

STEC

Safety, Training, Environmental, Consultants

In response to the concerns raised during the proposed amendments to Section 8-8 of the City Code of Ordinances.

Concerns:

1. Remove the existing requirement to mark the towline at 800 ft.
 - a. The argument of trimming the line will cause operator to re-measure and adjust line mark every week.

Response: No change to requirement.

Explanation: This mark will help identify length of towline for operators and City officials. Operators generally mark their towline approximately 150 from the bitter end to maintain a safe amount of wraps on their drum to prevent “Yoyoing” the line.

2. Reduce the 1000ft minimum operating distance from shore

Response: No change to requirement.

Explanation: Industry standards set a **minimum** distance of 1,000 feet. ASTM and First Flight Insurance require a minimum distance of 1,000 feet. It is critical to give yourself a safety buffer in the event of line separation or loss of power to execute a retrieval/rescue of passengers. 6 of the 8 deaths since 2009 involved towline separation. This will also provide an additional safety buffer between banner planes and parasail operations.

3. Reduce the 700ft proposed minimum operating distance from any fixed object (pier)

Response: I propose to change it to 1,000ft

Explanation: No argument or evidence was presented to show justification for approaching the pier. This fixed object can be deadly in the event of towline separation or loss of power. In 2009 two female passengers died following a towline separation and where drug into the pier. This information is available per the NTSB investigation.

4. Change buoy type requirement.

Response: I recommend changing to an all-orange buoy with a 12” min. diameter. No wording requirements.

5. Maximum above ground level (AGL) of parasail from 500ft to 450ft Maximum.

Response: I agree with change to provide a safety buffer for low flying air-craft.

6. Change the requirement for the safety briefing to occur on the shore to allow the briefing to take place on the vessel.

Response: At minimum, the guest should be given a written safety briefing on shore to read, or have it read to them. This safety briefing must be signed by the passenger showing that he/she has read, understands, and is willing/able to comply. Minor passengers should have this briefing signed by a parent or guardian.

7. Remove the existing restriction requiring people who rent jet skis to possess a current vessel operator's license.

Response: Defer to legal council

8. Revise the required parasail towline type to "line must be polyester with a minimum tensile strength of 6,000 lbs."

Response: Parasail tow lines should be braided with a minimum strength of not less than 6,000lbs.

In addition to the above responses, I recommend the following:

1. Each operator prepare and post at their place of operation an emergency procedures/crisis management plan to include:
 - a. Name and contact number of designated company representative
 - b. Secondary contact person
 - c. USCG phone number
 - d. Marine Patrol phone number
 - e. Life Guard
 - f. Designated City official
 - g. Hospital(s)
 - h. All incidents/accidents requiring more than basic first aid to a passenger must be reported to City officials within 24 hours.
 - i. Any incident/accident involving a death or transported by EMS to hospital, must be reported as soon as possible, but no later than 8 hours to Designated City Official.
 - j. Submit in writing emergency procedures for the following:
 - i. Fire on vessel with parasail aloft.
 - ii. Line Separation.
 - iii. Sudden or Heavy weather
 - iv. Man overboard
2. Parasails, harness, and multi-passenger bars, shall be individually numbered or tagged with a number that can easily identify each piece of equipment. This ID/serial number will be reference when completing required maintenance logs.