
North Coast Regional Water Quality Control Board

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DATE: July 21, 2016

SUBJECT: SMALL DISADVANTAGED AND FINANCIAL HARDSHIP DETERMINATION FOR
NORTH COAST REGION COMMUNITIES

This memo determines which counties, and communities¹ served by wastewater facilities, within the North Coast Region are considered “small and disadvantaged”² or face a “financial hardship”³ based on two State Water Board criteria [Division of Financial Assistance (DFA) criteria and Water Quality Enforcement Policy (*Enforcement Policy*) criteria]. Additionally, this memo presents a perspective on the financial, technical and regulatory challenges that these local entities face when they are required to comply with Water Board policies or orders.

Based on our analysis, eight out of the ten counties in the region are considered “disadvantaged” and face a financial hardship. Out of the 60 communities analyzed, 67% are considered “small and disadvantaged” or “small and severely disadvantaged” pursuant to DFA

¹ Communities analyzed include only those that are served by a wastewater facility and which serve a designated area defined by the Census Bureau. There are many communities in the region that are either too small to be defined by the Census Bureau, or are in an unincorporated area not defined by the Census Bureau. For these communities, more involved analysis may be warranted using census block group data, ArcGIS software (ArcMap) or conducting a community-specific survey per State Water Board guidelines. Several communities throughout the North Coast Region are not served by a wastewater facility. Such communities were also not analyzed, but likely reflect similar circumstances as other communities in the region.

² A community is considered Small and Disadvantaged if the population is less than 20,000 and the medium household income (MHI) is less than \$49,191 (80% of CA MHI) per Division of Financial Assistance Clean Water State Revolving Fund (CWSRF) and Small Community Grant (SCG) criteria. The Drinking Water State Revolving Fund (DWSRF) considers communities small and disadvantaged if the population is less than 10,000 and the MHI is less than 80% of CA MHI.

³ A community with financial hardship must meet one of the following three economic criteria: unemployment rate of 10% or greater; at least 20% of the population is below the poverty level (\$23,850); or have a MHI that is less than \$49,191(80% of CA MHI). The community must also have a population of 10,000 or less; or be located within a rural county.

criteria and 77% face “financial hardship” pursuant to Enforcement Policy criteria. Small and disadvantaged or severely disadvantaged communities may be eligible for grants and loans for the planning and construction of water quality and drinking water projects. Communities facing financial hardship and served by wastewater facilities that discharge to surface water may be eligible to implement compliance projects to increase future compliance in lieu of paying the monetary penalties due to permit violations.

The analysis presented is a snapshot in time of the current economic landscape of the North Coast Region. This analysis is not an attempt to identify specific projects eligible for DFA funding or eligible compliance projects in accordance with the Enforcement Policy.

This region-wide analysis uses data from United States Census Bureau’s American Community Survey (ACS). It is important to note that in some instances, the income data analyzed had a wide margin of error⁴ or might not reflect current economic conditions. In these cases, a community-specific income survey may be warranted in order to obtain more accurate data and to better assess whether a community meets one or both of the State Water Board criteria.

Background

The North Coast Region comprises all basins from the California-Oregon state line including Lower Klamath Lake and Lost River Basins draining into the Pacific Ocean to the southerly boundary of the watershed of Estero de San Antonio and Stemple Creek in Marin and Sonoma Counties. The majority of the region is contained within 5 counties: Del Norte, Trinity, Humboldt, Mendocino and Sonoma Counties. The region also includes significant portions of Siskiyou, Modoc and Lake Counties, and has a relatively small portion of territory in Marin and Glenn counties. All 10 counties are primarily comprised of sparsely-populated rural areas.

The North Coast Region is also abundant in surface water and groundwater resources disproportionately so when compared to the rest of the state. Although the North Coast Region constitutes only about 12 percent of the area of California, it produces about 40 percent of the annual runoff (Basin Plan, pg. 1-8.00). The relative abundance of water resources means that there are relatively more natural resources and beneficial uses of water to protect, including but not limited to uses of water for drinking water supply, for recreational activities, for irrigation, and for support of aquatic habitats, fish, and wildlife. The proper protection of these beneficial uses is inextricably linked to the well-being of the communities that reside within the region. It is important to understand the economic realities of the communities and local jurisdictions in order to most effectively protect beneficial uses.

Over the years, North Coast Regional Water Quality Control Board staff (Staff) has recognized that it takes a significant amount of Staff time to assist many communities within the region to achieve consistent compliance with water quality requirements in Water Board policies or orders. This is because these communities, most of which are located in sparsely-populated rural areas, often do not have the financial and/or staffing resources to achieve consistent compliance on their own, given their economic constraints. Small and disadvantaged

⁴ The margin of error for the medium household income (MHI) data analyzed ranges from +-\$1,568 to +-\$98,505

communities may lack the economies of scale necessary to build and maintain adequate wastewater facilities. Many small and disadvantaged communities rely on onsite wastewater treatment systems (i.e., septic systems) for wastewater treatment and disposal, which are prone to failure if not properly operated and maintained. Additionally, some of these communities have old and undersized wastewater collection and treatment facilities that cannot meet current water quality standards. These communities are often also unable to recruit and retain qualified operators. If their wastewater facilities violate water quality requirements, they often lack the capital to upgrade the facilities, and may be unable to pay the fines or penalties associated with permit violations. These wastewater facilities can pose significant public health and safety threats and adversely affect beneficial uses of surface water and groundwater.

Furthermore, many small and disadvantaged communities may lack the in-house expertise necessary to apply for grants and loans to help make wastewater improvement projects feasible, and may not have the technical expertise to determine the best project alternative or to appropriately plan and manage long-term operations and maintenance needs.

DFA Current Funding and Criteria for Small and Disadvantaged or Severely Disadvantaged Communities

The State Water Board DFA administers financial assistance programs that include loan and grant funding for the planning and construction of various water quality and wastewater projects. Currently, there are two main sources of funding for projects within disadvantaged communities: the Clean Water State Revolving Fund (CWSRF) loan program and the Small Community Grant (SCG) Fund. The SCG Fund receives \$8 million annually from CWSRF repayments and funds from Proposition 1 Water Quality, Supply, and Infrastructure Improvement Act of 2014 (Prop 1).

The CWSRF program has significant financial assets and is capable of financing water quality projects from less than \$1 million to greater than \$100 million. Prop 1 authorized \$7.545 billion in general obligation bonds for water projects including surface and groundwater storage, ecosystem and watershed protection and restoration, and drinking water protection. DFA administers \$2.1 billion of Prop 1 funds for five programs: small community wastewater (\$260 million), water recycling (\$625 million), drinking water (\$260 million), stormwater (\$200 million), and groundwater sustainability (\$800 million). An additional \$200 million is administered by the Department of Water Resources (DWR) for desalinization projects and groundwater management plans. Additionally, Prop 1 requires DFA to operate a Technical Assistance program to help small, disadvantaged communities develop, fund, and implement capital improvement projects. Technical Assistance may include project coordination and development, legal assistance, engineering and environmental analysis, and/or leak detection/water audits.

Prop 1 Planning Grants

To be eligible for SCG/Prop 1 planning grant funds, a community⁵ must serve a population considered “small and disadvantaged” as defined Water Code section 13193.9(c), and used by DFA as noted below. Prop 1 planning grants can cover up to 100% of planning costs not to exceed \$500,000 per project.

1. Must have an annual median household income [MHI] that is less than 80 percent of the statewide MHI; and
2. Must have a population of 20,000 or less.

Prop 1 Construction Grants

To be eligible for SCG/Prop 1 construction grants, a “small and disadvantaged” community must also have an annual wastewater rate that is equal to or greater than 1.5% of community MHI. The wastewater rate criterion does not apply to “small and severely disadvantaged” communities. To be considered “severely disadvantaged”, the community must have a MHI that is 60 percent or less of the statewide MHI (Water Code section 13476(j)).

“Small and severely disadvantaged” communities may be eligible to receive SCG/Prop 1 construction grant funds to cover up to 100% of the total project cost. “Small and disadvantaged” communities may be eligible for Prop 1 construction grants to cover up to 75% of the total project cost. Additionally, small communities with an MHI equal to or less than the statewide MHI may be eligible for SCG/Prop 1 construction grants to cover up to 50% of the total project cost.

Communities with populations greater than 20,000 but that have a MHI equal to or less than 80% of statewide MHI are not eligible for SCG/Prop 1 grants. Nonetheless, all communities regardless of population size and disadvantaged status are eligible for low-interest⁶ loans from the CWSRF program.

Enforcement Policy Criteria for Small Communities

Water Code section 13385, subdivision (k), provides that the State Water Board or Regional Water Board may, contingent upon certain findings, require a facility that discharges to surface water (regulated under NPDES permit) serving a small community to spend an amount of money equivalent to the Mandatory Minimum Penalty (MMP) amount toward the completion of a compliance project proposed by the facility, in lieu of paying the penalty amount to the State Water Board’s Cleanup and Abatement Account. Water Code section 13385, subdivision (k)(2), defines a facility “serving a small community” as:

⁵ A “community” can be a town, county, district, Indian tribe, or other public body. DFA may determine community boundaries based upon existing wastewater facility service areas, census geographies, project boundaries, or other basis, as appropriate. The “community” for septic to sewer projects is often defined by the area that is being connected to the existing system.

⁶ The current CWSRF interest rate is 1.7%

“[A] publicly owned treatment works serving a population of 10,000 persons or fewer or a rural county, with a financial hardship as determined by the state board after considering such factors as median income of the residents, rate of unemployment, and low population density in the service area of the publicly owned treatment works.”

Determining whether a facility is “serving a small community” entails two separate determinations, whether: (1) the facility is either situated within a rural county or has a population of 10,000 or less; and (2) the facility’s service area has a “financial hardship.” The following describes the specific thresholds Staff used to make the determinations:

(1) Rural County/Population Cap

The Enforcement Policy⁷ defines a “rural county” as “a county classified by the Economic Research Service, United States Department of Agriculture (2013 USDA Rural-Urban Continuum Codes) with a rural-urban continuum code of four through nine.”⁸

(2) Financial Hardship

Consistent with Water Code section 13385, subdivision (k)(2), the *Enforcement Policy*, at page 24, defines “financial hardship” in terms of median household income (MHI), unemployment rate and poverty level. Specifically, the *Enforcement Policy* defines “financial hardship” as meaning that the community served by the wastewater and/or water supply facility meets one of the following three thresholds:

- a) Median household income⁹ for the community is less than 80 percent of the California median household income;
- b) The community has an unemployment rate¹⁰ of 10 percent or greater; or
- c) Twenty percent of the population is below the poverty level.¹¹

The “median household income,” “unemployment rate,” and “poverty level” of the population served by the facility are based on the most recent U.S. Census block

⁷ A copy of the State Water Board’s Water Quality Enforcement Policy is available at http://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/enf_policy_final111709.pdf.

⁸ <http://www.ers.usda.gov/data-products/rural-urban-continuum-codes.aspx>, and contains continuum codes used to determine “rural county” status.

⁹ **Median household income** The median income divides the income distribution into two equal groups, one having incomes above the median and the other having incomes below the median.

¹⁰ **Unemployed** All civilians, 16 years and older, are classified as unemployed if they (1) were neither “at work” nor “with a job but not at work” during the reference week, (2) were actively looking for work during the last 4 weeks, and (3) were available to accept a job. Also included as unemployed are civilians who (1) did not work at all during the reference week, (2) were waiting to be called back to a job from which they had been laid off, and (3) were available for work except for temporary illness.

¹¹ **Poverty** Following the Office of Management and Budget’s Directive 14, the Census Bureau uses a set of income thresholds that vary by family size and composition to detect who is poor. If the total income for a family or unrelated individual falls below the relevant poverty threshold, then the family or unrelated individual is classified as being “below the poverty level.”

group¹² data or a community-specific (local) survey approved by the Regional Water Board in consultation with the State Water Board.

Region-wide Analysis

To prioritize compliance assistance in various core regulatory programs, to facilitate grant and loan application, and to expedite settlement negotiation in enforcement proceedings, Staff conducted a region-wide analysis using United States Census Bureau's ongoing American Community Survey (ACS) estimates to determine which:

1. North Coast Region **counties** that are considered "disadvantaged" or "severely disadvantaged" in accordance with DFA criteria and that have a "financial hardship" in accordance with the Enforcement Policy criteria; and
2. North Coast Region **communities**, served by a wastewater facility, that are considered "small and disadvantaged" or "small and severely disadvantaged" in accordance with DFA criteria; and/or meet the "financial hardship" and the population size or "rural county" thresholds in accordance with the Enforcement Policy criteria.

The analysis took into account, separately, but equally, these two respective State Water Board criteria. The analysis provides population, household income, relative poverty, and unemployment statistics for each county, each community served by a wastewater facility that discharges wastewater to surface waters (i.e., subject to NPDES permits), and each community served by a wastewater facility that discharges wastewater to land (i.e., subject to Waste Discharge Requirements). The analysis did not consider wastewater rates for each community to determine potential eligibility for Prop 1 construction grants. As noted above, to be eligible for Prop 1 construction grants "small and disadvantaged" communities must have an annual wastewater rate equal to or greater than 1.5% of community MHI.

A total of 10 counties and 60 communities were analyzed (see Figures 1 and 2 for geographical locations and spatial analysis). There are also a number of communities in the region not served by a wastewater facility (e.g., on individual septic systems), or were too small to be designated by the Census Bureau, which were not considered in this analysis. These communities are likely to have similar, if not greater, financial challenges than the communities analyzed in this memo.

The most recent available economic data (median household income, unemployment rates, and poverty rates) are from the United States Census Bureau's ongoing American Community Survey (ACS) estimates. For smaller communities, ACS data are only available for 5-year estimates, so this was used for all communities, to make the analysis consistent. The most recent available 5-year estimates with block group data were released in 2014¹³.

¹² **Block group** A subdivision of a census tract (or, prior to 2000, a block numbering area). A block group is the smallest geographic unit for which the Census Bureau tabulates sample data. A block group consists of all the blocks within a census tract beginning with the same number. Example: block group 3 consists of all blocks within a 2000 census tract numbering from 3000 to 3999.

¹³ Selected data tables may be retrieved through the Census Bureau's American Fact Finder portal, available at: <http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>. These data tables provide the necessary information at the Census Designated Place level.

Findings

Based on our analysis, we make the following determinations:

1. Eight out of ten counties in the North Coast Region face a financial hardship in accordance with the Enforcement Policy criteria and are disadvantaged in accordance with DFA criteria. Table 1 summarizes data by county.
 - a. The counties of Glenn, Lake, Humboldt, Mendocino, Modoc and Siskiyou meet all three financial hardship thresholds: (1) over 20% of the county population is below the poverty level, (2) over 10% of the county population is unemployed, and (3) the county MHI is less than \$49,191 (or 80% of the statewide MHI).
 - b. The counties of Lake and Trinity are severely disadvantaged with a county MHI less than \$36,893 (or 60% of the statewide MHI).
 - c. The counties of Marin and Sonoma are neither financially disadvantaged nor face a financial hardship. However, there are a number of disadvantaged communities within these counties.
2. As shown on Figure 3, out of 60 communities analyzed, 17 communities (28%) served by a wastewater facility meet the DFA “small and disadvantaged” criteria and 23 communities (38%) meet the DFA “small and severely disadvantaged” criteria. The attached Table 2 provides data by community.
3. As shown in Figure 4, 46 out of 60 communities (77%) served by a wastewater facility have a financial hardship and a population less than 10,000 or situated in a rural county. 19 out of the 46 communities discharge to surface water under NPDES permits and are allowed to use penalty toward a compliance project to improve compliance with Water Board’s permits per the Enforcement Policy criteria.
4. With the exception of Marin and Sonoma counties, counties within the North Coast Region are classified as a “rural county” according to the 2013 USDA Rural-Urban Continuum Codes. Sonoma and Marin counties which have a rural-urban continuum code of one and two, respectively (Metro - Counties in metro areas of 250,000 to 1 million population) do not fall within the “rural county” classification (see Table 1).
5. 55 out of 60 communities (92%) served by a wastewater facility have a MHI less than the California MHI and a population equal to or less than 20,000. Of these, 16 such small communities (27%) may be eligible for Prop 1 construction grants to cover 50% of the total project cost and/or loans. Those considered large with populations greater than 20,000 (7% or 4 communities) are only eligible for CWSRF loans to cover project costs. Figure 5 graphically depicts the MHI for each community and which criterion is met.

Conclusion

The economic disadvantage of the North Coast Region is staggering. The communities and counties of the region, by and large, face financial hardship and are considered small disadvantaged or severely disadvantaged. Most of these communities have limited funding and staff resources to plan and implement capital improvement projects. This creates many challenges for the Regional Water Board, the counties and the communities to protect water quality and beneficial uses. It is clear that these communities need administrative, financial, and technical assistance to plan and implement capital improvements, to apply for grants and/or loans, and to operate and maintain constructed facilities. Although this analysis focuses on communities served by wastewater facilities, the findings and conclusions are relevant to other regulated communities under all Water Board programs.

For example, many water supply facilities serving small and disadvantaged communities were installed decades ago, and are in need of upgrades to meet current demand. A significant increase in water demand has come from the recent expansion of cannabis cultivation throughout communities in the North Coast Region. The increased cultivation is not limited to remote areas via direct diversion or groundwater pumping, but also in residential areas, that are served by community water systems.

Meeting increasing demand for water in the region has further elevated the need to augment water supplies and restore watershed processes, and to further incentivize groundwater sustainability, stormwater capture for beneficial use, and wastewater recycling. Many small and disadvantaged communities, however, lack the resources sufficient to plan and construct wastewater recycling projects; stormwater capture, infiltration and reuse projects; or develop and implement groundwater management plans.

The State Water Board and Regional Water Board are committed to addressing the human health and water pollution problems associated with small and disadvantaged communities especially in cases where these problems present an environmental injustice¹⁴ (as resolved in State Water Board Resolution No. 2008-0048 Promoting Strategies to Assist Small and/or Disadvantaged Communities with Wastewater Needs).

On February 16, 2016, State Water Board adopted Resolution No. 2016-0010¹⁵ declaring human right to water as a core value and directing its implementation in water board programs and activities. One of the directives is to for State and Regional Water Board Staff, as resources allow, to meaningfully engage with communities that lack adequate, affordable, or safe drinking water, including providing community outreach, technical assistance and financial resources, as part of the Water Boards' administration of programs or project funding pertinent to human right to water.

¹⁴ California statute defines environmental justices as "the fair treatment of people of all races, cultures and incomes with respect to the development, adoption, implementation and enforcement of all environmental laws, regulations, and policies".

¹⁵ http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2016/rs2016_0010.pdf

With this analysis, Staff can better prioritize our efforts to reach out and assist communities that have the most pressing needs in the region. We could begin to do so in the office through an integrated approach that involves all units and regulatory programs. Taking this approach requires careful planning and coordination with our external local, state and federal partners who provide financial and technical assistance to such communities, and who can augment the efforts of the Regional Water Board. Staff intends to integrate compliance assistance with enforcement, prioritize our compliance assistance efforts, and partner with funding entities to ensure adequate protection of water quality and beneficial uses and the fair treatment of communities of all incomes.

Concurred: _____
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Figure 1: North Coast Region Small and Disadvantaged Communities (DFA Criteria)

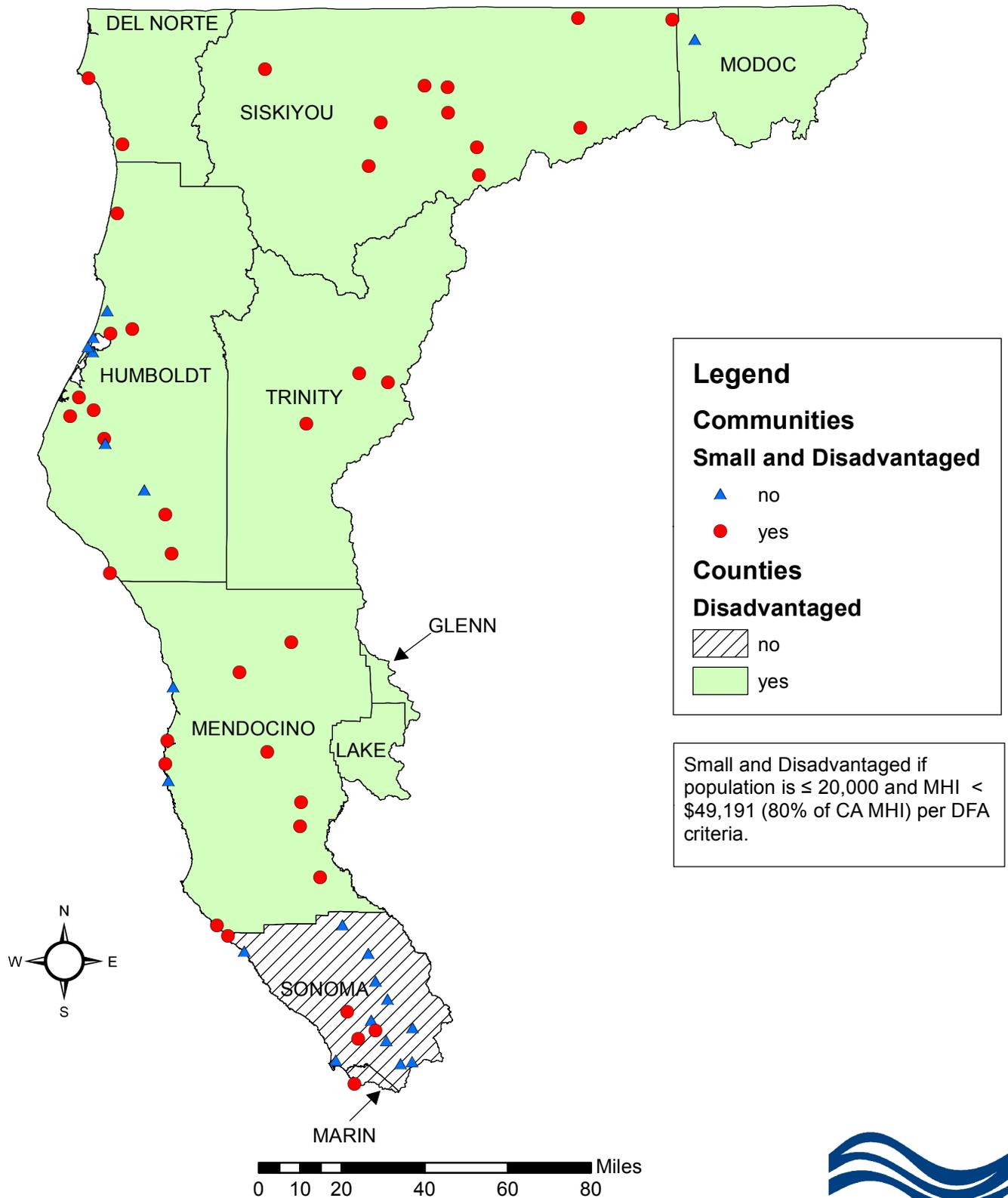


Figure 2: North Coast Region Communities with Financial Hardship (Enforcement Policy Criteria)

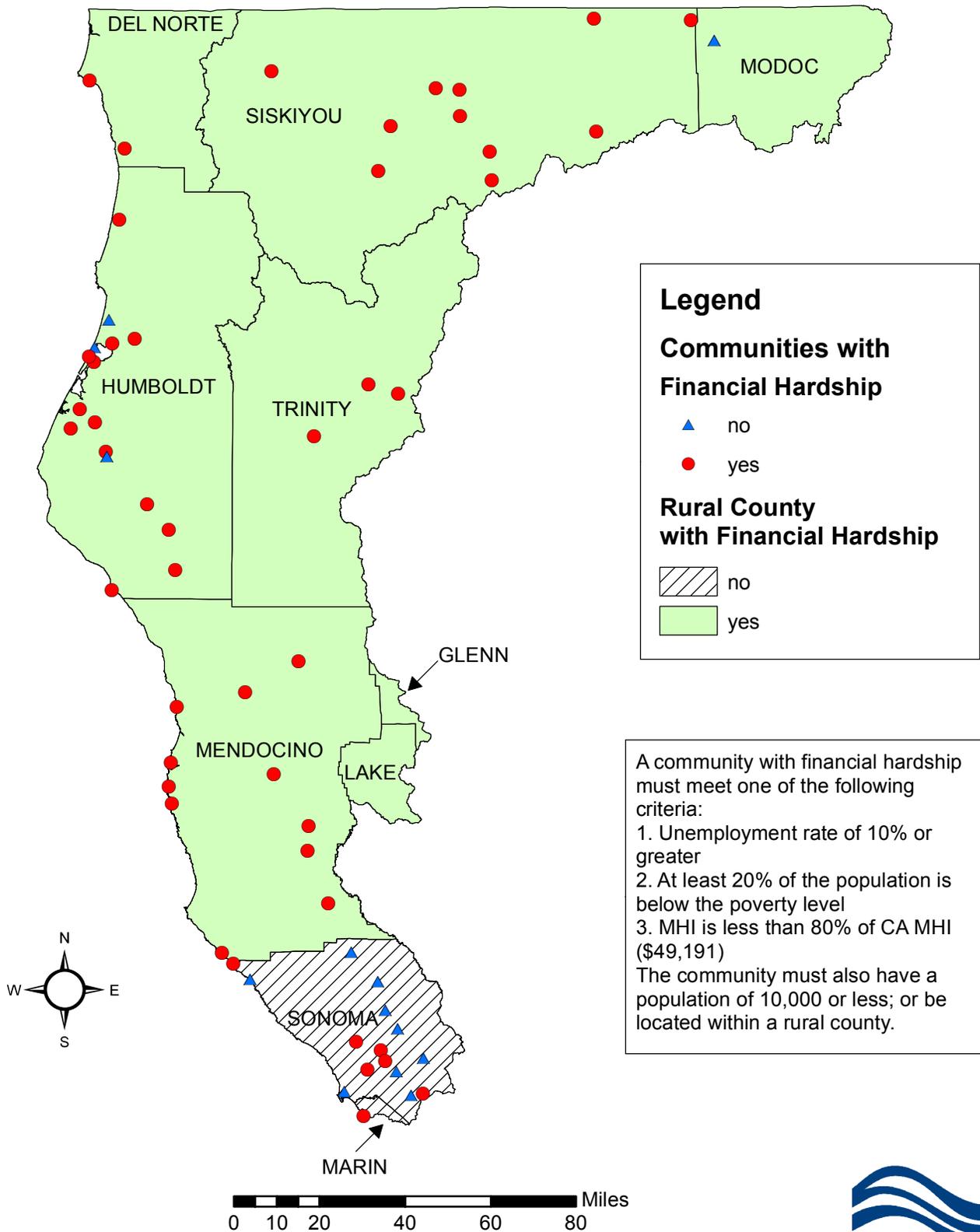


Figure 3: Percent of North Coast Communities¹ Considered Disadvantaged (Based on DFA Criteria)

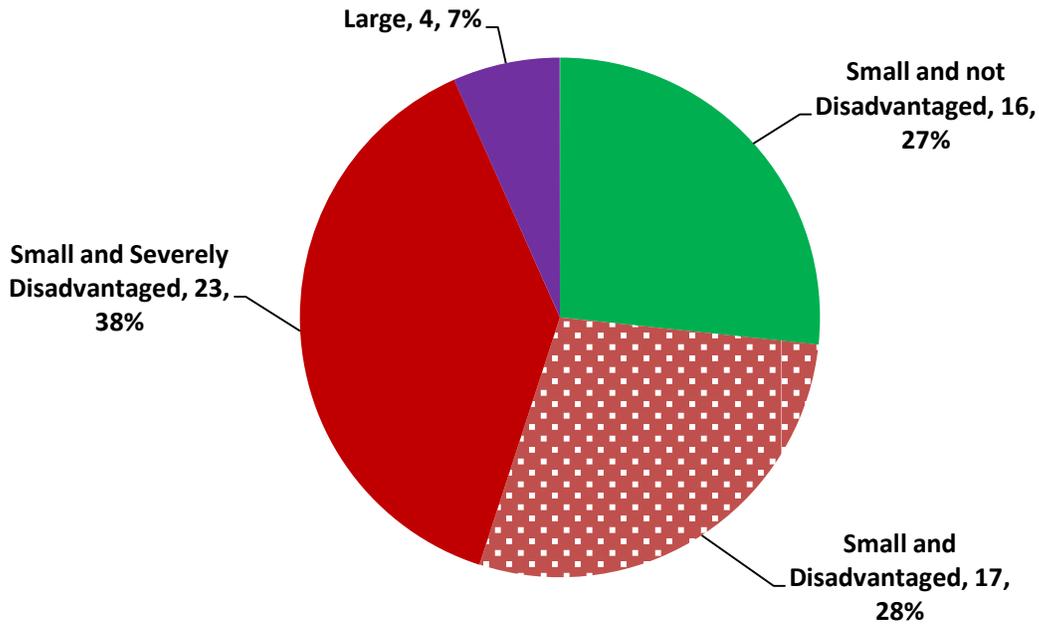
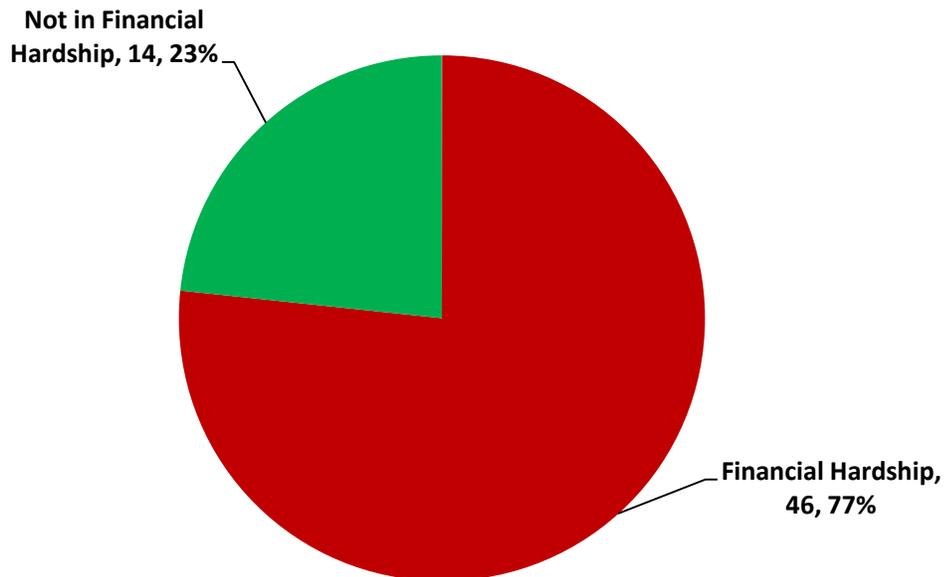
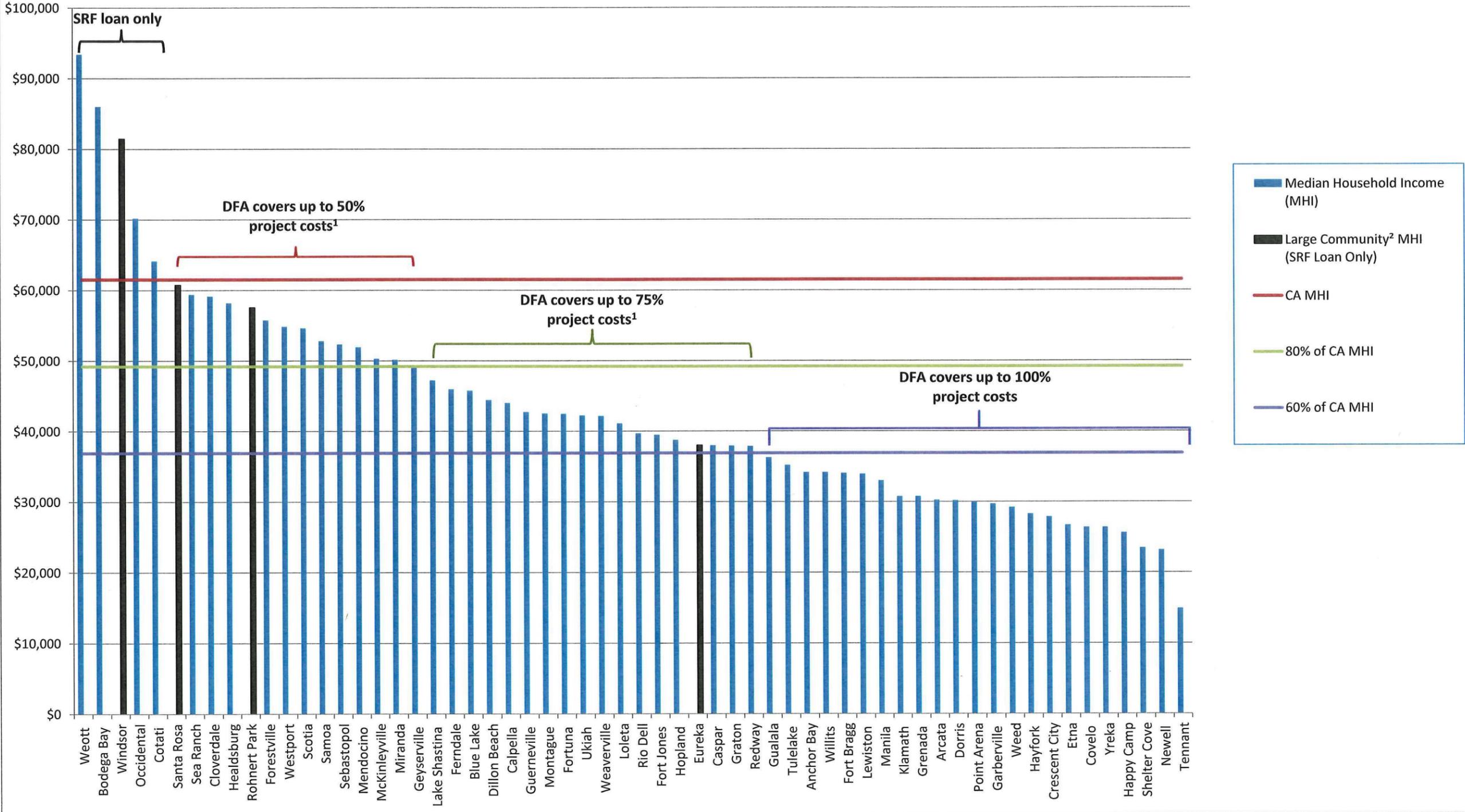


Figure 4: Percent of North Coast Communities¹ with Financial Hardship (Based on Enforcement Policy Criteria)



¹ Communities analyzed include only those served by a wastewater facility and which serve a designated area defined by the Census Bureau. In Figure 4, out of the 46 communities facing a hardship, 19 communities are served by facilities that discharge to surface water and are therefore allowed to use penalty toward a compliance project to improve compliance with Water Board's permits per the Enforcement Policy criteria.

Figure 5: Median Household Income for North Coast Region Communities



¹Facility wastewater rates must be equal or greater than 1.5% of community's MHI.

² Large communities with population > 20,000 are only eligible for SRF loans, not grant monies.

Table 1: Summary of Economic Data and Disadvantage/Hardship Determinations for North Coast Region Counties

County	Population	Rural County Continuum Code	Median Household Income (MHI)	% Unemployed	% of Population Below Poverty Level	Disadvantaged per DFA Criteria? < 80% of CA MHI (\$49,191)	Severely Disadvantaged per DFA Criteria? < 60% of CA MHI (or \$36,893)	Has a Financial Hardship per Enforcement Policy Criteria	MHI ≤ CA MHI (\$61,489)
Del Norte	28,066	7	\$39,302	12.6	19.5	yes	no	yes	yes
Glenn	28,019	6	\$40,106	13.5	19.7	yes	no	yes	yes
Humboldt	134,876	5	\$42,153	11.3	20.3	yes	no	yes	yes
Lake	64,209	4	\$35,997	16.7	24.0	yes	yes	yes	yes
Mendocino	87,612	4	\$43,290	12.3	19.9	yes	no	yes	yes
Modoc	9,335	6	\$38,560	12.3	20.3	yes	no	yes	yes
Siskiyou	44,261	6	\$37,495	14.4	22.5	yes	no	yes	yes
Trinity	13,515	8	\$36,862	12.9	18.4	yes	yes	yes	yes
Marin	256,802	1	\$91,529	7.2	8.5	no	no	no	no
Sonoma	491,790	2	\$63,799	9.6	12.1	no	no	no	no

Table 2: Summary of Economic Data and Disadvantage/Hardship Determinations for North Coast Region Communities

County	Community Served by Wastewater Facility	Wastewater Facility Discharge Type	Population	Median Household Income (MHI)	Small and disadvantaged per DFA criteria? pop ≤ 20,000 and < 80% of CA MHI (or \$49,191)	Severely Disadvantaged per DFA criteria? < 60% of CA MHI (or \$36,893)	Has Financial Hardship per Enforcement Policy Criteria? pop ≤ 10,000, or be located within a rural county?
Del Norte	Crescent City	Surface Water	7,295	\$27,885	yes	yes	yes
	Klamath	Land	955	\$30,769	yes	yes	yes
Humboldt	Arcata	Surface Water	17,679	\$30,244	yes	yes	yes
	Blue Lake	Land	1,258	\$45,750	yes	no	yes
	Eureka ¹	Surface Water	27,039	\$38,007	no	no	yes
	Ferndale	Surface Water/Land	1,456	\$45,948	yes	no	yes
	Fortuna	Surface Water/Land	11,863	\$42,450	yes	no	yes
	Garberville	Land	1,061	\$29,694	yes	yes	yes
	Loleta	Surface Water	661	\$41,094	yes	no	yes
	Manila	Land	673	\$32,997	yes	yes	yes
	McKinleyville	Surface Water/Land	16,448	\$50,298	no	no	no
	Miranda	Land	536	\$50,144	no	no	yes
	Redway	Surface Water/Land	1,132	\$37,882	yes	no	yes
	Rio Dell	Surface Water/Land	3,373	\$39,692	yes	no	yes
	Samoa	Land	305	\$52,778	no	no	yes
	Scotia ²	Surface Water	864	\$54,605	no	no	no
	Shelter Cove	Surface Water/Land	516	\$23,480	yes	yes	yes
Weott	Land	152	\$93,393	no	no	yes	
Marin	Dillon Beach	Land	82	\$44,417	yes	yes	yes
Mendocino	Anchor Bay	Surface Water/Land	254	\$34,191	yes	yes	yes
	Calpella	Land	424	\$44,000	yes	no	yes
	Caspar	Land	599	\$37,981	yes	no	yes
	Covelo	Surface Water/Land	1,444	\$26,389	yes	yes	yes
	Fort Bragg	Surface Water	7,274	\$34,057	yes	yes	yes
	Gualala ^{4,5}	Land	2,133	\$36,275	yes	yes	yes
	Hopland	Land	587	\$38,750	yes	no	yes
	Mendocino	Surface Water/Land	826	\$51,917	no	no	no
	Point Arena	Land	405	\$30,000	yes	yes	yes
	Ukiah	Surface Water/Land	15,956	\$42,237	yes	no	yes
	Westport ^{4,6}	Land	280	\$54,830	no	no	yes
	Willits	Surface Water/Land	4,853	\$34,186	yes	yes	yes
Modoc	Newell	Land	429	\$23,182	yes	yes	yes
Siskiyou	Dorris	Land	1,115	\$30,179	yes	yes	yes
	Etna	Land	750	\$26,711	yes	no	yes
	Fort Jones	Land	848	\$39,500	yes	no	yes
	Grenada	Land	421	\$30,750	yes	yes	yes
	Happy Camp	Land	1,153	\$25,625	yes	yes	yes
	Lake Shastina ^{4,7}	Land	2,847	\$47,222	yes	no	yes
	Montague	Land	1,504	\$42,500	yes	no	yes

Table 2 (cont.): Summary of Economic Data and Disadvantage/Hardship Determinations for North Coast Region Communities

County	Community Served by Wastewater Facility	Wastewater Facility Discharge Type	Population	Median Household Income (MHI)	Small and disadvantaged per DFA criteria? pop ≤ 20,000 and < 80% of CA MHI (or \$49,191)	Severely Disadvantaged per DFA criteria? < 60% of CA MHI (or \$36,893)	Has Financial Hardship per Enforcement Policy Criteria? pop ≤ 10,000, or be located within a rural county?
Siskiyou	Tennant	Land	115	\$14,934	yes	yes	yes
	Tulelake	Surface Water	1,029	\$35,208	yes	yes	yes
	Weed	Land	2,937	\$29,200	yes	yes	yes
	Yreka	Land	7,675	\$26,385	yes	yes	yes
Sonoma	Bodega Bay	Land	603	\$86,000	no	no	no
	Cloverdale	Surface Water/Land	8,692	\$59,120	no	no	no
	Cotati ³	Surface Water/Land	7,347	\$64,107	no	no	yes
	Forestville	Surface Water/Land	3,461	\$55,740	no	no	yes
	Geyserville	Land	879	\$49,271	no	no	yes
	Graton	Surface Water/Land	1,626	\$37,927	yes	no	yes
	Guerneville	Surface Water/Land	3,775	\$42,712	yes	no	yes
	Healdsburg	Surface Water/Land	11,466	\$58,176	no	no	no
	Occidental	Surface Water	1,155	\$70,172	no	no	no
	Rohnert Park ³	Surface Water/Land	41,352	\$57,557	no	no	no
	Santa Rosa ³	Surface Water/Land	170,782	\$60,758	no	no	no
	Sebastopol ³	Surface Water/Land	7,535	\$52,326	no	no	no
	Sea Ranch	Land	983	\$59,375	no	no	no
	Windsor	Surface Water/Land	27,113	\$81,442	no	no	no
Trinity	Hayfork	Land	2,372	\$28,287	yes	yes	yes
	Lewiston	Land	1,480	\$33,929	yes	yes	yes
	Weaverville	Land	3,294	\$42,165	yes	no	yes

¹ Eureka Wastewater facility serves areas outside city limits, for a total population of approximately 40,0000.

² Town of Scotia is currently privately owned and will be forming a Community Service District by the end of July 2016.

³ The Laguna Subregional Wastewater facility serves the cities of Cotati, Rohnert Park, Sebastopol, and Santa Rosa.

⁴ For these unincorporated communities, MHI data was not available from ACS thus a block group analysis was conducted. For Gualala, the MHI for block group 060450111023 was used.

⁵ Population information is from the Gualala Community Services District Sphere of Influence Update 2016 report, which can be found at http://www.mendolafco.org/msr/Gualala%20CSD%20SOI%20Update_%20Adopted%201.4.2016.pdf.

⁶ Facility serves 70 households according to the Westport County Water District Water Supply Reliability Project Fact Sheet which can be found at http://www.northcoastresourcepartnership.org/files/managed/Document/8047/NorthCoastConf13_Project-Westport.pdf; assumed 4 persons per household.

⁷ Population from the Lake Shastina Community Services District Facts and Figures document which can be found at http://www.lakeshastina.com/Docs_PDFs/FactsAndFigures2015.pdf.