

Regional Water Quality Control Board
North Coast Region

Executive Officer's Summary Report
Thursday, August 11, 2016
Regional Water Board Office
Santa Rosa, California

ITEM: 5

SUBJECT: Small Disadvantaged and Financial Hardship Determination for North Coast Region Communities (*Connor McIntee*)

BOARD ACTION: This is an informational item only. No action will be taken by the Regional Water Board.

BACKGROUND: Over time, staff working with North Coast communities to ensure compliance with Water Board's policies and regulations, have noted that, more often than not, these communities either face financial hardship, or are considered small and disadvantaged or severely disadvantaged communities according to the criteria either in the State Water Resources Control Board's Water Quality Enforcement Policy or in the Division of Financial Assistance (DFA) funding guidelines. From these observations, staff found it prudent to conduct a region-wide analysis of communities (focusing on communities served by wastewater facilities) and counties that comprise the North Coast Region.

DISCUSSION: Staff conducted a region-wide analysis of communities and counties based on small and disadvantaged and severely disadvantaged criteria set forth by DFA and financial hardship criteria set forth by the Enforcement Policy. The population, household income, unemployment rates, and poverty level data for the analysis come from U.S. Census Bureau's American Community Survey. The results show that 8 out of the 10 counties in the region are rural and are considered disadvantaged and face financial hardship. Two counties, Trinity and Siskiyou are severely disadvantaged. Out of 60 communities analyzed, 67% (40) of the communities are considered small and disadvantaged or small and severely disadvantaged based on DFA criteria. Out of the same communities, 77% (46) face financial hardship. 19 of the 46 communities that are subject to NDPES permits are eligible to implement compliance projects in lieu of paying mandatory minimum penalty when permit limits are exceeded.

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 disadvantaged or severely disadvantaged. This creates many challenges for the Regional Water Board, the counties and the communities to adequately protect water quality and beneficial uses. It is clear that these communities need administrative, financial and technical assistance to apply for grants or loans, to plan and construct capital improvements, and to operate and maintain these improvements after they are built. Although this analysis focuses on communities that are served by wastewater facilities, the findings and conclusions are relevant to other regulated communities within all Water Board programs. 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.

RECOMMENDATION: N/A

SUPPORTING DOCUMENTS:

1. Staff Memo on Small Disadvantaged And Financial Hardship Determination For North Coast Region Communities, July 21, 2016