



**PETITION TO REQUEST THE UNITED STATES COAST GUARD TO RECONSIDER ITS “VESSEL” CLASSIFICATION OF STAND UP PADDLEBOARDS, OR IN THE ALTERNATIVE ALLOW STAND UP PADDLEBOARDS TO OPERATE UNDER THE WINDSURFER EXEMPTION TO THE PFD REQUIREMENT, OR IN THE ALTERNATIVE, OPEN UP THESE ISSUES TO PUBLIC COMMENT**

**PREAMBLE**

The new sport of Stand Up Paddle Boarding (“SUP”) enables many people to enjoy our oceans, lakes, and rivers in all of their glory. From open ocean crossings, to surfing distant offshore reefs, paddling in harbors and cruising in our streams and estuaries, new opportunities abound for fisherman, photographers, surfers, and exercise enthusiasts of all stripes. The fast growth of SUP is challenging local, state, and the federal government on how to safely integrate SUP activities while ensuring that all watercraft can maximize the enjoyment of our natural resources.

In October of 2008, the United States Coast Guard (“USCG”) in a legal memorandum, *without a public comment period*, designated SUP’s operating outside the surf zone as “vessels.” This legal determination requires, among other things, that SUP riders wear, or have attached to their boards, personal flotation devices (“PFD’s”). While there are specific conditions where PFD’s for SUP’s may be appropriate such as running whitewater rapids, the wearing of PFD’s in most circumstances is unnecessary and hinders the safety of the SUP rider. Further, this determination *made without a public comment period* may lead to other requirements contained within Subchapter S such as Hull Identification Numbers (“HIN’s”) and maximum capacity plates which are impracticable for SUP’s, (one-person boards varying in length from seven feet to 20 feet, made by both local custom surfboard shapers and high volume offshore factories).

Unlike kayaks, canoes and other paddle craft that seat an operator, SUP riders must stand and continuously balance atop their board much like windsurfers. Few riders are willing to wear a PFD due to the discomfort and obstruction with the unique SUP paddling stroke, causing most riders to lash the PFD to the deck of the SUP or wear a belted inflatable. In conditions of wind, waves and tidal flow it is more difficult for a rider wearing any type of PFD to swim and recover the board before it is swept away, and if the PFD is strapped to the board the rider would lose both the PFD and the SUP. SUP’s are large unsinkable platforms that typically provide at least ten times the flotation of a PFD and experienced riders know the safest operation requires staying with the board at all times. The consensus is that utilizing a leash firmly affixed to both the rider and the board achieves the highest level of safety and will be readily accepted by the SUP community as leashes are currently worn by nearly all SUP users.

The SUP community agrees with the USCG that lights and whistles are essential to safe nighttime paddling.

**PETITION**

***I, the undersigned, respectfully petition the USCG to reconsider its determination that SUP’s operating outside of the surf zone are “vessels.” For the reasons set forth above, I believe that requiring PFD’s to be affixed to the SUP or worn by the rider does not maximize rider safety and can, in fact, lead to a false sense of security and hinder rider safety.***

***I believe that the SUP “vessel” designation should be rescinded with the SUP categorized in the same class as surfboards and laydown paddleboards, or alternatively, to include SUP’s within the windsurfing exemption for PFD use, or alternatively to open these issues to “public comment” in order that the above issues may be determined with the full input of riders, industry, and other watercraft user groups. The requested rescission and reclassification will maximize rider compliance and help to ensure that the USCG’s limited resources are used to further its mission of enhancing maritime safety.***

<b>Name:</b>
<b>Address:</b>
<b>City, State, Zip:</b>
<b>Email Address:</b>
<b>Signature:</b>