Regarding the proposed removal of Utah Natural Resources Section R651-215-8

Dear Officer Wright,

River Runners For Wilderness was founded in 2002 and represents a broad spectrum of river runners and American citizens who care about the river resources in the Colorado River watershed. Our members, now numbering over two thousand with outreach to over 40,000 whitewater enthusiasts, continue to have a deep concern for the future of the recreational and safety values of the Colorado River watershed and the management of these national treasures.

It was with some surprise that we recently became aware of a proposal by the State of Utah to rescind Utah Natural Resources Parks and Recreation Section R651-215-8 titled River Throw Bag in Lieu of Type IV PFD. (cite: https://rules.utah.gov/publicat/bulletin/2017/20170201/41154.htm)

Did you know Lewis and Clark used throw ropes when in swift (rough) waters with their canoes in the Voyage of Discovery with lifesaving effect? (Cite: October 25, 1805, Lewis and Clark Expedition) To this day, the use of a throwable rope is still recognized as an effective swift (rough) water safety device.

Since 2014, we in the swift (rough) water community have been thrilled that the State of Utah has allowed river runners wearing life jackets to choose either a cushion or a bag of rope for rough water rescue. This ability to choose either a Throw Rope with a minimum of 40 feet of line OR a throw cushion where all vessel occupants are required to wear lifejackets (PFD’s) has been a safety promoting breath of regulatory fresh air.

Simply stated, R651-215-8 says when a river runner has to wear a life jacket by regulation, they must also have either a cushion or rope, one or the other. It’s their choice.

As most swift (rough) water river runners know, when in swift (rough) water, we are required to wear a life jacket. We also know that the ability to throw a rope to someone who has been cast into the river to pull them either to shore or to another watercraft has proven to be a lifesaving device.

We understand that United States Coast Guard (USCG) regulations say that watercraft 16 feet long and over must carry a Type IV throwable personal flotation device (throw cushion or life ring) as per 33 CFR 175.15.

We note that in swift (rough) water, both the USCG and the Arizona Game and Fish Department acknowledge Type IV throwable cushions are not recommended. The United States Coast Guard notes a Type IV throwable cushion or ring is “Not for rough water survival.” (cite http://www.uscg.mil/hq/cg5/cg5214/ringlb.asp)
The Boaters Guide of Arizona handbook of boating laws and responsibilities, page 38, notes the following with regards to TYPE IV throwable devices: “These cushions and ring buoys are designed to be thrown to someone in trouble. *Since a Type IV is not designed to be worn, it is neither for rough waters nor for persons who are unable to hold onto it.*

The reasoning behind this rough water disclaimer is a cushion does not get you out of rough water. Also, a cushion is a one-shot application. A rope can be deployed to multiple swimmers and can be used repeatedly during one rescue attempt.

The State of Utah notes the intent of R651-215-8 as presently written “is solid with swift water rescue techniques” and we support that determination 100%.

The State of Utah also notes they must be in compliance with 33 CFR 175.15. With utmost respect, it may be possible that on swift (rough water), the managing agencies of these river sections have imposed a more restrictive and stringent standard than 33 CFR 175.15. In these specific areas of swift (rough) water, all participants must wear a lifejacket (personal flotation device), a more restrictive and stringent standard than 33 CFR 175.15. Only within this more restrictive standard is R651-215-8 applied in these areas where participants are wearing a lifejacket (PFD) by regulation.

As such, we ask you to keep R651-215-8 (River Throw Bag in Lieu of Type IV PFD) in effect as written.

On a personal note, I have greatly enjoyed whitewater (swift/rough) recreation in the State of Utah for decades, and have written two riverguides for whitewater enthusiasts in Utah, the *Guide to the San Juan River* and the *Guide to the Colorado & Green Rivers in the Canyonlands of Utah & Colorado*. River safety is of the highest priority to me, my family, and all of the individuals cc’d in this letter.

This proposed rule change removes choice and does nothing to enhance or benefit the issue of swift (rough) water river safety that even Lewis and Clark understood two centuries ago.

Cordially yours,

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