



CGD17INST 16714.1
15 FEB 2001

SEVENTEENTH DISTRICT INSTRUCTION 16714.1

Subj: ALASKA SURVIVAL CRAFT AND EQUIPMENT REQUIREMENTS FOR SMALL PASSENGER VESSELS

Ref: 46 Code of Federal Regulations (CFR) 117.25 and 180.25

1. PURPOSE. This instruction promulgates Seventeenth Coast Guard District policy regarding survival craft requirements and the carriage of EPIRBs on small passenger vessels operating in Alaska waters to reduce the potential for loss of life developing from marine casualties.
2. DIRECTIVES AFFECTED. None.
3. DISCUSSION. The cold waters, remote operating environment and limited emergency resources in Alaska present a substantially higher risk of loss of life resulting from a maritime accident than in other regions of the U.S. In many areas of Alaska limited VHF communications prevent notification of emergencies to the Coast Guard necessitating the carriage of more effective communications as provided by EPIRBS. Additionally the remoteness of Alaska's waters and limited maritime traffic in many areas can lead to lengthy delays in obtaining assistance from the Coast Guard or other vessels in the event of an emergency. Delays in obtaining assistance and cold water temperatures render lifefloats and buoyant apparatus, presently required by regulations for most small passenger vessels, ineffective in preventing loss of life.

The above risks faced by vessels operating in Alaska waters warrants Seventeenth District Officers in Charge, Marine Inspection (OCMI) to carefully evaluate presently required lifesaving equipment carried on inspected vessels operating in their respective zones and modify these requirements as appropriate, pursuant to the guidance provided in this instruction.

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The very cold waters of Alaska typically lead to persons in the water expiring from hypothermia in 30 minutes to an hour. The lifefloats or buoyant apparatus presently carried by many passenger vessels solely provide buoyancy and do not provide crew and passengers escape from Alaska's cold waters and the deadly threat of hypothermia. Historically the safety record for these vessels is good, however, past accidents and the increase in small passenger vessel activity to remote areas warrant improving the lifesaving equipment safety net in the event of a sinking. While the likelihood of an accident on these vessels is relatively low, the high probability and consequence of loss of life is not acceptable.

4. **BACKGROUND.** Two small passenger vessel groundings in the summer of 1999 and one in 2000 caused substantial damage requiring the evacuation of all passengers onto vessels that came to assist. Fortunately, the weather was favorable in all cases and did not prevent the safe evacuation of passengers. Additionally, the required safety equipment, drills, and emergency procedures worked well and prevented injuries or loss of life. These accidents highlight the reality that passenger vessels will be involved in serious accidents requiring "abandon ship" in Alaska and that survival craft play a critical role in preventing loss of life. Amplifying information on the two most serious accidents is provided below.

On 12 June 1999, a 156' passenger vessel grounded on a rock near Glacier Bay and, due to the flooding and 45 degree list, required the evacuation of 56 passengers and 24 crew to nearby fishing vessels and a second passenger vessel.

On 27 July 1999, a 150' vessel struck bottom leading to uncontrolled flooding requiring the evacuation of 126 passengers onto an assisting vessel.

In both of the above cases, VHF communications were ineffective in notifying the Coast Guard due to poor communications in the areas the vessels were located. Additionally, there were two serious marine casualties involving uninspected passenger vessels in 1999 that led to the abandonment of both vessels and the serious potential for loss of life. The safety of these smaller, uninspected passenger vessels are the focus of the Seventeenth Coast Guard District's Uninspected Passenger Vessel Voluntary 5 Star Safety Program that addresses the carriage of inflatable liferafts (ILR's), inflatable buoyant apparatus (IBA's), and EPIRBS.

Vessels operating on international voyages are required by SOLAS to carry an EPIRB and a minimum 125% primary lifesaving either through the carriage of lifeboats or ILR's. Other vessels in domestic voyages are not required to carry this equipment. While the new regulations in 46 CFR 180 require additional lifefloats in 2001, lifefloats provide no protection from hypothermia, the primary safety concern in Alaska. It is the Seventeenth District's policy to phase out the carriage of buoyant apparatus and lifefloats and replace them with IBA's and ILR's. This measure is needed to provide added protection from hypothermia and increase the survivability of passengers and crew in the event of a casualty by providing them escape from cold water.

46 CFR 117.25 and 180.25 provides the OCMI authority to modify required lifesaving equipment on vessels operating in their zones. Specifically, the regulation states;

"(b) The cognizant Officer in Charge, Marine Inspection (OCMI) may require a vessel to carry specialized or additional lifesaving equipment if:

- 1) The OCMI determines the conditions of the voyage render the requirements of this part inadequate; or
- (2) The vessel is operated in Arctic, Antarctic, or other severe conditions not covered under this part.”

In light of Alaska’s severe operating environment, the Seventeenth District promotes higher lifesaving equipment standards for passenger vessels that OCMI’s shall apply, as appropriate, to small passenger vessels operating in their zone. Enclosure (1) depicts the previous regulations applying to existing vessels, the regulations that become effective 11 March 2001, the International Maritime Organization Safety Of Life At Sea (SOLAS) requirements (for comparative purposes) and the Seventeenth District’s standards to be applied to vessels as determined by the OCMI in April 2002.

The estimated cost associated with these requirements over a five-year period is \$1 per passenger day. This calculation is based on the cost of the associated equipment, annual servicing costs, and a 100-day operating season at 80% passenger capacity.

5. ACTION.

- a. OCMI’s shall exercise their authority under 46 CFR 117.25 and 180.25 and evaluate each small passenger vessel’s route and operation and apply the Seventeenth District’s safety equipment standards found in enclosure (1) as appropriate. Subject to the operating conditions encountered outlined in paragraph 5 (b) below lifefloats and buoyant apparatus that do not provide escape from the water should not be allowed to satisfy primary lifesaving requirements for vessels operating on Alaska’s coastal waters after 15 April 2002.

Additionally, OCMI’s should evaluate the need to require the carriage of a registered 406 MHz EPIRB based on the remoteness of a vessel’s route and its potential for operating in areas of poor communications.

- b. The OCMI shall consider the following criteria when reviewing each small passenger vessel operation in his zone in determining the primary lifesaving equipment carriage requirements;
 - (1) weather and sea conditions prevalent for the route of the vessel,
 - (2) cold water conditions that can lead to rapid onset of hypothermia,
 - (3) proximity of ports of refuge and rescue resources,
 - (4) rugged coast and inaccessible shoreline,
 - (5) remoteness of vessel operations, and
 - (6) Coast Guard VHF-FM coverage for the vessel’s area of operation.
- c. The following survival craft carriage policy shall be applied to all small passenger vessels operating in Alaska as determined appropriate by the cognizant OCMI based on the above criteria:

Route	Minimum Survival Craft Requirements
Rivers	No Change – see 46 CFR Table 117.200(c) and 180.200(c)
Lakes, Bays and Sounds	100% Inflatable Buoyant Apparatus
Limited Coastwise	100% Inflatable Buoyant Apparatus
Coastwise	100% Inflatable Liferrafts
Oceans	100% Inflatable Liferrafts

The compliance date for carrying additional lifesaving equipment as determined by the OCMI shall be 15 April 2002 for existing vessels and immediately for vessels undergoing new construction or major conversion. Vessels required by 46 CFR 180 to carry additional life floats effective 11 March 2001, should purchase IBA's or ILR's instead.

- d. After determining a small passenger vessel's lifesaving equipment requirements, OCMI's must ensure its weight or arrangement does not compromise the vessel's stability. Vessels with questionable stability should be required to undergo a new stability test. If necessary to ensure a vessel's stability, appropriate restrictions, such as a reduction in the number of passengers or operational limitations, should be determined and noted on its Certificate of Inspection (COI).
- e. There may be vessel routes or built-in operational practices that do not meet or significantly reduce the severe operating conditions outlined above. In these cases, the application of this lifesaving equipment policy by the cognizant OCMI may not be warranted. Possible exemptions might include:
 - (1) Vessels on short routes in protected waters, such as water taxi services, with a support infrastructure and dedicated communications that ensures immediate response.
 - (2) Operational practices where two or more vessels always operate at the same time, over the same limited route and always in visual and radio contact with each other and capable of safely rescuing all crew and passengers in the event of a casualty.

If a vessel is exempted, the operating conditions should be included on its COI with a statement that these operating conditions are in lieu of additional lifesaving requirements.

- f. Questions regarding application of this policy should be directed to CDR John Bingaman at (907) 463-2805.



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Encl: (1) Comparison Chart for Small Passenger Vessel Lifesaving Equipment Requirements (Cold Water Only)

Comparison Chart For Small Passenger Vessel Lifesaving Equipment Requirements (Cold Water Only)

	Old "T" (Existing Vessels built prior to 11 March 1996)	New "T" (by March 11, 2001 or 10 years from keel laid date)	"K" (by March 11, 2001 or 10 years from keel laid date)	Alaska Survival Craft Equipment Requirements	
Ocean	100% L.F.	W/subdivision 100% IBA 100% L.F.	100% ILR	100% ILR	
Coastwise	100% L.F or Buoyant Apparatus (BA)	W/subdivision Non-wood vsls W/in 3 nm from shore W/out subdivision W/subdivision or 406 EPIRB	Wood vsls 67% IBA 100% L.F. 100% L.F. 100% L.F. 50% L.F.	W/accom 100% IBA W/out Accom 67% IBA W/406 EPIRB 50% L.F. W/in 3 nm from shore w/406 EPIRB 50% L.F.	100% ILR
Limited Coastwise (20 miles from a harbor of safe refuge)	50% L.F or BA W/in 1nm from shore None	Wood vsls W/subdivision Non-wood vsls W/in 3 nm from shore W/out subdivision W/subdivision or 406 EPIRB	67% IBA 100% L.F. 100% L.F. 100% L.F. 100% L.F. 50% L.F.	W/accom 100% IBA W/out accom 67% IBA W/in 3 nm from shore w/406 EPIRB 50% L.F.	100% IBA
Lakes, Bays, and Sounds	30% L.F. or BA W/in 1nm from shore None Dinghies, Dories, skiffs, ILR or ring buoy may be used as substitute for some or all of the primary LS req.	Wood vsls W/subdivision Non-wood vsls W/in 1 nm from shore	100% L.F. 50% L.F. 50% L.F. None	W/accom 67% IBA W/out accom 100% L.F. W/in 1 nm from shore None	100% IBA

	Passenger Ships On International Voyages (not short)	Passenger Ships On Short International Voyages	Passenger Ships Less Than 500GT & Less Than 200 Persons On Board
International Maritime Organization SOLAS Requirements For Passenger Ships On International Voyages	Life Boats - 50% per side, 100% total or 37.5% per side + liferafts w/equivalent capacity for a total of 100% persons on board In addition – Liferafts w/ 25% capacity persons on board One rescue boat on each side of the ship	Life Boats – 30% per side, w/ additional liferafts for a total of 100% persons on board In addition – Liferafts w/ 25% capacity persons on board One rescue boat on each side of the ship	Liferafts – 100% per side, 200% total persons on board if readily transferable from one side to the other, otherwise – 150% per side, 300% total person onboard One rescue boat