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February 12, 2019

MARINE SAFETY INFORMATION BULLETIN 02-19

Application Process for Restricted Operator of Uninspected Passenger Vessel (ROUPV) Merchant Mariner Credential on Inland Waters in Western Alaska

- Ref: (a) Title 46 Code of Federal Regulations (CFR) 11.467(g)
(b) [CG-MMC Policy Letter 01-16 "Restricted Operator of Uninspected Passenger Vessels \(ROUPV\) Endorsements"](#)
(c) COMDTPUB 16721 [Navigation and Vessel Inspection Circular 02-14](#) "Grandfathering and Transitional Provisions for Merchant Mariner Credentials"
(d) Seventeenth District Instruction 16670.0 "Field Guidance to Submit Information for a Navigability Determination of Federal Waterways in D17"
(e) Title 33 Code of Federal Regulations (CFR) 2.05-25

PURPOSE: This informational bulletin provides guidance for individuals seeking Restricted Operator of Uninspected Passenger Vessel (ROUPV) endorsements on Merchant Mariner Credentials to operate on Inland lakes and/or rivers within the Western Alaska Officer in Charge of Marine Inspection (OCMI) Zone. The Western Alaska OCMI Zone encompasses all of Alaska, with the exception of the Southeast Alaskan panhandle and the majority of Prince William Sound.

AUTHORITY: Reference (a) and (b) permits the OCMI to set sea service and examination standards for local ROUPV endorsements that are less stringent than those required for an Inland OUPV endorsement, but which must still align with Federal regulation and national policy concerning ROUPV credentialing.

PUBLICATIONS AFFECTED: Sector Anchorage MSIB 04-15 regarding ROUPV is canceled.

BACKGROUND: Beginning in the late 1990s, guides and other operators of Uninspected Passenger Vessels were able to obtain a Restricted or Limited "Operator of Uninspected Passenger Vessels Guide License on the Freshwaters and Rivers of Western Alaska" that permitted operation on all freshwater rivers or lakes in Western Alaska. In 2009, the Coast Guard consolidated mariner credentials and created "Merchant Mariner Credentials" which replaced licenses. This consolidation also incorporated the centralization of the credentialing program at the Coast Guard National Maritime Center. In 2016, Policy Letter 01-16 (reference (b)) took effect to ensure nation-wide consistency with the application of the credentialing regulations. Both the policy and the subsequent regulation defined parameters for the issuance of ROUPV endorsements that are more restrictive in scope than the original Western Alaskan ROUPV credential.

- 2010 POLICY LETTER 10-04: Policy was issued by the Coast Guard Headquarters Office of Commercial Vessel Compliance (Mariner Credentialing) in 2010. The purpose of this policy letter was to establish national standards to assist OCMI's with consistent implementation of ROUPV credentialing regulations. The Office of Commercial Vessel Compliance developed the policy letter as part of a more general Uninspected Passenger Vessel safety push following deaths of passengers on multiple Uninspected Passenger Vessels, including one on Lake Texoma

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(between Texas and Oklahoma) in 2009. Findings from the casualty investigations led to an expanded review of the Coast Guard's issuance of ROUPV endorsements nationwide. The review found that implementation varied considerably between OCMI Zones and was often inconsistent with regulations. The 2010 policy letter was intended to promote uniform nationwide compliance. Among other restrictions, the 2010 policy letter introduced the guidance that OCMI's should issue ROUPV endorsements only for "low risk" waterways. CG-543 policy letter 10-03 was canceled and replaced with CG-MMC Policy Letter 01-16. The policy letter can be downloaded from the National Maritime Center's website at under canceled policy :

https://www.dco.uscg.mil/national_maritime_center/

- **2014 RULE CHANGE:** Reference (a) is a regulation that became effective in March 2014, updating the requirements for issuance of a ROUPV endorsement. The Federal Register is available at federalregister.gov/a/2013-28032. This rule was published on December 24, 2013, and was proposed in a supplemental notice of proposed rulemaking on August 11, 2011 in 76 Federal Register 45908. The new rule requires "at least 3 months of service in the operation of the type of vessel and on each body of water for which the endorsement is requested." Three months of sea service is counted as 90 days. This requirement for local sea service significantly reduces the potential geographical scope of an individual's ROUPV endorsement. This also allowed for a phase in period that ends March 23, 2019 in accordance with reference (c) which allowed a five year phase in period.
- **2016 RULE CHANGE:** Reference (b) gives the most current and up-to-date guidance on ROUPV endorsements including, but not limited to, changes for sea service and recency. Also, it gives guidance for applications, examinations, and experience. For Sector Anchorage's most current policy and the list of approved ROUPV endorsement please visit our [website](#).

IMPLEMENTATION: Effective March 23, 2019, the National Maritime Center will cease processing original applications for the 2014 "Operator of Uninspected Passenger Vessels Guide License on the Freshwaters and Rivers of Western Alaska," and will fully implement Policy Letter 01-16.

- **EXISTING ROUPV HOLDERS:** An individual currently holding a valid "Operator of Uninspected Passenger Vessels Guide License on the Freshwaters and Rivers of Western Alaska" credential before March 23, 2019 may continue to use the credential and renew it indefinitely. An individual seeking the flexibility to operate on any Inland water body in Western Alaska (and elsewhere in the United States) must obtain an Inland OUPV endorsement.
- **FIRST TIME APPLICANTS AFTER March 23, 2019:** Anyone who wishes to apply for an initial ROUPV endorsement in Western Alaska must submit an application under the updated guidelines set forth in Policy Letter 01-16. An individual seeking the flexibility to operate on any Inland water body in Western Alaska (and elsewhere in the United States) must obtain an Inland OUPV endorsement.

NAVIGABLE WATERWAYS: Coast Guard credentialing requirements apply only to individuals operating on Navigable Waterways. Not all Inland waters in Western Alaska are Navigable Waterways. Included as Enclosure (2) to this MSIB is a list of freshwater lakes and rivers in Western Alaska that the Seventeenth Coast Guard District has determined to be navigable. Individuals are encouraged to verify, before applying for a credential, that the Inland waters on which they intend to operate are indeed Navigable Waterways. More information about the process of determining whether or not a particular Inland waterway is navigable can be found in reference (d). Note that waterways adjoining the ocean are

considered navigable up to mean high water, per reference (e), even if they are not specifically listed in Enclosure (1).

GEOGRAPHIC RESTRICTIONS: Reference (b) stipulates that ROUPV endorsements must be tied to certain OCMI-vetted “low risk” waterways. Reference (a) specifies that sea service must be on the specific body of water for which the credential is sought.

- **“LOW RISK” WATERWAY:** Reference (b) specifies that the OCMI may exercise the discretion to modify sea service and examination requirements for a ROUPV credential if the bodies of water to which the credential is restricted are “low risk.” A ROUPV credential will not be issued for any waterway that is not “low risk.” For waterways for which Sector Anchorage has not yet made a risk determination, potential applicants may initiate the risk assessment process. To prompt Sector Anchorage to conduct a risk assessment, a potential applicant must complete a “Western Alaska OCMI Zone Waterway Risk Assessment for a Restricted Operator of Uninspected Passenger Vessel Merchant Mariner Credential,” provided as Enclosure (2) to this MSIB. Taking into consideration the information provided in this form, the OCMI will determine whether a waterway is “high risk” or “low risk.” Sector Anchorage will aim to issue a risk determination within 30 days of receipt of the completed form. The status of risk determinations will be updated on the [ROUPV website](#). To avoid duplicating efforts, applicants should check the website to see what waterways are already under evaluation before submitting a new Waterway Risk Assessment.
- **BODY OF WATER:** For the purposes of issuing ROUPV endorsements in Western Alaska, the OCMI will consider joining more than one contiguous waterway listed in Enclosure (1) into a single body of water for endorsements, provided that the contiguous body of water is comprised entirely of “low risk” waterways. The OCMI may also consider splitting a single river into more than one body of water for the purpose of endorsements if, for example, the lower portion has been determined to be “high risk,” but the upper portion could be considered “low risk.” Currently, Enclosure (1) groups waterways by drainage. These drainage groups represent starting-points for proposals for potential “bodies of water” for the purposes of ROUPV endorsements.

SECTOR ANCHORAGE APPROVAL: Each time the OCMI wishes to formalize a ROUPV endorsement for a new body of water comprised of “low risk” waterways, the applicant must submit a waterway risk assessment requesting approval. The approval is specific to a body of water, not specific to a person. Once the OCMI has approved a given endorsement (for example, “*Operator of Uninspected Passenger Vessels Upon Inland Waters Restricted to the Porcupine River*”) any qualified individual may apply for that endorsement without further review. Sector Anchorage will update the ROUPV website when new endorsements are approved. An overview of the risk determination and endorsement approval process is provided in Enclosure (2).

MINIMUM AGE, SEA SERVICE AND EXAMINATION REQUIREMENTS: The OCMI’s sea service and examination standards for the new ROUPV credential are as follows:

- **AGE:** Applicants 17 years old and older may be awarded a ROUPV credential.
- **SEA SERVICE & RECENCY:** In accordance with Policy Letter 01-16. Sea service is not creditable on house boats, float planes, canoes, kayaks or jet skis.

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- **FIRST AID and C.P.R. TRAINING:** Due to the remote nature of Alaskan waterways, Sector Anchorage requires that all ROUPV credential applicants show proof of current first aid and CPR qualifications as part of their application package. A Wilderness First Aid credential is encouraged, but not required.

APPLICATION: Individuals may submit applications to the Anchorage REC. **Potential applicants are advised to initiate the process of requesting the risk assessment determination and endorsement approval several months in advance of their anticipated start of employment.**

CONTACTS: Questions regarding the ROUPV endorsement application process should be directed to the REC in Anchorage at 907-271-6736. It is located at 222 West 7th Avenue in Room 154. Questions regarding Sector's waterway risk assessment process or headquarters' endorsement approval status should be directed to the Sector Anchorage Inspections Division at 907-428-4164 or anchorage.inspections@uscg.mil.

Sincerely,

S. C. MACKENZIE
Captain, U. S. Coast Guard
Officer in Charge, Marine Inspection
Western Alaska

Enclosures: (1) Federally Navigable Waterways
(2) Western Alaska OCMI Zone Waterway Risk Assessment for a Restricted Operator of Uninspected Passenger Vessel (ROUPV) Merchant Mariner Credential

Copy: CG District Seventeen
CG MSU Valdez
CG MSD Dutch Harbor
CG MSD Homer
CG MSD Kodiak
CG DD Seward

NAVIGABLE WATERWAYS OF WESTERN ALASKA

PRINCE WILLIAM SOUND
<u>Copper River Drainage</u>
Copper River
Gulkana River - up to Sourdough Campground (mile 33.5)
Chistochina River
Klutina River - up to Klutina Lake
Klutina Lake
Gakona River
<u>Low River Drainage</u>
Low River - up to Wortmanns Creek

This is a list of navigable waterways in Western Alaska as determined by Coast Guard District Seventeen as of March 1, 2015. Note that waterways listed in italics have determinations pending. Also, all waterways adjoining the ocean are considered navigable up to mean high water, per Title 33 Code of Federal Regulations (CFR) 2.05-25.

COOK INLET
<u>Kenai River Drainage</u>
Kenai Lake
Upper Kenai River (from Kenai Lake to Skilak Lake)
Shilak Lake
Lower Kenai River (from Shilak Lake to mouth)
<u>Portage Creek Drainage</u>
Portage Creek
Portage Lake
<u>Matanuska River Drainage</u>
Matanuska River - up to Caribou Creek
<u>Knik River Drainage</u>
Knik River
<u>Fish Creek Drainage</u>
Big Lake
Fish Creek
<u>Susitna River Drainage</u>
Susitna River - up to Gold Creek, AK (Alaska RR Bridge)
<i>Fish Creek and Flat Horn Lake</i>
Red Shirt Lake
Alexander Creek
Kahiltna River
Yentna River
Kroto Creek
Deshka River
Neil Lake
Willow Creek (Tyonek, Anchorage Quads)
Little Willow Creek (Tyonek, Anchorage Quads)
Kashwitna River - up to 2 miles below its confluence with N. Fork
Talkeetna River - downstream of Iron Creek
Honolulu Creek
Tokositna River
Chulitna River
<u>Little Susitna River Drainage</u>
Little Susitna River - up to Schrock Road Bridge
Lake Creek
Lake Nancy

BRISTOL BAY
<u>Ugashik River Drainage</u>
Ugashik River
Upper and Lower Ugashik Lake
<u>Naknek River Drainage</u>
Naknek Lake
Naknek River
<u>Kvichak River Drainage</u>
Lake Clark
<i>Sixmile Lake</i>
Newhalen River
Lake Iliamna
Kvichak River
Nonvianuk Lake
Nonvianuk River
Kukaklek Lake
Alagnak River
<u>Nushagak River Drainage</u>
Lake Chauekuktuli
<i>Northwest Passage</i>
Nuyakuk Lake
Tikchik Lake
Tikchik River
Nuyakuk River
Lake Kulik
Wind River
<i>Mikchalk Lake</i>
<i>Peace River</i>
Lake Beverly
Agulukpak River
Lake Nerka
Agulowak River
Lake Aleknagik
Wood River
Nushagak River - up to Village of Koliganek
<i>Nushagak River - Koliganek up to confluence with Nuyakuk River</i>
<u>Togiak River Drainage</u>
Togiak Lake
Togiak River

KUSKOKWIM BAY
<u>Kuskokwim River Drainage</u>
Kuskokwim River - Mouth to town of McGrath
<u>Tanana River Drainage (Yukon)</u>
Tanana River
Tolovana River
Chatanika River
Nenana River - upstream as far as mile 121.2, near Cantwell, AK
Julius Creek - up to the Alaska RR Bridge at 64° 25'N; 149° 05'W
Chena River
Salcha River
Delta River
Jarvis Creek
Gerstle River
Johnson River
<i>Tok River</i>
Little Tok River
<i>Chisana River</i>
Shaw Creek up to Canadian border
Scottie Creek
Gardiner Creek
<u>Koyukuk River Drainage (Yukon)</u>
<i>Koyukuk River</i>
<i>South Fork of Koyukuk River - up to Fish Creek</i>
<i>Fish Creek - up to Bonanza Creek</i>
Bonanza Creek, North Fork and South Fork
<i>Middle Fork of Koyukuk River</i>
Dietrich River
Hammond River
<u>Yukon River Drainage</u>
Porcupine River
Yukon River

KOTZEBUE SOUND
<u>Kobuk River Drainage</u>
Kobuk River - Mouth to Village of Kobuk
<u>Noatak River Drainage</u>
Noatak River - Mouth to Village of Noatak

BEAUFORT SEA
<u>Colville River Drainage</u>
Colville River - upstream to junction with the Killik River
<u>Sagavanirktok River Drainage</u>
Sagavanirktok River - up to Lupine River confluence at mile 109

Western Alaska OCMI Zone Waterway Risk Assessment for a Restricted Operator of Uninspected Passenger Vessel (ROUPV) Merchant Mariner Credential

Updated 7 NOVEMBER 2018



Risk Assessment Process:

- 1) Section A through Section F of this supplement must be completed by the applicant (or by the remote lodge owner or guide service wishing to employ the applicant).
- 2) The information contained in the supplement must be vouched for by a credentialed mariner, other than the applicant, who has commercial experience operating on the waterway in question within the previous five years. If no other credentialed mariners operate on the waterway, review by a non-credentialed individual with knowledge of the waterway may be accepted by Sector Anchorage on a case-by-case basis. (See Section G: "Peer Review.")
- 3) Applicants may submit Waterway Risk Assessment to the Anchorage Regional Exam Center or email Sector Anchorage at: RECANC@uscg.mil or anchorage.inspections@uscg.mil
- 4) Sector Anchorage will approve/disapprove the endorsement based low risk operations. Evaluation criteria in bold decisively determines whether an operating area is "low risk." Evaluation criteria in italics provide supporting information to be used in the case of an assessment of a special hazard, or in an appeal. The evaluation criteria are based on the terms of CG-MMC Policy Letter 01-16 "Restricted Endorsements for Merchant Mariner Credentials as Operator of Uninspected Passenger Vessels (ROUPV).
- 5) Upon receipt of approval (or disapproval) from the OCMI, Sector Anchorage will notify the REC for approval of any mariner applications requesting the endorsement and update the ROUPV website for approved endorsements.

***High Risk Waterways will not be issued a ROUPV: The Klutina River (up to Klutina Lake)/The Kenai River downstream of Warren Ames Bridge/ and the Nushagak River (up to Black Point) is considered High Risk**

Section A: Area of Operation

- In the space below, provide a concise written description of your proposed area of operation. Include all rivers, lakes and creeks by name. If only a portion of the river is requested, denote the upper and lower limits of the area of operation by referencing villages, confluences, bridges, or other landmarks, or by referencing lines of latitude or longitude. This description will form the basis of the text that will be used on your ROUPV credential.

Operator of Uninspected Passenger Vessels Upon Inland Waters Restricted to:

- Verify that the waterways named above are considered Federally Navigable. A list of Federally Navigable waterways in Western Alaska, current as of 19 February 2015, is provided as Enclosure (1) to Sector Anchorage MSIB 02-19. Verify the endorsement is not already approved by checking the [ROUPV website](#).

Yes, the waterway is Federally Navigable, per Coast Guard District Seventeen.

No, the waterway is not listed as Federally Navigable.

- On a separate page, provide one or more map(s) or chart(s) of the lake(s) and/or river(s) on which you would like to operate. (Use of a commonly available internet mapping service or local navigational publication as a basis for your map/chart is recommended). Indicate the following information:

Boundaries of your proposed operating area.

Scale and orientation.

Villages, lodges, boat ramps, lodges, or other landmarks.

Hazards (rapids or other areas of risk).

Section B: Navigational Complexity

- Is the waterway charted by NOAA?
(<http://www.charts.noaa.gov/InteractiveCatalog/nrnc.shtml>)
- No, it is not charted by NOAA.
- Yes, it is charted by NOAA. Elaborate, if only a portion of the waterway is charted, and the rest is not:

If yes, the OCMI will consider the waterway “high risk.”

Section C: Characteristics of the Waterway

- What is the maximum distance to shore from any point in the operating area?

The OCMI has not assigned a particular width as “low risk,” but narrow waterways favor a “low risk” determination.

- Does the operating area contain any rapids? If so, what class are the rapids, and can they be avoided?

No rapids are present.

Rapids are present; they are Class ___.

The OCMI will evaluate rapids on a case-by-case basis.

- Does the waterway present any other special hazards besides those described above? If so, describe them.

No other special hazards are present.

Other special hazards include:

The OCMI will evaluate special hazards on a case-by-case basis.

<ul style="list-style-type: none"> • What is the range of water depths in the operating area? _____ 	<p><i>The OCMI has not assigned a particular depth as “low risk,” but shallow waterways are less likely to support large vessel traffic, favoring a “low risk” determination.</i></p>
<ul style="list-style-type: none"> • What is the maximum current, in knots, that might be encountered in the operating area? _____ 	<p><i>The OCMI has not assigned a particular current speed as “low risk,” but the absence of strong currents favors a “low risk” determination.</i></p>

Section D: Vessel Traffic

<ul style="list-style-type: none"> • Does the waterway support commercial vessel traffic other than Uninspected Passenger Vessels (UPVs) and Small Passenger Vessels (SPVs)? If so, describe what type(s) of commercial vessels use the waterway. Commercial vessel types may include, but are not limited to: towing vessels, fuel barges, freight barges, self-propelled freight vessels, commercial fishing vessels, and passenger vessels greater than 100 gross tons. <input type="checkbox"/> Only UPVs, SPVs and recreational vessels operate in the area. <input type="checkbox"/> Other commercial vessels operate in the area. (Below, list the types of vessels that use the waterway, along with the months that they operate on the waterway and the frequency of their transits. Include areas of operation for this traffic on your map/chart in section A.) _____ _____ 	<p><i>The OCMI will evaluate vessel traffic on a case-by-case basis.</i></p>
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Section E: Availability of Emergency Resources

<p>What villages or lodges are in the vicinity of the operating area? (Specify how close they are, in terms of distance and travel time.) _____ _____</p>	<p><i>The OCMI may consider operating areas near larger population to favor a “low risk” determination.</i></p>
<ul style="list-style-type: none"> • What hospitals or village clinics are closest to the operating area? (Specify how close they are, in terms of distance and travel time.) _____ _____ 	<p><i>The OCMI may consider operating areas in close proximity to medical aid to favor a “low risk” determination.</i></p>
<ul style="list-style-type: none"> • Is VHF emergency communication possible throughout your entire operating area? <input type="checkbox"/> No. <input type="checkbox"/> Yes, continuous shoreside VHF monitoring is provided on Channel(s) _____. It is monitored by _____ _____ <input type="checkbox"/> Partial: Continuous shoreside monitoring of VHF is only available in the following area(s): _____ _____ _____ 	<p><i>The OCMI may consider operating areas with VHF monitoring to favor a “low risk” determination.</i></p>

<ul style="list-style-type: none"> Is cellular phone service available in your area of operation? <ul style="list-style-type: none"> <input type="checkbox"/> No. <input type="checkbox"/> Yes, cellular phone coverage provided by _____ is available throughout the entire operating area, including shoreside lodges and/or villages. <input type="checkbox"/> Partial: Cellular coverage is only available in the following area(s): _____ _____ _____ 	<p><i>The OCMI may consider operating areas with cellular coverage to favor a “low risk” determination.</i></p>
<ul style="list-style-type: none"> Besides VHF, satellite phone or cellular phone, what other methods are available in the area for contacting shoreside support? Please describe them in detail. _____ _____ _____ 	<p><i>The OCMI may consider operating areas with good emergency communication channels to favor a “low risk” determination.</i></p>
<ul style="list-style-type: none"> What waterborne emergency response assets are available in the operating area? (This may include other Uninspected Passenger Vessels.) What is their approximate response time from their dock or mooring to the most remote part of the operating area? _____ _____ 	<p><i>Rapid and robust shoreside emergency response favors a “low risk” determination.</i></p>
<ul style="list-style-type: none"> What land-based emergency response assets are available in the operating area? What access points do they have to the waterway? What is their approximate response time to the access points? _____ _____ 	<p><i>Rapid and robust waterborne emergency response favors a “low risk” determination.</i></p>
<ul style="list-style-type: none"> What airborne emergency response assets are available in the operating area? What is their approximate response time to the most remote part of the operating area? _____ _____ _____ 	<p><i>Rapid and robust airborne emergency response favors a “low risk” determination.</i></p>

Section F: Applicant Verification

- By signing below, I attest that the information I have provided is true and correct to the best of my knowledge. I also wish to add the following (optional) notes regarding this area of operation:*

Name of Applicant	Signature of Applicant	Today’s Date
Phone Number of Applicant	Email of Applicant	

Section G: Peer Verification

- To confirm the validity of the information presented in this supplement, Sector Anchorage requires the review of a currently credentialed mariner (any grade) with commercial operational experience upon the waterway in question. The operational experience must have been within the last five years. If no other credentialed mariners operate on the waterway, review by a non-credentialed individual with knowledge of the waterway may be accepted by Sector Anchorage on a case-by-case basis.

*By signing below, I attest that I have reviewed answers provided in this supplement and that the information is true and correct to the best of my knowledge. I have operated a commercial vessel in the area described in Section A as recently as the year 20___. My employer in the area was _____
 _____. I hold Merchant Mariner's Credential (MMC)# _____, which expires on _____, 20___.*

I also wish to add the following (optional) notes regarding this area of operation:

Attach additional pages as necessary.

Name of Peer MMC-holder	Signature of Peer MMC-holder	Today's Date

Section H: Sector Anchorage Review

- I have reviewed this supplement and have determined that the operating area is:*

- Low-risk
- High-risk, because:

- I have reviewed Sector Anchorage files to determine whether a supplement has been reviewed for an identical area of operation.*

- No supplements have been revised for this waterway segment, or
- One or more (#___) supplements have been reviewed for this waterway segment, the most recent of which was dated _____ and,
 - This supplement is in alignment with the conclusion of previous Sector Anchorage reviews; or
 - This supplement is not in alignment with previous Sector Anchorage reviews. The difference is:

Name of USCG Reviewer	Signature of USCG Reviewer	Today's Date

