



DIVISION OF NATURAL RESOURCES

324 4th Avenue, Room 342
South Charleston, WV 25303-1228
Telephone (304) 558-2754
Fax (304) 558-2758
TDD (304) 558-1439
TDD (800) 354-6087

Stephen S. McDaniel
Director

July 20, 2018

R. Duane Michael
Chief Ranger
United States Department of the Interior
National Park Services
New River Gorge National River
Gauley River National Recreation Area
Bluestone National Scenic River
PO Box 246
Glen Jean, WV 25846

Dear Mr. Michael:

The West Virginia Division of Natural Resources would like to thank you and your management team for your review and comments related to the proposed rule changes to 58CSR12 – Commercial Whitewater Outfitters.

The agency agrees with your conclusion the proposed changes would have no negative impact on park resources or visitor experiences. The statement of clarification relating to licensed outfitter rental services that would include soliciting or engaging in business within National Park boundaries is appreciated and the agency will revise the proposed rule to include compliance with applicable federal regulations.

Again, your comments and clarification are appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Jenkins", written over a horizontal line.

Colonel Jerry Jenkins, Chief
Law Enforcement Section

ll/wg



United States Department of the Interior

NATIONAL PARK SERVICE

NEW RIVER GORGE NATIONAL RIVER
GAULEY RIVER NATIONAL RECREATION AREA
BLUESTONE NATIONAL SCENIC RIVER

104 Main Street
P.O. Box 246

Glen Jean, West Virginia 25846



IN REPLY REFER TO:

July 20, 2018

WV Division of Natural Resources
324 4th Avenue
Room 343
South Charleston, WV 25303
Attention: Wendy Greene

Dear Ms. Greene:

The management team at New River Gorge National River has reviewed the proposed rule change to 58CSR12. The Park does not believe that the proposed rule change would negatively impact park resources or the visitor experience.


However, the Park would like to provide a statement for clarification as it relates to the proposed regulatory change that would allow rentals on the New River from below Sandstone Falls to Meadow Creek. Per 36 CFR § 5.3, anyone soliciting or engaging in business within park areas must have a permit to do so. Accordingly, Outfitters or other business that would want to provide livery services at the Lower Beach at Sandstone Falls would need a commercial use permit in order to legally conduct those activities. This would also apply for any other locations within the New River Gorge National River, Bluestone National Scenic River or the Gauley River National Recreation Area.

Thank you for the opportunity to comment on this proposed regulatory change. If you have any questions or require any additional information please contact me at ronald_michael@nps.gov or on my work phone at (304) 465-6518.

Sincerely,

Ronald D. Michael

R. Duane Michael
Chief Ranger

TAKE PRIDE
IN AMERICA 

DNR Comments

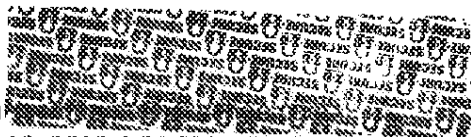
From: DNR Comments
Sent: Thursday, July 19, 2018 12:53 PM
To: 'sammy pugh'
Subject: RE: Proposed New River rule change

Mr. Pugh,

The West Virginia Division of Natural Resources would like to thank you for submitting your public comment for support of the proposed rule change to 58CSR12 Commercial Whitewater Outfitters relating to the Sandstone Falls to Meadow Creek area of the New River.

Again, we thank you for your comments and support of the proposed rule changes.

Colonel Jerry B. Jenkins
DNR Law Enforcement
324 Fourth Avenue
South Charleston WV 25303-1228
Telephone: 304-558-2784
Fax: 304-558-1170
jerry.b.jenkins@wv.gov



From: sammy pugh
Sent: Monday, July 16, 2018 4:01 PM
To: DNR Comments <DNRCComments@wv.gov>
Subject: Proposed New River rule change

I fully support the new rule changes for the Sandstone Falls to Meadow creek area. This will help the local economy, encourage litter cleanup events, and could produce employment opportunities for local citizens.

Sammy Pugh

DNR Comments

From: DNR Comments
Sent: Thursday, July 12, 2018 11:36 AM
To: 'Laura Lou'
Subject: RE: DIY New River

Dear Ms. Harbert:

The West Virginia Division of Natural Resources would like to thank you for submitting your public comments regarding proposed rule changes to 58CSR12 Commercial Whitewater Outfitters.

The division would like to clarify that changes to DIY boating and kayaking on the New River as mentioned in recent news articles is inaccurate may be a bit misleading. As a private boater or kayaker, you are welcome to traverse West Virginia rivers at your leisure, which has always been the case. The proposed changes to 58CSR12 provide for an additional designated whitewater section of the New River permitting rental services provided by licensed commercial outfitters and guides where currently they are prohibited. These proposed changes do not affect the private boater/kayaker.

Again, we thank you for your comments and support of the proposed rule changes.

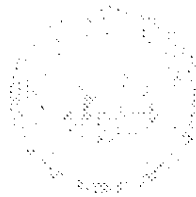
Colonel Jerry B. Jenkins
DNR Law Enforcement
324 Fourth Avenue
South Charleston WV 25303-1228
Telephone: 304-558-2784
Fax: 304-558-1170
jerry.b.jenkins@wv.gov


From: Laura Lou Harbert <llou@charleston.com>
Sent: Thursday, July 12, 2018 11:36 AM
To: DNR Comments <dnrcomments@wv.gov>
Subject: DIY New River

Where do I start? I am 76 years old and this is the first time I have responded to a public comment. I guess this says how important I think this is to the future of WV. I am also a native of Hinton.

I find the DIY on the New River an exciting opportunity to increase economic development in the Hinton and New River area via recreation and tourism. This is one of the keys to the future of WV. I will be one of the first ones there on a kayak with my 46 year old son and his family.

Laura Lou Harbert
Charleston, WV

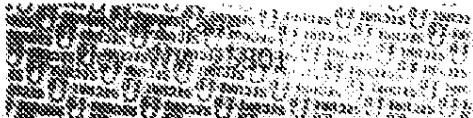


DIVISION OF NATURAL RESOURCES
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Telephone 304-558-2754
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Stephen S. McDaniel
Director

July 13, 2018

Bill Redden



RE: 58CSR12 Rule Comments – Commercial Whitewater Outfitters

Dear Mr. Redden:

The West Virginia Division of Natural Resources would like to thank you for submitting your public comments regarding proposed rule changes to 58CSR12 Commercial Whitewater Outfitters.

Your concerns regarding the proposed change to the rule in relation to permitting rental services by licensed commercial whitewater outfitters, outfitters, and guides to the section of the New River below Sandstone Falls to Meadow Creek have been noted and will be reviewed.

Again, we thank you for your comments and value your efforts in reviewing the proposed rule changes.

Sincerely,

Colonel Jerry Jenkins, Chief
Law Enforcement Section

JJ/hk/wg

RECEIVED

JUL 11 2018

AND
DIRECTOR'S OFFICE

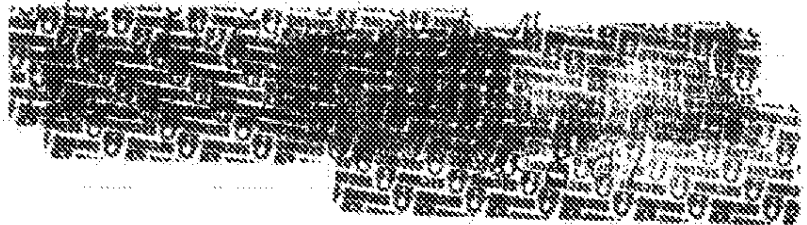
ATTN: WENDY GREEN;

NO WAY SHOULD THIS BE ALLOWED
TO HAPPEN BELOW SANDSTONE FALLS!!

IT IS A FAVORITE FISHING SPOT
FOR JOBS OF FISHERMEN, AND THIS
WILL KILL ALL OF THAT FOR THEM,
INCLUDING ME! OR AS I SUSPECT,
THE REAL REASON BEHIND IT??
I SUSPECT SO!! LOOK FOR A LOT
LESS FISHING LIC. TO BE BOUGHT!

STOP THIS INSANITY

BILL REDDAN



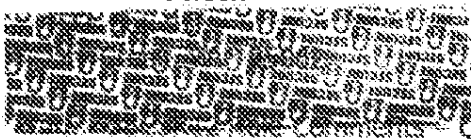


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Stephen S. McDaniel
Director

July 10, 2018

Glen Henderson



Commercial Whitewater Outfitters

Dear Mr. Henderson:

The West Virginia Division of Natural Resources would like to thank you for submitting your public comments regarding proposed rule changes to 58CSR12 Commercial Whitewater Outfitters.

In response to your comments regarding rentals on the New River, the division would like to clarify the proposed rule changes do not open all whitewater zones on the New River to rental services. Currently, there are two sections of the New River on which rental services provided by licensed commercial whitewater outfitters, outfitters, and guides are permitted. The proposed changes add an additional section of the New River on which rental services by licensed commercial whitewater outfitter, outfitters and guides will be permitted. However, rentals of inner tubes are prohibited on the newly designated section. Addition restrictions based on water levels for rental services will be in place.

Licensed commercial whitewater outfitters, outfitters, and guides track river usage numbers daily, which are reported to the division monthly. These totals are then reviewed at least annually by the Whitewater Commission and adjustments are made to river usage designations as deemed necessary.

Again, we thank you for your comments and value your efforts in reviewing the proposed rule changes.

Sincerely,

Colonel Jerry Jenkins, Chief
Law Enforcement Section

JJ/hk/wg

To: WV DNR

I am a 64 yr old retired coal miner with a lifetime of experience on New River.

From total novice to whitewater raft guide, to John Boat owner and operator, canoe owner and turnoverer, fisherman, fishing guide and camper.

Your idea to oper New River rentals, DIY is not a very good one. Just like we used to tell rafting clients, "This is NOT Disneyland." There is nothing to stop people from doing these activities on their own right now, but if you open it up on a rental basis the public will assume it is perfectly safe and people will be injured or worse.

If you have been out on the river in these locations in summer you would know that we don't need more congestion. The river is turning from a place to get away from it to another crowded place with not enough parking.

Please do not approve rental DIY trips on the New.

RECEIVED

JUL 09 2018

DNR
DIRECTOR'S OFFICE

Alan Nelson



Greene, Wendy L

From: Greene, Wendy L
Sent: Tuesday, July 10, 2018 1:09 PM
To: 'jmack'
Subject: RE: ATTN: Wendy Greene - Public Comments - 58CSR12

Dear Mr. McCallister:

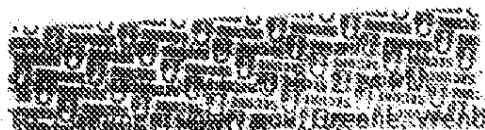
The West Virginia Division of Natural Resources (WVDNR) would like to thank you for submitting your public comments regarding proposed rule changes to 58CSR12 Commercial Whitewater Outfitters.

We would like to provide clarification on some of your comments,

- Comment A1 – West Virginia State Code §20-3B-4, Whitewater Responsibility Act, outlines the duties of participants engaging in recreational activities offered by commercial whitewater outfitters and commercial whitewater guides in this state. Among other prohibitions, it states no participant may board upon or embark upon any commercial whitewater expedition when intoxicated or under the influence of nonintoxicating beer, intoxicating beverages or controlled substances.
- Comment A5 – A 2008 court decision determined that whitewater rafting is not governed by maritime law, therefore US Inland Waterways Navigation rules and regulations are not applicable to this rule.
- Comment A6 – Yes. Thank you for catching this error, it should read “two trip guides”. We shall make the correction in the revised filing of the rule.
- All other comments – The WVDNR will submit your concerns, comments, and suggestions to the Whitewater Commission for review and discussion.

Again, we thank you for your comments and value your efforts in reviewing the proposed rule changes.

Colonel Jerry B. Jenkins
DNR Law Enforcement
324 Fourth Avenue
South Charleston WV 25303-1228
Telephone: 304-558-2784
Fax: 304-558-1170
jerry.b.jenkins@wv.gov



Greene, Wendy L <Wendy.L.Greene@wv.gov>
Subject: ATTN: Wendy Greene - Public Comments - 58CSR12

ATTN: Ms. Wendy Greene:

Attached you will find comments I am submitting related to the proposed rules related to whitewater outfitters/etc (58CSR12)

58CSR12

TITLE 58
LEGISLATIVE RULE
DEPARTMENT OF COMMERCE
DIVISION OF NATURAL RESOURCES

SERIES 12
COMMERCIAL WHITewater OUTFITTERS

§58-12-1. General.

1.1. Scope and Purpose. -- The purpose of this rule is to provide for the regulation of commercial whitewater rafting, outfitting, and related activities to assure safe operations and protect the environment.

1.2. Authority. -- W. Va. Code §20-2-23a.

1.3. Filing Date. -- ~~February 23, 2016.~~

1.4. Effective Date. -- ~~May 11, 2016.~~

1.5. Sunset Provision. -- ~~This rule shall terminate and have no further force or effect upon the expiration of five years from its effective date.~~

§58-12-2. Definitions.

2.1. "Commercial Watercraft Clinic" means an instructional class ~~for the purpose of teaching to teach~~ the Eskimo roll, paddling, reading whitewater, navigating, portaging, surfing and scouting whitewater, as applicable.

2.2. "Commercial Watercraft Clinic Instructor" means a person who is qualified to teach a commercial watercraft clinic pursuant to the relevant American Canoe Association (ACA), or comparable, industry standards, and who has appropriate first aid and CPR training.

2.3. "Commercial Whitewater Guide" or "trip guide" means any person who is an owner, agent or employee of a commercial whitewater outfitter, and who is qualified and authorized to provide services for whitewater expeditions in the state in accordance with W. Va. Code §§20-2-23 and 20-2-23a and this rule.

2.4. "Commercial Whitewater Expedition" means the act of floating, traveling or traversing whitewater, in any manner, using a watercraft by a commercial whitewater outfitter.

2.5. "Commercial Whitewater Outfitter" means any person, partnership, corporation, or other organization, or any combination thereof, duly licensed, authorized and operating from within or from without the State, which for monetary profit or gain, provides whitewater expeditions or rents watercraft or equipment for use in commercial whitewater expeditions on any river, portions of rivers, or waters of the State.

2.6. "Division" means the Division of Natural Resources.

Commented [A1]: Overall Comment: There is no section that instructs/requires guides or trip leaders to remove someone who they deem to be impaired by alcohol, drugs, or otherwise unable to participate safely. Providing an instruction that guides must legally eject anyone deemed "unfit" due to intoxication or drug use, eliminates the concern that guides would "get in trouble" for removing someone from their trip who might be drunk/similar. There may be value in considering writing a section that enables (or better, enforces) guides to remove impaired guests.

~~2-14. 2.18.~~ "Watercraft" means a vessel in the commercial whitewater outfitter's fleet used for commercial whitewater expeditions, or other watercraft in an outfitter's fleet, ~~including a vessel in an out of state commercial whitewater outfitter's fleet used for out of state commercial whitewater expeditions for the purposes of meeting guide training criteria required by section 12 of this rule. It shall include including, but not be limited to the following vessels that further meet the requirements set forth in this rule:~~

~~2-14.a. 2.18.1.~~ A canoe;

~~2-14.b. 2.18.2.~~ An inflatable kayak or duckie rated to carry one (1) or two (2) persons;

~~2-14.c. 2.18.3.~~ An inner tube;

~~2-14.d. 2.18.4.~~ A kayak or C-1 that is a hard-shell boat that is made of plastic, fiberglass or other hard material, not rubberized material;

~~2-14.e. 2.18.5.~~ A raft that is an inflatable craft rated to carry three (3) or more passengers;

~~2-14.f. 2.18.6.~~ A river board; or

~~2-14.g. 2.18.7.~~ A stand-up paddleboard.

~~2-15. 2.19.~~ "Whitewater" means water, in part of a river, that is white because it is moving swiftly over rocks, including rapids and falls.

~~2-16. 2.20.~~ "Whitewater Zone" means all rivers, portions of rivers or other waters of the state as identified in subsections sections 3.1 and 9.12 of this rule.

58-12-3. Designated Whitewater Zones.

3.1. The following rivers, portions of rivers, or waters of the State are designated as whitewater zones. For the purposes of conducting studies as required by W. Va. Code §20-2-23a, the New, Gauley, Cheat, Shenandoah and Tygart Valley Rivers are further divided into special "study zones".

~~3-1.a. 3.1.1.~~ Cheat River from its confluence with Saltlick Creek to the confluence of Big Sandy Creek.

~~3-1.a.1. 3.1.1.a.~~ From its confluence with Saltlick Creek to the State Route 26 Bridge at Albright.

~~3-1.a.2. 3.1.1.b.~~ From the State Route 26 Bridge at Albright to the confluence of Big Sandy Creek.

~~3-1.b. 3.1.2.~~ Gauley River from the Summersville Lake Dam to the Railroad Bridge at Jodie.

~~3-1.b.1. 3.1.2.a.~~ From the Summersville Lake Dam to Mason's Branch Road.

~~3-1.b.2. 3.1.2.b.~~ From Mason's Branch Road to the Bridge at Jodie.

~~3-1.b.3. 3.1.2.c.~~ From the Bridge at Jodie to Confluence at Gauley Bridge.

Commented [A2]: It may be worth noting if "inner-tube" means a commercially available automobile/agricultural fire tube legitimately used for cars/tractors... or if "innertubes" include devices such as those manufactured for "pool floats", etc. Only pointing this out as durability of "innertubes" could be varied, and result in safety issues.

Commented [A2]: There is a "raft" type known as a "shredder" which can be manned by two persons. It may be worth noting that as one of the items in 2.18.5. Also "outcrafts" might be worth mentioning here. If you want to see a R.I shredder, look here:

West Virginia and shall hold valid public liability insurance in the name of the commercial whitewater outfitter with minimum coverage of three hundred thousand dollars (\$300,000) per occurrence for bodily injury and twenty-five thousand (\$25,000) aggregate for property damage. The commercial whitewater outfitter shall submit proof of liability insurance coverage and the surety bond to the director not later than February 15th of each year. The issuing insurance company shall furnish immediate written notification of the cancellation of the policy and/or the surety bond to the director. The requirement of cancellation notification shall be printed on the bottom of every policy.

4.5. The commercial whitewater outfitter shall pay its annual license fees to the Division not later than February 15th.

4.6. An applicant for a commercial whitewater outfitter's license for the ensuing year shall provide the director with the information specified on the Division's application and any additional information that the director considers necessary for consideration of the application by March 15th. Upon review and consideration by the whitewater commission, the director shall send the applicant a written reply by September 30th stating whether or not the license will be granted.

4.7. A commercial whitewater outfitter shall keep a current record or file containing the name, address, age, and residency of all persons who have used his or her services. An outfitter operation shall keep a current record or file containing the name, address, age, and residency of all persons who have used his or her services in a whitewater zone. These records shall be kept for a period of two (2) years and shall be made available to the director upon request.

4.8. Whitewater Guide Trainee Information Sheet.

~~4.8.a.~~ 4.8.1. Individual guides are responsible for completing the Whitewater Guide Trainee Information Sheet furnished by the division. The commercial whitewater outfitter shall provide forms to individual guides or guide trainees.

~~4.8.b.~~ 4.8.2. A commercial whitewater outfitter shall not employ a guide trainee for the purpose of guiding to a guide on a commercial whitewater expedition until it has received the guide trainee's information sheet.

~~4.8.c.~~ 4.8.3. A West Virginia commercial whitewater guide is not required to supplement the guide trainee information sheet except to show qualifications for additional rivers or sections of rivers.

~~4.8.d.~~ 4.8.4. The commercial whitewater outfitter is responsible for keeping on file the original or a certified copy of the completed whitewater guide trainee information sheet. These records shall be maintained by the commercial whitewater outfitter for two (2) years following the guide's last date of employment. The commercial whitewater outfitter shall provide the guide or guide trainee with a certified copy of the trainee information sheet and upon request, shall forward a copy to the Division of Natural Resources, Law Enforcement Section, 324 Fourth Avenue, South Charleston, West Virginia 25303-1228. ~~upon request.~~

4.9. Whitewater Guide Trip Leader Information Sheet.

~~4.9.a.~~ 4.9.1. Individual guides shall complete the Whitewater Guide Trip Leader Information Sheet furnished by the division.

Commented [A4]: Would it be appropriate in this section to add something like "for children under 18, the operator shall maintain the associated parent or guardian accompanying the minor, and shall maintain that for each individual child's record."

9.3. The director may issue special use permits to commercial whitewater outfitters for the use of motorized watercraft to provide whitewater trips to senior citizens, disabled persons, and other persons who might not otherwise be able to participate in whitewater recreation. The director may also issue special use permits to commercial whitewater outfitters to conduct whitewater trips for the purpose of ~~making to make~~ documentary recordings or to provide emergency transport services.

9.4. Motorized watercraft shall not pass non-motorized trips unless signaled to do so by the trip leader of the non-motorized watercraft. The non-motorized watercraft shall make all reasonable efforts to facilitate passing of the motorized watercraft.

9.5. While underway, each passenger, ~~guide trainee, commercial watercraft clinic instructor, trip guide, and trip leader shall wear a securely fastened vest-type personal flotation device of an appropriate design and fit for each activity type and person as defined and approved by the United States Coast Guard pursuant to 33 C.F.R. §175.13, 2014 et seq. as authorized by 46 U.S.C. §4302 and as prescribed in subsection 10.1. of this rule.~~ The commercial whitewater outfitter shall maintain all personal flotation devices in a good and serviceable condition.

9.6. Each commercial whitewater expedition shall have a minimum of one (1) trip guide for every ten (10) passengers or any portion thereof. There shall be a minimum of two guides on each commercial whitewater expedition of more than six (6) watercraft.

9.7. There shall be no less than one (1) trip guide on a commercial whitewater expedition on rivers or sections of rivers, unless otherwise designated in ~~subsection 9.12. or section 14 of this rule.~~ ~~Section 14 requirements shall only apply to rented watercraft on sections specifically permitting rental watercraft which are listed in section 14.~~

9.8. A commercial whitewater outfitter may run his or her whitewater expedition in conjunction with another commercial whitewater outfitter's whitewater expedition in ~~order~~ to fulfill the requirements of this subsection.

9.9. There shall be one commercial whitewater trip leader on each commercial whitewater expedition.

9.10. A trip leader may count as a trip guide ~~for the purpose of meeting to meet~~ the requirements of this subsection.

9.11. Each commercial watercraft clinic shall have a minimum of one (1) trip guide for each six (6) customers or any portion thereof.

9.12. The following rivers, portions of rivers, or waters of the State are designated as whitewater zones for ~~the purpose of~~ rafting West Virginia's rivers, portions of rivers, or waters of the State to determine the appropriate watercraft, student limits and minimum number of guides per trip by whitewater zones:

~~9.12.a.~~ 9.12.1. Cheat River.

~~9.12.a.1.~~ 9.12.1.a. From its confluence with Saltlick Creek to the State Route 26 Bridge at Abright there shall be a minimum of one (1) trip guide per trip.

Commented [A5]: Just wondering that there may be precedent which could be referenced here in US Waterways rules and regulations for navigation? Also "Pass" may be best clarified to include upstream or downstream navigation (for example the upriver is always going downstream, but a power boat may be going up or downstream... "passing" seems to indicate something akin to "overtaking" which would be downstream? Only for clarity, this might be worth cleanup?

Commented [A6]: For clarity... should the second sentence say "two trip guides" rather than "two guides"?

~~10.2.~~ 10.2. Commercial watercraft clinic instructors, guide trainees, trip leaders, and trip guides shall wear a vest-type personal flotation device of an appropriate design and fit for each activity and person as defined and approved by the United States Coast Guard pursuant to 33 C.F.R. §175.13 2014 et seq. as authorized by 46 U.S.C. §4302, which shall be worn and securely fastened while underway during commercial whitewater expeditions, training trips, and commercial watercraft clinics.

~~10.2.~~ 10.3. The minimum raft size that may be used on any river is an eight (8) foot, two (2) compartmentalized raft. The size of raft shall be measured from the outside tube surface in the bow to the outside tube surface in the stern when fully inflated, plus or minus six (6) inches.

~~10.3.~~ 10.4. Gauley River. At flows ~~in excess of~~ more than one thousand (1,000) cubic feet per second between Summersville Dam and Sweet's Falls, the minimum watercraft size shall be a twelve (12) foot, four (4) compartmentalized watercraft.

~~10.4.~~ 10.5. Every commercial whitewater expedition shall be equipped with the following:

~~10.4.a.~~ 10.5.1. At least one (1) first aid kit per trip.

~~10.4.b.~~ 10.5.2. At the beginning of each trip, each trip leader or trip guide shall possess at least one (1) throw line or throw bag not less than forty (40) feet in length. One (1) professional quality rescue rope which is seventy (70) feet in length shall be carried on each commercial whitewater expedition. The seventy (70) foot rescue rope may be counted as one of the required throw lines or throw bag.

~~10.5.~~ 10.6. All watercraft used by a commercial whitewater outfitter or outfitter shall be marked with its name, initials, or an easily recognizable logo, and shall be plainly visible and legible from a distance of one hundred (100) feet.

558-12-11. Accident Reports.

11.1. Injury Report. If a commercial whitewater outfitter or outfitter receives a report of an injury from a customer or is aware of an injury or accident that requires medical services at an established medical facility and the injury or accident occurs during the performance of its services from the put-in to the take-out, the commercial whitewater outfitter or outfitter shall file an accident report with the director using the injury report form prescribed by the Whitewater Commission. The form shall include the name, address, and age of the person injured, the nature of the injury, the time and place of the accident and the circumstances of the accident and shall be filed with the director within fifteen (15) days after the accident.

11.2. Property Damage Report. If an accident occurs during the performance of a commercial whitewater outfitter's or outfitter's activities that results in non-vehicular property damage ~~in excess of five hundred dollars (\$500)~~ of more than two thousand dollars (\$2,000), it shall file a report with the director within fifteen (15) days after the accident. This property damage report shall include the name of the owner of the property; an estimate of the amount of the loss; the time and location of the event causing the damage; and a description of the accident.

558-12-12. Commercial Whitewater Trip Guides and Trip Leaders.

12.1. Commercial Whitewater Trip Guides. A Commercial Whitewater Trip Guide shall:

Commented [A7]: See earlier comment RE: Canzrafts, sleds, etc which may not meet this criteria, but may not qualify as "duckies/inflatable kayaks" ... may be worth asking a commercial outfitter's opinion on language here? Also, this seems for commercial use, since that's the context of this document, right? ... private rafters may use any size raft or configuration?

Commented [A8]: These thresholds seem somewhat hard to enforce? Do throwts constitute "compartments"? While the intent is probably to mean the main tubes must have four compartments, it may be smart to state that cross throws do not constitute unique compartments.

Commented [A9]: What comprises a "first aid kit"... is that just bandages and gauze? May be worth at least vaguely defining the scope/readiness of the kit?

Commented [A10]: Is there merit to requiring at least one throw bag PER BOAT (not per trip group)?