

U.S. Department of  
Homeland Security

United States  
Coast Guard



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CG-WWM Policy Letter 02-22  
May 13, 2022

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From: Kevin C. Kiefer  
COMDT (CG-WWM)

To: LANTAREA (LANT-54)  
PACAREA (PAC-54)

Subj: ANCHORAGE GROUND RISK ASSESSMENTS

- Ref: (a) 33 CFR Part 110, Subpart B, Anchorage Grounds  
(b) Anchorage Management Tactics, Techniques, and Procedures, CGTTP 3-71.2  
(c) Navigation Safety Risk Assessments Tactics, Techniques, and Procedures, CGTTP 3-71.7  
(d) Implementation of the National Environmental Policy Act, DHS Directive 023-01-01, Revision 01  
(e) 46 United States Code, Section 70006  
(f) William M. Thornberry NDAA, FY2021, Title LVXXXIV, Subpart D, Section 8437  
(g) Preparation of Field Regulations, COMDTINST M16704.43

1. PURPOSE. This policy letter directs District Waterways Management Branches, Sector Waterways Management Divisions, and Marine Safety Unit (MSU) Waterways Management Divisions to conduct risk assessments for anchorage grounds outlined in reference (a). Sectors and MSUs should include their Harbor Safety Committee or equivalent committee in risk assessment processes.
2. ACTION. Using the guidance in reference (b) and the “5-Step Navigation Safety Risk Assessment Tool” in reference (c), District, Sector and MSU Waterways Managers should thoroughly evaluate, in conjunction with their local Harbor Safety Committee or a commensurate industry stakeholder group, whether anchorage grounds pose risk to the environment and marine transportation system (MTS). District, Sector and MSU Waterways Managers with a Harbor Safety Committee or equivalent committee shall conduct inaugural risk assessments within 12 months of this policy letter’s issuance and every seven years thereafter. District, Sector and MSU Waterways Managers without a Harbor Safety Committee or equivalent committee shall conduct inaugural risk assessments within 18 months of this policy letter’s issuance and every seven years thereafter.
3. DIRECTIVES AFFECTED. None.
4. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS. The Office of Waterways and Ocean Policy (CG-WWM) and the Office of Environmental Management (CG-47) have reviewed the general policies contained within this policy letter. In accordance with reference (d), these policies are categorically excluded (CE) under current Department of Homeland Security (DHS) CE L5 from

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further environmental analysis. Since this policy letter implements, without substantive change, an applicable Commandant Instruction and/or other federal agency regulations, procedures, manuals, and other guidance documents, DHS categorical exclusion L5 is appropriate. This directive will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State, or local laws or administrative determinations relating to the environment. Waterways Managers must evaluate all future actions resulting from this policy letter for compliance with the NEPA, DHS and Coast Guard NEPA policy, and compliance with all other environmental mandates.

5. FORMS/REPORTS. None

6. DISCUSSION.

- a. The MTS is crucial to the nation's economy, readiness, and national security. Diverse users, economies of scale, novel technologies, commercial space operations, and federal conservation efforts have contributed to the MTS's evolution and risk profile. As such, anchorage grounds are a vital component of the MTS, and mitigate risk in the maritime domain by providing vessels a safe designated area to anchor. However, changing demand patterns and increased interest in global commerce have generated concerns about navigation safety and environmental impacts caused by established anchorage grounds. Ongoing supply chain disruptions, caused by COVID-19, have magnified these concerns, as the volume of commercial vessels anchored in U.S. waters has reached unprecedented levels.
- b. Congress transferred the authority to establish anchorage grounds from the Secretary of the Army to the Coast Guard in 1967. As a result, the Coast Guard inherited numerous anchorage grounds, some of which remain part of the MTS. The purpose of anchorage grounds, as stated in reference (e), is for maintaining safe navigation. Periodically evaluating MTS usage is a necessary component of safe navigation, risk management, and ensuring the needs of maritime stakeholders are accommodated, especially as users and usages change overtime.

7. POLICY. District Waterways Managers should work with Sector and/or MSU Waterways Managers to conduct a risk assessment for each of the anchorage grounds listed in reference (a). Sector and/or MSU Waterways Managers should work with their Harbor Safety Committee or equivalent committee during this process. CG-WWM recognizes not all Sectors and/or MSUs have a Harbor Safety Committee or equivalent committee to help inform anchorage ground risk assessments. Therefore, Sectors and/or MSUs without a Harbor Safety Committee or equivalent committee shall conduct anchorage ground risk assessments within 18 months of this policy letter's issuance. Whereas, Sectors and/or MSUs with a Harbor Safety Committee or equivalent committee shall conduct anchorage ground risk assessments within 12 months of this policy letter's issuance. Anchorage ground risk assessments shall be conducted every seven years following the completion of inaugural anchorage ground risk assessments. The process for conducting anchorage ground risk assessments is as follows:

- a. Using the processes and "5-Step Navigation Safety Risk Assessment Tool" in reference (c), complete the risk assessment while addressing factors (1)-(5), listed below. *Waterways Managers should consult their local Harbor Safety Committee or equivalent committee, Area Committee, port and industry stakeholders, relevant federal, state and municipal agencies, and*

*Coast Guard Response personnel during the risk assessment process.*

1. Navigational safety
  2. Protection of the marine environment
  3. Proximity to subsea pipelines, cables, tunnels or other infrastructure
  4. Safe and efficient use of the MTS
  5. The national security of the U.S.
- b. Districts should complete a separate MISLE activity for each anchorage ground risk assessment conducted. The results of the “5-Step Navigation Safety Risk Assessment Tool” should be uploaded to MISLE, and the MISLE narrative should address factors (1)-(5), listed in paragraph 7(a).
- c. Per reference (f), 180 days’ notice to Congress must be provided, via CG-5PW, before modifying an existing or establishing new anchorage grounds.
- d. After providing notice to Congress, Districts shall initiate modifications to existing anchorage grounds or establish new anchorage grounds via the rulemaking and NEPA processes outlined in references (b), (d), and (g). Districts shall also contact their servicing legal office for environmental and NEPA consultations, as appropriate.
- e. District, Sector and MSU Waterways Managers shall consider whether anchorage grounds encompassing subsea infrastructure pose a potential pollution threat to the environment. If applicable, District, Sector and MSU Waterways Managers shall develop mitigation measures to include working with their local Area Committee to determine how anchorage grounds can be included in the Area Contingency Plan.
- f. Reference (b) will be updated to reflect the requirements outlined in this policy letter. It will also provide an anchorage ground risk assessment example, including a sample MISLE narrative.
8. **QUESTIONS.** All CG-WWM policy letters, as well as other guidance documents, are posted to the CG-WWM Portal page at <https://cg.portal.uscg.mil/units/cgwwm1/SitePages/Home.aspx>. Questions or comments regarding this policy can be directed to the Office of Waterways and Oceans Policy, Waterways Policies and Activities Division (CG-WWM-1). The point of contact is LCDR [REDACTED]@uscg.mil.

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