



CGD17INST 16714.1A
5 Mar 2007

SEVENTEENTH DISTRICT INSTRUCTION 16714.1A

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

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

1. PURPOSE. This instruction promulgates Seventeenth Coast Guard District (D17) 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. Seventeenth District Instruction 16714.1 is canceled.

3. DISCUSSION. The cold waters, remote operating environment, and limited emergency response 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 passengers of vessels operating in Alaska waters warrants D17 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 cold waters of Alaska typically lead to persons in the water expiring from hypothermia within 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 activity to remote areas warrant improving the lifesaving equipment safety net in the event of 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.** 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 inflatable liferafts (ILRs). Other vessels in domestic voyages are not required to carry this equipment. Title 46 CFR Part 180 requires additional lifefloats; however, lifefloats do not provide protection from hypothermia, the primary safety concern in Alaska. Title 46 CFR Parts 117.25 and 180.25 provides the OCM authority to modify required lifesaving equipment on vessels operating in their zones. In April 2002, D17 phased out the carriage of buoyant apparatus or lifefloats and replaced them with inflatable buoyant apparatus (IBAs) and ILRs. This measure was implemented to provide for added protection from hypothermia and to increase the survivability of passengers and crew in the event of a casualty by providing them escape and protection from cold water.

5. **ACTION.**

a. OCMs's shall exercise their authority under 46 CFR Part 117.25 and 46 CFR Part 180.25 and evaluate each small passenger vessel's route and operation to apply the D17 safety equipment standards. Subject to the operating conditions encountered outlined in paragraph 5 (b) below, lifefloats and buoyant apparatus that do not provide escape from the water shall not be allowed to satisfy primary lifesaving requirements for vessels operating on Alaska's coastal waters.

b. The OCM shall consider the following criteria when reviewing each small passenger vessel operation in their 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
- (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 OCM 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 & Sounds	100% Inflatable Buoyant Apparatus
Limited Coastwise	100% Inflatable Buoyant Apparatus
Coastwise	100% Inflatable Liferafts
Oceans	100% Inflatable Liferafts

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 shall be required to undergo a new stability test. If necessary to ensure vessels 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 capable of safely rescuing all crew and passengers in the event of a casualty.

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

6. **ENVIRONMENTAL EFFECT AND IMPACT CONSIDERATIONS.** Environmental considerations were examined in the development of this instruction and have been determined to be not applicable.
7. **FORMS/REPORT.** All appropriate Marine Information for Safety and Law Enforcement (MISLE) documentation shall be completed within the required timeframes.


A. E. BROOKS