



MARINE RETAILERS ASSOCIATION OF THE AMERICAS

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October, 22nd 2025

Katie Dykes
Commissioner
Connecticut Department of Energy and Environmental Protection
70 Elm Street
Hartford, CT 06106

Subject: Wake Boat and Wakesurf Study

Dear Commissioner Dykes,

On behalf of the undersigned Connecticut based boating businesses, the Marine Retailers Association of the Americas (MRAA) is writing today to provide comment on the proposed “Wake Boat & Wakesurf Study” as put forth by the Connecticut Department of Energy and Environmental Protection (DEEP).

It is our hope that our comments guide DEEP in conducting a study which fully and fairly evaluates the complexities inherent with the regulation of wake boats, elucidating the potential negative impact that outright bans, and even restrictions, on wakeboats and wakesurfing have on the Connecticut marine trades industry. The MRAA greatly appreciates DEEP's focus on this matter and hopes that this study will help to ultimately guide the state toward uniform regulations which balance access to Connecticut's lakes and ponds for all boaters with common-sense regulations which ensures the safety of all recreational boaters and stakeholders on all Connecticut waterways.

The Marine Retailers Association of the Americas (MRAA) is the leading trade association of North American small businesses that sell and service new and pre-owned recreational boats and operate marinas, boatyards, and accessory stores. MRAA represents more than 1,300 individual member retail locations and conducts advocacy efforts on their behalf.

The recreational marine industry plays a critical role in Connecticut's economy, annually valued at \$3.6 billion, it supports 13,223 jobs at more than 600 local businesses throughout the state. Recreational boating generates significant revenue for local communities through boat sales, marina operations, service and repair facilities, fuel sales, tourism, and related businesses like restaurants and tackle shops. Wake boats and wakesurfing, in particular, represents one of the fastest-growing segments of recreational boating. According to data from the National Marine Manufacturers Association sales of wake and tow boats have experienced strong growth nationally over the past decade, with Connecticut dealers and service providers benefitting from this trend. Specifically in 2024, wake sport boats sold reached a total of 8,867 units, generating approximately \$1.7 billion and equal to 9.9% of the total market value. Representing just around 10% of the total boating market, a ban or

severe restriction on wake boats and wakesurfing would have a disproportionate impact on the undersigned businesses, resulting in lost sales, reduced employment, and even diminished tourism revenue for waterfront communities. **Due to the potential negative economic impacts to small businesses, we encourage DEEP to conduct a thorough and thoughtful economic impact study on how any regulations on wake boats will hurt marine retailers and others in the Connecticut recreational boating industry. This economic impact analysis should not only take into account lost sales bans or regulations on wake boats may have, but how reduced use may also impact revenues generated from service and maintenance, boat storage, and fuel use.**

From a recreational standpoint, wakesurfing is an inclusive and family-oriented activity that attracts a broad range of participants, from young first-time boaters to experienced water sports enthusiasts. It provides a low-speed, low-risk way to enjoy time on the water and has proven to be compatible with other traditional boating activities such as water skiing, tubing, and cruising when conducted responsibly and in accordance with safe-operating practices. Many wake boat operators already observe voluntary best practices, such as maintaining a 200ft distances from shorelines, structure, and other water users, minimizing repetitive passes, and ensuring that the surf wave is being directed toward the center of the lake. These simple yet effective best practices ensure help ensure safe coexistence with anglers, paddlers, swimmers and other recreational boaters. Bans or restrictive regulations could unnecessarily divide user groups and limit opportunities for families and individuals to recreate on the water together while hurting the states recreation marine industry and the many small businesses that comprise it. The Water Sports Industry Association (WSIA) “Wake Responsibly” campaign is a great example of how self-regulations and best practices can inform user behavior. This campaign, spearheaded by the WSIA, is supported by the entirety of the recreational boating industry and focused on arming wake boat operators with the knowledge and power to operate safely and in ways that minimize negative impacts to other stakeholders. Ultimately, education and outreach emphasizing responsible operation can promote harmony among all recreational users while preserving Connecticut’s longstanding tradition of shared access to its lakes and waterways. **The MRAA encourages DEEP to include a thorough analysis on the impact of education and self-regulation on curbing user behavior. We encourage DEEP to include discussion of how education and self regulation can be used instead of a ban or restriction to achieve harmony between waterway users. Lastly, we employ DEEP to consider in their study how partnering with the recreational boating industry to share these best practices can further their reach and influence.**

From a navigation and safety perspective, it is important to recognize that wakesurfing, when conducted responsibly, can safely coexist with other forms of recreational boating such as kayaking, paddleboarding, rowing, and power boating. Modern wake boats are equipped with advanced technologies that enhance operator awareness and safety, including ballast monitoring systems, GPS-based speed controls, and wake-shaping features that allow for precise operation and control of the wake. Despite these controls and industry efforts around education and self-regulation, some states have already put in place regulations on wake surfing. **The MRAA encourages DEEP to consider how Maine established current wake surfing regulations, as they employed a transparent stakeholder driven process that ultimately created a fair and balanced regulation supported by many in the state.** While the process in Connecticut will be different then Maine, the takeaway is the same, the MRAA encourages DEEP to convene a group of stakeholders to meet and ultimately provide input on potential regulations as well as the study itself. **The MRAA holds that there should ultimately be two stakeholder working groups, one that is convened to provide input on the study, and one that is convened after the study is finalized to discuss potential regulatory options and be responsible for helping craft policy recommendations from the study for consideration by the Connecticut General Assembly.**

The MRAA greatly appreciates the opportunity to provide comment and help to inform how DEEP will go about conducting this study. We hope that this study will ultimately help to create a more clear picture of how overly restrictive regulations on wake surfing, or wake boats, will ultimately hurt the CT recreational marine industry and the many small businesses that comprise it while elucidating that regulations which balance user access while minimizing stakeholder conflict do exist for wake boats. We thank you for the ability to provide input ahead of this study. Should you have any questions, please reach out to MRAA Government Relations Manager Chad Tokowicz, at Chad@mraa.com.

Sincerely,

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