

ExhibitBThresholdRequirements

State of Alaska

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The State of Alaska submits two target areas for threshold consideration. They are the Association of Village Council Presidents (AVCP) Tribal Region and the Tanana Chiefs Conference (TCC) Tribal Region, as detailed below. Per NOFA guidelines and as discussed with HUD, these tribal areas meet guidelines as qualified sub-county areas. The AVCP Tribal Region and its referenced communities were impacted by eligible disasters DR-4050, DR-4122, DR-4162. The TCC Tribal Region and its referenced communities were impacted by DR-4122. The AVCP MID-URN checklist is located in Dropbox AK-162 and the TCC MID-URN checklist at Dropbox AK-162.

Target Area #1: The Association of Village Council Presidents (AVCP) Region

The AVCP tribal (target) area encompasses a 58,000 square mile portion of southwestern Alaska. AVCP is a federally recognized Alaskan unorganized regional association. It is a non-profit association established by the federal government in 1964. AVCP was incorporated in implementation of the Alaska Native Claims Settlement Act in 1971. Each of its 56 members is a federally-recognized tribe (http://www.avcp.org/?page_id=33). The AVCP tribal area had four communities - Alakanuk, Kotlik, Emmonak, and Newtok -impacted by qualifying disasters. Communities include a local city government (if one exists) and associated Alaska Native Village. The aggregate AVCP target area infrastructure damage exceeds \$11M (Dropbox- AK-00) meeting the Most Impacted Characteristics threshold. Qualifying disasters are listed with associated FEMA project worksheets. See Dropbox-AK-1 through 48 for FEMA Project Worksheets.

As a federally recognized tribal area, AVCP meets the Most Distressed Characteristics threshold. Impacted tribes in this region are the Native Village of Alakanuk, Native Village of Kotlik, Newtok Village, and Emmonak Village.

The AVCP tribal area Unmet Recovery Needs for permanent infrastructure exceeds \$2M (Dropbox-AK-0). None of the four impacted communities within the target area, nor AVCP have received previous allocations of CDBG Disaster Recovery funds in response to major disasters in 2011, 2012, or 2013. The City of Alakanuk has unmet needs from DR-4122 for infrastructure. The amount of Unmet Recovery Needs (URN) is estimated at \$666,782.08 based the 25% local match on FEMA project worksheets (PWs), categories C through G (Dropbox: AK-49 through 50). Additionally, Alakanuk has \$69,047.73 in unmet needs for a mitigation project stemming from the Qualified Disaster (Dropbox: AK-51). The City of Kotlik has URN of over \$1M based the 25% local match on FEMA project worksheets (PWs), categories C through G. (Dropbox AK-52 through 55). Newtok's URN in the area of infrastructure is estimated at \$270,527.36 based on the 25% local match on FEMA project worksheets (PWs), for Newtok. (Dropbox: AK-56) Additionally, Newtok has also been identified as a "climate-induced relocation," per *Climate-Induced Community Relocations: Creating an Adaptive Governance Framework based in Human Rights* (Dropbox AK-57 pg. 373-392). The *National Climate Assessment: regions: Coasts: Climate-related Drivers of Coastal Change* identifies Newtok as an Alaska Village susceptible to climate change and erosion accelerated by storms and flooding. (Dropbox AK-58, pg. 2). During qualifying event DR-4122, the City of Emmonak suffered from damage due to high winds and inundation by high water. The ongoing erosion issues which are exacerbated during disaster events place housing, infrastructure, and economic revitalization at risk. The 2014 draft Emmonak HMP's Vulnerability Assessment (Dropbox AK-67 pg 6-1 through 6-12) indicates that 64 residential structures valued at \$9.8M and six community facilities valued at \$9.4M are at risk from erosion. Critical facilities at risk include the City Women's Shelter, two churches, Lower Yukon School District Pre-School, health clinic, and YFDM Co-op Fisheries Building. The Emmonak Women's Shelter is one of two facilities dedicated to domestic violence protection in the State. It is also the only

facility located in a Native American community. It is located in a region in which there are few police officers, no transitional housing for women, and limited options for women seeking to escape.

(Dropbox: AK-68, pg. 41)

Target Area #2: The Tanana Chiefs Conference (TCC) Region

TCC tribal area is a 235,000 square miles area in interior Alaska. TCC is a regional non-profit consortium of 37 federally recognized member tribes in interior Alaska (<https://www.tananachiefs.org/wp-content/uploads/2014/04/Subregional-Map1-1024x791.jpg>), offering a wide array of health and social services to their beneficiaries. TCC provides health, social, and other services while supporting and advocating on behalf of the tribal leadership and tribes. TCC serves more than 14,000 Alaska Natives in interior Alaska. TCC's regional for-profit is Doyon, Ltd. (http://en.wikipedia.org/wiki/Tanana_Chiefs_Conference). The TCC tribal area had three communities- Galena, Hughes and Fort Yukon-impacted by a qualifying disaster.

The aggregate TCC tribal area infrastructure damage exceeds \$5M (Dropbox-AK-69 and 103) meeting the Most Impacted Characteristics threshold. Within the TCC target area, the City of Galena meets the Most Impacted Characteristics of Housing. Twenty-one privately-owned homes met FEMA-verified loss values of over \$8,000 (HUD's definition of serious damage) from DR-4122, exceeding the minimum threshold criteria of "serious damages to a minimum of 20 homes" (Dropbox: AK-71 through 72). Additionally, the City of Galena suffered from environmental degradation from ice-jam flooding due to the qualifying event. The US Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) Damage Survey Report (Dropbox: AK-118) noted that the Galena levee erosion was caused by ice jam flooding from the 2013 event. It also notes a potential of \$75M in near term damage reduction through protection of infrastructure and economic resources through a EWP project to repair the eroded section of the levee. The 1983 Galena Flood Insurance Study documented the 1% annual

exceedance probability level of 131.5 ft. The FEMA Region X Freeboard Standard for Elevation Projects in Galena Memo (Drop Box AK-119) notes that the USACE Ice Affected Stage Frequency for DR-4122 study recommended a new 1% annual exceedance probability level of 135.5 feet. As a result, FEMA Region X Mitigation Division Director recommended a flood recovery elevation (FRE) of 136.5 feet, 1-foot of freeboard above the new base flood elevation. Any federally funded repair, rebuild, and mitigation projects were required to elevate to at least the FRE. Additionally, as a result of the qualifying event, the Federal Coordinating Officer applied an E.O. 11988 Flood Plain determination on “Old Town” Galena, not allowing federal investment in the area. The “Old Town” area of Galena lies along the banks of the Yukon River, riverside of the ring levee protecting the old airbase and runway. (Dropbox: AK-73 through 74). The updated (best available) data and FEMA/State funding decisions that resulted from this event indicate significant environmental degradation placing housing, infrastructure, and/or economic revitalization.

TCC meets the Most Distressed Characteristics threshold. Impacted tribes in this region are Galena Village, Native Village of Fort Yukon, and Hughes Village. None of the three impacted communities within the target area, nor TCC have received previous allocations of CDBG Disaster Recovery funds in response to major disasters in 2011, 2012, or 2013.

The aggregate TCC area URN for infrastructure exceeds \$5M (Dropbox-AK-75). The City of Galena has URN in the area(s) of Housing, Infrastructure, and Environmental Degradation. During the qualifying event, DR-4122, the area suffered from inundation by high water, ballistic ice, and woody debris due to flooding. Much of the city’s infrastructure was damaged, but funded for repair and 406 mitigation under FEMA PWs (Dropbox-AK-76 through 101). Fifty-one eligible residential structures were funded for elevation to one foot above the FRE under FEMA/State funding with Hazard Mitigation Grant Program (HMGP) and State Disaster Recovery funds. Despite the commitment of \$3,070,995.71

in FEMA repair and mitigation (406) funding, and approximately \$8M of State Disaster Recovery and FEMA HMGP funds, unmet needs remain in mitigation projects (infrastructure and residential). Galena has \$717,368.58 in unmet needs for mitigation projects stemming from the Qualified Disaster (Dropbox: AK-102). During the qualifying event, the flood almost overtopped the levee. In response to a FEMA-State Joint Field Office (JFO) mission assignment, the USACE conducted a field study to assess the condition of the levee. The resulting Galena Airport Levee Inspection and Geotechnical Assessment recommended that portions of the levee be protected using armor rock and/or articulated concrete matting. The estimated project cost is \$5M-10M (Dropbox AK-103 pg. 4). The City of Fort Yukon meets the Unmet Recovery Needs Criteria of Infrastructure and Environmental Degradation. Ft. Yukon has \$405,237.19 in URN for mitigation projects stemming from the Qualified Disaster (Dropbox: AK-104). During the qualifying disaster event DR-4122, the City of Fort Yukon suffered from damage due to inundation by high water, ice and woody debris. The ongoing erosion issues which are exacerbated during disaster events place housing, infrastructure, and economic revitalization at risk. The City of Fort Yukon HMP Potential Hazard Exposure Analysis lists no critical infrastructure at risk from erosion, but lists one bridge valued at \$300K and 2 utilities valued at \$2.6M at risk (Dropbox: AK-105 pg. 70-72). The City of Hughes has Unmet Recovery Needs, in the areas of Housing and Environmental Degradation. During the qualifying disaster event DR-4122, the area suffered from damage due to inundation by high water and high winds. The 2010 City of Hughes FEMA-approved LHMP Potential Hazard Exposure Analysis indicates that seven residential structures valued at \$295,000 are at risk from erosion (Dropbox: AK-106 pg. 70) A 2013 HMGP project application development effort at DHS&EM ascertained a total project cost of \$ 323,228.57 to relocate and elevate 3 homes, stemming from the Qualified Disaster (Dropbox: AK-107).