



16700/16-021
January 11, 2016

City of Gulf Shores
Director of Recreation & Cultural Affairs
Attn: Mr. Grant Brown
P.O. Box 299
Gulf Shores, AL 36547

Subj: CITY OF GULF SHORES PARASAIL VESSEL SAFETY ORDINANCE

Ref: (a) Mr. Grant Brown (City of Gulf Shores) email dated December 22, 2015, Request for
USCG Comments on Proposed Amendments
(b) ASTM Specification F3099-14, Standard Practices for Parasailing

Dear Mr. Brown:

This letter is being provided in response to reference (a) to address concerns raised at the December 18, 2015 meeting on proposed amendments to Section 8-8 of the City of Gulf Shores City Code of Ordinances.

Proposal #1: Remove the existing requirement to mark the towline at 800 feet.

Recommendation: Keep the towline marking requirement in place if it will assist with the enforcement of the 500 foot (or 450 foot per Proposal #5 below) Above Ground Level (AGL) height restriction. We understand that the towline requirement was put in place to assist enforcement personnel on shore or on the water with the computation of height. If other means are available to observe or calculate this height, then we would have no objection to removing this portion.

Proposal #2: Reduce the 1000 foot minimum operating distance from shore.

Recommendation: Maintain the minimum operating distances of at least 1000 feet for onshore wind conditions and per the following table for offshore wind conditions:

Wind 0-5 mph	1000 ft distance from shore
Wind 6 to 10 mph	1000 ft + 1 times the towline length
Wind 11 to 15 mph	1000 ft + 2 times the towline length
Wind 16 to 20 mph	1000 ft + 3 times the towline length

This will ensure alignment with reference (b) and help reduce conflicts with the banner plane operating corridor. Additionally, we recommend noting that this minimum distance applies to both the vessel and the parachute.

Proposal #3: Reduce the 700 foot proposed minimum operating distance from any fixed object (pier)

Recommendation: We concur with this recommendation. While reference (b) does not specifically speak to the subject of minimum distance from piers, we feel that a minimum of 700 feet from the boat and parasail is sufficient.

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Proposal #4: Change the existing safety corridor buoy type requirement from orange and white to orange, and not require the buoys to be marked “No Swimming.”

Recommendation: We have no objection to this proposed change. We recommend ensuring that “No Swimming” restrictions are posted elsewhere to warn other beachgoers.

Proposal #5: Change the maximum Above ground Level (AGL) height of parachute to 450 feet.

Recommendation: We concur with this proposal as it will reduce the risk of interference with banner plane operations.

Proposal #6: Change the existing requirement for the Safety Briefing to occur onshore to the allow the briefing to take place on the vessel.

Recommendation: We recommend that the Safety Briefing include, at a minimum, the details provided in Section 8 of reference (b), and that this Safety Briefing, whether it occurs on shore or on the vessel, be recorded for each passenger so that enforcement agencies can later verify that this is being completed.

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

Recommendation: Per enclosure (1), the Coast Guard recommends that rental businesses provide basic boating safety instruction and education on the safe and prudent operation of personal watercraft (jet skis) or require proof of prior education before renting to anyone. If the vessel operator’s license restriction is removed, we recommend prescriptive requirements for safety instructions and safe operation by the rental business.

Proposal #8: Revise the required parasail towline type to “line must be polyester with a minimum tensile strength of 6,000 pounds.”

Recommendation: We concur with the increase in minimum tensile strength from 4,800 to 6,000 pounds. Parasail towlines should be of braided, low stretch construction.

We appreciate the opportunity to provide our recommendations, and appreciate your cooperation in helping to enhance the safety of parasail operations within the Gulf Shores jurisdiction. Please feel free to contact me at (251) 441-5284 or by email at robert.c.compher@uscg.mil if you have any questions or if I can be of further assistance.

Sincerely,



R. C. Compher
Commander, U. S. Coast Guard
By direction

Encl: (1) U.S. Coast Guard Information Sheet, “Personal Watercraft”



U. S. COAST GUARD

INFORMATION SHEET



PERSONAL WATERCRAFT

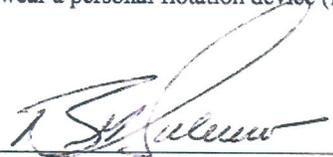
ISSUE: An upward trend in the number of personal watercraft (PWC) in accidents involving children and adolescents when compared to other types of recreational vessels.

BACKGROUND: Since their introduction in the mid 1970's, PWC continue to enjoy a steady upward trend in use and popularity, especially among younger boaters. While the overall number of PWC in accidents and resulting injuries have shown a remarkable downward trend since 1996, children and adolescents are injured with greater frequency riding PWC when compared to other types of recreational vessels. In one year, 112 children under the age of 12 were injured on PWC. Lack of experience and excessive speed caused 60% of the accidents when the operator was less than 12 years of age. Twenty percent of these were operators in violation of State laws and manufacturers' recommendations. Additionally, 80% of these operators did not have formal training, and most PWC accidents occur in the first 20 hours of operation. Current estimates show over 1.48 million PWC are in use with an annual rider-ship of over twenty million Americans.

DISCUSSION: States have assumed the greater responsibility for regulating PWC operation. Currently, the majority of the States and Territories have adopted laws specifically aimed at PWC operation and that address one or more of the following: mandatory lifejacket wear, minimum operator age, prohibition of night operation, and prohibition of unsafe operation such as wake jumping within 100 feet of the vessel creating the wake, weaving through congested traffic, excessive speed, and operation too close to another vessel. PWC are recreational vessels as defined in 46 U.S.C. § 2101 and must command the same respect as any other vessel by its operator and fellow boaters. The Coast Guard worked with the National Association of State Boating Law Administrators (NASBLA) in the development of a Model Act for Personal Watercraft. The Personal Watercraft Industry Association (PWIA) has a similar model act and fully supports passage of such legislation. The industry has been sensitive to the negative perceptions regarding their product and has been very active in promoting PWC operator legislation, education and safety awareness.

A personal watercraft is a vessel and the operator must obey the Navigation Rules. Similarly, they retain all the privileges and responsibilities that accrue to other power driven vessels on the water. The Coast Guard strongly advocates basic boating safety instruction and education, especially for children, before riding a PWC. Supervising adults should be aware of all manufacturers' recommendations and local laws concerning PWC use by children. The Coast Guard further recommends that rental businesses provide basic boating safety instruction and education on the safe and prudent operation of the PWC or require proof of prior education before renting to anyone, and require renters to wear a personal flotation device (lifejacket).

APPROVED: _____


B. M. SALERNO
Rear Admiral, U.S. Coast Guard

DATE: _____

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