March 2, 2017

Re: Utah Natural Resources Section R651-215-8
River Throw Bag in Lieu of Type IV PFD

To all concerned parties,

Founded in 1880, The American Canoe Association (ACA) is a national nonprofit organization serving the broader paddling public by providing education related to all aspects of paddling; stewardship support to help protect paddling environments; and sanctioning of programs and events to promote paddlesport competition, exploration and recreation. Since 1972, the ACA’s Safety Education and Instruction Council(SEIC) has developed and implemented effective paddlesports safety, education and instructional programs and materials that inform, train and serve the public at all skill levels and in all aspects of paddlesports.

It is widely recognized as a best practice, and a paddlesports industry and recreational standard that throw ropes are an appropriate rescue tool for whitewater rivers, combined with wearing a properly fitting Personal Flotation Device(PFD).

We understand the complexities involved with R651-215-8: River Throw Bag in Lieu of Type IV PFD in regards to the Federal requirements versus the State regulations and the implications of programmatic grant funding from the U.S. Coast Guard.

However, we ask you to continue to consider the appropriateness of providing the throw rope option in whitewater rivers.

If we can provide any additional reasoning or insights, please let us know.

Thank you for your time and consideration.

Sincerely,

Christopher Stec
Chief Operating Officer
ACA | Canoe - Kayak - SUP - Raft - Rescue
503 Sophia St., Suite 100
Fredericksburg, VA 22401
540-907-4460 x110
828-329-3404 (cell)
888-229-3792 (fax)
cstec@americancanoe.org
www.americancanoe.org

Making the World a Better Place to Paddle! Since 1880.
CC:
United States House Subcommittee on Coast Guard and Maritime Transportation
Representative Hunter, Chairman, Representative Garamendi,
Ranking Member Peter.davidson@mail.house.gov John.Rayfield@mail.house.gov

United States Senate Commerce Subcommittee on Oceans, Atmosphere, Fisheries, and Coast Guard, Senator Sullivan, Chairman, Senator Peters, Ranking Member, Senator Lee, Member leslie_ford@lee.senate.gov

Utah Governor Herbert: Twall@utah.gov

Utah Department of Records:
Tammy Wright: tammywright@utah.gov

Utah Department of Natural Resources:
Executive Director Michael Styler mikestyler@utah.gov
Law Enforcement Director Sid Groll sidgroll@utah.gov
Watershed Director Alan Clark alangclark@utah.gov
Boating Law Administrator Ty Hunter tyhunter@utah.gov

United States Coast Guard:
Sector San Diego, Lieutenant Robert Cole: Robert.D.Cole@uscg.mil
Regulatory Development Manager, Boating Safety Division, ADFO for NBSAC, Jeff Ludwig: Jeffrey.A.Ludwig@uscg.mil
Recreational Boating Safety Specialist, Eleventh District, Paul Newman: Paul.L.Newman@uscg.mil