

State Water Infrastructure Authority
Meeting Date: April 18-19, 2023
Agenda Item S – Draft Priority Rating System for the Community Development Block Grant-Infrastructure (CDBG-I) Program

Division of Water Infrastructure Staff Report

Background

The Community Development Block Grant - Infrastructure (CDBG-I) program is a federally funded community development program in the Department of Housing and Urban Development (HUD) designed to provide grant funds to non-entitlement communities (i.e., incorporated municipalities under 50,000 and counties under 200,000 in population) to carry out housing and community development activities.

The CDBG-I Program is designed to help communities create healthy living environments through financing public water and sewer infrastructure and to mitigate public and environmental health problems in areas where the percentage of low-to-moderate income (LMI) persons is at least 51 percent.

All of the Division's funding programs follow a similar Priority Rating System (PRS) consisting of four categories:

1. Category 1 – Project Purpose
2. Category 2 – Project Benefits
3. Category 3 – System Management
4. Category 4 – Affordability / Financial Situation

The current system provides a consistent and transparent methodology for prioritization that aligns with the Authority's Master Plan and with statutory requirements. The prioritization system supports applicants in their continued efforts toward long-term utility viability and resiliency.

Potential Changes to the Priority Rating System

The Division recommends that the proposed PRS provides high priority to PFOA and PFOS exceeding proposed MCLs and a combination of GenX, PFBS, PFNA and PFHxS exceeding Hazard Index of 1.0 as announced by EPA on March 14, 2023.

The proposed Priority Rating System revises the project purpose benefit (2.H.3) to include both drinking water and wastewater projects where a portion of the project addresses PFAS and provides two additional benefit line items for projects addressing specific contamination.

Recommended project benefit points are shown below.

- Updated Line Item 2.H.3: Project addresses any PFAS compounds exceeding 10 ppt, will receive two (2) points.
- New Line Item 2.H.4: Project addresses PFOA and/or PFOS compounds exceeding proposed MCL of 4 ppt, will receive ten (10) points.
- New Line Item 2.H.5: Project addresses Hazard Index exceeding 1.0 for an individual or combination of GenX, PFBS, PFNA, PFHxS, will receive ten (10) points.

Staff Recommendation

Staff recommends the Authority approve the Draft CDBG-I Priority Rating System for public review.

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Instructions: For each line item, mark “X” to claim the points for that line item. Be sure that your narrative includes justification for every line item claimed. At the end of each category, provide the total points claimed for each program in the subtotal row for that category. Then add the subtotals from each category and enter the Total of Points for All Categories in the last line. Note that some categories have a maximum allowed points that may be less than the total of individual line items.

Line Item #	Category 1 – Project Purpose (Points will be awarded for only one Project Purpose)	Claimed Yes/No	Points
1.A	Project will consolidate a nonviable drinking water or wastewater utility		15
1.B	Project will resolve failed or failing infrastructure issues		15
1.C	Project will rehabilitate or replace infrastructure, including by a regionalization project		10
1.C.1	Treatment units, pumps and/or pump stations to be rehabilitated or replaced are greater than 20 years old, OR lines, storage tanks, drinking water wells or intake structures to be rehabilitated or replaced are greater than 40 years old, OR lead service lines		5
1.D-1.E	Reserved for other programs		
1.F	Project will extend service for the following specific reasons:		
1.F.1	Extend water and/or sewer service to new low-income housing, or to an area where existing LMI homes are being rehabilitated, OR		15
1.F.2	Connect existing LMI homes to water and/or sewer service		10
1.G- 1. I	Reserved for other programs		
Maximum points for Category 1 – Project Purpose			15
Subtotal claimed points for Category 1 – Project Purpose			
Line Item #	Category 2 – Project Benefits	Claimed Yes/No	Points
2.A	Project provides a specific environmental or public health benefit		15
2.A.1	Project eliminates 20% or more failing septic systems, malfunctioning onsite wastewater systems, or private wells that are dry or contaminated.		5
2.B-2.C	Reserved for other programs		
2.D	Project addresses promulgated but not yet effective regulations		3
2.E	Project directly addresses enforcement documents		

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2.E.1	Project directly addresses an EPA Administrative Order for a local government applicant located in a Tier 1 county, or addresses an existing or pending SOC, or a DEQ Administrative Order, OR		5
2.E.2	Project directly resolves a Notice of Violation or Notice of Deficiency		3
2.F	Project includes system merger		10
2.G	Project addresses low pressure in a public water supply system		5
2.H	Project addresses contamination of a water supply source:		
2.H.1	Project addresses acute contamination of a water supply source, OR		15
2.H.2	Project addresses contamination of a water source other than acute (this includes 1-4 Dioxane and Manganese), OR		10
2.H.3	Project addresses an emerging contaminant without an MCL		10
2.H.3	Project addresses any PFAS compounds exceeding 10 ppt, OR		2
2.H.4	Project addresses PFOA and/or PFOS compounds exceeding proposed MCL of 4 ppt, OR		10
2.H.5	Project addresses Hazard Index exceeding 1.0 for an individual or combination of GenX, PFBS, PFNA, PFHxS		10
2.I	Reserved for other programs		
2.J	Water loss in system to be rehabilitated or replaced is 30% or greater		10
2.K	Project provides a public water system interconnection		
2.K.1	Project creates a new interconnection between systems not previously interconnected OR		5
2.K.2	Project creates an additional or larger interconnection between two systems already interconnected which allows one system's public health water needs to be met during an emergency		3
2.K.3	Reserved for other programs		
2.L	Water and sewer project is located within the same footprint		5
2.M	Project directly addresses a moratorium on a local government unit system		7
2.N	Project provides resiliency for critical system functions		

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2.N.1	Project relocates infrastructure from inside the 100-year floodplain to outside the 500-year floodplain OR		8
2.N.2	Project relocates infrastructure from inside the 100-year floodplain to outside the 100-year floodplain OR		5
2.N.3	Project relocates infrastructure from between the 100-year and 500-year floodplains to outside a 500-year floodplain, OR		3
2.N.4	Project fortifies or elevates infrastructure within floodplain, OR		4
2.N.5	Project improves ability to assure continued operation during flood events, OR		4
2.N.6	Project downsizes infrastructure related to buyouts, OR		4
2.N.7	Project provides redundancy/resiliency for critical treatment and/or transmission/distribution system functions including cybersecurity and/or backup electrical power source		3
2.O - 2.R	Reserved for other programs		
2.S	Project provides site work and new water/wastewater infrastructure, including house or apartment connections, to new low-to-moderate income housing		5
Maximum points for Category 2 – Project Benefits			20
Subtotal claimed points for Category 2 – Project Benefits			
Line Item #	Category 3 – System Management	Claimed Yes/No	Points
3.A	Capital Planning Activities		
3.A.1	Applicant has implemented an Asset Management Plan as of the date of application, OR		10
3.A.2	Applicant has a current Capital Improvement Plan (CIP) that spans at least 10 years and proposed project is included in the plan		3
3.B	System Operating Ratio is greater than or equal to 1.00 based on a current audit, or is less than 1.00 and unit cost is greater than 2.5% of MHI		5
3.C	Applicant has an approved Source Water Protection Plan and/or a Wellhead Protection Plan		5
3.D	Applicant has implemented a water loss reduction program		5
3.E	Reserved for other programs		

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Maximum points for Category 3 – System Management			15
Subtotal claimed points for Category 3 – System Management			
Line Item #	Category 4 – Financial Situation	Claimed Yes/No	Points
4.A	Reserved for other programs		
4.B	Current Monthly Combined Utility Rates at 5,000 Usage		
4.B.1	Greater than \$79 OR		4
4.B.2	Greater than \$90 OR		6
4.B.3	Greater than \$107 OR		8
4.B.4	Greater than \$129		10
4.C - 4.D	Reserved for other programs		
4.E	Poverty Rate		Calculati on; Max 15 pts
4.F	Low-to-Moderate Income		Calculati on; Max 25 pts
Maximum points for Category 4 – Financial Situation			50
Subtotal claimed points for Category 4 – Financial Situation			
Total Points Claimed for All Categories			