# SAND POINT HARBOR FLOATING DOCK PROJECT

Aleutians East Borough, Alaska

FY 2022

U.S. Department of
Transportation/Maritime
Administration
Port Infrastructure
Development Program (PIDP)

**Project Narrative** 



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# **Project Narrative**



Submitted by: Aleutians East Borough, Alaska

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# **Supporting Documentation**

Supporting documentation for the Project, including Documentation of Funding Commitment and Letters of Support, are provided separately from this Narrative in the assigned Workspace on Grants.gov, in addition to the required SF424 and SFLLL forms.



# **Introductory Information**

introductory information	
Name of applicant	Aleutians East Borough, Alaska
Is the applicant applying as a lead applicant	
with any private entity partners or joint	No
applicants?	
What is the project name?	Sand Point Harbor Floating Dock Project
Project description	The Sand Point Harbor Floating Dock Project consists of installing a new prefabricated treated timber floating dock within the existing harbor, in addition to in-water and upland improvements.
Is this a planning project?	No
Is this a project at a coastal, Great Lakes, or inland river port?	Sand Point Harbor is a small coastal port.
GIS Coordinates (in Latitude and Longitude format)	Latitude 55.331° N, Longitude 160.5033° W
Is this project in an urban or rural area?	Rural
Is this application for a small project at a small port?	Yes
Is this project located in a noncontiguous State or U.S. territory?	Yes
Project Zip Code	99661
Is the project located in a Historically Disadvantaged Community or a Community Development Zone? (A CDZ is a Choice Neighborhood, Empowerment Zone, Opportunity Zone, or Promise Zone.)	Yes (Qualified Opportunity Zone)
Has the same project been previously submitted for PIDP funding?	PIDP FY 2020, PIDP FY 2021
Is the applicant applying for other discretionary grant programs in 2022 for the same work or related scopes of work?	No
Has the applicant previously received TIGER, BUILD, RAISE, FASTLANE, INFRA or PIDP funding?	No
PIDP Grant Amount Requested	\$5,365,000
Total Future Eligible Project costs	\$9,490,000
Total Project Cost	\$9,490,000
Total Federal Funding	\$5,365,000
Total Non-Federal Funding	\$4,125,000
Will RRIF or TIFIA funds be used as part of the project financing?	No



# I. Project Description

The Aleutians East Borough of Alaska (Borough) is requesting \$5,365,000 in FY22 Port Infrastructure Development Program (PIDP) Small Project/Small Port grant funding for the Sand Point Harbor Floating Dock Project (Project). Sand Point Harbor is a small port located in the remote community of Sand Point, Alaska, in the Aleutian Islands chain. The Project will complete the Borough's long-term efforts to fully build out the community's harbor, which will increase the mooring capacity for commercial fishing, subsistence, and transient vessels. Improved mooring capacity will in turn improve navigability, safety, and efficiency for fishing fleets that come into port to deliver their catch, as well as for those seeking a harbor-of-refuge.

In many U.S. communities, this would be an amenity project. But for the Borough, the Sand Point Floating Harbor Project is a life and safety necessity project for a fishing community that is 570 miles by air to Anchorage and the Alaska mainland, has no roadway connections to the mainland, and relies on once-a-month ferry service in May, July, August, and September. On the border between the Pacific Ocean and the Bering Sea, Sand Point is subjected to extreme wind and weather throughout the year. Failing to address the serious safety problems at Sand Point puts the entire community at risk. Existing conditions are shown in Figure 1.



Figure 1: Fishing vessels at Sand Point Harbor



The Project will improve mooring and berthing conditions for fishing vessels, which currently must seek safe berth at other regional small ports and harbors, or seasonally travel great distances for moorage. At the local level, some vessels must resort to rafting, a practice—not without risk—in which vessels berth sequentially, alongside one another, with the entire "raft" of vessels side-tied to a floating dock to make the most of the limited space in crowded harbors. Constructing the Project will make the harbor safer and more efficient while promoting economic vitality through the efficient movement of product from the area's commercial and subsistence fishing industries.

The Sand Point Harbor Floating Dock Project consists of installing a new prefabricated treated timber floating dock within the existing harbor, in addition to in-water and upland improvements. The harbor currently lacks capacity to berth the vessels that it serves and becomes overcrowded. The Project will improve local and regional economic benefits by alleviating moorage demand and improving safety for residents, commercial, subsistence, and transient vessels, especially during frequent severe Aleutian storms. A typical installation is shown in Figure 2.



Figure 2: Floating dock similar to the proposed Sand Point Harbor Floating Dock Project

The Project will enhance safety and economic competitiveness by creating additional safe moorage space and a harbor-of-refuge for fishing vessels, while also improving the ability of the Borough's critical commercial and subsistence fishing to move their products more efficiently from sea to end user. The Project will significantly reduce damage and injury costs due to harbor overcrowding and the need to "raft" vessels during extreme weather events. The Project will also reduce fuel costs for fishing vessels denied harborage, especially during winter months when vessels must travel 343 hours to safe harbor in the U.S. Pacific Northwest.

# A. Applicant Eligibility

The applicant, Aleutians East Borough (Borough), is a political subdivision of the State of Alaska, formed in 1987, and is composed of five Native Alaskan commercial fishing communities: Akutan, False Pass, King Cove, Nelson Lagoon, and Sand Point, as well as the non-Native city of Cold Bay,



which serves as the regional center for air transportation on the Alaska Peninsula. The Borough is the owner of Sand Point Harbor, and the City of Sand Point (City) operates the facility. Further, the Project is in a Census-Designated Rural Area and Qualified Opportunity Zone as well as a statutorily designated Low-Income Community. The area's population is predominantly made up of federally recognized tribes of native people.

# B. Project Context: Dependence on Commercial and Subsistence Fishing

Sand Point was established in the 1890s as a cod fishing station and trading post, and to this day, fishing remains the predominant industry in the community and region. Sand Point is currently home to one of the largest fishing fleets in the Aleutian Chain. Commercial fishing and fish processing occur almost year-round, and the Sand Point community relies on the industry as its primary source of employment. Trident Seafoods, which has grown to be the largest frozen food seafood processor in North America, has a plant in Sand Point, shown in Figure 3.

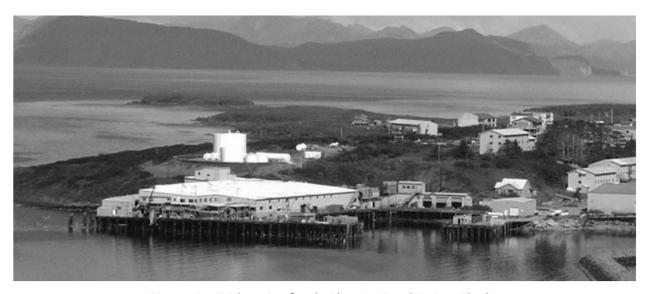


Figure 3: Trident Seafoods Plant in Sand Point, Alaska

Trident's Sand Point fish processing plant services an active, local fleet of independently owned catcher vessels harvesting a wide variety of fish from the rich waters of the central Gulf of Alaska. The Sand Point facility is a multi-species (i.e., crab, cod, and salmon), multi-seasonal year-round operation with the capacity to process 200,000 pounds of salmon per day. Employment at the plant ranges seasonally between 50 and 200 employees.

### i. Project Need

The Borough is requesting PIDP grant funding to construct a floating dock that will expand the safe harbor for subsistence and commercial fishing vessels as well as transient vessels. Lower fuel costs, fewer injuries, and reduced vessel damage will result. Current overcrowding at the harbor requires the "rafting" of vessels—the parallel, broadside mooring and lashing of vessels together—which can result in significant vessel damage, especially during the frequent extreme weather events.



Sand Point Harbor and its amenities are of great importance to the Native Village of Unga, who depend on the safety and security of the harbor. The Port infrastructure is essential to the community, who rely on local seafood and game for subsistence use. Seasonally, vessels leave Sand Point Harbor to catch salmon, returning to the harbor where the catch is shared communally and preserved for year-long use to sustain residents throughout the winter. For centuries the Unga people have used, kayaks, vessels, or skiffs to gather fish and game for their subsistence needs. The Project will provide an important safe haven for small vessels seeking protection from inclement weather conditions year-round.

—John Foster, President Unga Tribal Council, dated May 12, 2022 (see attached letters)

During the winter months, overcrowding and rafting require vessel owners to travel hundreds and even thousands of miles to find safe harbor and mooring conditions that will not damage the basic unit of economic independence in the Aleutians: a safe, well-maintained fishing vessel. In addition to the safety impacts, these seasonal travels require significant expenditures for fuel—even more challenging with recent cost escalation for diesel.

Congestion at Sand Point Harbor, as shown in Figure 4, has incurred damage to both harbor infrastructure and vessels utilizing the facility. This results from the extensive use of rafting practices. Based on interviews with the harbormaster and a U.S. Army Corps of Engineers (USACE), Alaska District, study published in 2000, Harbor Improvements—Final Interim Feasibility Repot and Environmental Assessment, Sand Point, Alaska<sup>1</sup>, it is estimated that about \$19,000 is spent each year to repair and/or replace damaged pilings. Of this, an estimated \$7,000 of damages are caused to harbor infrastructure annually due to rafting. These figures do not include the damage to individual fishing vessels. In previous debrief meetings, MARAD has questioned the validity of the referenced USACE Alaska District (2000) study. A recent call with the Chief of Planning for the Alaska District confirmed that this is the most recent study undertaken for Sand Point, and that its findings remain relevant for the proposed project. Since that time, overcrowding of the harbor and the practice of rafting have dramatically increased.



Figure 4: Vessels in Sand Point Harbor, at close quarters

<sup>&</sup>lt;sup>1</sup> https://www.govinfo.gov/content/pkg/CDOC-106hdoc185/pdf/CDOC-106hdoc185.pdf



## ii. Project Background

Sand Point Harbor is a very small port. The harbor facility was built in conjunction with USACE, is owned by the Borough, and is operated by the City. Current harbor facilities include a simple float for loading and offloading off the east harbor wall, a simple float structure, container van storage in the City-owned uplands, and available lots for commercial development and storage, as shown in Figure 5. Recently, the City installed a new 150-ton travel lift to promote and make the harbor more attractive to vessel owners. The Sand Point Harbor Floating Dock Project will complete the construction of Sand Point's small boat harbor, creating 1,308 lineal feet of moorage and more than tripling the existing moorage.

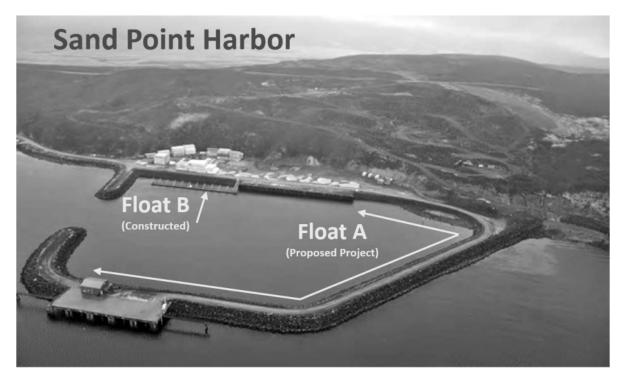


Figure 5: Existing Sand Point Harbor, showing project (Float A) and constructed float (Float B) (Image Source: National Oceanic and Atmospheric Administration)

The Project includes furnishing and installing the floats, trestle, gangway, and landing float; furnishing and driving steel piles; installing potable water systems; installing fire protection, electrical, lighting, cathodic protection, and other safety systems.

Sand Point's Harbor has been built out to include facilities for vessel loading and offloading. Currently, one floating dock, Float B, has been constructed and is able to accommodate about eight 130-ft-long vessels (not rafted) or twenty-four 80-ft vessels (rafted). Constructing Float A will bring the facility to full utilization and double its capacity, increasing moorage space in the harbor from 254 lineal feet to 1,308 lineal feet for vessels of all sizes.



# Statement of Work/Project Components (Addressing Transportation Challenges with Project Solutions)

The City of Sand Point is typical of the Aleutians East Borough's communities, which are small, remote, and isolated from one another. Although they are some of the most important fishing ports in the country in terms of volume and value of seafood production, they have very little infrastructure.

The City has worked along with the Borough to address the need for Sand Point Harbor's small boat harbor to address several navigation problems currently facing vessels that use Sand Point Harbor. These problems include: 1) the necessity to travel to other ports in-season to secure safe moorage, 2) the necessity to travel to the Pacific Northwest each year between fishing seasons in order to secure safe moorage, and 3) safety issues and damage related to the practice of rafting vessels—a practice necessitated by the lack of available moorage.

The new floating dock at Sand Point will increase navigational safety within Sand Point Harbor, while providing an additional node in the regional transportation network that encourages economic growth. The capacity constraints at Sand Point Harbor impact both local and seasonal fishermen. Local fishermen frequently must go outside of the Sand Point community to moor their vessels due to the lack of protected moorage. Both during and between fishing seasons, fishermen travel to nearby ports such as Dutch Harbor, Kodiak, and King Cove, as shown in Figure 6. However, moorage capacity at these ports is also outstripped by current demand. Vessels frequently return to homeports in the Pacific Northwest between fishing seasons to obtain moorage.

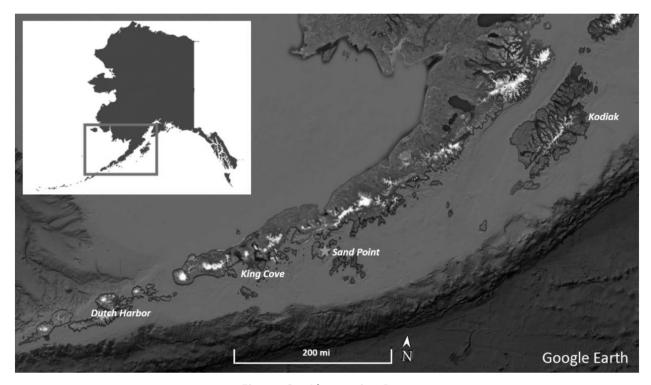


Figure 6: Alternative Ports



# As a stop-gap measure, the capacity constraints at Sand Point Harbor require the risky use of rafting, a practice in which vessels berth sequentially, alongside one another, marginal to a floating dock to make the most of the limited space in crowded harbors. Because of the vessels' proximity to one another and port infrastructure, navigation is impeded, and costly damage to the harbors' infrastructure and to vessels utilizing the facilities is frequent.

Without Project construction, Sand Point Harbor will continue operating at its current limited capacity, significantly below vessel moorage demand. As a result, a significant number of vessels will continue to be turned away and will have to travel to alternative ports. These alternative harbors will continue to suffer from significant overcrowding, and vessels unable to find moorage at these alternative ports will be required to travel to the Pacific Northwest to secure moorage between fishing seasons. The additional distance that vessels must travel to obtain moorage, both during fishing seasons and between them, results in economic costs for fuel, operating expenses, and travel time.

Alternately, the Project benefits will reach beyond the immediate Sand Point community. The new floating dock will alleviate the pressure at other regional small harbors, reduce fleet travel between seasons, expand facilities for vessels seeking safe harbor during extreme weather, and expand moorage capacity for subsistence fishing activities. Constructing Float A at Sand Point will allow the fishing harbor to be utilized at full capacity, support community-based enterprise and subsistence fishing, while creating an incentive for private sector business investment.

The Sand Point Harbor Floating Dock Project will have a positive impact on the economies and the residents of the City of Sand Point and the Aleutians East Borough. Over time, the harbor will support expansion of both local and transient fleets, encouraging business development and expanding market opportunity. Given the percentage of indigenous population (37 percent of the Borough and 50 percent of the City in 2010), as well as state and federal policies, this economic growth will unfold equitably, in keeping with the policies of and aspirations of the 2022 PIDP program.



# **II. Project Location**

### A. Port Location

Sand Point Harbor (Port) is a small port located on Popof Island just south of the Alaska Peninsula, near the entrance to the Bering Sea. It is in the eastern portion of the Aleutian Islands chain, which comprises 14 large volcanic islands and 55 smaller islands that define a border between the Bering Sea to the north and the Pacific Ocean to the south. The region has frequent high winds resulting from the meeting of cold air from the Bering Sea with warm air over the Japan Current.

The Port is within the coastal City of Sand Point, Alaska, and is the Borough seat of Aleutians East Borough (Borough), which includes the westernmost portion of the Alaska Peninsula and several Aleutian Islands. It is home to the largest fleet of commercial fishing vessels in the Aleutian Islands.

The Borough consists of five incorporated cities and one village that are administered by a tribal council and include the communities of Sand Point, Akutan, Cold Bay, False Pass, King Cove, and Nelson Lagoon. The area is remote and economic opportunities are limited profoundly by climate and geography.

# B. Project Site

The Sand Point Harbor Floating Dock A Project location is at Latitude 55.331° N, Longitude 160.5033° W, as shown in Figure 7.

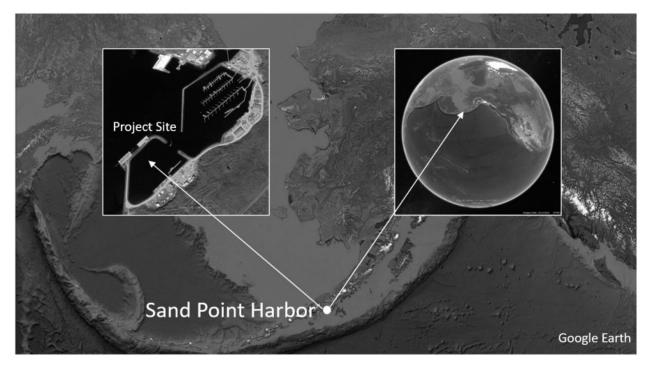


Figure 7: Port of Sand Point and project site location. (Aerial imagery: Google Earth)



# C. Transportation Connections

The Aleutians East Borough communities are extremely isolated and are only accessible by boat or small aircraft. Although this physical geography imposes limitations, it is also the source of the communities' economic strength due to their proximity to the rich Bering Sea fishing grounds. Sand Point is 570 air miles from Anchorage and has an airport with a 5,200-foot runway.

As an island, the community relies on the Alaska Marine Highway System, the Alaska State Ferries, MV Tustumena and MV Kennicott, stop in Sand Point once a month from May through September, providing service for all 13 ports of call between Homer and Unalaska, as shown in Figure 8. Additional air transportation is provided by the Akutan airport, seven miles away on Akun Island. Interisland helicopter transport is available.

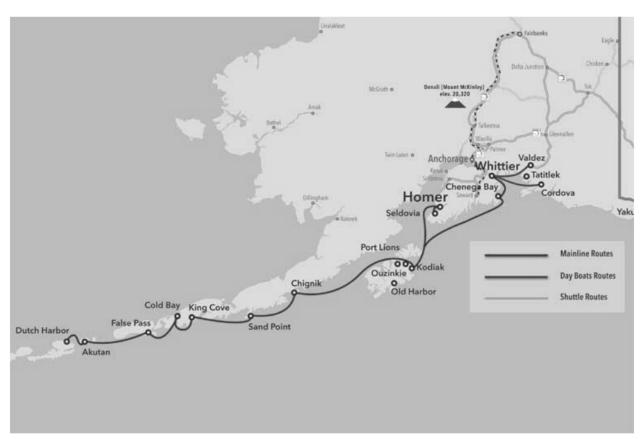


Figure 8: Alaska Marine Highway System, transportation route for Southwest Alaska. (Source: Alaska Department of Transportation.)

# D. Project Eligibility

Sand Point Harbor is eligible for a small project/small port PIDP grant. The City of Sand Point operates and maintains two boat harbors and one public dock, which provide for moorage and marine services, including freight handling, and constitute a very small port. Sand Point is home to the largest fishing fleet in the Aleutian Chain, and the primary cargo handled at Sand Point is fish for processing. The Trident processing facility at Sand Point has the capacity to process



user.

200,000 pounds of salmon per day.<sup>2</sup> In terms of tonnage, with the seasonal nature of the fishery and inconsistent size of the catch, this translates to well below 8,000,000 short tons. Assuming a six-month season, processing 200,000 pounds per day is the approximate equivalent of 18,250 tons per season. The volume of containerized and general cargo handled at Sand Point is minimal and destined for local trade and consumption, either in support of fishery operations, local businesses, or residents. The Project will support the small port to maintain its competitiveness in the fishing industry by creating additional safe moorage space and harbors-of-refuge for fishing vessels, while improving the fleet's ability to move products more efficiently from sea to the end

## i. Census-Designations

The population of Aleutians East Borough, as of the 2010 Census, was 3,141 residents<sup>3</sup>, although during the summer months with the arrival of transient seafood industry workers, the population almost doubles. The Project and the Borough are in a Census-Designated Rural Area and a Qualified Opportunity Zone, pursuant to 26 U.S.C. 1400Z-1, which is intended to spur economic development and job creation in distressed communities.

Overall, the Borough population consists of approximately 37 percent native people, with many residing in their respective tribal communities. The populations of all the Borough's communities are ethnically diverse, with the relative proportion of Aleuts and Euro-Americans varying from community to community. Sand Point, also known as Qagan Tayagungin, had a 2010 census population of 976 residents. Nearly half of Sand Point's permanent residents are of native Aleut Unangan descent and support themselves by fishing and fish processing. There are three federally recognized tribes in Sand Point: Pauloff Harbor Village, Qagan Taygungin Tribe of Sand Point Village, and the Native Village of Unga.

<sup>&</sup>lt;sup>2</sup> https://www.tridentseafoods.com/our-story/our-plants/

<sup>&</sup>lt;sup>3</sup> https://www.census.gov/quickfacts/aleutianseastboroughalaska



# 2022 PIDP Grant Application Project Narrative

# ii. Community Development Zones

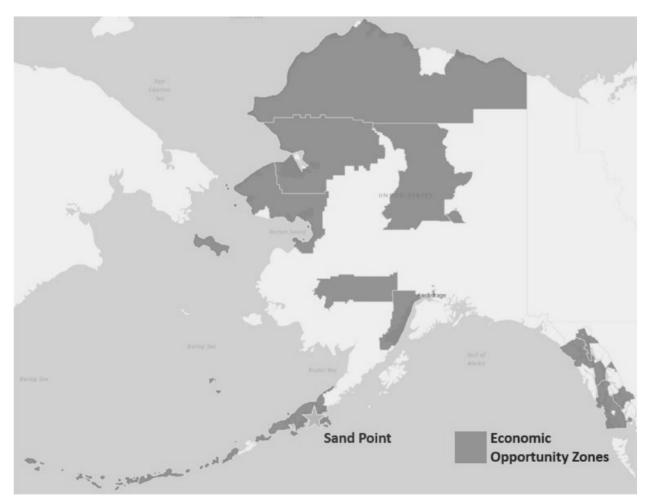


Figure 9: Alaska Qualified Opportunity Zones (Source: State of Alaska Open Data Geoportal)

The Project is within the Aleutian Borough East, which is within a statutory Qualified Opportunity Zone and is a statutory Low-Income Community (Opportunity Zone No. 02013000100)<sup>4</sup>. Further, because of its location, the Project is within a Housing and Urban Development identified Difficult Development Area (DDA), where land, construction, and utility costs are high relative to the area median income and are based on Fair Market Rents, income limits, 2010 census counts, and 5-year American Community Survey (ACS) data<sup>5</sup>.

<sup>&</sup>lt;sup>4</sup> https://www.irs.gov/pub/irs-drop/n-18-48.pdf

<sup>&</sup>lt;sup>5</sup> https://www.huduser.gov/portal/Datasets/qct/DDA2022NM.PDF



# III. Grant Funds, Sources, and Uses of Project Funds

# A. PIDP Funding Request

The total cost of the Sand Point Floating Dock Project is estimated at \$9,490,000 (Table 1). The Borough and City will allocate 43% percent of the total Project cost (\$4,125,000), with the funding appropriated from the Borough and the City's general funds. An additional \$5,365,000 is still needed for Project construction and is requested through the PIDP Grant Program. If federal grant funds are not awarded, construction will be delayed as the Borough seeks alternate sources of funding, which will result in additional costs due to inflation.

# B. Project Costs and Funding Sources

The total budget costs to fabricate the floating dock, transport it to Sand Point, and install the dock are summarized in Table 1, with a detailed project budget summarized in Table 2. The Borough will allocate 43% percent of the total Project cost (\$9,490,000).

Table 1: Sand Point Floating Dock Project Costs & Funding Sources

Duoiset Cost	Funding A	Allocation	% Funded by AEB
Project Cost	PIDP Funds	AEB/CITY Funds	% Funded by AEB
\$9,490,000	\$5,365,000	\$4,125,000	43%

Table 2: Sand Point Floating Dock Project Costs (With Contingency)

Item No.	Description	2022 US\$ Cost
1	Mobilization and demobilization	\$1,090,000
2	Furnish and install West Harbor floats 12 ft wide x 1,054 linear ft	\$3,040,000
3	Furnish and install trestle – 12 ft x 20 ft	\$170,000
4	Furnish and install new gangway - 6 ft x 80 ft	\$220,000
5	Furnish and install new landing float – 20 ft x 20ft	\$110,000
6	16-in. dia. x 1/2-in. wall steel piles, furnished and driven	\$100,000
7	18-in. dia. x 1/2-in. wall x 75-ft steel piles, furnished and driven	\$2,000,000
8	Furnish and install potable water system	\$370,000
9	Furnish and install dry standpipe fire protection system	\$630,000
10	Furnish and install electrical and lighting	\$900,000
11	Furnish and install life rings ladders and extinguishers	\$70,000
12	Furnish and install new anodes	\$260,000
	Subtotal	\$8,960,000
	Construction phase services	\$350,000
	Contract administration and other indirect costs	\$180,000
	Total	\$9,490,000



# IV. Merit Criteria

# A. Achieving Safety, Efficiency, or Reliability Improvements

The Project provides an additional node in the transportation network that will increase public safety and boost the local economy. The location of Sand Point along a chain of fully functional harbors supporting the Bering Sea fishing industry will provide an additional harbor-of-refuge opportunities for vessels to moor. The Project will expedite the movement of people and goods to and from Sand Point and because it will provide a safe and reliable transportation node to the community and to commercial fishermen. Economic benefits will be gained by the Project's savings in vessel operating costs and travel time savings for the crews of vessels that are otherwise required to moor elsewhere, traveling back to their residences and place of work, due to the lack of mooring space in the existing harbor. Currently, vessels wanting to moor in Sand Point have had to travel to further-away locations such as King Cove, Dutch Harbor, Kodiak, or the Pacific Northwest to secure moorage. The completion of this harbors will result in operating cost and travel time savings for the operators and crews of these fishing vessels.

The construction of the floating docks will also limit the practice of rafting, which is dangerous and causes accelerated damage to vessels. The new floating docks will make this practice less prevalent, thus making it safer to moor vessels in each harbor.

# Loading and Unloading of Goods/Movement of Goods Into, Out of, Around, or Within a Port

The Project will improve vessel navigation within Sand Point Harbor, as well as the movement and loading and unloading of cargo for both the fishery and other vessels, such as scheduled ferry and cargo service. The City of Sand Point operates and maintains two boat harbors and one public dock. Harbor services include slip rentals with electricity and potable water, upland electricity, boat haul out and storage, storage facilities for vessels and gear, repairs, a crane, and freight handling services. Trident Seafoods Corporation owns and operates the seafood dock, which is used for handling seafood and fishing vessel supplies.

The increased berthing capacity provided by the new Float A will eliminate overcrowding in Sand Point Harbor and improve navigation within harbor waters. This will in turn facilitate the fishing fleets' ability to efficiently access the Trident processing facility, then navigate to a convenient mooring arrangement within the harbor, without rafting. Eliminating or reducing the practice of rafting will reduce the cost and severity of damage to individual vessels and port infrastructure.

### ii. Operational Improvements/Port Resilience

The main operational challenge facing Sand Point Harbor is the frequent high winds that impact the region. Increasing the ability of fishing and other vessels to find a harbor of refuge will improve regional resiliency by reducing vessel damage and down time.

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### iii. Environmental or Emissions Mitigation Measures

The Project advances the goal of reducing or eliminating port-related pollutants, specifically exhaust from fishing vessels, by reducing the distance they currently travel to reach safe mooring accommodations. A research article completed by the Sierra Nevada Research Institute, University of California, claims that "fishing vessels were recently found to be the largest source of black carbon ship emissions in the Artic" 6.

Sand Point Harbor will be expanded to accommodate additional moored vessels. While moorage demand will continue to outstrip capacity, fewer vessels will be turned away to travel to further-away locations such as King Cove, Dutch Harbor, Kodiak, or the Pacific Northwest to secure moorage. This will result in carbon and other greenhouse gas emission savings.

Assuming an average of 16 added vessel slips, the Project will eliminate more than 55,000 metric tons of CO<sub>2</sub> emissions over the first 20-years of its operation. Additionally, the Project will eliminate 815 metric tons of NOx emissions and 16 metric tons of SO<sub>2</sub> emissions over the 20-year period. In total, this would have a present value of \$9.0 million in emission benefits over the 20-year period. Emissions savings are shown in Table 3.

Out-of- Season	Fuel Consumed (gallons)	Emission Rate	Units	Metric Tons	Present Value (2020 US\$)
CO2	276,014	10,180	g/gal	56,196	\$2,463,127
NOx	276,014	52	g/kg	815	\$6,188,544
SO2	276,014	1	g/kg	16	\$323,196
				Total	\$8,974,867

Table 3: Emissions Savings

# B. Supporting Economic Vitality at the National and Regional Level

Because this grant request is for a Small Project at a Small Port, a Benefit-Cost Analysis (BCA) is not required. Instead, the following describes and quantifies the Project's impact on the economic advantage to the port, the contribution to freight transportation at, around, and through the port, and overcoming the competitive disadvantage of the port.

The Borough's economy is based primarily on fisheries, subsistence, and other general employment opportunities that exist throughout the communities. According to the 2019 Alaska Community Survey, it was determined at that time that a total of 2,403 residents were employed, and 557 adults were not in the labor force (i.e., not seeking work). The per capita income was \$33,939. The median and mean household incomes within the Borough were \$69,706 and \$81,570, respectively. Nearly 14.8% of residents lived below the poverty level<sup>7</sup>.

The City of Sand Point has a reported 2010 census population of 976, and the village has two stores and three restaurants. In terms of local new job creation, the City of Sand Point

<sup>&</sup>lt;sup>6</sup> https://agupubs.onlinelibrary.wiley.com/doi/epdf/10.1002/2015JD023747

<sup>&</sup>lt;sup>7</sup> https://www.census.gov/programs-surveys/acs/data.html



Administrator estimates that the Project will create and retain two City jobs at the harbor and two local maritime jobs—one at the grocery store and one at Ravn Alaska (the local passenger and freight service), to handle an increase in travelers to and from the community. In addition to these direct jobs, additional mooring capacity will bring more vessels, leading to more work for local ship repair and local mechanical and electrical and firms. Specialized technology and other maritime service providers will need to travel to Sand Point for high end ship repairs and upgrades. These visits will add to local hotel and restaurant revenues. Sand Point is too small an economy to calculate indirect and induced jobs but increasing mooring capacity from 254 lineal feet to 1,308 lineal feet will have a significant local economic impact in Sand Point.

However, the Project's long-term overall positive benefits to the community include promoting good paying jobs through improved facilities for the fishing industry and the existing public-private relationship with Trident. Constructing the Project will allow the harbor to be utilized to its full capacity, enhancing its capacity to provide economic support for private sector investment, community-based entrepreneurship, and economic growth. The Borough's procurement policies give preference to residents, workers, businesses, contractors, producers, and dealers to the extent consistent with the law and interests of the public.

### Economic Advantage to Sand Point Harbor

The economic benefits associated with the new Float A dock in Sand Point Harbor are multifold. While Alaska's Aleutian Islands are of prime significance to the state and national fishing industries, Sand Point Harbor lacks sufficient infrastructure to support the commercial fishing activities taking place nearby. Construction of the Project will make additional safe moorage space available to fishing vessels, reducing travel distances for such vessels to find moorage, and reducing damage that occurs when mooring in congested harbors.

The greatest source of benefits quantified for the purposes of estimating the economic advantage of the Project to Sand Point stems from the reduction in vessel travel distances for seasonal berthing, off-season moorage, and/or for refuge during inclement weather (an important safety factor.) Currently, moorage demand in Sand Point significantly exceeds its availability. Many fishing vessels operating nearby must therefore travel to alternative ports in Southeast Alaska or the Pacific Northwest to secure moorage during and/or between fishing seasons. The Project is estimated to create a reduction in travel distances, which in turn reduces vessel operating cost and the value of time savings for affected crews.

Based on interviews with local vessel operators, the 2000 USACE study estimates that vessels fishing in the region that are turned away from mooring at Sand Point must undertake trips to alternative moorage locations an average of three times annually. While dated, MARAD staff confirmed that this is the most recent study available, and Borough officials confirmed that these expensive and risky trips in search of alternative moorage have only grown in frequency with growth in the fishing industries and more frequent and severe storms as a result of climate change. That study assumed that vessels would seek alternative moorage in King Cove, Dutch Harbor, and Kodiak in order of preference. However, due to capacity constraints at Borough and other Alaskan ports, not all vessels diverted from Sand Point and seeking moorage in their preferred alternative port will be able to obtain it. The USACE study estimates that around 59%



2022 PIDP Grant Application Project Narrative

of diverted vessels would likely find alternative moorage in Dutch Harbor and the remaining vessels could moor in Kodiak. The costs and prevalence of each of these options is outlined in Table 4. It is important to note that these costs, obtained from the USACE study, refer to 110-to -125-foot vessels. Because this value falls in the range between the vessel sizes used for moorage scenarios in this project (i.e., small vessels of 80 feet or larger vessels of 130 feet), it was used as an input for vessel operating costs.

Table 4: Overview of Moorage Destinations & Operating Costs - 2000

				Hourly	Hourly	Non-Fuel	Fuel & Oil	Total
Destination	Diverted	Distance	Time	Non-Fuel	Fuel & Oil	Operating	Operating	Cost
Destination	Vessels	(miles)	(hours)	Operating	Operating	Cost Per	Cost Per	Per
				Cost	Cost	Trip	Trip	Trip
King Cove	0	156	16	\$25	\$55	\$400	\$880	\$1,280
Dutch	9	472	47	\$25	\$55	\$1,175	\$2,585	\$3,760
Harbor	9	4/2	47	\$25	<b>\$</b> 35	\$1,175	\$2,585	\$5,760
Kodiak	7	720	70	\$25	\$55	\$1,750	\$3,850	\$5,600

Source: USACE, Harbor Improvements – Final Interim Feasibility Repot and Environmental Assessment, Sand Point, Alaska, 2000.

Vessel operating cost assumptions used in the 2000 USACE study are outlined in Table 4. Note, however, that the USACE study uses \$1.10/gallon as a fuel price assumption. To reflect the substantial increase in fuel prices having occurred since the USACE study was conducted, this input was updated to reflect 2020 numbers. Based on Monthly Marine Fuel Price data obtained from the Fisheries Economic Data Program, the average fuel price in the States of Alaska, Oregon, and Washington was \$3.24/gallon in Q1 2022.8 Oil costs were estimated at 7 percent of total fuel costs and are also considered. The USACE study establishes a fuel consumption rate of 50.34 gallons per hour. This results in an hourly fuel cost of \$163.06 and oil cost of \$11.41, for a total fuel and oil cost of \$174.47 in 2020 US\$.

Non-fuel operating costs were updated using GDP deflator values.<sup>9</sup> As price levels have increased 46% since 2000, this results in an updated non-fuel operating cost of \$36.41 per hour, up from an estimated \$25 per hour in the USACE study. Updated operating cost assumptions are shown below in Table 5, alongside the 2000 operating costs shown in Table 4 for comparison.

Table 5: Vessel Operating Cost Assumptions—2000 and 2020

Item	USACE Study (2000 US\$)	Updated Values (2020 US\$)
Hourly Non-Fuel Operating Cost	\$25.00	\$36.41
Hourly Fuel & Oil Operating Cost	\$55.00	\$174.47
Total Operating Cost	\$80.00	\$186.97

<sup>&</sup>lt;sup>8</sup> "EFIN Monthly Marine Fuel Prices", Pacific States Marine Fisheries Commission.

<sup>&</sup>lt;sup>9</sup> "Gross Domestic Product: Implicit Price Inflator", U.S. Bureau of Economic Analysis.



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				Hourly	Hourly	Non-Fuel	Fuel & Oil	Total
Destination	Diverted	Distance	Time	Non-Fuel	Fuel & Oil	Operating	Operating	Cost
Destination	Vessels	(miles)	(hours)	Operating	Operating	Cost Per	Cost Per	Per Trip
				Cost	Cost	Trip	Trip	Per Imp
King Cove	0	156	16	\$36.41	\$174.47	\$583	\$2,792	\$3,374
<b>Dutch Harbor</b>	9	472	47	\$36.41	\$174.47	\$1,711	\$8,200	\$9,912
Kodiak	7	720	70	\$36.41	\$174.47	\$2,549	\$12,213	\$14,762

Table 6: Overview of Moorage destinations – Update (2020 US\$)

In addition to three local vessel diversions to other nearby ports annually, it is expected that eight vessels (i.e., 50 percent of added moorage capacity) will be able to secure moorage in Sand Point during the fishing off-season. Currently, fishing vessels unable to secure moorage in Alaskan ports between fishing seasons are required to travel to locations further away in the Pacific Northwest to secure moorage. Based on interviews with local fishing operators, the USACE study estimates that half of the displaced vessels will continue to be required to undertake such trip annually, without the Project. Multiplying the updated estimate of total cost of each journey by the number of vessels having to undertake the journey to alternate ports (i.e., Dutch Harbor, Kodiak, the U.S. Pacific Northwest) and the annual number of trips made by each vessel, yields \$10 million (present value discounted at 7 percent) in economic savings for the Project.

In total, the Project will eliminate approximately 5,400 hours annually of vessel travel time because of the added moorage capacity at Sand Point. This consists of an annual 1,269-hour savings in local vessel activity, and an annual 2,700-hour savings in off-season vessel activity. It is assumed that local vessels will have five crew members per trip, while off-season vessel trips will require eight crew members per trip. These time savings resulting from the Project will result in \$3.4 million (present value discounted at 7 percent) benefits for the crew members aboard diverted vessels.

Further, currently, rafting is prevalent in Aleutian harbors, but the increase in moorage availability resulting from the completion of the Project will result in a decreased need for rafting at the harbor; therefore, economic savings in the form of reduced rafting damage will be accrued. According to local harbormaster insights and the USACE study, the annual damages associated with rafting of 16 vessels at the Port total \$28,021. This consists of \$4,716 in annual infrastructure repairs and \$23,305 in annual vessel repairs. Calculated using available data, throughout the 20-year forecast period, rafting benefits totaled \$242,320 for the Project at a discount rate of 7 percent.

## ii. Contribution to Freight Transportation

The Sand Point Harbor is an economic lifeline to the entire Aleutians East Borough. Basic foodstuffs, construction materials, medicines, mail, and other essentials arrive through Harbor. Road or rail connections do not exist, and significant air freight transportation is limited by the lack of landside connections and the frequent and severe weather conditions.



The Project also contributes to improved freight transportation by providing an additional transportation node, as detailed in the *Merit Criteria: Achieving Safety, Efficiency, or Reliability Improvements* section.

### iii. The Competitive Disadvantage(s) of the Port

Sand Point Harbor is an economic lifeline for much of the Aleutians East Borough. It (and the communities reliant on Sand Point Harbor) face two basic disadvantages. First, the Harbor does not have sufficient mooring capacity to safely harbor all the commercial or subsistence fishing vessels that need it. Second, alternative Alaskan mooring locations are 150 to 720 miles away, requiring expensive and fuel-intensive voyages, often under extreme weather conditions, to find safe moorage.

The Sand Point Harbor is an essential regional transportation node, providing a regional harbor of refuge, access to the state-operated Sand Point Airport, and ferry service via the Alaska Marine Highway system. The Project will increase Sand Point Harbor's competitive advantage through its improved ability to serve local and regional fishing fleets, provide increased and safer moorage and berthing arrangements, and maintain connectivity with the greater regional transportation system.

The Project will not only improve the economic competitiveness of Sand Point Harbor—it will also improve the resilience of the local supply chain for basic food, medicine, and fuel commodities.

# C. Addressing Climate Change and Environmental Justice Impacts

The Project recognizes the significance of climate change, sea level rise, and environmental justice and has focused on these important considerations within the planning/policy and design for each project component. Floating dock systems are designed with guide piles extended sufficiently above the waterline to account for sea level variations such as storm surge, extreme tidal events, and long-term sea level rise. Design conservancy is used to ensure that floats will remain supported at higher water levels without the risk of floating over the tops of the guide piles. Further, the docking system has been designed to be accessible to both commercial and subsistence fishing vessels.

The Project will also reduce emissions produced by vessels, as detailed in the *Merit Criteria*: Achieving Safety, Efficiency, or Reliability Improvements section, because fewer vessels will need to travel to ports further away from their operations during and between fishing seasons to secure safe moorage in the Build-scenario, thereby reducing vessel travel time and thus also reducing the emissions produced by the vessels. A discount rate of 3-percent was used for CO<sub>2</sub> emission benefits as suggested in USDOT guidelines for 2022. The Project's emission savings total \$9 million and are shown in Table 7.



(FV = Fresent Value III 2020 055)							
Out-of- Season	Fuel Consumption Savings (gallons)	Emission Rate	Units	Metric Tons	Present Value (2020 US\$)		
CO2		10,180	g/gal	56,196	\$2,463,127		
NOx	5,520,280	52	g/kg	815	\$6,188,544		
SO2		1	g/kg	16	\$323,196		
				Total	\$8,974,867		

Table 7: Emissions Savings for Sand Point Floating Dock
(PV = Present Value in 2020 US\$)

Sand Point is in a Census-Designated Rural Area and Qualified Opportunity Zone as well as a statutorily designated Low-Income Community, with a population made up of federally recognized tribes of native people. As such, nearby populations—including low-income and tribal communities—will benefit directly from the particulate reductions resulting from the Project.

# D. Advancing Equity and Opportunity For All

Project planning was performed with creating economic opportunities for the residents of Sand Point and promoting equity for commercial and subsistence fisherman in mind. The Borough worked with the community to understand how the Project would affect the residents' subsistence fishing activities and transportation choices.

The Aleut Unangan people native to the Borough have historically had to and still currently rely on the sea for their livelihood. Today, most Aleut Unangan people live a subsistence lifestyle that includes fishing, hunting, and harvesting traditional foods and preserving them for the winter. Many residents own small vessels dedicated to subsistence fishing, but due to limited local moorage at the small boat harbors, residents have been prevented from finding safe and reliable moorage for their subsistence vessels. The Project will provide residents with greater availability of moorage space, allowing residents to increase their subsistence production levels. The additional moorage capacity will make it easier and more efficient for them to moor their skiffs in water, saving time and minimizing preventable damage.





Figure 10: Aleut Kayak celebration at Sand Point (Source: The City of Sand Point)

# E. Leveraging Federal Funding to Attract Non-Federal Sources of Investment

Forty-three percent of Project funding for the Sand Point Floating Dock is from non-federal sources, with \$4,125,000 committed from the Borough. Federal PIDP grant funding is essential to provide the remaining 57 percent of the Project budget to allow the construction phase to proceed on schedule. The Project provides an opportunity to further leverage this substantial local funding with federal dollars and is a much-needed investment to this remote community in need of infrastructure to support their main source of economic livelihood.

Functional harbors support the Borough's seafood industry. The harbors encourage commercial fishermen and fishing companies to make Sand Point their home ports and to fish local waters. Constructing the new float and improved functionality will substantially enhance the raw fish tax revenue of the Borough and the City of Sand Point. The increased berthing capacity will allow more commercial fishermen make Sand Point their home base, they will fish and moor in nearby waters, supplying raw product to the local processors. With an increase in tax revenue, the Borough and City will be able to invest more money in capital projects that will further encourage private investment in the community's harbor facility and benefit their residents' primary source of employment and quality of life.



# V. Project Readiness

# A. Technical Capacity

### i. Experience Working with Federal Agencies

The Project team has the personnel, knowledge, skills, and expertise necessary to implement the Project on schedule and within budget to ensure its benefits are rapidly realized. This includes experience and understanding of federal requirements gained from previous harbor-related project work, specifically with the USACE. This understanding extends from contracting to construction, supporting a timely project delivery within budget.

Extensive environmental reviews have already been conducted that will reduce the likelihood of any challenges to the project under the National Environmental Policy Act (NEPA), Endangered Species Act, or Clean Water Act.

- Extensive experience procuring services and goods in compliance with the Federal Acquisition Regulation and committed to maintaining an open, competitive bidding and procurement process for all components proposed within this application. The Project Team will begin developing FAR-compliant bidding packages to enable the Project to begin moving forward shortly after contracting with MARAD (if awarded PIDP grant funding).
- The Project Team is committed to complying with the Build America, Buy America Act and recognizes that obtaining a waiver for any project components would be extremely challenging and detrimental to the goals of this funding opportunity, particularly as we seek to support United States businesses as they recover from the recent tumult caused by the novel coronavirus (COVID-19).

### Experience with BUILD, INFRA and PIDP Awards

The Borough's experience working with federal agencies will assist in the administration and reporting of the Project. The Borough has relied on technical and policy guidance from MARAD and the USACE for this grant request. The Borough has an extensive relationship with the USACE, who have assisted with construction of the Borough's many harbors. The Aleutians East Borough has never been awarded a PIDP, BUILD (TIGER/RAISE) or INFRA grant, but has received Denali Commission funds to complete the design of the clinic in Cold Bay; received \$1,487,500 in Economic Development Administration (EDA) funds to construct the wharf in the Sand Point Harbor; received \$1,000,000 in Denali Commission funds to help complete Sand Point Harbor Float B, and \$1,000,000 for the Akutan Harbor float system.

The Borough has worked closely with state agencies on the Community Development Block Grant (CDBG) grant program, the Coastal Impact Assistance Program, and Department of Economic Development grants.



## iii. Technical Experience and Resources

The Borough has sought and received guidance from the USACE Alaska District for developing the Project since its inception.

# iv. Feasibility/Constructability

The Borough has been planning the construction of the Sand Point Harbor Floating Dock Project for at least 20 years and is prepared to issue a Notice to Proceed (NTP) to begin construction once funding is secured. If awarded PIDP grant funding, the Borough can proceed with Project construction soon after funding allocation, with a completion date in 2024.

The Sand Point Floating Dock Project is at 100% design and the environmental documentation is complete. The Project consists of installing new prefabricated treated timber floats within the existing harbor, in addition to in-water and upland improvements.

The technical design and construction aspects of the Project are described below:

- Installation of a new, prefabricated, Americans with Disabilities (ADA)-compliant, float system (referred to as "Float A") for vessel moorage. The new float system, which will encompass individual float sections (materials include treated timber decking and plastic flotation material) connected into a single system. The entire float system will be approximately 12,648 square feet (SF) in area, with a width of about 12 feet (ft) and a total length of about 1,054 lineal feet (LF). The float system will be secured in place with up to 88 new galvanized steel pipe piles; all 24-inches in diameter or less.
- Installation of three new, prefabricated transformer floats (about 12 ft long by 6 ft wide) to support the electrical system upgrades for the main float, connecting directly to the main float. Each float would be approximately 72 SF in area (i.e., total area of 216 SF).
- Installation of a new, prefabricated, ADA compliant gangway landing float (about 20-ft in length and 20-ft wide) for float access, secured by up to two new galvanized steel pipe piles (24-inches in diameter or less) to stabilize the float.
- Installation of a new, prefabricated, aluminum gangway (about 80-ft long by 6-ft wide) for float access.
- Construction of a treated timber-decked, steel pile-supported access trestle from the top of the existing harbor bulkhead wall to the gangway. The trestle deck will be about 30-ft long by 20-ft wide and supported by up to six new galvanized steel pipe piles (24-inches in diameter or less). Two of these six piles will be installed above the High Tide Line (HTL). Up to 15 cubic yards (CY) of existing rock rip-rap along the shoreline may need to be moved to the side, reworked, and possibly replaced (with up to 5 CY of clean rock) once the trestle support piles have been installed. A small quantity of fill will also be placed in the uplands, above the HTL, to grade the approach to the new trestle. It is anticipated that the quantity of this fill material will not exceed 20 CY.



- Installation of supporting utilities on the new float system (i.e., potable water, fire protection, power, lighting). Power and lighting cables will run from the new access trestle, down the gangway and into the float system's utility chaseways. The potable water and fire protection lines will run from the existing power and water connections (located on the uplands adjacent to the proposed new access trestle), through a 6-ft deep, average 4-ft wide trench to the shoreline. The trench for the water and fire protection line is anticipated to displace up to 20 CY of fill material and 7 CY of armor rock below HTL.
- The new power and water lines will daylight from the shoreline slope at an elevation of 4 ft Mean Lower Low Water (MLLW). Up to two concrete anchor blocks (2-ft by 2-ft in size) will hold the lines in place at this daylight location. Flexible hoses will connect the buried lines to the floating docks. Chains may be used to weigh down the lines so that they remain submerged until they connect to the float system.
- The potable water and dry standpipe fire protection systems will submerge approximately 1,100 If of 3-inch and 4-inch High Density Polyethylene (HDPE) pipe, and 60 If of 3-inch and 4-inch flexible hose below MHHW.

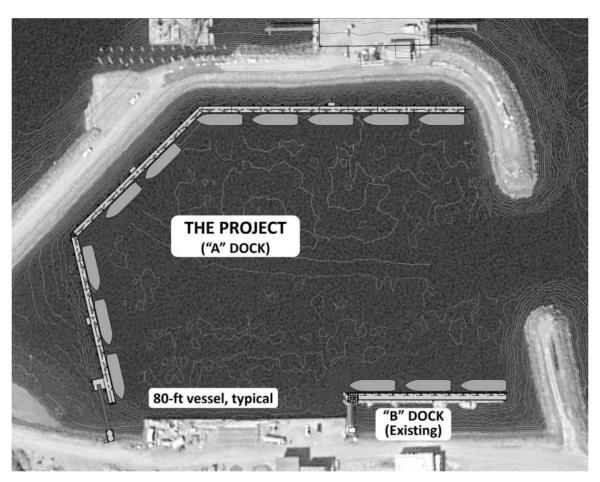


Figure 11: Layout of Sand Point Harbor proposed Project "A Dock" and existing "B Dock"



### v. Schedule

If PIDP grant funding is awarded, Project construction could be awarded as early as July of 2023 and construction could be completed as early as November 2024, which is well in advance of the federal funding obligation deadline of September 30, 2025. A detailed Project schedule is shown in Table 8. There is sufficient float in the schedule to accommodate any major delays due to environmental, regulatory, or material availability changes.

Milestone	Date
Notice of Invitation to Bid	May 2023
Contract Issue	July2023
Notice to Proceed	July 2023
Submittals	September 2023 – December 2023
Procure/Fabricate Materials	October 2023 – April 2024
Mobilization	May 2024
Installation	May 2024 – September 2024
Project Close Out	November 2024

Table 8: Project Schedule

### B. Environmental Risk

Potential long-term adverse impacts to environmental, cultural, and historic resources are not anticipated. Potential impacts to federally protected species and habitat were first avoided during design, and then minimized by permit conditions that will be adhered to during construction. In-air and in-water noise impacts from pile driving activities and temporary impacts to water quality (i.e., minor turbidity from shoreline work) are minimized as part of the permit review process with the incorporation of agency-approved construction Best Management Practices. Impacts are greatly avoided because work will occur within a sheltered harbor.

### i. NEPA Status

The National Environmental Policy Act (NEPA) process is complete for the Sand Point Harbor Floating Dock Project, with an Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) completed by the USACE in 2005 as a revision to the 1988 EA. According to the FONSI:

"The project does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, an environmental impact statement is not necessary to construct the navigation improvements design revisions in Sand Point, Alaska."

Should MARAD determine that additional NEPA documentation is necessary, the Borough will work with MARAD, USACE, and any affected stakeholders to ensure an efficient and timely completion of any additional NEPA studies or documentation.



### ii. Environmental Permits and Reviews

All necessary federal, state, and local environmental reviews, permits, and approvals for this project have been obtained. Construction permits are in process. The Borough is in the process of coordinating with the Alaska Department of Environmental Conservation to determine if a Construction Permit is required to bring potable water on to the new float system. The Borough will be required to submit a building permit application for project construction, to be approved by City Council. No other permits or approvals are anticipated.

Permits required for the Sand Point Harbor Floating Dock Project include federal, state, and local permits and approvals. A federal permit from the USACE, which includes Section 106 review (for possible impacts to cultural and historic resources), and Section 7 review (for possible impacts to federally protected species and habitat) was obtained for the project in 2018 (POA-2006-2015 M4, Sand Point Harbor). A state Water Quality Certification (WQC) from the Alaska Department of Environmental Conservation (ADEC) was obtained in 2018 in accordance with Section 401 of the Clean Water Act. All necessary long lead time environmental reviews and permits are in place and no timing restrictions are affiliated with the Project.

### iii. State, Local, and USACE Approvals

The Borough and City have included the Sand Point Harbor Floating Dock Project on their Southwest Alaska Municipal Conference Community Improvement Project Lists from FY2011 through FY2021. In addition, the City of Sand Point Comprehensive Community Development Plan<sup>10</sup>, approved in January 2018, includes Project construction.

A Water Quality Certification (WQC) from the Alaska Department of Environmental Conservation (ADEC) was obtained in 2018 in accordance with Section 401 of the Clean Water Act. The Borough is in the process of coordinating with ADEC to determine if a Construction General Permit is required to bring potable water on to the new float system.

The Borough will be required to submit a building permit application for project construction, which will be approved by the City.

A federal permit from the USACE, which includes Section 106 review, for possible impacts to cultural and historic resources, and Section 7 review, for possible impacts to federally protected species and habitat, was obtained for the project in 2018 (POA-2006-2015 M4, Sand Point Harbor<sup>11</sup>).

### iv. Environmental Studies

Sand Point Harbor was constructed in such a manner as to avoid and minimize impacts to environmentally sensitive areas. Several studies have been completed in recent years documenting conditions at the harbor, such as wetland assessments and topography models, in addition to Environmental Constraint Maps. The harbor was built to be sustainable and will be

<sup>&</sup>lt;sup>10</sup> https://www.sandpointak.com/uploads/2/7/6/7/27677223/ordinance 2018-

<sup>01</sup> adopting sand point comprehensive community development plan -final.pdf

<sup>&</sup>lt;sup>11</sup>https://www.poa.usace.army.mil/LinkClick.aspx?fileticket=yJ1-DYYPtnI%3d&portalid=34



used for many years to come. The new harbor floats will be built to sustain the harsh weather conditions and years of use. Mitigation measures were established for the construction of the harbor's mooring basin and breakwaters in conjunction with the NEPA process and accompanying federal, state, and local permits, which require adherence to numerous environmental regulations. These measures will be satisfied during construction of the floating dock system.

# C. Risk Mitigation

As a traditional design-bid-build project, the ability to deliver the Project on time and on budget typically encounter a few challenges. However, because a similar floating dock was already constructed in the harbor, there are no anticipated issues with construction or permitting. No rights-of-way or real estate purchases are required to complete the Project. New or revised NEPA requirements are possible and can be mitigated. The minimal risks to Project financing and construction include those outlined in Table 9.

Over the last year the Borough has become aware of rapidly increasing construction project costs throughout much of the United States. Lumber, steel, and cement are all in short supply due to global economic and supply chain disruptions over the last two years, and the now-resurging economy. Those factors have amplified cost increases even more so in Alaska, which is very dependent on maritime transport of these goods. The Borough accepts the responsibility of managing those cost increases.

Impact/Probabili Risk Description Mitigation **Federal Funding** High/Moderate \$5,365,000 shortfall PIDP grant Global supply/demand causing Re-scope or Re-bid cost to rise in construction when/if costs **Cost Increases** High/High materials (lumber, steel) normalize Address with MARAD Possible new or unexplained **NEPA Changes** High/Low during Grant requirements or regulations Agreement

Table 9: Project Risks and Mitigation Strategies

# VI. Domestic Preference

All steel for construction of the Project will be sourced from U.S. manufacturers. Borough contracts include the "Buy American Steel" provision, and there are a several local contractors qualified to construct the proposed improvements. The Borough will meet all domestic preference requirements, including those published in April 2022 by USDOT and the White House.



# VII. Determinations

Project Determination	Guidance
1. The project improves the safety, efficiency, or reliability of the movement of goods through a port or intermodal connection to the port.	The Project provides an additional node in the transportation network that will increase public safety and boost the local economy. The location of Sand Point along a chain of fully functional harbors supporting the Bering Sea fishing industry will provide an additional harbor-of-refuge opportunity for vessels to moor. The Project will expedite the movement of people and goods to and from Sand Point by providing a safe and reliable transportation node to the community and to commercial fishermen. Economic benefits will be gained by the Project's savings in vessel operating costs and travel time savings for the crews of vessels that are otherwise required to moor elsewhere due to the lack of mooring space in the existing harbor. The Project will create safety benefits by limiting the practice of rafting, which is dangerous and causes accelerated damage to vessels.
2. The project is cost effective.	As a Small Port/Small Project request, the Borough has not conducted a formal benefit cost analysis for the 2022 PIDP program. However, the provision of safe harborage at Sand Point will improve safety inside the harbor and significantly reduce marine transport costs, marine costs, and maritime emissions for those vessels seeking safe harbor in Alaska or the Pacific Northwest. Many of these benefits have been quantified above and are described in the Narrative.
3. The eligible applicant has the authority to carry out the project.	The Aleutians East Borough is a political subdivision of the State of Alaska and is composed of five Native Alaskan commercial fishing communities, including Sand Point. The Borough owns the harbor and therefore has the authority to request PIDP grant funding to carry out the Project.



Project Determination		Guidance
4.	The eligible applicant has sufficient funding available to meet the matching requirements.	The total cost of the Sand Point Harbor Floating Dock Project is estimated at \$9,490,000. The Borough Assembly will allocate 43% percent of the total Project cost (\$4,125,000), with the funding appropriated from the Borough's General Fund. The Project has the full support and commitment of the Borough Assembly and the Sand Point City Council.
5.	The project will be completed without unreasonable delay.	If PIDP grant funding is awarded, Project construction is anticipated to be awarded by July 2023 and construction will be completed by November 2024, which is well in advance of the federal funding obligation deadline of September 30, 2025. A detailed Project schedule is shown in Table 8.
6.	The project cannot be easily and efficiently completed without Federal funding or financial assistance available to the project sponsor.	An additional \$5,365,000 is still needed for Project construction and is requested through the PIDP Grant Program. If federal grant funds are not awarded, construction will be delayed as the Borough seeks alternate sources of funding, which will result in additional costs due to inflation.



May 10, 2022

The Honorable Pete Buttigieg U.S. Secretary of Transportation 1200 New Jersey Ave, SE Washington, DC 20590

Dear Secretary Buttigieg:

The expansion of the Sand Point Harbor is essential to the physical safety and economic well-being of our borough residents, the City of Sand Point, and the many native communities that rely on fishing for both income and subsistence.

The Aleutians East Borough has accumulated Borough general funds to support essential capital improvements.

The Aleutians East Borough Assembly has authorized matching funds in the amount of \$4.125 million for the Sand Point Harbor expansion PIDP grant request, and this letter confirms that authorization.

Please be aware that the borough is also seeking \$4.125 million in State of Alaska grant funds for this same purpose. Should the State award that grant, the borough funds will be re-allocated to other essential capital improvements, including the expansion and improvements to the Akutan Harbor.

Thank you for your consideration of this important request and significant match by our small municipality.

Sincerely,

Mayor Alvin D. Osterback

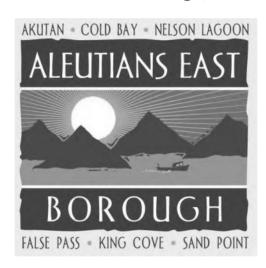
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# SAND POINT HARBOR FLOATING DOCK PROJECT

# **Attachment**

# **Resolutions and Letters of Support**

Submitted by: Aleutians East Borough, Alaska





### **RESOLUTION 22-36**

# A RESOLUTION OF THE ALEUTIANS EAST BOROUGH ASSEMBLY SUPPORTING THE COMPLETION OF THE SAND POINT HARBOR FLOATING DOCKS PROJECT

WHEREAS, economic development and diversification is a priority of the Assembly; and

WHEREAS, the Sand Point Harbor is an economic asset for the community of Sand Point and the Aleutians East Borough; and

WHEREAS, the Sand Point Boat Harbor mooring basin, breakwater, Float B, and wharf have been completed;

WHEREAS, completing the float system is necessary for the harbor to function as intended, meet the needs of the community, and realize their potential as a key harbor for the fishing industry and the North Pacific fishing fleets; and

WHEREAS, these projects are a center point of investment already made by the Borough, Army Corps of Engineers, the City of Sand Point and for business opportunities planned in the future; and

WHEREAS, the Assembly recognizes the importance of having operational harbors within the Borough and supports the Borough's effort to provide its communities with functional harbor infrastructure; and

WHEREAS, the US Department of Transportation has grant opportunities available to assist in funding the harbor float system in Sand Point.

**NOW THEREFORE BE IT RESOLVED** that the Aleutians East Borough Assembly supports the completion of the Sand Point Harbor Floating Dock Project.

NOW THEREFORE BE IT FURTHER RESOLVED that the Aleutians East Borough Assembly supports the Borough's Port Infrastructure Development Grant to complete the harbor float system.

PASSED AND APPROVED by the Assembly of the Aleutians East Borough this 14th day of April 2022.

Alvin D. Osterback, Mayor

ATTEST:

Beverly Rosete, Clerk

#### **City of Sand Point**



#### **RESOLUTION 22-02**

### A RESOLUTION OF THE SAND POINT CITY COUNCIL SUPPORTING THE COMPLETION OF THE SAND POINT HARBOR FLOATING DOCKS PROJECT

WHEREAS, economic development and diversification is a priority of the Council; and

**WHEREAS**, the Sand Point Harbor is an economic asset for the community of Sand Point and the Aleutians East Borough; and

**WHEREAS,** the Sand Point Boat Harbor mooring basin, breakwater, Float B, and wharf have been completed;

WHEREAS, completing the float system is necessary for the harbor to function as intended, meet the needs of the community, and realize their potential as a key harbor for the fishing industry and the North Pacific fishing fleets; and

WHEREAS, these projects are a center point of investment already made by the Borough, Army Corps of Engineers, the City of Sand Point and for business opportunities planned in the future; and

WHEREAS, the Council recognizes the importance of having operational harbors within the Borough and supports the Borough's effort to provide its communities with functional harbor infrastructure; and

**WHEREAS,** the US Department of Transportation has grant opportunities available to assist in funding the harbor float system in Sand Point.

**NOW THEREFORE BE IT RESOLVED** that the City of Sand Point Council supports the completion of the Sand Point Harbor Floating Dock Project.

**NOW THEREFORE BE IT FURTHER RESOLVED** that the City of Sand Point Council supports the Borough's Port Infrastructure Development Grant to complete the harbor float system.

## PASSED AND APPROVED BY A DULY CONSTITUTED QUORUM OF THE CITY COUNCIL FOR THE CITY OF SAND POINT ON THIS $12^{th}$ DAY OF APRIL, 2022.

CITY OF SAND POINT

James Sroth, Mayor

**ATTEST:** 

Shannon Sommer, City Clerk

Shannon Sommu

#### **Pauloff Harbor Tribe**

P.O. Box 97 Sand Point, AK 99661

Phone: (907)383-6075 Fax: (907)383-6094

April 26, 2022

The Honorable Pete Buttigieg
U.S. Secretary of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Buttigieg:

The Pauloff Harbor Tribe is pleased to express support for the Aleutians East Borough's (Borough) application to the FY22 U.S. Department of Transportation/Maritime Administration Port Infrastructure Development Program (PIDP) for its Sand Point Harbor Floating Dock Project (Project).

The Sand Point Harbor Floating Dock Project is essential to the safety and economic security of the residents of the remote Aleutians East Borough. With no road connections to the Alaska mainland, the nearest airport 570 miles to the east, extreme weather, and only twice-monthly ferry service in the summer months, the Sand Point Harbor is a true lifeline and a safe harbor for subsistence, transitory, and commercial fishing vessels.

The current Harbor is overcrowded, leading to the risky practice of rafting—mooring big and small vessels together and in parallel. This can result in damage to vessels, often the most important asset owned by many Aleuts.

Harbor overcrowding also leads to long trips to Puget Sound in advance of the winter months, adding significant fuel costs to operators along with carbon, particulate, and other emissions.

Sand Point Harbor is a small port located in the remote community of Sand Point, Alaska, in the Aleutian Islands chain. The Project will increase the mooring capacity for commercial fishing, subsistence, and transient vessels. Improved mooring capacity will in turn improve navigability, safety, and efficiency for fishing fleets that come into port to deliver their catch, as well as for those seeking a harbor-of-refuge.

This project is a focal point of previous investment by the Borough, U.S. Army Corps of Engineers, the City of Sand Point and for business opportunities planned in the future.

#### The Project will:

- Improve the safety, efficiency, and movement of goods in Sand Point Harbor.
- Support economic vitality for the community
- Incorporate climate change and environmental justice impacts
- Advance equity and opportunity

Pauloff Harbor Tribe strongly endorses this and look forward to working with Aleutians East Borough on improvements to the harbor at Sand Point. We believe the Project will bring positive economic change to the community of Sand Point.

Sincerely,

George P. Gundersen

Deorge P. Jundasa

**Tribal President** 



#### UNGA TRIBAL COUNCIL

P.O. Box 508 Sand Point, Alaska 99661

(907) 383-2415 / 5553 Facsimile ungatribe@arctic.net

Iviay 12, 2022

The Honorable Pete Buttigieg
U. S. Secretary of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Buttigieg:

On behalf of the Unga Tribal Council (Native Village of Unga), I am writing about the importance of the Sand Point Harbor and its amenities as a reliance to not only the safety and security of the harbor the the importance of a Port Infrastructure of a subsistence lifestyle of the local residents within the community.

We consume a lot of seafood and wild game. In a few short weeks vessels will leave the harbor to catch salmon for subsistence use. That vessel parks itself at the float in the harbor and if there is a surplus of salmon they share with the community; whereas, residents walk down the floats to the vessel picking out a couple salmon to take home and cook up and or freeze for later use. We depend on the salmon to sustain us throughout the winter by freezing, pressure cooking into cans or jars, salting or smoking the fish. Small open skiffs will head out a nice day to cast their rod and pole to catch a halibut to take home for personnel use. We are limited to wild game on the island but will transverse to another island to hunt for wild game or head to the mainland the Alaska Peninsula to hunt for caribou or moose. For centuries our people have used, kayaks, vessels or skiffs to gather our subsistence needs.

The Sand Point Harbor Floating Dock Project is important for a safe haven of moorage for our vessels and skiffs, a place of protection of the inclement weather conditions that prevail us throughout the year providing a means of a subsistence lifestyle we continue to maintain now and into the future.

The Unga Tribal Council fully supports and endorses this funding proposal and looks forward to working with the Aleutians East Borough on the improvements to the harbor in Sand Point, Alaska. We believe this project will help us sustain a safe subsistence lifestyle that we all utilize the resources to sustain us as people.

Sincerely,

President



#### UNGA TRIBAL COUNCIL

P.O. Box 508 Sand Point, Alaska 99661

(907) 383-2415 / 5553 Facsimile ungatribe@arctic.net

May 2, 2022

The Honorable Pete Buttigieg
U. S. Secretary of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Buttigieg:

On behalf of the Unga Tribal Council (Native Village of Unga), I am writing to express our support for the Aleutians East Borough application for the FY22 U. S. Department of Transportation/Maritime Administration Port Infrastructure Development Program (PIDP) for the Sand Point Harbor Floating Dock Project.

The Sand Point Harbor Floating Dock Project is essential to the safety and security of the residents of the community of Sand Point located within the Aleutians East Borough. There are no road connections to the Alaska Peninsula, we are situated on an island within the Shumagin Islands and the nearest major hub is 570 miles to the northeast of the community of Sand Point. Our area witnesses at times extreme weather conditions. We have twice monthly ferry service during the summer months. The Sand Point Harbor is a lifeline to our community and is a safe haven for all types of vessels including subsistence, transitory and commercial fishing vessels who all utilize the harbor.

Currently the harbor is overcrowded, leading to a risky practice of mooring big and small vessels together parallel to each other. This practice can result in damage to vessels, vessels that are owned by the local indigenous fleet.

Harbor overcrowding often leads to long vessel trips to Puget Sound in advance of the winter stormy months adding a significant fuel cost to the vessel operators leading to carbon, particulate and other emissions.

Sand Point Harbor is a small port located on Popof Island within the community of Sand Point. The project will increase the mooring capacity for commercial fishing, subsistence fishing, and the mooring of transit vessels. Improved mooring capacity will in turn improve navigability, safety and efficiency for the fishing fleet that arrive into port to deliver their catch of seafood seeking a safe harbor refuge.

This project is a focal point of previous investments by the Borough, U. S. Army Corps of Engineers, the City of Sand Point and for future business opportunities.

#### The project will also:

- Improve the safety, efficiency and movement of goods in the Sand Pont Harbor.
- · Support economic vitality for the community.
- Incorporate climate change and environmental justice impacts.
- Advance equity and opportunities.

The Unga Tribal Council fully supports and endorses this funding proposal and looks forward to working with the Aleutians East Borough on improvements to the harbor in Sand Point, Alaska. We believe this project will bring a positive economic change to the community of Sand Point.

Sincerely,

John Foster President

# Trident SEAFOODS

#### TRIDENT SEAFOODS CORPORATION

5303 Shilshole Ave. NW, Seattle, WA 98107-4000 (206) 783-3818 • Fax: (206) 782-7195

April 26, 2022

The Honorable Pete Buttigieg U.S. Secretary of Transportation 1200 New Jersey Ave, SE Washington, DC 20590

RE: Sand Point Harbor Floating Dock Project

Dear Secretary Buttigieg:

Trident Seafoods is pleased to express support for the Aleutians East Borough's (Borough) application to the FY22 U.S. Department of Transportation/Maritime Administration Port Infrastructure Development Program (PIDP) for its Sand Point Harbor Floating Dock Project (Project).

The Sand Point Harbor Floating Dock Project is essential to the safety and economic security of the residents of the remote Aleutians East Borough. With no road connections to the Alaska mainland, the nearest airport 570 miles to the east, extreme weather, and only twice-monthly ferry service in the summer months, the Sand Point Harbor is a true lifeline and a safe harbor for subsistence, transitory, and commercial fishing vessels. Fishing vessels are often the most important asset owned by Sand Point residents and the current Harbor is overcrowded, leading to the risky practice of rafting—mooring big and small vessels together—which can result in damage to vessels, putting these critical assets at risk. Harbor overcrowding also forces some vessel owners to dock their vessels in Puget Sound during the winter months and making this lengthy trip adds significant fuel costs to operators along with carbon, particulate, and other emissions.

The Sand Point Harbor is a small port located in the remote community of Sand Point, Alaska, in the Aleutian Islands chain. The Project will increase the mooring capacity for commercial fishing, subsistence, and transient vessels. Improved mooring capacity will in turn improve safety and efficiency for fishing fleets that come into port to deliver their catch, as well as for those seeking a harbor-of-refuge. This project is a focal point of previous investment by the Borough, U.S. Army Corps of Engineers, the City of Sand Point and for business opportunities planned in the future. Among other things, the Project will: improve the safety, efficiency, and movement of goods in Sand Point Harbor; support economic vitality for the community; incorporate climate change and environmental justice impacts; and, advance equity and opportunity.

Trident Seafoods strongly endorses this and look forward to working with Aleutians East Borough on improvements to the harbor at Sand Point. We believe the Project will bring positive economic change to the community of Sand Point.

Sincerely,

Shannon Carroll,

Director, Alaska Fisheries Development and Public Policy

#### ATTACHMENTS FORM

**Instructions:** On this form, you will attach the various files that make up your grant application. Please consult with the appropriate Agency Guidelines for more information about each needed file. Please remember that any files you attach must be in the document format and named as specified in the Guidelines.

Important: Please attach your files in the proper sequence. See the appropriate Agency Guidelines for details.

1) Please attach Attachment 1	1234-Aleutians East Borough \$	Add Attachment	Delete Attachment	View Attachment
2) Please attach Attachment 2	1235-Documentation of Match	Add Attachment	Delete Attachment	View Attachment
3) Please attach Attachment 3	1236-ResolutionsLettersofSupp	Add Attachment	Delete Attachment	View Attachment
4) Please attach Attachment 4		Add Attachment	Delete Attachment	View Attachment
5) Please attach Attachment 5		Add Attachment	Delete Attachment	View Attachment
6) Please attach Attachment 6		Add Attachment	Delete Attachment	View Attachment
7) Please attach Attachment 7		Add Attachment	Delete Attachment	View Attachment
8) Please attach Attachment 8		Add Attachment	Delete Attachment	View Attachment
9) Please attach Attachment 9		Add Attachment	Delete Attachment	View Attachment
10) Please attach Attachment 10		Add Attachment	Delete Attachment	View Attachment
11) Please attach Attachment 11		Add Attachment	Delete Attachment	View Attachment
12) Please attach Attachment 12		Add Attachment	Delete Attachment	View Attachment
13) Please attach Attachment 13		Add Attachment	Delete Attachment	View Attachment
14) Please attach Attachment 14		Add Attachment	Delete Attachment	View Attachment
15) Please attach Attachment 15		Add Attachment	Delete Attachment	View Attachment

OMB Number: 4040-0004 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424				
* 1. Type of Submission:  Preapplication  Application  Changed/Corrected	]	⊠ New [	f If Revision, select appropriate letter(s):  Other (Specify):	
* 3. Date Received: 05/13/2022	eceived: 4. Applicant Identifier:			
5a. Federal Entity Identifier:  5b. Federal Award Identifier:				
State Use Only:				
6. Date Received by State	te:	7. State Application I	Identifier:	
8. APPLICANT INFORM	MATION:			
* a. Legal Name: Aleu	ıtians East Bo	prough		$\overline{\neg}$
* b. Employer/Taxpayer lo	dentification Number	er (EIN/TIN):	* c. UEI:	
d. Address:			•	
Street2:  * City:  County/Parish:  * State:  Province:	80 C Street, chorage : Alaska A: UNITED STA			]
1	503-3949			]
e. Organizational Unit:	:			
Department Name:			Division Name:	
f. Name and contact information of person to be contacted on matters involving this application:				
Prefix:  Middle Name:  * Last Name:  Bailey  Suffix:	7	* First Name	: Anne	
Title: Aleutians East Borough Administrator				
Organizational Affiliation:				
* Telephone Number: (	* Telephone Number: (907) 274-7580 Fax Number:			
*Email: abailey@aeboro.org				

Application for Federal Assistance SF-424				
* 9. Type of Applicant 1: Select Applicant Type:				
B: County Government				
Type of Applicant 2: Select Applicant Type:				
Type of Applicant 3: Select Applicant Type:				
* Other (specify):				
* 10. Name of Federal Agency:				
Maritime Administration				
11. Catalog of Federal Domestic Assistance Number:				
20.823				
CFDA Title:				
Port Infrastructure Development Program				
* 12. Funding Opportunity Number:  MA-PID-22-001				
* Title:				
2022 Port Infrastructure Development Program Grants				
2022 Fore Infrastructure Development Frogram Stants				
13. Competition Identification Number:				
Title:				
14. Areas Affected by Project (Cities, Counties, States, etc.):				
1237-7_Location Figure.PNG Add Attachment Delete Attachment View Attachment				
1237 7_Bocación Figure.rns				
* 15. Descriptive Title of Applicant's Project:				
Sand Point Floating Dock Project				
Attach supporting documents as specified in agency instructions.				
Add Attachments Delete Attachments View Attachments				

Application for Federal Assistance SF-424				
16. Congressional Districts Of:				
* a. Applicant	AtLarg	* b. Program/Project AtLarg		
Attach an addition	nal list of Program/Project	Congressional Districts if needed.		
		Add Attachment Delete Attachment View Attachment		
17. Proposed Pr	roject:			
* a. Start Date:	05/01/2023	* b. End Date: 11/01/2024		
18. Estimated F	unding (\$):			
* a. Federal		5,365,000.00		
* b. Applicant		4,125,000.00		
* c. State		0.00		
* d. Local		0.00		
* e. Other		0.00		
* f. Program Inco	me	0.00		
* g. TOTAL		9,490,000.00		
* 19. Is Applicat	ion Subject to Review E	By State Under Executive Order 12372 Process?		
a. This appli	ication was made availal	able to the State under the Executive Order 12372 Process for review on		
b. Program	is subject to E.O. 12372	2 but has not been selected by the State for review.		
C. Program	is not covered by E.O. 1	2372.		
* 20. Is the Appl	icant Delinquent On An	ny Federal Debt? (If "Yes," provide explanation in attachment.)		
Yes	⊠ No			
If "Yes", provide	e explanation and attach			
		Add Attachment Delete Attachment View Attachment		
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)  ** I AGREE  ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.				
Authorized Rep	resentative:			
Prefix:		* First Name: Anne		
Middle Name:				
* Last Name:	ailey			
Suffix:				
*Title: Aleutians East Borough Administrator				
* Telephone Number: (907) 274-7580 Fax Number:				
* Email: abailey@aeboro.org				
* Signature of Aut		Anne Bailey * Date Signed: 05/13/2022		

#### **DISCLOSURE OF LOBBYING ACTIVITIES**

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352

OMB Number: 4040-0013 Expiration Date: 02/28/2025

1. * Type of Federal Action:	2. * Status of Federal A	ction: 3. * Report Type:
a. contract	a. bid/offer/application	a. initial filing
b. grant	b. initial award	b. material change
c. cooperative agreement	c. post-award	
d. loan		
e. loan guarantee		
f. loan insurance		
4. Name and Address of Reporting	Entity:	
Prime SubAwardee		
* Name Aleutians East Borough		
* Street 1	Street 2	2
3380 C Street, Suite 205	State	Zip
Anchorage	AK: Alaska	
Congressional District, if known: AtLarg		
5. If Reporting Entity in No.4 is Subar	wardee, Enter Name and	Address of Prime:
6. * Federal Department/Agency:	7.	* Federal Program Name/Description:
Maritime Administration	Por	t Infrastructure Development Program
		FDA Number, if applicable: 20.823
O. Fordayal Action Number (fluorist		
8. Federal Action Number, if known:		Award Amount, if known:
	\$	
10. a. Name and Address of Lobbying	n Pogistrant:	
	_	
Prefix *First Name N/A	Midd	dle Name
*Last Name PIDP funds will not be used for 1	obbying activities	Suffix
* Street 1	Street 2	?
* City	State	Zip
N/A		
b. Individual Performing Services (incl	uding address if different from No. 10a)	
Prefix *First Name N/A		die Name
* Last Name		Suffix
PIDP funds will not be used for I		
* Street 1 N/A	Street 2	2
* City N/A	State	Zip
4.4 Information requested through this form is authorized	by title 21 U.S.C. section 1252. This di	isclosure of lobbying activities is a material representation of fact upon which
reliance was placed by the tier above when the trans-	action was made or entered into. This di	isclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to
the Congress semi-annually and will be available for \$10,000 and not more than \$100,000 for each such for		to file the required disclosure shall be subject to a civil penalty of not less than
* Cinnatura		
Annie Balley		Middle Name
*Name: Prefix *First Nam	Anne	Middle Name
* Last Name		Sutfix
Title: Administrator	Telephone No.: (907)	274-7580 <b>Date:</b> 05/13/2022
	(507)	Authorized for Local Reproduction
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