# ALASKA CLEAN WATER FUND Draft Intended Use Plan

State Fiscal Year 2025

July 1, 2024 – June 30, 2025

For Federal Base Capitalization Grant funds appropriated in Federal Fiscal Year 2024 and Bipartisan Infrastructure Law General Supplemental funds appropriated in Federal Fiscal Year 2023



Submitted to the U.S. Environmental Protection Agency
By
Alaska Department of Environmental Conservation
Division of Water – State Revolving Fund Program
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# Acronyms

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AAC	Alaska Administrative Code
ACWF	Alaska Clean Water Fund
ADEC	Alaska Department of Environmental Conservation
ADWF	Alaska Drinking Water Fund
AIS	American Iron and Steel
AWIA	America's Water Infrastructure Act
AWWU	Anchorage Water and Wastewater Utility
BABA	Build America, Buy America Act
BIL	Bipartisan Infrastructure Law
CBR	Clean Water Benefits Reporting
CE	Categorical Exclusion
CWA	Clean Water Act
CWSRF	Clean Water State Revolving Fund
DBE	Disadvantaged Business Enterprise
DWSRF	Drinking Water State Revolving Fund
EPA	U.S. Environmental Protection Agency
FFATA	Federal Funding Accountability Transparency Act
FFY	Federal Fiscal Year
FOCUS	Financial Operations and Cash Flow Utilization System
GPR	Green Project Reserve
IUP	Intended Use Plan
MHI	Median Household Income
OASys	Online Application System
PPL	Project Priority List
SERP	State Environmental Review Process
SFY	State Fiscal Year
SRF	State Revolving Fund

#### INTRODUCTION

The 1987 amendments to the Clean Water Act (CWA), authorized the Clean Water State Revolving Fund (CWSRF), a low interest loan program to assist public entities with the financing of publicly owned treatment facilities (Section 212) and nonpoint source management activities (Section 319). The 1987 CWA Amendments authorized the US Environmental Protection Agency (EPA) to award capitalization grants to states to provide seed money for the low-interest loan program. While the 1987 Amendments only authorized funding for the first several years of the loan program, Congress has continued to provide funding as part of its annual appropriations. The Alaska Department of Environmental Conservation (ADEC) State Revolving Fund (SRF) Program administers this ongoing funding source, referred to in this document as base capitalization grants, through the Alaska Clean Water Fund (ACWF) on behalf of the State of Alaska.

The Infrastructure Investment and Jobs Act of 2021 (also referred to as the Bipartisan Infrastructure Law or BIL) includes two new appropriations for the CWSRF: the General Supplemental grant and the Emerging Contaminants grant.

This Intended Use Plan (IUP), required under the CWA, describes how Alaska proposes to use available funds in State Fiscal Year 2025 (SFY25) from July 1, 2024 through June 30, 2025 provided by federal funds allocated to Alaska through the CWSRF Federal Fiscal Year 2024 (FFY24) base capitalization grant as well as the FFY23 BIL General Supplemental grant. A separate IUP has been prepared to address the use of Emerging Contaminants funding.

The IUP is the central component of the capitalization grant application and describes how the state will use the CWSRF to meet CWA objectives and further the protection of public health and water quality. This IUP contains the following elements pertaining to both the base and supplemental grants:

- Short and long-term goals of the program.
- Project priority list, including description and size of community.
- Criteria and method used for distribution of funds.
- Description of the financial status of the CWSRF program.
- Description of other activities and percentage of funds, that will be used from the CWSRF capitalization grant, including CWSRF administrative expenses allowance and technical assistance.
- Description of how the program defines a disadvantaged system and the amount of CWSRF funds that will be used for this type of loan assistance.

Once prepared, an IUP must be noticed for a period of at least 30 days to accept comments from the public. Comments on all facets of the draft IUP are accepted. After considering comments received, the IUP is finalized and posted on the SRF Program's website at <a href="https://dec.alaska.gov/water/technical-assistance/state-revolving-fund/">https://dec.alaska.gov/water/technical-assistance/state-revolving-fund/</a>.

#### **PROGRAM GOALS**

ADEC has identified several long- and short-term goals intended to promote sustainable improvements to the state's infrastructure and help ensure maximum environmental and public health benefits.

# Long-Term Goals

- 1. Foster coordination with other programs and agencies to improve assistance to water systems in their efforts to achieve compliance and improve capacity.
- 2. Maintain a working relationship with other infrastructure funding authorities, including but not limited to U.S. Department of Agriculture (USDA) Rural Development, to coordinate financial assistance for eligible projects.
- 3. Develop program guidelines to improve the pace of loan projects.
- 4. Establish a marketing and outreach plan to expand program awareness, inform current and potential borrowers of the SRF's wide variety of funding options and benefits, and thereby, expand the borrower pool.
- 5. Pursue methods for encouraging borrowers to pursue innovative and non-traditional projects, such as green infrastructure, water and/or energy efficiency, climate resilience, and environmentally and financially sustainable projects.
- 6. Fully implement the Financial Operations and Cash Flow Utilization System (FOCUS), a cash flow model for forecasting fund usage to allow for improved planning and funding allocation decisions and implementation of a long-term lending strategy.
- 7. Utilize a portion of the capitalization grant technical assistance funding to provide eligible borrowers with guidance and technical assistance.

#### **Short-Term Goals**

- 1. Enhance program marketing.
  - a. Coordinate with EPA and EPA funded technical assistance providers to reach new potential borrowers, assess their needs, and provide appropriate assistance with the goal of making SRF funds accessible to this untapped customer base that likely has great need. This goal aligns with a key priority identified in the BIL implementation memorandum<sup>1</sup> to ensure that communities most in need of financial assistance for infrastructure improvements benefit equitably from the opportunities provided through BIL.
  - b. Review results of a survey of potential borrowers to develop effective marketing materials and target their distribution to improve outreach to potential borrowers.
- 2. Ensure that the SRF Program is meeting capitalization grant requirements for the allocation of additional subsidy.

https://www.epa.gov/system/files/documents/2022-03/combined\_srf-implementation-memo\_final\_03.2022.pdf

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<sup>&</sup>lt;sup>1</sup> Environmental Protection Agency. *Implementation of the Clean Water and Drinking Water State Revolving Fund Provisions of the Bipartisan Infrastructure Law.* March 8, 2022.

- 3. Review current subsidy allocation methods to strategically use the CWSRF additional subsidy to achieve affordable compliance, especially for small, disadvantaged communities in accordance with a key priority of the BIL implementation memorandum<sup>1</sup>.
- 4. Identify workflow processes needed to update and utilize FOCUS, including an improved method to track both the allocation and disbursement of additional subsidy.
- 5. Complete revisions to the ACWF Operating Agreement.
- 6. Pursue revisions to the regulations at 18 AAC 76 to increase the SRF Program's agility in response to the needs of borrowers, as well as federal grant conditions. This goal aligns with a fundamental principal of the CWSRF which is affirmed in the BIL implementation memorandum to provide flexibility to states and borrowers to address a wide variety of local water quality and public health challenges.
- 7. Pursue revisions to Alaska Statute at AS 46.03, to broaden ACWF eligibility for private wastewater systems and tribally owned utilities.
- 8. Review and update guidance materials developed for distribution to current and potential borrowers related to federal requirements including, but not limited to, American Iron and Steel, Build America, Buy America Act and Davis-Bacon guidance wage requirements.
- 9. Develop an online resource for borrowers that identifies potential sources of infrastructure funding. Also provide an online resource that directs borrowers to potential technical assistance opportunities.
- 10. Building on the technical assistance provided through an EPA pilot program, continue efforts to identify potential partners for conduit lending to provide financing to private homeowners for onsite decentralized wastewater treatment system and underground fuel storage repairs or replacement.
- 11. In coordination with the Divisions of Air Quality and Spill Prevention and Response and the Division of Water's Non-Point Source Program pursue an avenue for funding conversion of home heating in the Fairbanks area from wood stoves and diesel fired boilers to natural gas in an effort to reduce nonpoint source pollution in nearby waterbodies while also improving air quality in the PM2.5 Nonattainment Area.
- 12. Develop webinar material and offer SRF related training (e.g., SRF 101, Eligibility, etc.) to existing and potential borrowers.

#### CRITERIA AND METHOD FOR FUND DISTRIBUTION

The following principles and procedures will be the basis for the administration, funding, allocation, and distribution of the DWSRF funding. The principles and procedures are designed to provide maximum flexibility for assistance and ensure the long-term viability of the revolving program.

### **Project Priority List**

For a project to be considered for funding from the ACWF, it must be included in the Project Priority List (PPL). The process is initiated when an eligible applicant completes a project questionnaire through the ADEC Online Application System (OASys).

Questionnaires are accepted year-round through OASys and are reviewed by a scoring committee on a triannual basis. The submittal deadlines for questionnaire reviews are February 29, June 30, and October 31. An email was sent to eligible borrowers in January 2024 providing information about the schedule and inviting submittal of project questionnaires to be considered for SFY25 funding assistance.

The project scoring committee, made up of representatives from the SRF Program, as well as the ADEC Drinking Water, Wastewater, Source Water Protection, and Nonpoint Source Programs, evaluates the project questionnaires based on the CWSRF criteria and assigns a numeric score to each project. Projects are added to the PPL in rank order. The rating criteria are provided in Appendix 1.

Appendix 2 includes the PPL, the list of public water systems in Alaska that have submitted a questionnaire to express interest in financing a capital improvement project through the SRF Program.

#### Amendments to the Project Priority List

ADEC will amend the PPL to include additional projects after each review and scoring of new project questionnaires. In updates to the PPL, any projects reviewed and scored will be added to the PPL in ranked order. The amended funding list will be publicly noticed for 10 days.

#### Project Readiness Bypass Procedures

When available funding exceeds demand, ADEC awards funding to ready-to-proceed projects without regard to project score or ranking because the SRF Program has sufficient funds to finance all projects. This ensures timely utilization of federal funds.

In the event the SRF Program does not have sufficient funds available to offer loans to all projects that are ready to proceed, ADEC will work with potential borrowers with the highest ranked projects on the PPL to ensure that those projects are given a chance to be funded first. However, the final funding selection of projects from the PPL will be based primarily on the projects' readiness to proceed.

Projects are considered ready to proceed if the applicant is prepared to begin design and/or construction and is immediately ready, or poised to be ready, to execute a loan agreement with ADEC. If, for whatever reason, an applicant is not ready to proceed with completing a loan application and initiating a project, ADEC may select a lower ranking project for funding based

on its ability to proceed in a timely manner. This bypass procedure is necessary to ensure that the available funds will be disbursed in a timely manner.

ADEC reserves the right to fund lower priority projects over higher priority projects if in the opinion of ADEC, a higher priority project has not taken the steps necessary to expeditiously prepare for funding and project initiation (e.g., ADEC has not received the required documents to execute a loan agreement, the project is not ready to proceed with construction, or the applicant withdraws the project for consideration).

In addition, a project may be bypassed as necessary for the state to meet federal grant requirements for equivalency and additional subsidy. In the event that two or more projects have the same ranking, preference will be given to projects with the following criteria and in this order: ready to proceed; response to a compliance or legal order with a specific deadline; and inclusion of a green component.

SRF Program staff will regularly evaluate the status of available principal forgiveness funds and the outstanding projects list on the PPL. The intent of this evaluation is to determine if the projects currently identified as receiving principal forgiveness actually are capable of applying for and entering into a loan agreement within the current program year. If during this evaluation, a project is determined to be incapable of meeting the requirements of the program, that project may be bypassed, and the corresponding principal forgiveness may be awarded to other eligible projects on the PPL. In addition to readiness-to-proceed, a project may be bypassed due to an applicant's inability to meet all other program requirements, failure to develop an approvable, implementable project, or for other reasons applicable under state or federal law. Any projects bypassed during the program year may be reconsidered for principal forgiveness funds in a future year.

# Removing Projects from the Project Priority List

Projects on the PPL will be monitored to ensure that applicants are proceeding with their projects in a timely fashion. A project may remain on the PPL for a maximum of two years. Projects will retain the same score originally assigned unless a revised questionnaire is submitted and reviewed by the project scoring committee. If an application has not been submitted for a project within two years, the project will be removed from the list and a new questionnaire will be required to relist the project.

### Amendments to Existing Loans

A borrower may request an amendment to an existing loan agreement to modify the project scope, increase the loan amount, or both. Amendments that solely increase the loan amount by no more than 10% of the original loan amount, up to \$100,000, may be completed through an informal request for a loan amendment with the SRF Program Manager's approval. Similarly, minor scope changes that do not affect the location or purpose of the originally proposed project may also proceed with an informal request for a loan amendment with the SRF Program Manager's approval. Amendments that will increase the loan amount by more than 10% of the original loan, or more than \$100,000, and/or include scope modifications that affect the footprint

or purpose of the project, are required to be public noticed in a PPL update before the loan amendment is issued.

# Phasing of a CWSRF Project

To make construction and/or funding more manageable, a project may be divided into separate funded phases or segments, at the option of the borrower. However, to be CWSRF-eligible, any such phase or segment must be of reasonable scope, and when constructed, must have the capability of being placed into immediate full operation, without its full operation being dependent on a subsequent project phase or segment or another outside operation yet to be completed. After a given project phase is funded, subsequent phases must stand separately in competing with other project for priority list ranking in later fiscal years.

# Refinancing Existing Debt

Under the CWA, and in accordance with the Code of Federal Regulations (CFR) §35.3120(b), CWSRF funds may be used by a publicly owned system to refinance existing local debt obligations for a project that would otherwise be eligible for SRF funding. Cross-cutter requirements, including environmental review requirements, American Iron and Steel, and Davis-Bacon wage rate requirements apply to these projects. Documentation of an approved environmental determination at the time the project was initially financed must be provided. American Iron and Steel requirements apply to projects with construction after June 10, 2014. Davis-Bacon wage rate requirements apply to projects with construction after October 30, 2009. Refinancing requests will not be eligible to receive principal forgiveness.

# **Emergency Procedures**

For purposes of the SRF Program, an emergency refers to a natural disaster or manmade disaster that damages or disrupts normal wastewater system operations and requires immediate action to protect public health and safety. Upon issuance of an emergency declaration by a federal or state emergency response official, or upon a finding by ADEC, funds may be made available for projects not currently described in an IUP. Bypass procedures may be waived under direct threat of severe public or environmental harm. Reasonable efforts to fund projects in priority order will still be followed under emergency situations.

#### **FUNDS AVAILABLE**

# Capitalization Grants and State Match Requirement

Alaska's allotment from the FFY24 federal appropriation for the base grant is \$4,886,000. The appropriation for the FFY23 BIL supplemental grant for Alaska is \$12,475,000

For the base grant, Alaska will provide the required 20% state match (\$977,200) from short term bonding by November 2024. In a process that effectively substitutes bond receipts for interest income, the interest income of the Fund is used as collateral to acquire bond receipts and avoids use of any general funds from the State budget. ADEC is required to document that sufficient interest income exists in an amount equal to or greater than the proposed bonding amount, and

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that this process will still allow the ACWF to grow in perpetuity. ADEC's program audits have documented the availability of the required amount of interest.

For the BIL General Supplemental grant, Alaska must deposit an amount equal to at least 10% of the federal capitalization grant (\$1,247,500) into the ACWF. State general funds were appropriated by the Alaska Legislature in the SFY25 capital budget.

#### Cash Draw

Draws for loan funding comes from federal funding and the state match. Previously, the cash draw was split between federal funding and state match following the grant specific proportionality rate method, 83.33% federal and 16.67% state match. However, EPA permanently ended requirement for proportionality on November 30, 2022. Alaska's proposed payment schedule (Table 1) was developed based on projected needs for project construction and execution of loan agreements.

**Table 1. SFY24 Estimated Schedule of Payments** 

Grant Type	FFY	Grant Amount	Q1	Q2	Q3	Q4
Base	24	\$ 4,886,000	\$1,221,500	\$1,221,500	\$1,221,500	\$1,221,500
BIL General Supplemental	23	\$12,475,000	\$3,118,750	\$3,118,750	\$3,118,750	\$3,118,750

# Finance Rates and Loan Terms for Eligible Projects

The finance rates, defined in Title 18, Chapter 76 of Alaska Administrative Code (18 AAC 76), are calculated to reflect current market trends based on the Bond Buyer's Municipal Bond Index when the index exceeds 4%. The finance rate includes the interest rate and a 0.5% administrative fee. The state regulations also allow for a maximum loan repayment term of 30 years.

<b>Finance Rates</b>	(effective	Sentember	10	2017	١
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Loan Term	Finance Rate for any Bond Rate* Less than 4 %	Finance Rate for Bond Rate* Greater than 4 %
20-30 Years	2	2 + (0.75 x [Bond Rate* – 4])
5-20 Years	1.5	1.5 + (0.625 x [Bond Rate* – 4])
0-5 Years	1	1 + (0.5 x [Bond Rate* – 4])
<1 Year	0.5	0.5

<sup>\*</sup>Bond Buyer's Municipal Bond Index Current Day – Yield to Maturity

#### Administrative Fees

Since December 29, 2000, assistance recipients have been assessed an administrative fee in the amount of 0.5% of the total dollars disbursed as prescribed in 18 AAC 76. Fee revenue is kept in the ACWF Fee Account, separate from the regular loan fund, and is used exclusively to pay program administrative costs.

As noted in 18 AAC 76.086, ADEC will use administrative fees for direct costs including salaries, supplies, travel, and professional service contracts. In SFY25, the SRF Program intends to use the 4% administrative base and supplemental allowances for \$694,440 administrative

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expenses. SRF Program administrative costs in excess of \$694,000 will be drawn from the ACWF fee account. In addition, SRF Program administrative expenses associated with the ADWF in excess of \$739,700 will be charged to the ACWF fee account.

### Program and Non-Program Income

In SFY25, program income is estimated to total \$86,805 (0.5% of the base and BIL General Supplemental grants). Program income is defined at 40 CFR 31.25(b) as "gross income received by the grantee or subgrantee directly generated by a grant supported activity or earned only as a result of the grant agreement during the grant period."

Non-program income is estimated based on the difference between total anticipated deposits to the ACWF Fee Account less the program income. Based on all pending SFY25 repayments, fees collected will total \$977,241 in SFY25. Non-program income is estimated at \$890,436 (ACWF Fees less the program income).

#### Sources and Uses of Funds

The sources of federal funding identified in this IUP include the FFY24 base capitalization grant and the FFY23 BIL General Supplemental Grant. In SFY25, the amount available for base grant loans is the difference between the funds available and total program commitments, plus two years of projected future loan repayments, for a total of approximately \$160.5 million. The following table summarizes funding sources, loan commitments, and expenditures since the inception of the ACWF.

#### **Estimated Available Funding**

Sources of CWSRF Funds	
Federal Grants Received (cumulative through FFY23)	\$318,837,962
FFY24 Base Capitalization Grant	\$4,886,000
FFY24 Base Capitalization Grant State Match	\$977,200
FFY23 BIL General Supplemental Capitalization Grant	\$12,475,000
FFY23 BIL General Supplemental Capitalization Grant State Match	\$1,247,500
State Match, prior years	\$57,714,389
Investment Income	\$58,528,770
Repayments through SFY24 (principal + interest collected)	\$328,187,072
Projected Repayments through SFY26	\$32,011,458
Total Sources	\$814,865,352
Uses of CWSRF Base Funds	
Existing Loan Commitments	\$572,846,598
Transfer from ACWF to ADWF (SFY08)	\$29,000,000
Administrative and Technical Assistance Set-Asides	\$12,278,914
Previous Bonding and Transaction Costs	\$38,011,661
SFY25 Bonding and Transaction Costs	\$2,228,700
Total Uses	\$654,365,873
Net Resources Available to Provide Assistance	\$160,499,479

#### **Fund Transfer**

Under the SDWA, the state is allowed to transfer fund assets of the DWSRF program and the CWSRF program. ADEC may take advantage of this flexibility between the CWSRF and DWSRF programs in order to assure adequate capacity to meet all funding demands. In accordance with the SDWA Section 302 fund transfer provisions, ADEC hereby reserves the authority "to transfer an amount up to 33% of the DWSRF program capitalization grant to the CWSRF program or an equivalent amount from the CWSRF program to the DWSRF program."

# Administration Allowance (4%)

Three options exist with regard to the amount used for this administration set-aside as listed below:

- Four percent of the capitalization grant,
- Flat \$400,000, or
- 1/5 percent of the total valuation of the state revolving fund balance.

The SRF Program plans to spend funds from the ACWF loan fund in an amount equal to 4% of both the FFY24 base grant (\$195,400) and the FFY23 BIL General Supplemental grant (\$499,000). In total, \$694,440 will be used for general administrative work including but not limited to preparation of PPL updates; application reviews; project monitoring, tracking and reporting; environmental document review; and disbursement of loan funds.

# Technical Assistance Allowance (2%)

Alaska plans to spend funds from the ACWF loan fund in an amount equal to 2% of both the FFY24 base grant (\$97,720) and the FFY23 BIL General Supplemental grant (\$249,500). In total, \$347,220 will be used for technical assistance to communities to address wastewater and water quality issues.

# **GREEN PROJECT RESERVE**

The Consolidated Appropriations Act, 2023 requires the use of not less than 10% of the base grant and the supplemental grant for green infrastructure, water or energy efficiency improvements, or other environmentally innovative activities to the extent that there are eligible projects. Alaska's Green Project Reserve (GPR) amount for the base grant is \$488,600. For the supplemental grant, the GPR amount is \$1,247,500.

To incentivize borrowers to include water and energy conservation or other green aspects in their projects, ADEC awards 25 additional points in the project questionnaire scoring process for eligible GPR work. GPR projects are listed on the PPL by green project type: green infrastructure; water or energy efficiency improvements; or other environmentally innovative activities. Projects initially not listed as GPR qualified may be considered GPR qualified after the loan application is evaluated.

Projects initially identified to satisfy the federal grant GPR requirement have been identified in the PPL. These projects will be further reviewed during the loan application process to ensure that each project, in whole or in part, qualifies for the GPR. Applicants will be required to provide a Green Project Assessment form with applicable backup documentation. Several additional projects also will potentially qualify as GPR projects, and as more cost information becomes available, the GPR applicability will be defined for those projects moving forward with applications.

As necessary, ADEC will seek out other potential GPR eligible projects not initially listed in the IUP, which meet GPR project eligibility, to make up any shortfall in meeting current or past GPR requirements.

#### **DISADVANTAGED COMMUNITY ASSISTANCE**

Under the base grant, a minimum of 20% to a maximum of 40% of the grant will be offered in the form of additional subsidy. Exactly 49% of the supplemental grant must be awarded as additional subsidy. State regulations require the SRF Program to provide additional subsidy to disadvantaged communities. Alaska provides additional subsidy in the form of loan forgiveness.

The SRF Program has developed disadvantaged community criteria. Several factors are considered in identifying disadvantaged communities including those related to the household burden associated with income and the cost of water and wastewater service, as well as socioeconomic factors including the percentage of households utilizing assistance programs, the percentage of households below the federal poverty level, unemployment rates, and long-term population trends in the community. ADEC also includes several priority project types that impact the economic viability of a water system, including the presence of emerging contaminants. These factors, considered in total, are used to determine tiers of criticality for disadvantaged status with associated levels of principal forgiveness. Principal forgiveness is provided only to disadvantaged communities in tiers 2 through 4. More information about the disadvantaged community criteria is provided in Appendix 3.

Based on the points assigned in regard to household burden, socioeconomic factors and priority project types, each project on the PPL is assigned to a tier. To the extent that additional subsidy funds are available, disadvantaged communities may receive loan forgiveness associated with the base and supplemental capitalization grants as shown in the following table.

Tier	Point Range	<b>Maximum Loan Forgiveness</b>
Tier 1	0 to 3	No loan forgiveness
Tier 2	4 to 6	\$500,000
Tier 3	7 to 10	\$1,000,000
Tier 4	10+	\$2,000,000

#### ADDITIONAL SUBSIDY

Under the base grant, a minimum of 20% to a maximum of 40% of the grant will be offered in the form of additional subsidy. Exactly 49% of the supplemental grant must be awarded as additional subsidy. State regulations require the SRF Program to provide additional subsidy to disadvantaged communities. Alaska provides additional subsidy in the form of loan forgiveness.

The amount of principal forgiveness ADEC allocates each year is dependent on the federal capitalization grant requirements and what ADEC forecasts the ADWF can afford while maintaining the Fund's perpetuity.

All projects that are identified for subsidy allocation on the PPL must meet the following milestones in order to retain eligibility for subsidy:

- Submit a loan application within six months of the project being listed on the PPL; otherwise, subsidy funds may be made available to the next highest ranked eligible project.
- Initiate design and/or construction of the project within one year of completion of a loan agreement; otherwise, the loan agreement may be amended to remove principal forgiveness.

Any uncommitted subsidies that exist after one year of publication of the IUP will be distributed to projects with existing subsidies, or to those projects which are the furthest along in completion of construction. The SRF Program will aim to allocate required subsidy as quickly as reasonably possible; all required subsidy will be allocated within three years of the grant award to ensure compliance with the federal grant conditions.

# **MICRO LOAN PROJECTS**

Rural municipalities may be eligible to receive a Micro Loan of up to \$500,000 with a repayment term of up to 30 years depending on the useful life of the project. Municipalities who are eligible under the Village Safe Water Act may apply for Micro Loans. Subsidy allocations for Micro Loan projects will range from 50% to 90% of the total project cost. One new Micro Loan was issued in the previous year. The SRF Program has budgeted to issue \$2,500,000 in Micro Loans in SFY25.

The amount of subsidy offered will be determined based on the community's capacity as demonstrated by the Operation and Maintenance Best Practices score and the affordability of the utility's current user rates. The Operation and Maintenance Best Practices is a criteria developed in 2015 by the ADEC Facilities Programs in collaboration with the Rural Utility Business Advisor Program and the Alaska Native Tribal Health Consortium. The Best Practices criteria is used to assess operations and maintenance capacity of rural water and wastewater utilities.

The Alaska Village Rate Affordability Index was developed in 2018 to determine whether a community's users can afford the annual operation, maintenance, repair, and equipment and capital replacement costs of their water, wastewater, or solid waste facilities. This Affordability Index will be used as a factor in determining the amount of subsidy to be allocated to Micro Loan projects.

Projects that are initially identified to receive principal forgiveness must meet the following milestones in order to retain eligibility of subsidy:

- Submit a loan application within six months of the project being listed on the PPL; otherwise, subsidy funds may be made available to the next highest ranked eligible project.
- Initiate design and/or construction of the project within one year of completion of a loan agreement; otherwise, the loan agreement may be amended to remove principal forgiveness.

Micro Loan Subsidy Matrix		Best Practices Score	
		50-75 pts 76-100 pts	
User Rate Affordability	Unaffordable (High Burden)	70%	90%
Oser Rate Allordability	Mid-Affordable (Medium Burden)	50%	70%

A maximum of \$2,000,000 in Micro Loan forgiveness has been allotted by the SRF Program for SFY25. Any uncommitted subsidies that exist after one year of publication of the IUP will be distributed to projects with existing subsidies, or to those projects which are the furthest along in completion of construction. The SRF Program will aim to allocate required subsidy as quickly as reasonably possible; all required subsidy will be allocated within three years of the grant award to ensure compliance with the federal grant conditions.

# SUSTAINABLE INFRASTRUCTURE PLANNING PROJECTS

ADEC offers financing for wastewater system planning and related activities that promote sustainable infrastructure. For each Sustainable Infrastructure Planning Project (SIPP) on the PPL, a maximum of \$75,000 in loan principal may be forgiven for those borrowers that are considered disadvantaged communities.

A maximum of \$75,000 in loan forgiveness for SIPP will be allotted per project and per borrower during SFY25. If one borrower submits multiple planning projects for consideration, the \$75,000 in potential loan forgiveness may be divided between the SIPP projects. A maximum of \$750,000 in SIPP loan forgiveness has been budgeted by the SRF Program for SFY25.

Examples of eligible projects are described below:

- Feasibility Studies to evaluate infrastructure project feasibility. Studies may also include the evaluation of resiliency measures and continuity of operations, including identification of needed infrastructure improvements.
- Asset Management Plans for managing wastewater system infrastructure assets.
- Consolidation Studies to evaluate potential for wastewater system consolidation.
- Wastewater Rate Analysis to evaluate wastewater system rate charges, structure, and adequacy.
- Infiltration and Inflow Studies to detect inflows and identify potential solutions.

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• Wastewater System Master Plan to evaluate the needs of the wastewater system in the long term and make recommendations for future improvements.

Any wastewater system receiving a loan that includes principal forgiveness for a SIPP must enter into a loan agreement within six months of receiving notification that the project has been added to the PPL. The project must be completed within two years after signing the loan agreement. SIPP loans issued in excess of \$75,000 will be subject to a 5-year loan repayment term at the applicable finance rate as defined in 18 AAC 76.

# **FEDERAL REQUIREMENTS**

Loan agreements will include all applicable federal requirements. All funding recipients must comply with the following:

#### American Iron and Steel

All recipients of SRF funding for wastewater and stormwater facility construction projects must meet the American Iron and Steel (AIS) requirements. Projects may use only specific iron and steel produced in the United States. ADEC includes provisions addressing the AIS requirements in all funding agreements. Compliance with Build America, Buy America (BABA) iron and steel provisions will satisfy the AIS requirements.

# Davis-Bacon Act Prevailing Wage Rates

ADEC will require borrowers to include specific EPA Davis-Bacon language in bid specifications and contracts for all treatment works projects and will confirm that these contracts include the correct wage determinations. In addition, ADEC will collect certifications of Davis-Bacon compliance via online project quarterly report statements.

## **Environmental Project Review**

All CWSRF-funded projects involving the construction of treatment works, regardless of the source of the funding (e.g. capitalization grant, prior year appropriations, state match, interest earnings, principal repayments, etc.), must undergo an environmental review in conformance with the EPA-approved State Environmental Review Process.

#### Cost and Effectiveness Certification

In accordance with amendments to Section 602(b)(9) of the CWA effective June 10, 2014, funding recipients are required to submit a certification, signed by a professional engineer, stating that a cost and effectiveness study has been completed.

# Fiscal Sustainability Plans

The CWA requires CWSRF loan recipients for publicly owned treatment works (POTW) projects to develop and implement a Fiscal Sustainability Plan (FSP) that includes the following minimum elements:

- An inventory of critical assets that are part of the system;
- An evaluation of the condition and performance of the critical assets;

- A plan to maintain, repair and replace the critical assets and to fund those activities; and
- A certification that the assistance recipient has evaluated and will be implementing water and energy conservation efforts as part of the plan.

Applicants can self-certify that the FSP, or its equivalent, has been developed and implemented prior to the final disbursement for the project.

# Federal Equivalency Projects

Per EPA's Standard Operating Procedures for the CWSRF, specific requirements, referred to as federal equivalency requirements, apply only to a subset of loans equal to the amount of the capitalization grant, rather than to all loans funded by the SRF Program. In SFY25, ADEC intends to take full advantage of the flexibility offered by equivalency to reduce the burden of the federal grant conditions, listed above, for many applicants. For SFY25, the Anchorage Water Wastewater Utility (AWWU) Pro Fi loan will be required to meet all federal grant conditions in order to fulfill the equivalency requirement associated with the base grant.

For the CWSRF, the specific equivalency requirements, in addition to the requirements applicable to all projects, are listed below:

# Architectural and Engineering (A/E) Services Procurement

Loan recipients identified by ADEC as equivalency projects are required to procure A/E services in accordance with federal requirements found in Chapter 11 of Title 40 U.S. Code. These services include, but are not limited to, program management, construction management, feasibility studies, preliminary engineering design, engineering, surveying, mapping, and architectural-related services.

# Build America, Buy America Act (BABA) Provisions

This provision that was included in the BIL requires domestic preference procurement for iron and steel products, manufactured products, and construction materials.

# Disadvantaged Business Enterprise (DBE)

Loan recipients and their contractors must comply with the federal DBE requirements.

# Signage to Enhance Public Awareness

For base grant equivalency projects, the SRF Program will post a notice on the SRF Program website to provide awareness of the funding source.

For construction projects funded in whole or in part through the BIL General Supplemental grant, recipients must place a physical sign at construction sites that displays specific information. The EPA <u>Investing in America Signage</u> website provides more information about how to comply with the signage requirement.

### Single Audit

Borrowers who have received federal funds through ADEC's SRF Program may be subject to the requirements of the Single Audit Act and 2 CFR 200.

#### Prohibition of Certain Telecommunication and Video Surveillance Services

In compliance with Section 889 of Public Law 115-232, restrictions are placed on the use of some telecommunication and surveillance equipment.

#### **ASSURANCES AND CERTIFICATIONS**

The Operating Agreement specifies numerous conditions that must be met. Each capitalization grant typically contains additional conditions that must be met. ADEC is committed to compliance with all conditions in both the Operating Agreement and capitalization grant.

# Timely and Expeditious Expenditure

ADEC will enter into binding commitments to provide assistance in an amount equal to 120% of the FFY24 federal capitalization grant within one year after receipt of the grant payment. The PPL includes an estimated date for the beginning of construction for each project to indicate a proposed project schedule. Additionally, the State will strive to disburse available funds while maintaining enough cash on hand to meet disbursement obligations for two years.

To assure expeditious and timely expenditure of funds, ADEC continues to require that applicants initiate the project within one year of execution of the loan agreement and submit the first disbursement request within two years of execution of the loan agreement. If either condition is not met, ADEC may take action to recall the loan; however, an extension may be granted upon an applicant's request, if there is reasonable justification.

# Federal Funding Accountability Transparency Act (FFATA)

FFATA reporting requirements apply in an amount equal to the capitalization grants. ADEC will report loans with a dollar value equaling the federal capitalization grant awards to comply with FFATA requirements. Information will be reported no later than the end of the month following the date of the finalized loan agreement.

Additional loans may be identified to include all federal requirements (including those associated with equivalency) to ensure that ADEC has sufficient projects to report for FFATA in case any projects fail to fully disburse the loan amount as initially planned.

# Federal Reporting

ADEC will update project information at least quarterly in EPA's SRF Data System (previously identified as the Clean Water Benefits Reporting (CBR) database). The Data System collects project level information and anticipated environmental benefits associated with CWSRF projects.

ADEC also commits to entering all program information into the SRF Data System on an annual basis as EPA requests. This system is also used to collect annual financial information which was formerly collected through the National Information Management System (NIMS). This annual information submittal is used to produce annual reports that provide a record of progress and accountability for the SRF Program. EPA uses the information provided to oversee the CWSRF state programs and develop reports to the US Congress concerning activities funded by the CWSRF Program. ADEC commits to entering benefits information on all projects into the SRF

Data System by the end of the quarter in which the assistance agreement is signed. ADEC also commits to entering all program information into the SRF Data System on an annual basis as EPA requests.

# Generally Accepted Accounting Principles

Loan recipients are required to maintain project accounts per Generally Accepted Accounting Principles as issued by the Governmental Accounting Standards Board Amendments in accordance with Section 602(b)(9) of the CWA, effective June 10, 2014. This provision requires assistance recipients to use standards relating to the reporting of infrastructure assets. ADEC includes this information in the loan agreements and reviews compliance annually during Single Audit reviews.

#### **PUBLIC REVIEW AND COMMENTS**

The draft IUP will be posted on the SRF Program website for a 30-day public comment period. A notice of the draft IUP will be emailed directly to municipalities and other stakeholders, including potential SRF borrowers, located throughout the state. The notice of public comment will also be posted on the ADEC Public Notice website. This website is the official location for all active ADEC comment periods. Information about the comment period will also be provided to other stakeholders and funding partners including the U.S. Department of Agriculture Rural Development and the Alaska Native Tribal Health Consortium as well as to the Alaska Municipal League and the Alaska Water and Wastewater Management Association for distribution to their members.

May 2024

# Appendix 1 Priority Criteria for SFY25 CWSRF Projects



Division of Water State Revolving Fund Program

# **Alaska Clean Water State Revolving Fund**

# **Priority Criteria for Point Source Project – Reference Sheet**

PUBLIC HEALTH CONSIDERATIONS (Select only one)	POINTS
This project will correct the cause of a human disease event documented by ADEC or a recognized public health organization.	
Documentation required.	100
Examples: • Outbreaks of Hepatitis, Giardiasis or Cryptosporidiosis.	100
<ul> <li>Upgrading facilities to meet new EPA/ADEC regulations or resolve violation(s) of a wastewater permit with short term compliance deadline (≤ 1 year).</li> <li>Installation of new sewer mains in an area where there is documented well contamination resulting from sewer main leaks.</li> </ul>	
This project will correct conditions severe enough that a disease event may occur, although an event may have not yet been reported.	
Examples: Violations of a wastewater permit with longer term compliance deadlines (> 1 year). Documented failure of on-site disposal systems.  Correction of documented Inflow and Infiltration issues that prevent the WWTP from meeting permit limits.  Construction to address documented surface water contamination violation.	75
This project will minimize public health threats where the potential for a disease event exists.	
<ul> <li>Examples: Correction of documented issues with a high potential to violate a wastewater permit condition or ADEC design criteria.</li> <li>Replacement of pipes or facilities with documented leaks or constructed of inferior materials (example – asbestos cement pipe, structurally impaired lift station wet well).</li> <li>Improvements to a collection system prone to freeze-up.</li> <li>Installation of new sewer mains to an area that is currently served by on-site systems and has a high potential of regulated contaminants exceeding safe standards.</li> </ul>	50
This project will minimize potential future public health problems. There is no current threat of a disease event.	
Examples: • Replacement of collection system components that are at end of life, but no documentation of significant failure. Wastewater Treatment Facility upgrades to increase capacity and/or replace obsolete equipment that is not related to a permit violation correction. • Improve system security, such as fencing, remote monitoring, access cards, etc. SCADA upgrades, backup power to a critical system component.	25
This project will not address any significant health related issues.	
<ul> <li>Examples: Sewer main alignment changes (rerouting mains that have little to no improvement on operation). Sewer main expansion for future development.</li> <li>Wastewater treatment plant or collection system studies, unless required by compliance conditions.</li> <li>Master plans, backup power to a tangential facility.</li> </ul>	0
WATER QUALITY CONSIDERATIONS (Select only one)	
PROTECTION OF UNIMPAIRED WATERBODY	
The goal of the proposed project is prevention of water pollution in an unimpaired waterbody (Category 2 or Category 3) as reported in the Integrated Report ( <a href="https://dec.alaska.gov/water/water-quality/">https://dec.alaska.gov/water/water-quality/</a> ).	35
This project does not prevent water pollution in an unimpaired waterway.	0
RESTORATION OF IMPAIRED OR POLLUTED WATER BODY (Select only one)	
The goal of the proposed project is to reduce pollution/improve water quality in a waterbody identified as impaired or polluted (Cator Category 5) in the Integrated Report ( <a href="https://dec.alaska.gov/water/water-quality/">https://dec.alaska.gov/water/water-quality/</a> ).	tegory 4
This project will reduce pollution specifically related to the impairment.	35
This project will reduce pollution to the waterbody that may not be specifically related to impairment.	25
This project will minimize the potential for future pollution event.	10
This project has minimal impact on future pollution event.	0
RECEIVING WATERS	
This project addresses the following adverse impacts to receiving waters: (Select only one)	
Direct impacts to surface water or groundwater.	10
Direct impacts to marine waters or estuaries.	5
Indirect impacts to surface water or groundwater.	5
This project will not address adverse impacts to receiving waters.	0
ADMINISTRATIVE	POINTS
PROJECT READINESS (Select only one)	
Engineering plans and specifications have been approved by the ADEC Engineering Support and Plan Review (ESPR) Program in	50
and and appearmed to the deem approved by the Mode Engineering support and hair neview (Est h) Hogiann in	

# **Priority Criteria for Point Source Projects**

			-	
addition to having an approved environmental	review. Documentation is req	uired for both.		
Engineering plans and specifications have beer	approved by the ADEC ESPR F	Program. Documentation required.	40	
Substantial engineering plans and specification	(at least 65% complete) have	been prepared. Documentation required.	30	
A feasibility study, facility plan and/or set of er are attached. Documentation required.	gineering plans and specificat	ions (at least 35% complete) has been prepared and	20	
An up-to-date comprehensive study, master pl been prepared and is attached. Documentation		nate, and/or approved environmental review has	10	
No project development has been accomplished.				
ASSET MANAGEMENT (Select only one)				
		ssessment of the criticality and condition of the opted and implemented within the past 5 years.	30	
		must meet the requirements as outlined in the SRF nventory-guidance.pdf). Documentation is required.	20	
An asset management plan will be prepared or	r updated as part of the propo	sed project. Completed plan to be provided to SRF.	15	
An asset inventory will be prepared as part of	the proposed project. Complet	ted inventory to be provided to SRF.	10	
Employees have attended an asset manageme Continuing Education Units (CEUs), within the		Operator Training and Certification Program for quired.	5	
The system has not planned, developed, or implemented an asset management plan or inventory, and staff have not attended asset management training.			0	
FUNDING COORDINATION (Select only one)				
This loan will be used to match other state or federal funds, or this project will be coordinated with another municipal/state/federally funded project (e.g. DOT road construction). Documentation is required to identify each funding source.				
Other funding sources have not been identified			0	
SUSTAINABILITY PROJECTS (Select only one)				
Fix it First Projects – These are projects curren encouraged over project in undeveloped areas encouraged.		ea which is still suitable for use and should be upgrade of infrastructure in these types of areas are	50	
Effective Utility Management – Plans, studies and projects that improve the technical, managerial, and financial capacity of assistance recipients to operate, maintain and upgrade their infrastructure. Improved stewardship of the existing infrastructure will help improve sustainability and extend the useful life of the system.				
<b>Planning</b> – Preliminary planning, development of alternatives, and capital projects that reflect the full life cycle cost of infrastructure, conserve natural resources or use alternative approaches to integrate natural systems in the built environment.				
Not applicable.			0	
OPERATOR CERTIFICATION (Select only one)				
The system employs, or has on contract, an operator certified to the level of the system.				
The system does not employ, or have on contract, an operator certified to the level of the system.				
		Monthly Wastewater Cost/Monthly Income		
AFFORDABILITY CRITERIA	High	>2%	15	
(Select only one)	Medium	1.0% - 1.9%	10	
	Low	<1.0%	5	
		·		

# To Be Completed by ADEC

EQUIVALENCY		
This project will be used as an equivalency project.	50	
GREEN PROJECTS		
The applicant has sufficiently demonstrated eligible Green components under the project.	25	



# Division of Water State Revolving Fund Program

# **Alaska Clean Water State Revolving Fund**

# **Priority Criteria for Nonpoint Source Project – Reference Sheet**

	WATER QUALITY CONSIDERATIONS	POINTS
PR	OTECTION OF UNIMPAIRED WATERBODY (Select only one)	
1	The goal of the proposed project is prevention of nonpoint source water pollution in an unimpaired waterbody (Category 2 or Category 3) as reported in the Integrated Report.	60
2	This project has minimal impact protecting water quality.	0
RE	STORATION (Select only one)	
	e goal of the proposed project is to reduce pollution/improve water quality in a waterbody identified as impaired or polluted (Ca Category 5) in the Integrated Report.	ategory 4
1	This project will reduce pollution specifically related to the impairment.	75
2	This project will reduce pollution to the waterbody that may not be specifically related to impairment.	50
3	This project has minimal impact on restoring water quality.	0
	ADMINISTRATIVE ADMINISTRATIVE	
PR	OJECT READINESS (Select only one)	
1	Engineering documents have been prepared and are attached. Documentation is required.	15
2	Preliminary engineering documents have been prepared and are attached. Documentation is required.	10
3	Key planning document(s) (e.g. TMDL, Watershed Plan, Corrective Action Plan, Comprehensive Plan) have been prepared and are attached. Documentation is required.	5
4	A feasibility study that demonstrates the need and costs for the project have been prepared and are attached. Documentation is required.	2
5	No project development has been accomplished.	0
FU	NDING COORDINATION (Select only one)	
1	This loan will be used to match other state or federal funds. Documentation is required to identify each funding source.	5
2	Other funding sources have not been identified.	0

# To Be Completed by ADEC

	2021 – 2025 NONPOINT SOURCE STRATEGY IDENTIFIED PRIORITIES	
1	The project is located in an underserved community.	15
2	The project monitors waters for Best Management Practices (BMP) Effectiveness at reducing nonpoint source pollution.	10
3	The project conducts education or outreach related to reducing nonpoint source pollution.	10
4	The project evaluates which BMPs are most effective for Alaska's environment to reduce nonpoint source water pollution.	10
	GREEN PROJECT	
1	The applicant has sufficiently demonstrated eligible Green components under the project.	25
	EQUIVALENCY	
1	This project will be used as an equivalency project.	50

### Resources

- Integrated Report can be found on the following webpage: <a href="https://dec.alaska.gov/water/water-quality/">https://dec.alaska.gov/water/water-quality/</a>
- For additional information on Nonpoint Source water pollution control, visit: <a href="https://dec.alaska.gov/water/nonpoint-source-control/">https://dec.alaska.gov/water/nonpoint-source-control/</a>

# Appendix 2 Project Priority List

Net Resources Available to Provide Assistance = \$160.5 million

- (1) Within Funding Limits column indicates that the project is within the current fundable limit of the Alaska Clean Water Fund. Large projects (over \$5 million) may be phased based on projected funding needs during the next year. Loan applications may be submitted for any project within the funding limits that is ready to proceed.
- (2) Loan forgiveness is subject to change depending on the readiness of projects to proceed. Maximum loan forgiveness to be awarded from SRF Base and Supplemental Funds = \$12.8 million.
- (3) Loan terms will be finalized when a loan agreement is offered. The finance rate will be based on a calculation identified in Alaska Administrative Code (18 AAC 76).
- (4) Individual Pro Fi projects are reviewed and assigned a weighted score based on the total project cost. The overall score for the Pro Fi questionnaire is the sum of weighed scores for all of the Pro Fi projects.

Rank	Score Within Funding Limit	APDES Permit Number	Clean Water Needs Category (for EPA Use)	Applicant	Project Name and Description	Requested Loan Amount	Disadvantaged Community Tier	Green Project Category	SUBSIDY <sup>(2)</sup> Loan Forgiveness	Estimated Cost of Green Infrastructure	l erm	Estimated Construction Start	Added to PPL
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#### POINT SOURCE PROJECT QUESTIONNAIRES

1	225	х	AK0021440	III-B	Ketchikan	Water Street Sewer Main Replacement - Replace or rehabilitate existing sewer lines that have been determined to be significant contributors to inflow and infiltration at the Charcoal Point Wastewater Treatment Plan and also contribute to a general decline in water quality in the area.	\$3,900,000	Tier 2		\$1,000,000		5 to 20	7/1/2025	SFY22 Q2 SFY24-3
2	217 <sup>(4)</sup>	х	AK0022551	I III-A III-B	Anchorage AWWU	SFY25 Programmatic Financing (Pro Fi) Loan - The applicant has provided a list of eligible projects including planning, design, engineering, and construction activities for wastewater infrastructure projects that may be financed through the SFY25 Pro Fi loan agreement (see attached Pro Fi project list).	\$11,500,000	Tier 1						SFY25-1
3	212 <sup>(4)</sup>	х	AK0022551	I III-A III-B	Anchorage AWWU	SFY24 Programmatic Financing (Pro Fi) Loan - The applicant has provided a list of eligible projects including planning, design, engineering, and construction activities for wastewater infrastructure projects that may be financed through the SFY24 Pro Fi loan agreement (see attached Pro Fi project list).	\$11,500,000	Tier 1	Energy Efficiency		\$2,000,000	20	1/1/2024	SFY24-3
4	210	х	AKG573029	III-B	Bristol Bay Borough	King Salmon Lagoon Upgrade - Upgrade current lagoon system to an ultraviolet (UV) treatment system to ensure discharges are compliant with permit requirements.	\$3,165,756	Tier 2		\$500,000		5 to 20	3/31/2024	SFY23-Q1 SFY25-1
5	180	х	2007- DB0003	III-B	Nome Joint Utility System	Front Street Sewer Main Replacement - This project will replace failing water mains that are nearly 40 years old along and adjacent to Front Street from Bering Street to Steadman Street. This work is planned in coordination with Alaska Department of Transportation's road improvement project.	\$2,750,000	Tier 2		\$500,000	\$2,750,000	5 to 20	5/18/2026	SFY24-3
6	170	х	AK0021245	III-B	Homer	Beluga Sewer Lift Station Improvements - Reconfigure and rehabilitate the lift station to reduce corrosion and allow for greater ease of maintenance.	\$2,937,353	Tier 2	Energy Efficiency	\$500,000		20 to 30	1/17/2022	SFY22-Q3
7	170	х	AK0021245	IV-A	Homer	Mission Road Sewer Trunk Line - Install approximately 5,340 feet of 8-inch HDPE sewer trunk line pipe. This project would provide piped service to four homes located directly adjacent to the main and provide the opportunity to serve many more homes in nearby subdivisions.	\$1,493,506	Tier 2				20 to 30	8/1/2021	SFY22-Q2
8	165	х	AK0021385	I	Haines Borough	Wastewater Treatment Plant Influent Upgrade - Demolish the existing wet well located within the control building and provide a new exterior wet well and a below-grade valve vault. This project will prevent debris from entering the plant during significant storm events and provide for safer working conditions within the plant.	\$2,115,758	Tier 3		\$1,000,000		20 to 30	6/1/2022	SFY23-Q1
9	165	х	AK0021440	III-B	Ketchikan	Park Avenue and Harris Street Revitalization - Replace deteriorated aging corrugated metal sewer pipe with new corrosion resistant piping.	\$1,900,000	Tier 2		\$500,000		5 to 20	7/1/2024	SFY24-1
10	155	х	AK0022951	I	Juneau	Mendenhall Wastewater Treatment Plant (MWWTP) Influent Piping - Install new piping to bypass the now obsolete screening equipment located one floor above the rest of the treatment plant.	\$994,000	Tier 1	Energy Efficiency		\$994,000	20 to 30	1/1/2022	SFY22-Q2
11	145	х	AK0021890	I	Seward	<b>Lowell Point Lagoon Blower Improvements</b> - Remove and replace the main blowers at the Lowell Point wastewater treatment plant with high efficiency blowers.	\$547,500	Tier 2		\$250,000		5 to 20	8/5/2022	SFY23-Q1
12	145	х	AK0021890	1	Seward	<b>Lowell Point Lagoon Fine Bubble Aeration</b> - Upgrade 30-year-old coarse bubble diffuser with new fine bubble diffuser to increase bacteria efficiency and reduce lagoon odors.	\$637,500	Tier 2		\$250,000		5 to 20	5/27/2022	SFY23-Q1

Net Resources Available to Provide Assistance = \$160.5 million

- (1) Within Funding Limits column indicates that the project is within the current fundable limit of the Alaska Clean Water Fund. Large projects (over \$5 million) may be phased based on projected funding needs during the next year. Loan applications may be submitted for any project within the funding limits that is ready to proceed.
- (2) Loan forgiveness is subject to change depending on the readiness of projects to proceed. Maximum loan forgiveness to be awarded from SRF Base and Supplemental Funds = \$12.8 million.
- (3) Loan terms will be finalized when a loan agreement is offered. The finance rate will be based on a calculation identified in Alaska Administrative Code (18 AAC 76).
- (4) Individual Pro Fi projects are reviewed and assigned a weighted score based on the total project cost. The overall score for the Pro Fi questionnaire is the sum of weighed scores for all of the Pro Fi projects.

Rank	Score	Within Funding Limit	APDES Permit Number	Clean Water Needs Category (for EPA Use)	Applicant	Project Name and Description	Requested Loan Amount	Disadvantaged Community Tier	Green Project Category	SUBSIDY <sup>(2)</sup> Loan Forgiveness	Estimated Cost of Green Infrastructure	Requested Loan Term (years) (3)	Estimated Construction Start	Added to PPL
13	150		AK0022497	I	Palmer	Headworks Rehabilitation – Design and install a preliminary grit separator before the headworks building. This would allow for access to every part of the building, including lighting and machinery. The screw pumps and augers would then be replaced to handle daily flows independently. An emergency backup pump would also be installed in the influent basin to prevent any flooding of the plant and the gantry cranes would be reconfigured to allow better access when removing or installing large machinery.	\$7,600,000	Tier 2		\$500,000		20 to 30	5/1/2025	SFY25-1
14	145	х	AK0022591	I	Juneau	Mendenhall Wastewater Treatment Plan FOG (Fat, Oil and Grease)/Grit Removal - Design and construct pre-treatment FOG/grit removal process to moderate inputs into the sequencing batch reactor, improve treatment efficiency, and aid compliance with discharge standards.	\$6,250,000	Tier 1				5 to 20	1/2/2024	SFY23-Q4
15	145	x	AK0022591	I	Juneau	Mendenhall Wastewater Treatment Plant Microscreens - Design and construct pre-treatment microscreens and associated piping to reduce influent organic loading to the sequencing batch reactors and improve compliance with discharge standards.	\$9,501,000	Tier 1				5 to 20	1/2/2024	SFY23-Q4
16	130		AK0023213	I	Juneau	Juneau Douglas Treatment Plant (JDTP) Vactor Receiving Station – Construct a building to receive and process waste from Vactor trucks and septage haulers. Upgrade the JDTP headworks with two new coarse screens, a new grit removal system, and the non-portable water system to supply the new building and equipment.	\$5,417,900	Tier 1				5 to 20	4/30/2024	SFY25-1
17	120	x		III-B	Kotzebue	Fire Hall Lift Station and Sewer System - Replace sections of existing gravity main with 8-inch insulated pipe, replace the existing Fire Hall Lift Station, construct an additional 8-inch insulated arctic force main to allow for increased capacity in transmission of wastewater to Lagoon Cell 1 from existing lift stations.	\$2,662,000	Tier 3		\$1,000,000		5 to 20	9/1/2022	SFY23-Q2
18	115	x	AKG573025	III-B	Togiak	Lagoon Dredging - Due to lack of treatment volume, the sewage lagoon discharge is not meeting permit requirements. This project will involve a de-watering design, engineering services, dredging of the lagoon to re-attain the original design treatment volume, de-watering the sludge, and landfill costs for dewatered sludge.	\$2,000,000	Tier 4		\$1,500,000		30		SFY23-Q4
19	115	х	AK0020036	ı	Soldotna	Refurbish Headworks Building - Update the existing headworks building to include air sensors, screening, dewatering, compacting, and grit removal. The existing equipment has been in place more than 30 years and has exceeded its useful life.	\$850,000	Tier 3				5 to 20	1/1/2027	SFY23-Q2
20	115	x	2007- DB0003	TBD		Equipment Response / Storage / Office Facility - Construct a building to support sewer utility, amalgamate ancillary facilities, reduce operating costs, protect equipment, and improve health and safety of the work environment. The facility will also support the drinking water utility. The cost of construction would be split between the Alaska Clean Water Fund and the Alaska Drinking Water Fund.	\$5,025,000	Tier 2	Energy Efficiency		\$1,000,000	20 to 30	5/12/2025	SFY24-3
21	100	х		ı	Anchorage	Anchorage Regional Landfill Leachate Lagoon Upgrade - Replace leachate lagoon liners, lagoon piping and pre-treatment equipment. Expand Lagoon 2 to increase the storage capacity. Install jet aeration system. Construct ramps to aid in lagoon cleaning. Relocate truck loading station for transport of leachate to wastewater treatment plant.	\$13,000,000	Tier 1				5 to 20	1/1/2023	SFY23-Q4
22	95	х	AK0021440	Ш	Ketchikan	Charcoal Point WWTP: Disinfection Facility - Develop a Request for Qualifications (RFQ) and after selecting a firm, task them with providing 100% design for either improvement or expansion of the effluent treatment facility to house disinfection which will be necessary to meet new requirements.	\$1,000,000	Tier 2				5 to 20	10/1/2024	SFY25-1

Net Resources Available to Provide Assistance = \$160.5 million

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Rank	Score	Within Funding Limit	APDES Permit Number	Clean Water Needs Category (for EPA Use)	Applicant	Project Name and Description	Requested Loan Amount	Disadvantaged Community Tier	Green Project Category	SUBSIDY <sup>(2)</sup> Loan Forgiveness	Estimated Cost of Green Infrastructure	Requested Loan Term (years) (3)	Estimated Construction Start	Added to PPL
23	95	х	2007- DB0003	III-B	Nome Joint Utility System	Front and N Lift Station - Replace the Front and N lift station that was originally constructed in 1982 with a larger diameter wet well to accommodate wastewater needs and facilitate maintenance and operations.	\$2,500,000	Tier 2				5 to 20	6/3/2024	SFY24-3
24	85	х	AKG521030	III-B	Homer	Fish Grinder Building Replacement - Replace the corroded and rusted City-owned building housing the grinder that processes fish carcasses to a slurry before discharging the waste into Kachemak Bay in accordance with the wastewater discharge permit.	\$300,000	Tier 2				5 to 20	6/1/2023	SFY23-Q4
25	85	х	AKG521030	III-B	Homer	Lift Station Electrical Upgrades - Upgrade the electrical panels in seven lift stations.	\$254,286	Tier 2				20 to 30	4/30/2023	SFY24-1
26	80	х	AK0023213	I	Juneau	Juneau Douglas Wastewater Treatment Plant Supervisory Control and Data Acquisition (SCADA) and Instrumentation Upgrades - Upgrade the existing SCADA system, sensors, and instrumentation to assist in automating and managing the wastewater treatment process.	\$450,000	Tier 1				5 to 20	6/3/2024	SFY23-Q4
27	80	х	AK0021890		Seward	Lowell Point Lagoon Fence - Replace security fencing around wastewater treatment lagoon.	\$49,094	Tier 2				<5 years	5/1/2022	SFY22-Q4
28	80	х	AK0023213	ı	Juneau	Juneau Douglas Wastewater Treatment Plant Structural Improvements - Structural assessment and design of reinforced superstructure.	\$4,500,000	Tier 1				5 to 20	1/2/2024	SFY23-Q4
29	75	х	AKG521030	III-B	Homer	Wastewater Treatment Plant Pond Effluent Box - Rebuild the electrical components of the effluent box at the lagoon.	\$73,000	Tier 2				20 to 30	6/15/2023	SFY24-1
30	75	х	AKG521030	III-B	Homer	Wastewater Treatment Plant Transfer Switch Station - Replace the generator transfer switch.	\$33,000	Tier 2				20 to 30	7/24/2023	SFY24-1
31	70	х	AKG521030	III-B	Homer	Wastewater Treatment Plant Clarifier Coating Replacement - Remove the existing coating in the clarifiers and apply a new coating consistent with industry standard as corrosion protection for the concrete tanks/vats.	\$369,439	Tier 2				20 to 30	6/15/2023	SFY24-1
32	70	х	AKG521030	III-B	Homer	Wastewater Treatment Plant Digester Coating Replacement - Remove the existing coating in the digesters and apply a new coating consistent with industry standard as corrosion protection for the concrete tanks/vats.	\$231,806	Tier 2				20 to 30	6/15/2023	SFY24-1
33	65	x	AK0023451	I	Fairbanks	Golden Heart Utilities Wastewater Treatment Plant Grit Capture - Install two grit capture units with combined capability to process peak flows of 11 million gallons per day. Grit capture is a required process needed to support ultraviolet wastewater treatment in accordance with Alaska Pollution Discharge Elimination System requirements.	\$1,700,000	Tier 1				5 to 20	1/31/2024	SFY24-1
34	65	х	AK0023451	ı	Fairbanks	Golden Heart Utilities Wastewater Treatment Plant Ultraviolet (UV) Disinfection - To comply with lower permit levels for total residual chlorine in effluent, Golden Heart Utilities has agreed to replace the existing hypochlorite injection process with UV disinfection by 2025. Project specific work may include structure modification to existing chlorine contact chambers, installation of an in-channel UV disinfection system and other necessary modifications.	\$5,000,000	Tier 1				5 to 20	1/31/2024	SFY24-1
35	60	x	AK0022951	ı	Juneau	Pyrolysis of Per- and Polyfluorinated Substances (PFAS)-Impacted Biosolids - Add a pyrolysis thermal treatment at the Mendenhall Wastewater Treatment Plant to treat biosolids to avoid shipping PFAS-impacted biosolids out-of-state for disposal. In addition, this project proposes improvements to the Supervisory Control and Data Acquisition Industrial Control System.	\$6,236,000	Tier 1				5 to 20	1/1/2025	SFY25-1

Net Resources Available to Provide Assistance = \$160.5 million

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- (2) Loan forgiveness is subject to change depending on the readiness of projects to proceed. Maximum loan forgiveness to be awarded from SRF Base and Supplemental Funds = \$12.8 million.
- (3) Loan terms will be finalized when a loan agreement is offered. The finance rate will be based on a calculation identified in Alaska Administrative Code (18 AAC 76).
- (4) Individual Pro Fi projects are reviewed and assigned a weighted score based on the total project cost. The overall score for the Pro Fi questionnaire is the sum of weighed scores for all of the Pro Fi projects.

Rank	Score	Within Funding Limit	APDES Permit Number	Clean Water Needs Category (for EPA Use)	Applicant	Project Name and Description	Requested Loan Amount	Disadvantaged Community Tier	Green Project Category	SUBSIDY <sup>(2)</sup> Loan Forgiveness	Estimated Cost of Green Infrastructure	Requested Loan Term (years) (3)	Estimated Construction Start	Added to PPL
35	55	х	AK0020036	I	Soldotna	Water Treatment - Study and treat groundwater at existing municipal wells to limit concentrations of metals (copper and zinc) from the City's wastewater treatment plant effluent discharges to the Kenai River in accordance with anticipated new permit limits.	\$2,600,000	Tier 3				5 to 20	7/1/2025	SFY23-Q2
36	55	х	AK0020036	ı	Soldotna	pH Control at Wastewater Treatment Plant - Design and construct modifications to allow continuous monitoring of effluent pH levels.	\$260,000	Tier 3				5 to 20	3/1/2023	SFY23-Q2
37	55	х	AK0022951	Plan & Assess	Juneau	WWTP Comprehensive Facility Plan - Prepare an integrated, optimized strategy that includes specification of wastewater treatment elements ranging from source control for specific SIUs, collections system improvements to reduce infiltration and inflow, treatment plan enhancements and SCADA installations for integrated command and control.	\$1,200,000	Tier 1				5	7/3/2023	SFY23-Q4
38	40	х	AK0021385	ı	Haines Borough	Recondition WWTP Clarifier and Tanks – Recondition Haines Wastewater Treatment Plant's clarifier steel tank, the concrete digester tank, weir, and chlorine contact chamber along with the replacement of the aeration valves, piping, and diffusers.	\$80,000	Tier 3				20 to 30	5/1/2025	SFY25-1
39	40	х	AK0021890	IV-A	Seward	Maple Avenue Sewer - Design and construct approximately 850 feet of 8-inch sewer main. This project would provide piped service to approximately 11 residential parcels adjacent to Maple Avenue. Six of these parcels are currently developed.	\$255,000	Tier 2				5 to 20	5/31/2023	SFY24-1
40	40	х		I	Anchorage	Anchorage Regional Landfill Cell 9B/8C - Design improvements associated with the cell liner including leachate and stormwater collection and control systems.	\$1,530,000	Tier 1				5 to 20	11/30/2023	SFY23-Q4
41	40	х		I	Anchorage	Anchorage Regional Landfill Cell 9B/8C - Construct improvements associated with the cell liner including leachate and stormwater collection and control systems.	\$11,230,000	Tier 1				5 to 20	5/15/2024	SFY23-Q4
42	15	х				Utility Equipment Amendment - Replace aging equipment such as the Vactor truck, Digger Derrick, fuser, and pickup trucks which are used to maintain and repair vital water and sewer systems.	\$1,007,500	Tier 2				5 to 20	3/1/2024	SFY25-1
43	5	х		III-B	North Slope Borough	Barrow Pump Station - This project would address needed pump station upgrades. More information regarding the anticipated scope of work to be provided by the North Slope Borough.	\$6,018,000	Tier 3				20 to 30	5/1/2025	SFY25-1
44	5		AKG572036	III-B	North Slope Borough	<b>Point Lay Sewer Upgrade</b> - This project would address needed upgrades to the wastewater system. More information regarding the scope of anticipated work to be provided by the North Slope Borough.	\$40,000,000	Tier 3				20 to 30	5/1/2025	SFY25-1
						POINT SOURCE SUBTOTAL	\$182,624,398			\$7,500,000	\$6,744,000			

#### SUSTAINABLE INFRASTRUCTURE PLANNING PROJECT QUESTIONNAIRES

1	65	х	AKG521030	Plan & Assess	Homer	Wastewater Master Plan - Update the sewer system portion of the 2006 Water and Sewer Master Plan.	\$78,303	Tier 2	\$75,000	5	4/30/2023	SFY23-Q3
						SUSTAINABLE INFRASTRUCTURE PLANNING LOAN SUBTOTAL	\$78,303		\$75,000			

#### MICRO LOAN QUESTIONNAIRES (UPPER LIMIT OF \$500,000)

1	180	х	AKG380006	III-B	Seldovia Slough Sewer Improvement Project - Repair or replace failed service connections, manholes and sewer cleanouts. This loan would be used to finance the cost of portions of the project that are ineligible to be included in a project funded through Village Safe Water.	\$495,000	х	\$495,000		10	SFY24-1
2	125	х	AKG380006	III-B	<b>Lift Station Pump Replacement</b> - Purchase and install two new pumps in the Beach and Slough lift stations and purchase one additional pump to serve as backup in case one pump fails.	\$48,125	х	\$24,063	\$40,000	10	SFY22-Q1

Net Resources Available to Provide Assistance = \$160.5 million

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- (2) Loan forgiveness is subject to change depending on the readiness of projects to proceed. Maximum loan forgiveness to be awarded from SRF Base and Supplemental Funds = \$12.8 million.
- (3) Loan terms will be finalized when a loan agreement is offered. The finance rate will be based on a calculation identified in Alaska Administrative Code (18 AAC 76).
- (4) Individual Pro Fi projects are reviewed and assigned a weighted score based on the total project cost. The overall score for the Pro Fi questionnaire is the sum of weighed scores for all of the Pro Fi projects.

Rank	Score	Within Funding Limit	APDES Permit Number	Clean Water Needs Category (for EPA Use)	Applicant	Project Name and Description	Requested Loan Amount	Disadvantaged Community Tier	Green Project Category		Estimated Cost of Green	Term	Estimated Construction Start	Added to PPL
4	55	x			Hooper Bay	<b>Equipment Purchase</b> - Replace aging equipment used to maintain the sewer lagoon and to repair sewer lines damaged due to extreme weather events and other hazards.	\$500,000	х		\$450,000		10		SFY24-1
						MICRO LOAN SUBTOTAL	\$1,043,125			\$969,063	\$40,000			

#### NONPOINT SOURCE PROJECT QUESTIONNAIRES

1	100	х	 VI-B	Homer	Ohlson and Bunnell Storm Drain- Install storm drain in conjunction with a planned roadway improvement project.	\$324,000	Tier 2	\$324,000	5 to 20	5/1/2022	SFY24-1
2	97	х	 VI-B	Homer	Baycrest Storm Drainage - Design and construct a system to capture and convey stormwater away from highly erodible bluffs. The project would include property acquisition as well as storm drain and retention basin construction in conformance with state and federal permitting requirements. Through the conveyance system, concentrated runoff may be used to generate hydroelectricity.	\$1,000,000	Tier 2	\$176,000	5 to 20	5/1/2022	SFY22-Q4
3	97	x	 VI-C	Kotzebue	Storm Drain Planning, Design and Construction - Conduct inflow and infiltration study for Lift Station 8. Conduct hydrologic study to identify areas draining toward Lift Station 8 to estimate stormwater flow diversion needs, assess snow storage methods and locations. Construct storm drain with thaw wire. Based on recommendations of snow management planning, implement eligible capital improvements for snow management in catchment area.	\$2,456,000	Tier 3	\$1,000,000	5 to 20	9/1/2022	SFY23-Q2
3	92	x	 VI-B	Homer	Hansen Avenue Stormwater Management - Construct a concrete vault containing a filtration system for stormwater along Hansen Avenue. The filtered stormwater would discharge to Beluga Slough.	\$275,720	Tier 2		5 to 20	5/1/2024	SFY24-3
4	87	x	 VI-B	Homer	Bishop's Beach Stormwater Pollution Control - Design and construct a system to channel untreated stormwater into a green infrastructure feature before discharge to Beluga Slough and Kachemak Bay. Project would include acquisition of approximately 2.5 acres of land and construction of green infrastructure features in conformance with state and federal permitting requirements.	\$290,978	Tier 2		5 to 20	7/1/2022	SFY22-Q4
5	80	x	 VII-E	Nome Joint Utility System	Tank Farm Relocation - Relocate the existing tank farm to a more stable location. Due permafrost and climate change, the existing tank farm location is subject to differential settling that requires ongoing leveling and maintenance to avoid tank failure. The bulk fuel tank farm supports community electric power generation needs which in turn provides essential support to the community water and sewer system. The tank relocation site is a former US Air Force contaminate site that will require specific site development and construction attributable to the brownfield site. These costs are proposed for financing through the Clean Water Fund as a nonpoint source project.	\$4,500,000	Tier 2	\$500,000	5 to 20	5/15/2023	SFY23-Q2
6	77	x	 VI-B	Homer	Homer Spit Storm Drain - Design and construct storm drain infrastructure to collect runoff from several parking lots and convey the runoff to a storm water treatment device that will trap sediments, hydrocarbons and other contaminants before the runoff is discharged into Kachemak Bay.	\$1,198,628	Tier 2		5 to 20		SFY24-1
7	75	х	 VII-J	King Cove	Landfill Cell Capping and Closure - Install a partial closure system as required by state regulations (18 AAC 60.390) to stabilize slopes, minimize infiltration of liquids and soil erosion, and protect against the release of hazardous constituents to the environment at the King Cove Landfill.	\$67,318	Tier 3	\$67,318	5 to 20	10/1/2021	SFY22-Q3

Net Resources Available to Provide Assistance = \$160.5 million

AK0021474

III-B

Sitka

system.

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8	70	х		VII-J	Bristol Bay Borough	Naknek Landfill Cell Expansion and Fencing - The Bristol Bay Borough plans to construct a combined unlined municipal solid waste and construction/demolition cell as well as an access road and an electrified bear-proof fence. Costs specifically associated with protection water quality may be eligible for financing through the SRF Program.	\$6,350,000	Tier 2		\$500,000		5 to 20	4/1/2024	SFY24-3
9	62	x		VI-B	Homer	Beluga Wetland / East Kachemak Drive - This project would involve the acquisition, or conservation easement designation, of 80 acres of wetland in a predominately industrial area to be used as a stormwater retention and treatment area. Design and construct storm drain and outfall in conformance with state and federal permitting requirements.	\$1,000,000	Tier 2				5 to 20	1/31/2022	SFY22-Q4
10	45	х		VII-J	Fairbanks North Star Borough	Cell 4 Expansion - Design and construct a new lined landfill cell. Costs specifically associated with landfill leachate collection and treatment may be eligible for financing through the SRF Program.	\$7,000,000	Tier 1				5 to 20	3/15/2022	SFY23-Q
11	25	x		VII-K	Ketchikan	Schoenbar Culvert Rehabilitation - Rehabilitate a failing corrugated metal culvert to maximize hydraulic capacity for a creek that is a documented floodway. Rehabilitation of this culvert will avoid failure that would harm water quality in a stream that provides spawning and rearing habitat for coho and pink salmon as well as cutthroat trout. This project has also received approval for Congressionally directed spending funds that are being administered through the EPA.	\$1,950,000	Tier 2		\$500,000		5 to 20	6/1/2023	SFY23-Q
						NONPOINT SOURCE SUBTOTAL	\$26,412,644			\$3,067,318				
MENDI	MENT TO	O EXIST	ING LOAN AGE	REEMENT										
	na		2007- DB0003	III-B	Nome Joint Utility System	Nome Bering Street Sewer Improvements (Loan 627251-SG) - Loan amendment to modify the scope of the existing Bering Street loan agreement to include replacement of sewer lines along Seppala Drive. No additional loan funds are requested.		Tier 2				20		SFY22-Q
		х	AK0020036	I	Soldotna	Biosolids Dewatering System (Loan 791071) - Loan amendment to increase loan by \$938,700. This project will replace existing dewatering belt to increase efficiency. Infrastructure demolished during this process will be replaced.	\$938,700	Tier 3		\$1,000,000		5 to 20	2/3/2025	SFY25-1
		х	AK0021474	III-B	Sitka	Lake and Monastery Sewer Improvements Loan (783251-G) — Loan amendment to increase loan by \$750,000. This project will replace sewer main, manholes and sewer services on Lake, Monastery, Kinkead, and Hirst Streets. Pavement, sub-base, sidewalks, and storm infrastructure demolished during this process will also be replaced.	\$750,000	Tier 1				20 to 30	1/6/2025	SFY25-1
						Thomsen Harbor Lift Station Rehabilitation (Loan 783541) – Loan amendment to increase loan by \$1,700,000. This project will fully rehabilitate a lift station in Sitka and may include the following: design								

TOTAL FUNDING REQUESTED (ALL CATEGORIES)

\$1,700,000

\$3,388,700

\$213,547,170

LOAN AMENDMENTS

Tier 1

2/1/2024

SFY25-1

20 to 30

\$0

\$6,784,000

\$1,000,000

\$12,611,381

and construction of new wet well and valve vault; replace pumps, valves, and associated appurtenances;

upgrade electrical system and SCADA controls; replace back-up generator; and install new hypochlorite

# Alaska Clean Water Fund Programmatic Financing (Pro Fi) Projects

Applicant: Anchorage Water and Wastewater Utility

SFY25 Loan Request:

Loan Repayment Term: 20 years

Year		SRF#	Sub Project Name	Description
SFY24	SFY25	C-19-05f	King Street Fuel Storage Improvements	Relocate the existing fuel storage and dispensing system. This project will also streamline the traffic pattern within the facility.
SFY24	SFY25	C-20-25	Pump Station 2 Rehabilitation	Rehabilitate Pump Station 2 to reduce the risk of sanitary sewer overflows, emergency repairs. Replace high voltage electrical system, aging and corroding piping, valves, control systems, and various site improvements for Pump Station 2.
SFY24	SFY25	C-22-01	E 42nd Ave Upgrade - Sewer	To prevent sewer backups associated with bellies and damaged pipe, re-route a section of sewer main to a new alignment in a dedicated sewer easement within MOA right-of-way. The replacement sewer and manholes will be constructed on helical piles.
SFY24	SFY25	C-22-02	Pump Station 12 Force Main Interceptor C - Gravity Junction Rehab	Assess and rehabilitate Pump Station 12, force mains, gravity junction box, and the receiving 48-inch gravity sewer. The culverts that support the force mains for the Campbell Creek crossing will also be assessed and rehabilitated as part of the project.
SFY24	SFY25	C-22-03	Turpin Septage Receiving Station	Assess and rehabilitate the Turpin Septage Receiving Station.
SFY24	SFY25	C-22-04	W 72nd Ave Trunk Rehabilitation	Rehabilitate a corroded 15-inch corrugated metal sewer main. This project will either line with cured-in-place pipe or directly replace the failing pipe.
SFY24	SFY25	C-23-01	D-2-4 Trunk Improvements	Design and construct improvements to the D-2-4 trunk main to improve the ability to access and maintain the line and to enhance capacity to avoid sanitary sewer overflows.
SFY24	SFY25	C-19-09	Pump Station (PS) 52 Improvements	Design and construct a pump station to replace the current infrastructure built in 1982. Construction work is anticipated to include abandoning and demolishing the existing sewage lift station and piping, construction of a new sewage pump station and valve vault, installing a new control panel, and constructing a generator pad and relocating the existing generator. The work will include a temporary sewer bypass system, dewatering, and restoration of all affected streets. Existing utilities will be relocated with the existing developed easement and Rights of way to accommodate the work and provide better access.
SFY24	SFY25	C-24-01	Eagle River Wastewater Treatment Facility (ERWWTF) Ultraviolet (UV) and Wastewater Upgrades	Increase ultraviolet (UV) disinfection capacity to address current Alaska Pollutant Discharge Elimination System (APDES) permit limits for fecal coliform effective March 1, 2020. Rehabilitate deficiencies identified during the preparation of the ERWWTF Plan.
SFY24	SFY25	C-24-03	Sanitary Sewer Energy Savings Performance Contracting Services	AWWU is contracting with an energy savings performance contractor to investigate, recommend improvements, design, and construct energy efficient and other related performance contracting services. Recommended improvements may include energy efficient lighting upgrades, HVAC and controls upgrades, and a new lower cost pressure wash system at the Girdwood WWTF, and a new Fats, Oil and Grease (FOG) receiving station.
SFY24			John Wells 1952 Addition Sewer Improvements	Install approximately 1,900 linear feet of sanitary sewer mains to alleviate on-site septic systems and leach fields within the John Wells 1952 Addition subdivision in Toloff Street, 86th Court and Arlon Street.
	SFY25		Girdwood Sewer R&R Ph 1	Upgrade of seventeen sewer services which include the removal and replacement of 512 feet of sewer lines, dewatering, upgrading sewer flow control, working on creek bypassing, and restoration of the landscaping.
	SFY25		King Street Septage Receiving Station	Upgrade the existing septage receiving station with pretreatment equipment and increase the user access.

# Appendix 3 Disadvantaged Community Criteria

# **Appendix 3. Disadvantaged Community Criteria**

# **Background**

The Safe Drinking Water Act (SDWA) and the Clean Water Act (CWA) allow states to define communities most in need of financial assistance through affordability criteria. Based on conditions established in the annual Clean Water and Drinking Water State Revolving Fund capitalization grants, a portion of each grant must be provided as an additional subsidy. The Alaska SRF Program provides this subsidy in the form of principal forgiveness of low interest loans.

In 2023, the Alaska SRF Program reviewed its disadvantaged community criteria and proposed a revised method. The SRF Program historically focused on three metrics--income, unemployment and population--to identify borrowers that would experience a significant hardship raising the revenue necessary to finance a project. In an effort to develop a more comprehensive definition of what it means to be a disadvantaged community, the Alaska SRF Program included additional socioeconomic metrics as well as a factor to account for rural status.

# Disadvantaged Community Criteria - Federal and State Requirements

Under the Drinking Water State Revolving Fund (DWSRF) program, states may establish separate eligibility criteria and special funding options for economically disadvantaged communities. Section 1452 of the SDWA defines a disadvantaged community as "the service area of a public water system that meets affordability criteria established after public review and comment by the State in which the public water system is located." Under this section, states may provide additional subsidies (including forgiveness of principal) to communities that meet the established criteria, or that are expected to meet these criteria as a result of a proposed project.

In 2014, the Water Resources Reform and Development Act (WRRDA) revised the CWA to require all CWSRF programs to develop affordability criteria to be used by the state when determining which CWSRF borrowers are economically disadvantaged and eligible for additional subsidy. Pursuant to WRRDA, the affordability criteria must be based on the income data, unemployment rates, and population trends, as well as any other components deemed relevant by the state.

In Alaska, state regulations limit the distribution of subsidy through the SRF Program to borrowers who meet the state definition of a disadvantaged community. As noted in regulations for the Alaska Clean Water Fund (Alaska Administrative Code, Title 18, Chapter 76.035 [18 AAC 76.035]), "the department may provide a subsidy to an applicant in the form of principal forgiveness...if the applicant demonstrates that it meets affordability criteria." Similarly, the Alaska Drinking Water Fund regulations indicate that "the department may provide a subsidy to a disadvantaged system in the form of principal forgiveness."

# **Additional Subsidy - Base Capitalization Grants**

**DWSRF Additional Subsidy:** The SDWA mandates that states use at least 12% but no more than 35% of the annual base capitalization grant to provide additional subsidization for state defined disadvantaged communities. Additional subsidization is funding beyond the savings provided by a below market rate subsidized loan. In Alaska, additional subsidization is provided in the form of principal forgiveness.

In addition to the additional subsidization identified in the SDWA, Congress has included further additional subsidization requirements through the annual appropriation language. For Federal Fiscal Year 2024 (FFY24), the Congressionally mandated subsidy requirement is 14% of the capitalization grant with no specific eligibility requirements. The two required groups of subsidy are additive, meaning that the state is obligated to offer 26 to 49% of the FFY24 base capitalization grant as additional subsidy. As noted previously, Alaska regulations restrict subsidy eligibility to disadvantaged communities.

**CWSRF Additional Subsidy:** The CWA mandates that states use at least 10% but no more than 30% of the annual base capitalization grant to provide additional subsidization for:

- any municipalities that meet the state's affordability criteria;
- municipalities that do not meet the state's affordability criteria but seek additional subsidization to benefit individual ratepayers in the residential user rate class; or
- entities that implement a process, material, technique, or technology that addresses water or energy efficiency goals; mitigates stormwater runoff; or encourages sustainable project planning, design, and construction.

The Congressionally mandated subsidy requirement is 10% of the FFY24 capitalization grant with no specific eligibility requirements. As with the DWSRF, the two groups of subsidy are additive, meaning that the state is obligated to offer a minimum of 20% and a maximum of 40% of the FFY24 capitalization grant as additional subsidy.

# **Bipartisan Infrastructure Law (BIL)**

A key priority of the BIL is to ensure that disadvantaged communities benefit equitably from this investment in water infrastructure. Disadvantaged communities can include those with environmental justice concerns that often are low-income. Disadvantaged communities experience, or are at risk of experiencing, disproportionately high exposure to pollution—whether in air, land, or water.

The BIL mandates that 49% of funds provided through the DWSRF General Supplemental Funding and the DWSRF Lead Service Line Replacement Funding be provided as grants and forgivable loans to disadvantaged communities. The BIL also requires that at least 25% of funds provided through the DWSRF Emerging Contaminants Funding be provided as grants and forgivable loans to disadvantaged communities or public water systems serving fewer than 25,000 people.

For the CWSRF, the law mandates that 49% of funds provided through the CWSRF General Supplemental Funding be provided as grants and forgivable loans to communities that meet the state's affordability criteria or certain project types, consistent with the CWA.

To accomplish this, the Environmental Protection Agency (EPA) recommends that states may need to:

- Evaluate and revise, as needed, the DWSRF disadvantaged community definition and CWSRF affordability criteria.
- Evaluate the SRF priority point system for project ranking commensurate with need.
- Use technical assistance funding to help disadvantaged communities identify needs and access funding.
- Engage residents and community stakeholders in disadvantaged communities.

# **Criteria for Defining Disadvantaged Communities**

Disadvantaged community status is determined by considering four factors: household burden, socioeconomic indicators, rural community status and priority projects. Points are assigned for each factor as noted below.

#### **Household Burden**

The Household Burden indicator focuses on household income and the affordability impacts on those households most effected by the cost of utility service. Income quintiles are a socioeconomic measure that groups a community's household income data into five equal parts. Each quintile represents 20% of the population.

<u>Upper limit of lowest quintile income (LQI)</u> – Income quintiles group a community's household income data into five equal parts. Each quintile represents 20% of the population.

If the LQI is greater than the statewide LQI	No points
If the LQI is less than the statewide LQI	1 point
If the LQI is less than 80% of the statewide LQI	2 points

Cost of service as a percentage of LQI – The annual cost of service for both water and wastewater service (user fees) for residential connections is divided by the upper limit of the LQI to provide an indicator of the burden on lowest income earners in the community.

If the Cost of Service/LQI is less than 4%	No points
If the Cost of Service/LQI is greater than 4%	1 point
If the Cost of Service/LQI is greater than 6%	2 points

#### **Socioeconomic Factors**

Socioeconomic factors are used to consider a variety of indicators that may demonstrate economic stress in a community including the percentage of household receiving public

assistance, the percentage of households below the poverty level, unemployment rates, and population trends.

Percentage of households receiving Supplemental Nutrition Assistance Program (SNAP) benefits relative to the statewide average.

If the % of households receiving SNAP is less than statewide average	No points
If the % of households receiving SNAP is greater than statewide average	1 point
If the % of households receiving SNAP is 150% of statewide average	2 points

<u>Percentage of households below poverty level relative to the statewide average</u>. The poverty level is determined by the U.S. Census Bureau.

If the % of households below poverty level is less than statewide	No points
If the % of households below poverty level is greater than statewide	1 point
If the % of households below poverty level is 150% of statewide or greater	2 points

<u>Unemployment Rate</u> – The monthly unemployment rates posted by the Alaska Department of Labor for the borough or census area where the community is located for the previous calendar year are averaged and compared to the statewide unemployment rates.

If the unemployment rate is less than statewide rate	No points
If the unemployment rate is greater than statewide rate	1 point
If the unemployment is 150% of statewide rate or greater	2 points

<u>Population Trend</u> – The 2010 population from the decennial Census data compared to the 2020 population.

If the community population increases or decreases by less than 10%	No points
If the community population changes by 10-20%	1 point
If the community population change exceeds 20%	2 points

#### **Rural Communities**

Rural communities will receive two additional points in the scoring process. The following definition is used for a rural community:

- (1) A community that is eligible for assistance under the Village Safe Water Act, or
- (2) A community that meets each of the following criteria:
  - (a) is not located in an area that is identified as a Metropolitan or Micropolitan according to the U.S. Office of Management and Budget and
  - (b) is at least 300 road miles from a Metropolitan or Micropolitan area and
  - (c) has a population that exceeds 25 but is less than 4,500.

Rural community status	2 points
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# **Priority Projects**

Eligibility for loan forgiveness will also be assessed based on the project type. If the project aligns with one of the priority types listed below, points will be added to the project's score as noted.

Priority Project Type	Points
Project will result in completion of a Lead Service Line Inventory or replace known lead service lines	6
Project will address an emerging contaminant as defined in the BIL	6
Project will resolve a health-based violation of the SDWA	6
Project will install domestic wastewater treatment to meet the minimum treatment requirements of 18 AAC 72.050	6
Project will result in consolidation of two or more public water systems or wastewater systems	6
A water distribution system will be expanded to provide service to replace private sources that exceed the MCL for a primary drinking water contaminant.	6
A wastewater collection system will be expanded to provide service to individual services that use on-site wastewater	6
Project will improve the water quality of an impaired water body	5
Project will result in development of an Asset Management Plan	4

# **Data Sources**

Data sources for the information included in the Household Burden and Socioeconomic indicators are listed below:

Category / Metric	Source
Income and Poverty	
Lowest quintile income	American Community Survey
% below poverty level	American Community Survey
% Public Assistance/SNAP	American Community Survey
Labor Force	
Unemployment rate of borough/census area	Alaska Department of Labor
Demographics	
Population Trend	Decennial Census

# **Disadvantaged Community - Tiers**

Each loan applicant will be assessed based on household burden and socioeconomic factors to represent a base score for the community. Depending on the type of project proposed, additional points may be assigned to specific priority projects based on the criteria in the preceding section. Based on the points allotted, each project will be assigned to a tier with an associated percentage of loan forgiveness. To the extent that additional subsidy funds are available, disadvantaged communities may receive principal forgiveness associated with the base and supplemental capitalization grants as shown in the table below.

Tier	Point Range	Maximum Loan Forgiveness per Community/System		
		Clean Water Projects	Drinking Water Projects	
Tier 1	0 to 3	Not applicable	Not applicable	
Tier 2	4 to 6	\$500,000	\$1,500,000	
Tier 3	7 to 10	\$1,000,000	\$2,500,000	
Tier 4	10+	\$2,000,000	\$3,500,000	

# **Disadvantaged Communities - Base Scores and Tiers**

The table below shows the Household Burden and Socioeconomic Factors scores for several communities throughout the state. The communities represented in this table are either past or present SRF borrowers or have expressed an interest in pursuing financing through the SRF Program.

The base score in this table combines the Household Burden and Socioeconomic Scores. The disadvantaged community tier in this table reflects only the base score for the community. If a community proposes a "priority project" as defined by the SRF Program, then additional points may be added to a particular project.

Anchorage         0         0         0         Tier 1           Bethel         2         5         2         9         Tier 3           Cordova         0         2         2         4         Tier 2           Craig         1         5         2         8         Tier 3           Dillingham         1         4         2         7         Tier 3           Fairbanks         1         1         0         2         Tier 1           Gustavus         1         5         2         8         Tier 3           Haines         3         3         2         8         Tier 3           Homer         2         2         0         4         Tier 2           Hoonah         1         6         2         9         Tier 3           Juneau         0         0         0         0         Tier 3           Juneau         0         0         0         0         Tier 3           Ketchikan         3         2         0         5         Tier 2           Ketchikan         3         2         0         5         Tier 2           King Cove	Community	Household Burden Score (1)	Socioeconomic Factors Score (2)	Rural Community (3)	Base Score (1)+(2)+(3)	Base Score Tier
Cordova         0         2         2         2         4         Tier 2           Craig         1         5         2         8         Tier 3           Dillingham         1         4         2         7         Tier 3           Fairbanks         1         1         0         2         Tier 1           Gustavus         1         5         2         8         Tier 3           Haines         3         3         2         8         Tier 3           Homer         2         2         0         4         Tier 2           Hoonah         1         6         2         9         Tier 3           Juneau         0         0         0         0         Tier 2           Hoonah         1         6         2         9         Tier 3           Juneau         0         0         0         0         0         Tier 2           Hoonah         1         6         2         9         Tier 3           Kethikan         3         2         0         5         Tier 2           Kethai         3         2         0         5         Tier 2	Anchorage	0	0	0	0	Tier 1
Craig         1         5         2         8         Tier 3           Dillingham         1         4         2         7         Tier 3           Fairbanks         1         1         0         2         Tier 1           Gustavus         1         5         2         8         Tier 3           Haines         3         3         2         8         Tier 3           Homer         2         2         0         4         Tier 3           Homer         2         2         0         4         Tier 2           Hoonah         1         6         2         9         Tier 3           Juneau         0         0         0         0         Tier 3           Juneau         0         0         0         0         Tier 3           Ketchikan         3         2         0         5         Tier 2           Ketchikan         3         2         0         5         Tier 2           King Salmon         0         2         2         4         Tier 2           Kodiak         2         4         0         6         Tier 2           Kodi	Bethel	2	5	2	9	Tier 3
Dillingham         1         4         2         7         Tier 3           Fairbanks         1         1         0         2         Tier 1           Gustavus         1         5         2         8         Tier 3           Haines         3         3         2         8         Tier 3           Homer         2         2         0         4         Tier 3           Juneau         0         0         0         0         Tier 3           Juneau         0         0         0         0         Tier 3           Juneau         0         0         0         0         Tier 3           Kenai         3         2         0         5         Tier 2           Ketchikan         3         2         0         5         Tier 2           Ketchikan         3         2         2         4         Tier 2           Kodiak	Cordova	0	2	2	4	Tier 2
Fairbanks         1         1         0         2         Tier 1           Gustavus         1         5         2         8         Tier 3           Haines         3         3         2         8         Tier 3           Homer         2         2         0         4         Tier 3           Homer         2         2         0         4         Tier 2           Homer         2         2         0         4         Tier 3           Juneau         0         0         0         0         Tier 1           Kenai         3         3         0         6         Tier 2           Ketchikan         3         2         0         5         Tier 2           King Cove         1         4         2         7         Tier 3           King Salmon         0         2         2         2         4         Tier 2           Kodiak         2         4         0         6         Tier 2           Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         5         Tier 2	Craig	1	5	2	8	Tier 3
Gustavus         1         5         2         8         Tier 3           Haines         3         3         2         8         Tier 3           Homer         2         2         0         4         Tier 2           Hoonah         1         6         2         9         Tier 2           Hoonah         1         6         2         9         Tier 1           Kenai         3         3         0         6         Tier 2           Ketchikan         3         2         0         5         Tier 2           King Cove         1         4         2         7         Tier 3           King Salmon         0         2         2         4         Tier 2           Kodiak         2         4         0         6         Tier 2           Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           North Pole         0         0         0         0         Tier 1           Palmer	Dillingham	1	4	2	7	Tier 3
Haines         3         3         2         8         Tier 3           Homer         2         2         0         4         Tier 2           Hoonah         1         6         2         9         Tier 3           Juneau         0         0         0         0         Tier 3           Kenai         3         3         0         6         Tier 1           Kenai         3         2         0         5         Tier 2           King Cove         1         4         2         7         Tier 3           King Salmon         0         2         2         4         Tier 2           Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           North Pole         0         0         0         0         0         Tier 1           Petersburg         1         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 3 <t< td=""><td>Fairbanks</td><td>1</td><td>1</td><td>0</td><td>2</td><td>Tier 1</td></t<>	Fairbanks	1	1	0	2	Tier 1
Homer         2         2         0         4         Tier 2           Hoonah         1         6         2         9         Tier 3           Juneau         0         0         0         0         Tier 3           Kenai         3         3         0         6         Tier 2           Ketchikan         3         2         0         5         Tier 2           King Cove         1         4         2         7         Tier 3           King Salmon         0         2         2         4         Tier 2           Kodiak         2         4         0         6         Tier 2           Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           Nome         0         3         2         5         Tier 2           North Pole         0         0         0         0         0         Tier 1           Petersburg         1         2         2         2         5	Gustavus	1	5	2	8	Tier 3
Hoonah         1         6         2         9         Tier 3           Juneau         0         0         0         0         Tier 1           Kenai         3         3         0         6         Tier 2           Ketchikan         3         2         0         5         Tier 2           King Cove         1         4         2         7         Tier 3           King Salmon         0         2         2         4         Tier 2           Kodiak         2         4         0         6         Tier 2           Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           Nome         0         3         2         5         Tier 2           North Pole         0         0         0         0         Tier 1           Patersburg         1         2         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 3	Haines	3	3	2	8	Tier 3
Juneau         0         0         0         Tier 1           Kenai         3         3         0         6         Tier 2           Ketchikan         3         2         0         5         Tier 2           King Cove         1         4         2         7         Tier 3           King Salmon         0         2         2         4         Tier 2           Kodiak         2         4         0         6         Tier 2           Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           Nome         0         3         2         5         Tier 2           Nome         0         0         0         0         Tier 2           Nome         0         0         0         0         Tier 2           North Pole         0         0         0         0         Tier 1           Petersburg         1         2         2         2         5         Tier 2           Sand Poin	Homer	2	2	0	4	Tier 2
Kenai         3         3         0         6         Tier 2           Ketchikan         3         2         0         5         Tier 2           King Cove         1         4         2         7         Tier 3           King Salmon         0         2         2         4         Tier 2           Kodiak         2         4         0         6         Tier 2           Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           North Pole         0         0         0         0         Tier 2           North Pole         0         0         0         0         Tier 1           Palmer         1         4         0         5         Tier 2           Petersburg         1         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2	Hoonah	1	6	2	9	Tier 3
Ketchikan         3         2         0         5         Tier 2           King Cove         1         4         2         7         Tier 3           King Salmon         0         2         2         4         Tier 2           Kodiak         2         4         0         6         Tier 2           Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           Nome         0         3         2         5         Tier 2           North Pole         0         0         0         0         Tier 2           North Pole         0         0         0         0         Tier 2           Petersburg         1         2         2         5         Tier 2           Petersburg         1         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2	Juneau	0	0	0	0	Tier 1
King Cove         1         4         2         7         Tier 3           King Salmon         0         2         2         4         Tier 2           Kodiak         2         4         0         6         Tier 2           Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           Nome         0         3         2         5         Tier 2           North Pole         0         0         0         0         Tier 2           Palmer         1         4         0         5         Tier 2           Petersburg         1         2         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2           Seward         3         2         0         5         Tier 2           Seward         3         2         0         0         Tier 1	Kenai	3	3	0	6	Tier 2
King Salmon         0         2         2         4         Tier 2           Kodiak         2         4         0         6         Tier 2           Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           North Pole         0         0         0         0         Tier 1           Palmer         1         4         0         5         Tier 2           Petersburg         1         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2           Seward         3         2         0         5         Tier 2           Sitka         0         0         0         0         Tier 1           Skagway         0         4         2         6         Tier 2 <t< td=""><td>Ketchikan</td><td>3</td><td>2</td><td>0</td><td>5</td><td>Tier 2</td></t<>	Ketchikan	3	2	0	5	Tier 2
Kodiak         2         4         0         6         Tier 2           Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           North Pole         0         0         0         0         Tier 2           Palmer         1         4         0         5         Tier 2           Petersburg         1         2         2         5         Tier 2           Petersburg         1         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2           Seward         3         2         0         5         Tier 2	King Cove	1	4	2	7	Tier 3
Kotzebue         1         4         2         7         Tier 3           Naknek         1         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           North Pole         0         0         0         0         Tier 2           Palmer         1         4         0         5         Tier 2           Petersburg         1         2         2         5         Tier 2           Petersburg         1         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2           Seward         3         2         0         5         Tier 2           Seward         3         2         0         5         Tier 2           Sitka         0         0         0         0         Tier 2           Skagway         0         4         2         6         Tier 2           Soldotna         3         4         0         7         Tier 3           S	King Salmon	0	2	2	4	Tier 2
Naknek         1         2         2         5         Tier 2           Nome         0         3         2         5         Tier 2           North Pole         0         0         0         0         Tier 2           North Pole         0         0         0         0         Tier 1           Palmer         1         4         0         5         Tier 2           Petersburg         1         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2           Seward         3         2         0         5         Tier 3           Sitka         0         0         0         0         Tier 1           Skagway         0         4         2         6         Tier 2           Soldotna         3         4         0         7         Tier 3           St. Paul         3         2         2         7         Tier 3           Talkeetna         3         5         0         8         Tier 3 <t< td=""><td>Kodiak</td><td>2</td><td>4</td><td>0</td><td>6</td><td>Tier 2</td></t<>	Kodiak	2	4	0	6	Tier 2
Nome         0         3         2         5         Tier 2           North Pole         0         0         0         Tier 1           Palmer         1         4         0         5         Tier 2           Petersburg         1         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2           Seward         3         2         0         5         Tier 2           Seward         3         2         0         5         Tier 2           Sitka         0         0         0         0         Tier 2           Sitka         0         0         0         0         Tier 1           Skagway         0         4         2         6         Tier 2           Soldotna         3         4         0         7         Tier 3           St. Paul         3         2         2         7         Tier 3           Talkeetna         3         5         0         8         Tier 3           Utqiakleet	Kotzebue	1	4	2	7	Tier 3
North Pole         0         0         0         Tier 1           Palmer         1         4         0         5         Tier 2           Petersburg         1         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2           Seward         3         2         0         5         Tier 2           Sitka         0         0         0         0         Tier 1           Skagway         0         4         2         6         Tier 2           Soldotna         3         4         0         7         Tier 3           St. Paul         3         2         2         7         Tier 3           Talkeetna         3         5         0         8         Tier 3           Togiak         3         6         2         11         Tier 4           Unalaskeet         3         6         2         11         Tier 4           Unalaska         0         0         2         2         Tier 1           Utqiagvik </td <td>Naknek</td> <td>1</td> <td>2</td> <td>2</td> <td>5</td> <td>Tier 2</td>	Naknek	1	2	2	5	Tier 2
Palmer         1         4         0         5         Tier 2           Petersburg         1         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2           Seward         3         2         0         5         Tier 2           Sitka         0         0         0         0         Tier 1           Skagway         0         4         2         6         Tier 2           Soldotna         3         4         0         7         Tier 3           St. Paul         3         2         2         7         Tier 3           Talkeetna         3         5         0         8         Tier 3           Togiak         3         6         2         11         Tier 4           Unalakleet         3         6         2         11         Tier 4           Unalaska         0         0         2         2         Tier 1           Utqiagvik         1         3         2         6         Tier 2	Nome	0	3	2	5	Tier 2
Petersburg         1         2         2         5         Tier 2           Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2           Seward         3         2         0         5         Tier 2           Sitka         0         0         0         0         Tier 1           Skagway         0         4         2         6         Tier 2           Soldotna         3         4         0         7         Tier 3           St. Paul         3         2         2         7         Tier 3           Talkeetna         3         5         0         8         Tier 3           Togiak         3         6         2         11         Tier 4           Unalakleet         3         6         2         11         Tier 4           Unalaska         0         0         2         2         Tier 1           Utqiagvik         1         3         2         6         Tier 2           Valdez         1         1         0         2         Tier 1	North Pole	0	0	0	0	Tier 1
Sand Point         2         3         2         7         Tier 3           Seldovia         0         2         2         4         Tier 2           Seward         3         2         0         5         Tier 2           Sitka         0         0         0         0         Tier 1           Skagway         0         4         2         6         Tier 2           Soldotna         3         4         0         7         Tier 3           St. Paul         3         2         2         7         Tier 3           Talkeetna         3         5         0         8         Tier 3           Togiak         3         6         2         11         Tier 4           Unalakleet         3         6         2         11         Tier 4           Unalaska         0         0         2         2         Tier 1           Utqiagvik         1         3         2         6         Tier 2           Valdez         1         1         0         2         Tier 1           Wasilla         3         7         0         10         Tier 3	Palmer	1	4	0	5	Tier 2
Seldovia         0         2         2         4         Tier 2           Seward         3         2         0         5         Tier 2           Sitka         0         0         0         0         Tier 1           Skagway         0         4         2         6         Tier 2           Soldotna         3         4         0         7         Tier 3           St. Paul         3         2         2         7         Tier 3           Talkeetna         3         5         0         8         Tier 3           Togiak         3         6         2         11         Tier 4           Unalakleet         3         6         2         11         Tier 4           Unalaska         0         0         2         2         Tier 1           Utqiagvik         1         3         2         6         Tier 2           Valdez         1         1         0         2         Tier 1           Wasilla         3         7         0         10         Tier 4           Whittier         3         6         0         9         Tier 3           <	Petersburg	1	2	2	5	Tier 2
Seward         3         2         0         5         Tier 2           Sitka         0         0         0         0         Tier 1           Skagway         0         4         2         6         Tier 2           Soldotna         3         4         0         7         Tier 3           St. Paul         3         2         2         7         Tier 3           Talkeetna         3         5         0         8         Tier 3           Togiak         3         6         2         11         Tier 4           Unalakleet         3         6         2         11         Tier 4           Unalaska         0         0         2         2         Tier 1           Utqiagvik         1         3         2         6         Tier 2           Valdez         1         1         0         2         Tier 1           Wasilla         3         7         0         10         Tier 3           Wrangell         2         3         2         7         Tier 3	Sand Point	2	3	2	7	Tier 3
Sitka         0         0         0         0         Tier 1           Skagway         0         4         2         6         Tier 2           Soldotna         3         4         0         7         Tier 3           St. Paul         3         2         2         7         Tier 3           Talkeetna         3         5         0         8         Tier 3           Togiak         3         6         2         11         Tier 4           Unalakleet         3         6         2         11         Tier 4           Unalaska         0         0         2         2         Tier 1           Utqiagvik         1         3         2         6         Tier 2           Valdez         1         1         0         2         Tier 1           Wasilla         3         7         0         10         Tier 4           Whittier         3         6         0         9         Tier 3           Wrangell         2         3         2         7         Tier 3	Seldovia	0	2	2	4	Tier 2
Skagway         0         4         2         6         Tier 2           Soldotna         3         4         0         7         Tier 3           St. Paul         3         2         2         7         Tier 3           Talkeetna         3         5         0         8         Tier 3           Togiak         3         6         2         11         Tier 4           Unalakleet         3         6         2         11         Tier 4           Unalaska         0         0         2         2         Tier 1           Utqiagvik         1         3         2         6         Tier 2           Valdez         1         1         0         2         Tier 1           Wasilla         3         7         0         10         Tier 4           Whittier         3         6         0         9         Tier 3           Wrangell         2         3         2         7         Tier 3	Seward	3	2	0	5	Tier 2
Soldotna         3         4         0         7         Tier 3           St. Paul         3         2         2         7         Tier 3           Talkeetna         3         5         0         8         Tier 3           Togiak         3         6         2         11         Tier 4           Unalakleet         3         6         2         11         Tier 4           Unalaska         0         0         2         2         Tier 1           Utqiagvik         1         3         2         6         Tier 2           Valdez         1         1         0         2         Tier 1           Wasilla         3         7         0         10         Tier 4           Whittier         3         6         0         9         Tier 3           Wrangell         2         3         2         7         Tier 3	Sitka	0	0	0	0	Tier 1
St. Paul       3       2       2       7       Tier 3         Talkeetna       3       5       0       8       Tier 3         Togiak       3       6       2       11       Tier 4         Unalakleet       3       6       2       11       Tier 4         Unalaska       0       0       2       2       Tier 1         Utqiagvik       1       3       2       6       Tier 2         Valdez       1       1       0       2       Tier 1         Wasilla       3       7       0       10       Tier 4         Whittier       3       6       0       9       Tier 3         Wrangell       2       3       2       7       Tier 3	Skagway	0	4	2	6	Tier 2
Talkeetna       3       5       0       8       Tier 3         Togiak       3       6       2       11       Tier 4         Unalakleet       3       6       2       11       Tier 4         Unalaska       0       0       2       2       Tier 1         Utqiagvik       1       3       2       6       Tier 2         Valdez       1       1       0       2       Tier 1         Wasilla       3       7       0       10       Tier 4         Whittier       3       6       0       9       Tier 3         Wrangell       2       3       2       7       Tier 3	Soldotna	3	4	0	7	Tier 3
Togiak         3         6         2         11         Tier 4           Unalakleet         3         6         2         11         Tier 4           Unalaska         0         0         2         2         Tier 1           Utqiagvik         1         3         2         6         Tier 2           Valdez         1         1         0         2         Tier 1           Wasilla         3         7         0         10         Tier 4           Whittier         3         6         0         9         Tier 3           Wrangell         2         3         2         7         Tier 3	St. Paul	3	2	2	7	Tier 3
Unalakleet         3         6         2         11         Tier 4           Unalaska         0         0         2         2         Tier 1           Utqiagvik         1         3         2         6         Tier 2           Valdez         1         1         0         2         Tier 1           Wasilla         3         7         0         10         Tier 4           Whittier         3         6         0         9         Tier 3           Wrangell         2         3         2         7         Tier 3	Talkeetna	3	5	0	8	Tier 3
Unalaska         0         0         2         2         Tier 1           Utqiagvik         1         3         2         6         Tier 2           Valdez         1         1         0         2         Tier 1           Wasilla         3         7         0         10         Tier 4           Whittier         3         6         0         9         Tier 3           Wrangell         2         3         2         7         Tier 3	Togiak	3	6	2	11	Tier 4
Utqiagvik         1         3         2         6         Tier 2           Valdez         1         1         0         2         Tier 1           Wasilla         3         7         0         10         Tier 4           Whittier         3         6         0         9         Tier 3           Wrangell         2         3         2         7         Tier 3	Unalakleet	3	6	2	11	Tier 4
Valdez       1       1       0       2       Tier 1         Wasilla       3       7       0       10       Tier 4         Whittier       3       6       0       9       Tier 3         Wrangell       2       3       2       7       Tier 3	Unalaska	0	0	2	2	Tier 1
Valdez       1       1       0       2       Tier 1         Wasilla       3       7       0       10       Tier 4         Whittier       3       6       0       9       Tier 3         Wrangell       2       3       2       7       Tier 3	Utqiagvik	1	3	2	6	Tier 2
Whittier         3         6         0         9         Tier 3           Wrangell         2         3         2         7         Tier 3		1	1	0	2	Tier 1
Wrangell 2 3 2 7 Tier 3	Wasilla	3	7	0	10	Tier 4
	Whittier	3	6	0	9	Tier 3
	Wrangell	2	3	2	7	Tier 3
		0	1	2	3	Tier 1