20' bass boat with say a 400 HP outboard both cruising along at 10 or 20 mph as well. Or a pontoon boat with twin 300 outboards. Comparing any inboard direct

drive tournament ski boat at 32 MPH is irrelevant as well since ski specific boats are designed to produce little wave when running a slalom course at 30-35 mph. and only 3 tournament ski boats are even produced in 2025. Mastercraft, Nautique and Malibu as the market has shifted to V Drive multi-sport tow boats.

### **Minimum run length and minimum wake sports zone**

This new proposal seems to be arbitrary to appease the persistent VT anti-watersports crowd to totally ban wake sports on 12 more VT lakes dropping the count to 18 from 30 out of the 73 that allow powerboats. The current 2024 rule requires 50 contiguous acre zone in that area with a 2,000' minimum run ( $2000' \times 1000' / 43,560 = 46$  acres) rounded up to 50 acres. At 11 MPH that is a 124 second run (2 mins and 4 seconds which is a very long run for many surfers). Remember, a 2,000' slalom ski run takes me just 48 seconds. The question is why arbitrarily increase the minimum reasonable wake surf run length to 3,000' and up the area to 100 acres minimum? At 3,000' the run at 11 mph takes 186 seconds or about 3.1 minutes. Who's to say a wake surf run of 3.1 mins should be the standard wake surf run versus a 2-minute wake surf run (if 2,000' length) versus a 48 second slalom run at 2,000'? This is such an arbitrary and capricious assumption to obtain a desired result of dropping the wake eligible lakes by twelve. Fifty acres is the minimum lake size to have motorized watersports in many states that have thousands more boats registered than VT. Without a doubt, a wake sports zone of 50 acres inside the 500'/20' footprint is more than enough and already the most stringent rule in all of North America. Finally, the 500' min distance from another vessel being floated around makes zero common sense. What if a vessel simply anchors out in the center of these crafted smaller water sports zone to prevent folks from participating in wake sports? Or kayakers congregate there to produce the same result to deny water sports by flooding that zone with non-motorized vessels? The 500' rule should be from shore or docks and not other vessels. Plus the boat towing the rider or surfer in a straight line always has the right of way versus a non-towing boat per all state boating laws and common sense. The boat not towing must be the "give way" boat unless it's a sailboat. One final point, modern widely used paddleboards did really become mainstream until around 2012, so how is that a normal "grandfathered" lake use? Again, we have been regularly wakesurfing about 120 hours a year here in the north country since 2000's. Most folks maybe put 20-30 hours on a boat annually. And stop talking about the wave boat waves knocking over their grandchildren wading in the water. Take the little kiddos to the ocean so they can learn to deal with breaking waves. And for all you grandmothers and grandpa's out there pay attention to your grandchildren when in the water. Better yet teach them to wake surf, they would love it. I have ridden with 3-5 year olds on the board with me and many 4-5 year olds can even get up on our small kid surf board and surf across the lake alone!

### **Aquatic Invasive Species**

Modern ballasted boats are designed to fully empty because the trailers are designed to support just the boat, a full tank of gas along with some equipment. There are warnings in the owner's manuals for wake boats and trailers not to place a boat with any ballast on the trailer stating the trailer can't handle the added weight and could destroy the trailer (and boat). We all fill and empty our tanks in the deep wake sports zones (deeper than 10') that are most always weed free. Finally, most wake sports boats, as ANR points out (over 95% of that 1% total of VT power boats) stay on the same lake for the season and rarely travel between lakes unlike fishing boats with live wells and outboard engines and runabout I/O's. Both of those type of motorized boats (I/O's and Outboards) retain far more lake water when those engines are shut down before placing on trailer than inboard V-Drive multisport boats. Inboard boats also typically have closed cooling systems like cars and trucks. Sterndrive boats (inboard/outboards) can retain up to

twice as much water, around 4 quarts, and their systems are also difficult to inspect. (and the engine heat doesn't kill those invasives when engine is turned off before loading back on the trailer) Additionally, many modern lake fishing vessels contain live wells and often visit several lakes in one day or over a long weekend for a regional bass tournament. There is zero credible evidence that a ballasted watersports boat has ever introduced invasives (plants or animals) into any body of water. It is simply a scare tactic by the anti-wake sports camp. Over in NH, on Baptist Pond in the Lake Sunapee Watershed, Curly Leaf Pond Weed an invasive plant recently exited over its spillway, flowed into Otter Pond and finally into pristine Lake Sunapee. Fortunately, it was quickly identified and eradicated from both Otter Pond and Lake Sunapee by the Lake Sunapee Protective Association. But the kicker is, there has never been a ballasted wake boat on Baptist Pond. It does seem VT ANR's updated approach/focus on AIS for ALL boats is a step in the right direction. As a Lake host at a boat ramp, we inspect all boats including kayaks, canoes and even paddleboards that are launched. Yes, it's a slippery slope if all boats become limited to one Home Lake per season. We know that will never fly and therefore ballasted water sports boat should not be singled out. Additionally, us volunteer and paid Lake Hosts are there for education of the boaters, observation/suggestions only and have zero enforcement authority.

In a nutshell, while I totally disagree with the current 500'/20' rules, let's leave the 2024 VT rules alone for 5-10 years, keep track of any incidents, # and type of boat launches and revisit in a few years. Similar to the 2024 report shared on our state's rulemaking page in 2025. Many of our VT lake associations that petitioned ANR to ban watersports boats have never even had a V-drive inboard watersports boat on "their lake" so these people are trying to ban something that doesn't even exist. Please don't take away the family fun from the citizens and tourists here in the great state of VT by cherry picking 12 more lakes for bans of summer fun and discrimination against folks that can only wake surf due to physical limitations. What about the property owners/taxpayers that already live and wake board and surf on our VT Lakes? Won't that sort of taking of rights plummet those real estate values? Lake Fairlee is a great example; 96 acres vs 100 acres? Why not 50 acres, 75 acres 90 acres etc? Why send the Fairlee surf boats over to Morey for an arbitrary 4 acres? This is so obvious of an assumption to satisfy the extreme fringe anti wake boat people. Perhaps those people could just sell and move to a smaller pond without any power boating?

I'm sure ANR is familiar what recently occurred on Lake Kanasatka over in Moultonborough NH when it turned green overnight? The NH Lakes Association recently mentioned a 27% drop in values over the next few months. Fortunately, the NHDES and the Kanasatka Lake Association has already partnered to rectify those Cyanobacteria causes for our neighbors over the border. Let's all coexist and focus on education and communication to keep our VT lakes pristine. Based on 25 years' experience surfing on the same 400+ acre lake, Wake Boats are not a threat if used 300' from shore in 10'-15' min water depth. VT already has the most stringent statewide rule in North America at 500'/20' so why modify or change it unless we go less restrictive to 300'/15' like Maine or 150' and no depth mandate like NH? Thank you again for accepting my comments and feel free to reach out.

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