

## **Attachment 7: Disadvantaged Community Assistance**

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The 2015 IRWM Implementation Guidelines define Disadvantaged Community (DACs) as communities with an annual median household income (MHI) that is less than 80% of the Statewide MHI (PRC §75005 (g)). The U.S. Census American Community Survey (ACS) data is the source of estimates of MHI for use in determining if a community is a DAC. Using the ACS data for the 5-year period of 2009-2013, the Statewide MHI is \$61,094 and 80% of the Statewide MHI is \$48,875.

Based upon the MHI criteria, the proposed project serving the City of Santa Cruz and the proposed project for the community of Davenport provide benefits to DACs. No funding match waiver is requested for these projects. The following narrative is provided to: 1) demonstrate that greater than 25% of the areas served by the respective projects meet the definition of a DAC; 2) provide a description of the water-related needs of the DACs; and 3) demonstrate that the proposed projects address the described need of the DAC. Figure A shows a regional map with the DACs locations within the three project proponents' service areas.

### **DAC Determination**

#### City of Santa Cruz, Tait Wells Replacement

Water from the Tait Wells Replacement Project area is blended with other sources, treated, and distributed to customers within the entire City service area. There are 34,399 residents in DACs within the City's water service area, and the total population of the service area is 95,244<sup>1</sup>, so the proportion of the population served by this project that meet the definition of a DAC is 36.1%. The DWR DAC mapping tool was used as a first pass screening tool for the identification of DAC Census tracts and block groups. Next, ArcGIS software was used with the Geodatabase data (May 2015) available on the DWR DAC website to map and calculate the DAC resident population. Figure B shows the DAC areas and DAC population totals within the City's service area.

#### Davenport, Recycled Water Facility

In 2014, the State Water Resources Control Board approved the Rural Community Assistance Corporation (RCAC) to perform an income survey of the Davenport Community Services District's service area. The purpose of the 2014 survey was to establish the MHI level for state and federal funding programs and sources. The RCAC survey results determined the MHI for Davenport is \$48,500. The proposed project benefits the entire service area; 100% of the service area meets the definition of a DAC. The RCAC Survey Results documentation is attached as Appendix A.

### **DOCUMENTATION OF CRITICAL WATER SUPPLY NEED OF THE DACs**

#### City of Santa Cruz, Tait Wells Replacement

The critical water supply needs of DACs in the City's service area, consistent with Table 9 of the 2015 IRWM Grant Program Guidelines, include:

- Infrastructure renovations to a public water supply system necessary to assure continued reliability of the minimum quality and quantity of water
- Replacement of water supply wells that have exceeded their useful life

The Tait Wells Replacement Project involves infrastructure necessary to assure continued reliability of the minimum quality and quantity of water that can be utilized from the San Lorenzo River at Tait Street. In 2009, a study of the Tait Street Diversion, the main diversion on the San Lorenzo River constructed in 1961, concluded that all four of the Tait Wells have reached the end of their useful lives. Tait Wells Nos. 1, 2 and 3 were constructed prior to 1955; Tait Well No. 2 has been abandoned in place, and Tait Well No. 3 is used as a monitoring well. Tait Well No. 4, which is to be rehabilitated, was constructed in 1992 and is 23 years old. The capacity available from the Tait Well field has been diminishing over time and the source cannot be relied upon, which is particularly important during drought conditions. The Project will provide operational flexibility for this valuable source of water supply because it

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<sup>1</sup> CA Dept of Finance demographic data May 1, 2015.

provides a means to withdraw San Lorenzo River water by pumping underflow out of the wells rather than a direct surface water diversion at the Tait Diversion. The wells have multiple benefits as it allows use of lower turbidity San Lorenzo River underflow when turbidity in the surface water exceeds the level acceptable for treatment during winter wet weather events. Water from these wells will not only be less turbid but also lower in total organic carbon with associated disinfection-by-product risk than flowing surface water, and will be available during times when the City bypasses flow for endangered species habitat and recovery. The Project allows the City to maximize and optimize usage of San Lorenzo River when other sources are unavailable to the benefit of DAC customers as well as all customers. As described in the Attachment 2- Project Justification, the drought is highlighting the limitations of the City's ability to supply water without rationing. On May 1, 2015, the City Council enacted a Stage 3 Water Emergency. Mandatory water use regulations are now in effect to reduce demand by 25%. After four dry years, the City is at risk of not meeting existing drinking water demands except for with the use of intensive water rationing measures, which lowered the per capita residential consumption from 63.1 gallons per person per day in June 2013 to 42.7 in June 2015. Without the Project all customers, including DAC communities, are at risk of not having their potable water demands met in spite of intensive water conservation measures and stringent water use restrictions.

#### Davenport, Recycled Water Facility

The critical water quality needs of DACs in the Davenport service area, consistent with Table 9 of the 2015 IRWM Grant Program Guidelines, include:

- Providing wastewater treatment necessary to abate or prevent surface water contamination;
- Providing wastewater treatment required to protect beneficial uses or meet a discharge standard.

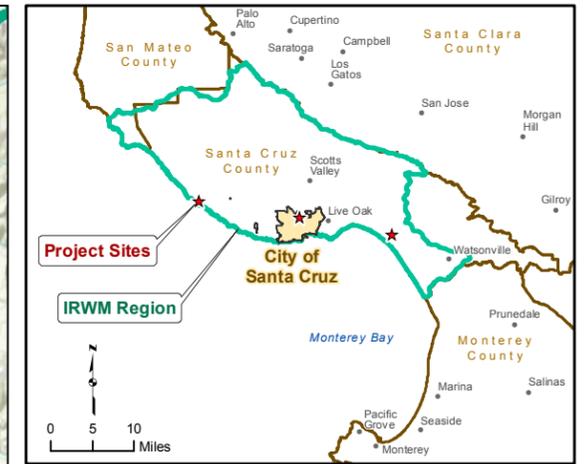
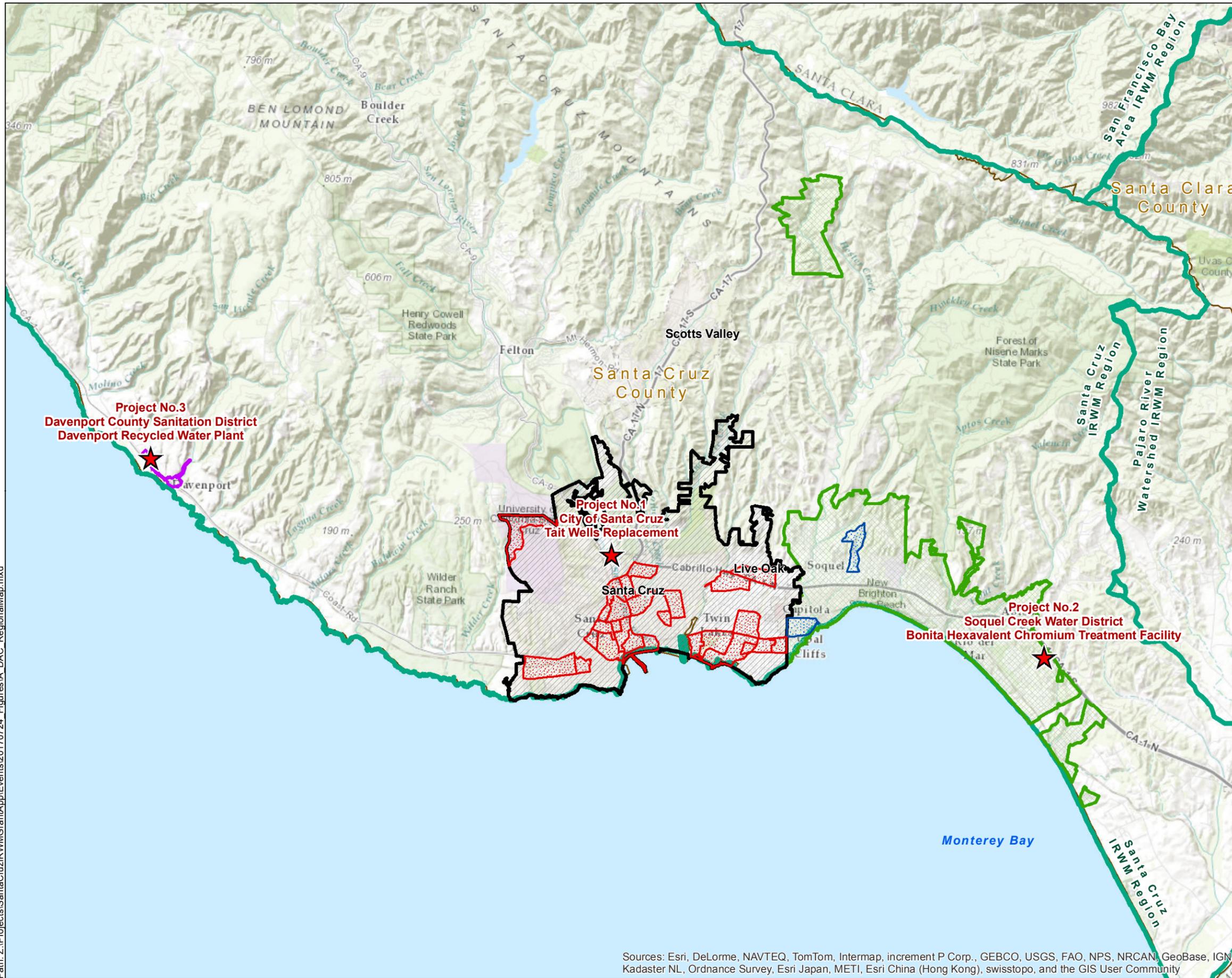
Davenport has been severely impacted by the 2010 closure of the CEMEX cement plant, which had operated since 1906 and for many years had subsidized the communities sewage and water operations and maintenance costs, in addition to providing jobs in the community. In 2013-14 with IRWM funding support from DWR, the Region conducted a DAC Pilot Project to engage DACs, identify water-related needs, and advance projects to address those needs. High priority projects identified included the construction of a recycled water treatment facility and increased capacity of the existing facility's storage lagoon.

As detailed in the Attachment 2 - Project Justification and elsewhere in this proposal, the Davenport Treatment Facility faces wastewater storage, treatment, and disposal challenges in the wet season. This is because limited storage capacity in the lagoon increases the risk of overtopping annually during average rainfall years, and limited land application area becomes too saturated in the wet season and creates runoff in violation of the Waste Discharge Requirement (WDR) Permit. These wastewater system limitations were compounded when the CEMEX concrete plant, which used treated effluent in its concrete manufacturing plant, ceased operation in 2010, magnifying an already challenging wastewater disposal situation. At present, the facility's limited wastewater storage capacity puts the District at risk of WDR permit violations for encroaching into the two feet of freeboard that must be maintained in the storage lagoon and for surface spills resulting in discharges to the Pacific Ocean. The Central Coast RWQCB issued a Notice of Violation in March 2011 when dechlorinated secondary effluent, with a BOD estimated at 4 mg/l, was discharged into to the nearby creek in an effort to increase freeboard and avoid uncontrolled over topping of the lagoon.

The facility improvements in the proposed project address storage capacity of the wastewater treatment facility that reduces the likelihood of future surface water contamination as well as protects beneficial uses and meets a discharge standard. The Central Coast Regional Water Quality Control Board provided a letter in strong support of grant funding for this facility; the April 4, 2015 letter states "the Central Coast Water Board views the sanitation district's proposed project as a perfect example of a shovel-ready project that will improve California's water resources, assist an economically disadvantaged community, increase the health and safety of the local population, and provide for much-needed agricultural water supply".<sup>2</sup>

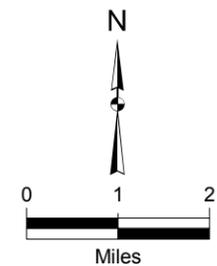
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<sup>2</sup> Packard, Harvey. Central Coast RWQCB 4/3/15. Letter of Support Davenport Sanitation District's Recycled Water Project  
SANTA CRUZ IRWM IMPLEMENTATION GRANT APPLICATION  
Attachment 7: Disadvantaged Community



**Legend**

-  Project Sites
-  City of Santa Cruz Water Service Area  
Project No. 1 Proponent  
(12,922 acres)
-  Soquel Creek Water District  
Project No. 2 Proponent  
(8,978 acres)
-  Davenport County Sanitation District  
Project No.3 Proponent
-  Disadvantaged Community Blocks in  
Soquel Creek Water District  
(264 acres)
-  Disadvantaged Community Blocks and  
Tracts in Santa Cruz Water Service Area  
(2,790 acres)
-  IRWM Regional Boundaries



**Kennedy/Jenks Consultants**

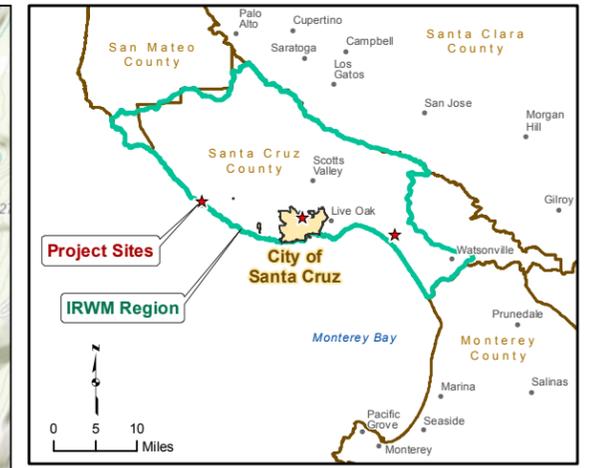
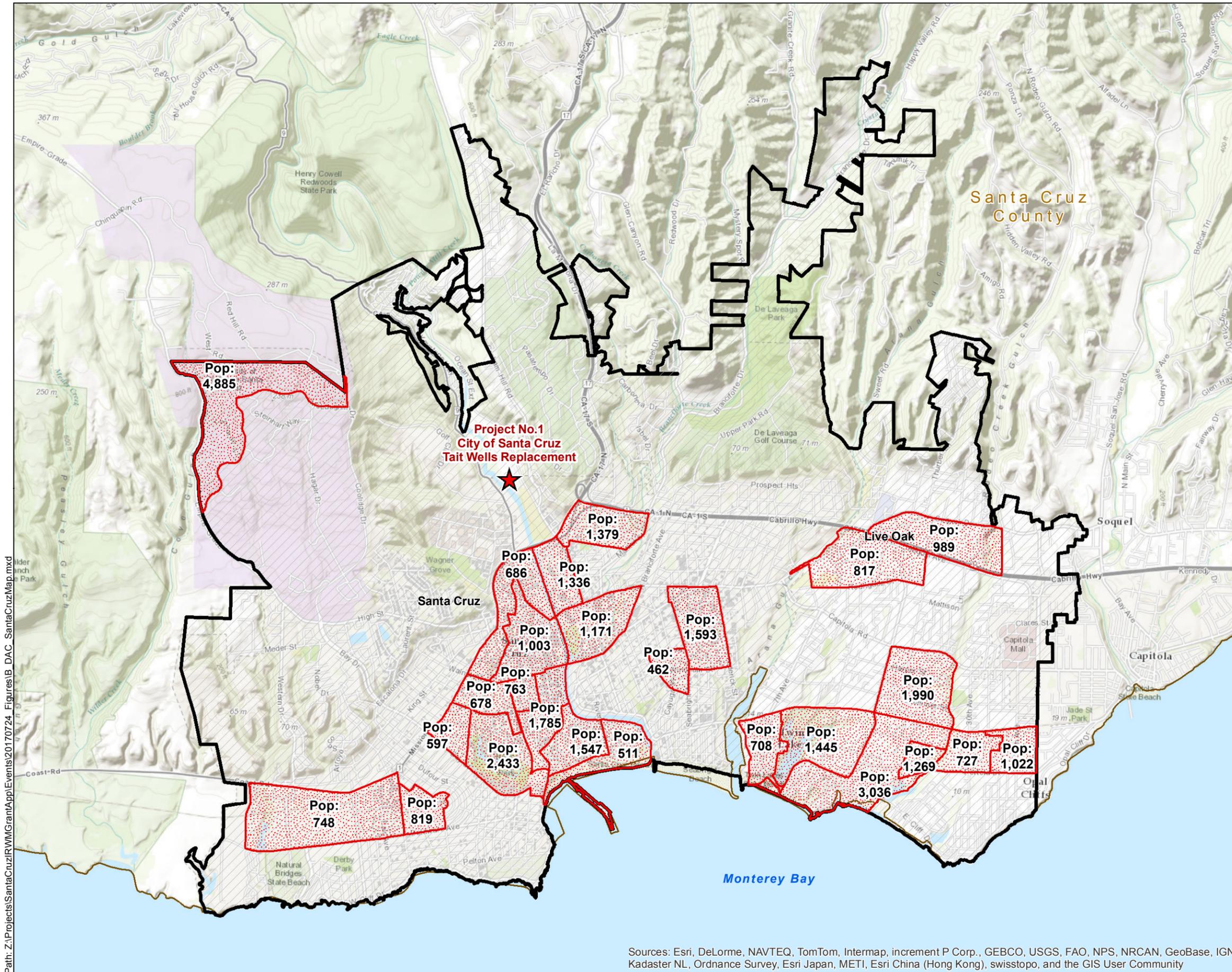
Regional Water Management Foundation  
2015 IRWM Implementation Grant Application  
Santa Cruz, California

**Disadvantaged Communities within the  
Service Areas of the Proposed Projects**

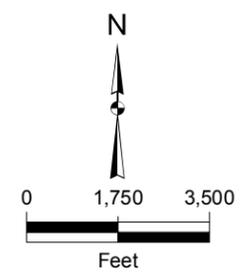
K/J 1568019.00

August 2015

**Figure A**



- Legend**
- ★ Project Site
  - City of Santa Cruz Water Service Area Project No. 1 Proponent (12,922 acres), (Population: 95,244)
  - Disadvantaged Community Blocks and Tracts in Santa Cruz (2,790 acres), (Population: 34,399)



**Kennedy/Jenks Consultants**  
 Regional Water Management Foundation  
 2015 IRWM Implementation Grant Application  
 Santa Cruz, California

**Disadvantaged Community Blocks and Tracts in City of Santa Cruz Service Area**

K/J 1568019.00  
 August 2015  
**Figure B**

Sources: Esri, DeLorme, NAVTEQ, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, and the GIS User Community

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# RCAC

December 2, 2014

Rachel Lather, Senior Civil Engineer  
Davenport County Sanitation District  
701 Ocean Avenue, Suite 410  
Santa Cruz, CA 95060

***Subject: Davenport Community Services District Median Household Income Survey Results***

Dear Rachel:

The California State Water Resources Control Board (SWRCB) approved Rural Community Assistance Corporation (RCAC) to perform an income survey of the Davenport Community Services District's service area located in Santa Cruz County. The purpose of this survey is to establish a median household income (MHI) level for state and federal funding programs and sources. This survey has been completed and the results are attached (see Chart 1, page 3).

**The MHI for Davenport CSD is \$48,500 with a response rate of 80 percent.**

*Davenport CSD has 137 parcels; 28 are vacant homes, 21 are commercial, one (1) vacation homes, leaving 87 parcels (households) to survey. The number of households in a range between 78 - 99 requires a sample size of 80 percent to meet State and Federal guidelines.*

*The 67 responses account for a **77 percent response rate**. Normally, an 80 percent response rate is encouraged for systems of this size. RCAC contacted the State Water Resources Control Board and together they determined that even if the remaining three (3) households (needed to obtain the 80% response rate) had responded with an income of \$300,000 (the highest income reported), the system would still have an MHI of no higher than \$48,500. The MHI of \$48,500 is based on 70 responses with an 80 percent response rate.*

The survey was designed and conducted per State and Federal Multiagency Guidelines established for the State Water Resources Control Board's State Revolving Funding programs, and the United States Department of Agriculture – Rural Development.

To qualify for CDBG funding, 51 percent or more of the community's population must be classified as Low to Moderate Income (LMI). Using the HUD established income limits for 2014 (see Exhibit A, page 6-12), the 80 percent level for different household sizes for Santa Cruz County (page 11) is shown as the LOW-INCOME line and runs from \$52,150 for a one (1) person household to \$123,892 for an eleven (11) person household. The number of households in a range between 78 – 87 requires a sample size of 70 household responses.

Rachel Lather, Senior Civil Engineer  
Davenport County Sanitation District  
Page 2

An analysis of the individual household data shows that 187 persons were living in the 67 households that responded. Forty-eight (48) households were determined to be LMI, and 19 households were above LMI. Of the 187 persons represented in the survey responses, 125 were living in LMI households. The percentage of LMI was therefore calculated as 66.8 percent for the community (125 LMI persons ÷ 187 total persons) x 100 = 66.8 percent LMI (see Exhibit B, page 13-14, Income Survey Verification: Summary Form).

Please free feel to contact me if you have additional questions or need further assistance. I can be reached at phone number: 916/207-8814, or e-mail: [jthompson@rcac.org](mailto:jthompson@rcac.org).

Yours truly,

*Jean A. Thompson-Ibbeson*

Jean A. Thompson-Ibbeson  
Rural Development Specialist-Environmental

Enclosure: Income Survey Report, MHI Data  
CC. Brian Phillips, RCAC, Regional Environmental Manager

**Chart 1: Median Household Income (MHI) Data  
for Davenport Community Services District**

Survey Ascending Order	Survey Number	Primary Residence	# of People in Residence	Annual Income Dollars	Survey Date
1	DP-007	Yes	1	\$8,749	9/22/14
2	DP-135	Yes	1	\$9,828	11/25/14
3	DP-047	Yes	2	\$10,000	9/25/14
4	DP-134	Yes	1	\$10,500	11/19/14
5	DP-085	Yes	2	\$11,000	11/4/14
6	DP-044	Yes	1	\$12,600	9/21/14
7	DP-014	Yes	1	\$15,120	9/22/14
8	DP-058	Yes	2	\$19,200	11/25/14
9	DP-132	Yes	1	\$20,000	10/14/14
10	DP-055	Yes	1	\$20,400	10/20/14
11	DP-041	Yes	3	\$21,000	9/18/14
12	DP-008	Yes	3	\$22,451	9/17/14
13	DP-040	Yes	2	\$23,000	9/21/14
14	DP-090	Yes	1	\$24,000	9/17/14
15	DP-027	Yes	1	\$24,813	10/1/14
16	DP-051	Yes	4	\$25,000	9/26/14
17	DP-042	Yes	1	\$26,280	9/25/14
18	DP-080	Yes	1	\$28,000	10/10/14
19	DP-045	Yes	1	\$30,000	10/11/14
20	DP-102	Yes	2	\$30,000	11/11/14
21	DP-013	Yes	5	\$35,000	11/20/14
22	DP-104	Yes	4	\$35,000	9/18/14
23	DP-036	Yes	1	\$35,340	10/11/14
24	DP-094	Yes	1	\$37,000	11/11/14
25	DP-109	Yes	1	\$37,200	9/18/14
26	DP-031	Yes	5	\$39,600	11/4/14
27	DP-037	Yes	2	\$40,768	9/29/14
28	DP-069	Yes	1	\$41,659	10/17/14
29	DP-105	Yes	1	\$42,000	10/14/14
30	DP-025	Yes	3	\$43,000	9/18/14

31	DP-006	Yes	1	\$44,000	9/18/14
32	DP-091	Yes	2	\$44,000	10/14/14
33	DP-101	Yes	3	\$44,000	10/10/14
34	DP-018	Yes	3	\$45,000	10/10/14
35	DP-011	Yes	3	\$48,000	9/29/14
36	DP-059	Yes	5	\$49,000	9/17/14
37	DP-005	Yes	2	\$50,000	11/1/14
38	DP-067	Yes	4	\$50,000	10/10/14
39	DP-111	Yes	2	\$53,000	9/27/14
40	DP-084	Yes	2	\$55,000	10/14/14
41	DP-092	Yes	6	\$55,000	9/26/14
42	DP-077	Yes	2	\$56,000	11/25/14
43	DP-115	Yes	3	\$59,000	10/1/14
44	DP-030	Yes	4	\$65,000	11/2/14
45	DP-046	Yes	4	\$72,000	9/17/14
46	DP-002	Yes	2	\$75,000	9/27/14
47	DP-012	Yes	4	\$75,000	9/27/14
48	DP-108	Yes	7	\$75,000	10/13/14
49	DP-052	Yes	11	\$77,000	10/1/14
50	DP-114	Yes	5	\$80,000	10/11/14
51	DP-088	Yes	5	\$83,000	11/5/14
52	DP-054	Yes	4	\$92,589	9/20/14
53	DP-049	Yes	4	\$92,995	10/2/14
54	DP-043	Yes	3	\$93,000	9/18/14
55	DP-070	Yes	3	\$96,000	9/29/14
56	DP-026	Yes	1	\$100,000	10/10/14
57	DP-100	Yes	3	\$100,000	10/14/14
58	DP-061	Yes	5	\$108,000	10/3/14
59	DP-071	Yes	2	\$115,000	10/11/14
60	DP-078	Yes	4	\$120,000	11/4/14
61	DP-038	Yes	3	\$145,000	9/18/14
62	DP-064	Yes	2	\$150,000	10/14/14
63	DP-066	Yes	2	\$150,000	11/18/14
64	DP-001	Yes	2	\$160,000	9/17/14
65	DP-096	Yes	9	\$170,000	10/14/14
66	DP-110	Yes	1	\$204,805	9/18/14
67	DP-021	Yes	3	\$300,000	9/21/14
68			DEFAULT	*\$300,000	

69			DEFAULT	*\$300,000	
70			DEFAULT	*\$300,000	
<b>Ascending Order Numbers 35 and 36, the average of Survey Numbers DP-011 and DP-059 = (\$48,000 + 49,000) ÷ 2 = the Median Household Income for Davenport Community Services District is \$48,500.</b>					

The 70 responses account for an **80 percent response rate**. The Median Household Income for Davenport Community Services District is on lines 35 and 36 (in ascending order), the average of survey numbers DP-011 and DP-059 =  $(\$48,000 + \$49,000) \div 2 =$  the median household income of \$48,500.

*The Median Household Income for Davenport Community Services District is \$48,500.*

*\* The 67 responses account for a **77 percent response rate**. Normally, an 80 percent response rate is encouraged for systems of this size. RCAC contacted the State Water Resources Control Board and together they determined that even if the remaining three (3) households (needed to obtain the 80% response rate) had responded with an income of \$300,000 (the highest income reported), the system would still have an MHI of no higher than \$48,500. The MHI of \$48,500 is based on 70 responses with an 80 percent response rate.*

**EXHIBIT A**

**HUD 2014 Income Limits  
for California Counties**

County	INCOME * CATEGORY	NUMBER OF PERSONS IN HOUSEHOLD							
		1	2	3	4	5	6	7	8
Alameda County	"30%" Limit	19,350	22,100	24,850	27,600	29,850	32,050	34,250	36,450
	"50%" Limit	32,200	36,800	41,400	46,000	49,700	53,400	57,050	60,750
	"60%" Limit	38,640	44,160	49,680	55,200	59,640	64,080	68,460	72,900
	"80%" Limit	47,350	54,100	60,850	67,600	73,050	78,450	83,850	89,250
Alpine County	"30%" Limit	17,150	19,600	22,050	24,500	26,500	28,450	30,400	32,350
	"50%" Limit	28,600	32,650	36,750	40,800	44,100	47,350	50,600	53,900
	"60%" Limit	34,320	39,180	44,100	48,960	52,920	56,820	60,720	64,680
	"80%" Limit	44,750	51,150	57,550	63,900	69,050	74,150	79,250	84,350
Amador County	"30%" Limit	15,200	17,400	19,550	21,700	23,450	25,200	26,950	28,650
	"50%" Limit	25,350	28,950	32,550	36,150	39,050	41,950	44,850	47,750
	"60%" Limit	30,420	34,740	39,060	43,380	46,860	50,340	53,820	57,300
	"80%" Limit	40,500	46,300	52,100	57,850	62,500	67,150	71,750	76,400
Butte County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Calaveras County	"30%" Limit	14,700	16,800	18,900	21,000	22,700	24,400	26,050	27,750
	"50%" Limit	24,500	28,000	31,500	35,000	37,800	40,600	43,400	46,200
	"60%" Limit	29,400	33,600	37,800	42,000	45,360	48,720	52,080	55,440
	"80%" Limit	39,200	44,800	50,400	56,000	60,500	65,000	69,450	73,950
Colusa County	"30%" Limit	12,050	13,800	15,500	17,200	18,600	20,000	21,350	22,750
	"50%" Limit	20,100	22,950	25,800	28,650	30,950	33,250	35,550	37,850
	"60%" Limit	24,120	27,540	30,960	34,380	37,140	39,900	42,660	45,420
	"80%" Limit	32,100	36,700	41,300	45,850	49,550	53,200	56,900	60,550
Contra Costa County	"30%" Limit	19,350	22,100	24,850	27,600	29,850	32,050	34,250	36,450
	"50%" Limit	32,200	36,800	41,400	46,000	49,700	53,400	57,050	60,750
	"60%" Limit	38,640	44,160	49,680	55,200	59,640	64,080	68,460	72,900
	"80%" Limit	47,350	54,100	60,850	67,600	73,050	78,450	83,850	89,250
Del Norte County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
El Dorado County	"30%" Limit	14,450	16,500	18,550	20,600	22,250	23,900	25,550	27,200
	"50%" Limit	24,050	27,500	30,950	34,350	37,100	39,850	42,600	45,350
	"60%" Limit	28,860	33,000	37,140	41,220	44,520	47,820	51,120	54,420
	"80%" Limit	38,550	44,050	49,550	55,050	59,500	63,900	68,300	72,700
Fresno County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750

\* Percentages may not be mathematically related to each other. Percents are used as names for the categories because programs' actual names for limits differ.  
Rev 6-16-14

County	INCOME * CATEGORY	NUMBER OF PERSONS IN HOUSEHOLD							
		1	2	3	4	5	6	7	8
Glenn County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Humboldt County	"30%" Limit	12,100	13,800	15,550	17,250	18,650	20,050	21,400	22,800
	"50%" Limit	20,150	23,000	25,900	28,750	31,050	33,350	35,650	37,950
	"60%" Limit	24,180	27,600	31,080	34,500	37,260	40,020	42,780	45,540
	"80%" Limit	32,200	36,800	41,400	46,000	49,700	53,400	57,050	60,750
Imperial County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Inyo County	"30%" Limit	14,500	16,600	18,650	20,700	22,400	24,050	25,700	27,350
	"50%" Limit	24,150	27,800	31,050	34,500	37,300	40,050	42,800	45,550
	"60%" Limit	28,980	33,120	37,260	41,400	44,760	48,060	51,360	54,660
	"80%" Limit	38,650	44,200	49,700	55,200	59,650	64,050	68,450	72,900
Kern County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Kings County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Lake County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Lassen County	"30%" Limit	14,250	16,300	18,350	20,350	22,000	23,650	25,250	26,900
	"50%" Limit	23,800	27,200	30,600	33,950	36,700	39,400	42,100	44,850
	"60%" Limit	28,560	32,640	36,720	40,740	44,040	47,280	50,520	53,820
	"80%" Limit	38,050	43,450	48,900	54,300	58,650	63,000	67,350	71,700
Los Angeles County	"30%" Limit	17,150	19,600	22,050	24,450	26,450	28,400	30,350	32,300
	"50%" Limit	28,550	32,600	36,700	40,750	44,050	47,300	50,550	53,800
	"60%" Limit	34,260	39,120	44,040	48,900	52,860	56,760	60,660	64,560
	"80%" Limit	45,650	52,200	58,700	65,200	70,450	75,650	80,850	86,100
Madera County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750

\* Percentages may not be mathematically related to each other. Percents are used as names for the categories because programs' actual names for limits differ.  
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State CDBG's and HOME's Table of 2014 Income Limits  
Effective May 1, 2014

County	INCOME * CATEGORY	NUMBER OF PERSONS IN HOUSEHOLD							
		1	2	3	4	5	6	7	8
Marin County	"30%" Limit	23,250	26,800	29,900	33,200	35,900	38,550	41,200	43,850
	"50%" Limit	38,750	44,300	49,850	55,350	59,800	64,250	68,650	73,100
	"60%" Limit	46,500	53,160	59,820	66,420	71,760	77,100	82,380	87,720
	"80%" Limit	62,050	70,900	79,750	88,600	95,700	102,800	109,900	117,000
Mariposa County	"30%" Limit	12,750	14,800	16,400	18,200	19,700	21,150	22,600	24,050
	"50%" Limit	21,250	24,250	27,300	30,300	32,750	35,150	37,600	40,000
	"60%" Limit	25,500	29,100	32,760	36,360	39,300	42,180	45,120	48,000
	"80%" Limit	33,950	38,800	43,650	48,500	52,400	56,300	60,150	64,050
Mendocino County	"30%" Limit	11,550	13,200	14,850	16,450	17,800	19,100	20,400	21,750
	"50%" Limit	19,200	21,950	24,700	27,400	29,600	31,800	34,000	36,200
	"60%" Limit	23,040	26,340	29,640	32,880	35,520	38,160	40,800	43,440
	"80%" Limit	30,700	35,100	39,500	43,850	47,400	50,900	54,400	57,900
Merced County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Modoc County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Mono County	"30%" Limit	17,050	19,500	21,950	24,350	26,300	28,250	30,200	32,150
	"50%" Limit	28,450	32,500	36,550	40,600	43,850	47,100	50,350	53,600
	"60%" Limit	34,140	39,000	43,860	48,720	52,620	56,520	60,420	64,320
	"80%" Limit	44,750	51,150	57,550	63,900	69,050	74,150	79,250	84,350
Monterey County	"30%" Limit	15,100	17,250	19,400	21,550	23,300	25,000	26,750	28,450
	"50%" Limit	25,200	28,800	32,400	35,950	38,850	41,750	44,600	47,500
	"60%" Limit	30,240	34,560	38,880	43,140	46,620	50,100	53,520	57,000
	"80%" Limit	40,250	46,000	51,750	57,500	62,100	66,700	71,300	75,900
Napa County	"30%" Limit	17,300	19,800	22,250	24,700	26,700	28,700	30,650	32,650
	"50%" Limit	28,850	33,000	37,100	41,200	44,500	47,800	51,100	54,400
	"60%" Limit	34,620	39,800	44,520	49,440	53,400	57,360	61,320	65,280
	"80%" Limit	46,150	52,750	59,350	65,900	71,200	76,450	81,750	87,000
Nevada County	"30%" Limit	15,200	17,400	19,550	21,700	23,450	25,200	26,950	28,650
	"50%" Limit	25,350	29,000	32,600	36,200	39,100	42,000	44,900	47,800
	"60%" Limit	30,420	34,800	39,120	43,440	46,920	50,400	53,880	57,360
	"80%" Limit	40,550	46,350	52,150	57,900	62,550	67,200	71,800	76,450
Orange County	"30%" Limit	19,000	21,700	24,400	27,100	29,300	31,450	33,650	35,800
	"50%" Limit	31,650	36,150	40,650	45,150	48,800	52,400	56,000	59,600
	"60%" Limit	37,980	43,380	48,780	54,180	58,560	62,880	67,200	71,520
	"80%" Limit	50,600	57,800	65,050	72,250	78,050	83,850	89,600	95,400

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County	INCOME * CATEGORY	NUMBER OF PERSONS IN HOUSEHOLD							
		1	2	3	4	5	6	7	8
Placer County	"30%" Limit	14,450	16,500	18,550	20,600	22,250	23,900	25,550	27,200
	"50%" Limit	24,050	27,500	30,950	34,350	37,100	39,850	42,600	45,350
	"60%" Limit	28,860	33,000	37,140	41,220	44,520	47,820	51,120	54,420
	"80%" Limit	38,550	44,050	49,550	55,050	59,500	63,900	68,300	72,700
Plumas County	"30%" Limit	11,650	13,300	14,950	16,600	17,950	19,300	20,600	21,950
	"50%" Limit	19,400	22,150	24,900	27,650	29,900	32,100	34,300	36,500
	"60%" Limit	23,280	26,580	29,880	33,180	35,880	38,520	41,160	43,800
	"80%" Limit	31,000	35,400	39,850	44,250	47,800	51,350	54,900	58,450
Riverside County	"30%" Limit	12,750	14,600	16,400	18,200	19,700	21,150	22,600	24,050
	"50%" Limit	21,250	24,300	27,350	30,350	32,800	35,250	37,650	40,100
	"60%" Limit	25,500	29,160	32,820	36,420	39,360	42,300	45,180	48,120
	"80%" Limit	34,000	38,850	43,700	48,550	52,450	56,350	60,250	64,100
Sacramento County	"30%" Limit	14,450	16,500	18,550	20,600	22,250	23,900	25,550	27,200
	"50%" Limit	24,050	27,500	30,950	34,350	37,100	39,850	42,600	45,350
	"60%" Limit	28,860	33,000	37,140	41,220	44,520	47,820	51,120	54,420
	"80%" Limit	38,550	44,050	49,550	55,050	59,500	63,900	68,300	72,700
San Benito County	"30%" Limit	16,000	18,300	20,600	22,850	24,700	26,550	28,350	30,200
	"50%" Limit	26,650	30,450	34,250	38,050	41,100	44,150	47,200	50,250
	"60%" Limit	31,980	36,540	41,100	45,660	49,320	52,980	56,640	60,300
	"80%" Limit	42,650	48,750	54,850	60,900	65,800	70,650	75,550	80,400
San Bernardino County	"30%" Limit	12,750	14,600	16,400	18,200	19,700	21,150	22,600	24,050
	"50%" Limit	21,250	24,300	27,350	30,350	32,800	35,250	37,650	40,100
	"60%" Limit	25,500	29,160	32,820	36,420	39,360	42,300	45,180	48,120
	"80%" Limit	34,000	38,850	43,700	48,550	52,450	56,350	60,250	64,100
San Diego County	"30%" Limit	16,600	18,950	21,300	23,650	25,550	27,450	29,350	31,250
	"50%" Limit	27,650	31,600	35,550	39,450	42,650	45,800	48,950	52,100
	"60%" Limit	33,180	37,920	42,660	47,340	51,180	54,960	58,740	62,520
	"80%" Limit	44,200	50,500	56,800	63,100	68,150	73,200	78,250	83,300
San Francisco County	"30%" Limit	23,250	26,600	29,900	33,200	35,900	38,550	41,200	43,850
	"50%" Limit	38,750	44,300	49,850	55,350	59,800	64,250	68,650	73,100
	"60%" Limit	46,500	53,160	59,820	66,420	71,760	77,100	82,380	87,720
	"80%" Limit	62,050	70,900	79,750	88,600	95,700	102,800	109,900	117,000
San Joaquin County	"30%" Limit	12,600	14,400	16,200	17,950	19,400	20,850	22,300	23,700
	"50%" Limit	21,000	24,000	27,000	29,950	32,350	34,750	37,150	39,550
	"60%" Limit	25,200	28,800	32,400	35,940	38,820	41,700	44,580	47,460
	"80%" Limit	33,550	38,350	43,150	47,900	51,750	55,600	59,400	63,250
San Luis Obispo County	"30%" Limit	15,800	18,050	20,300	22,550	24,400	26,200	28,000	29,800
	"50%" Limit	26,350	30,100	33,850	37,600	40,650	43,650	46,650	49,650
	"60%" Limit	31,620	36,120	40,620	45,120	48,780	52,380	55,980	59,580
	"80%" Limit	42,150	48,150	54,150	60,150	65,000	69,800	74,600	79,400

\* Percentages may not be mathematically related to each other. Percents are used as names for the categories because programs' actual names for limits differ.

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County	INCOME * CATEGORY	NUMBER OF PERSONS IN HOUSEHOLD							
		1	2	3	4	5	6	7	8
San Mateo County	"30%" Limit	23,250	26,800	29,900	33,200	35,900	38,550	41,200	43,850
	"50%" Limit	38,750	44,300	49,850	55,350	59,800	64,250	68,650	73,100
	"60%" Limit	46,500	53,160	59,820	66,420	71,760	77,100	82,380	87,720
	"80%" Limit	62,050	70,900	79,750	88,600	95,700	102,800	109,900	117,000
Santa Barbara County	"30%" Limit	15,900	18,200	20,450	22,700	24,550	26,350	28,150	30,000
	"50%" Limit	26,500	30,300	34,100	37,850	40,900	43,950	46,950	50,000
	"60%" Limit	31,800	36,360	40,920	45,420	49,080	52,740	56,340	60,000
	"80%" Limit	42,400	48,450	54,500	60,550	65,400	70,250	75,100	79,950
Santa Clara County	"30%" Limit	21,400	24,450	27,500	30,550	33,000	35,450	37,900	40,350
	"50%" Limit	35,700	40,800	45,900	50,950	55,050	59,150	63,200	67,300
	"60%" Limit	42,840	48,960	55,080	61,140	66,060	70,980	75,840	80,760
	"80%" Limit	49,950	57,050	64,200	71,300	77,050	82,750	88,450	94,150
Santa Cruz County	"30%" Limit	19,600	22,400	25,200	27,950	30,200	32,450	34,700	36,900
	"50%" Limit	32,600	37,250	41,900	46,550	50,300	54,000	57,750	61,450
	"60%" Limit	39,120	44,700	50,280	55,860	60,360	64,800	69,300	73,740
	"80%" Limit	52,150	59,800	67,050	74,500	80,500	86,450	92,400	98,350
Shasta County	"30%" Limit	11,550	13,200	14,850	16,450	17,800	19,100	20,400	21,750
	"50%" Limit	19,200	21,950	24,700	27,400	29,600	31,800	34,000	36,200
	"60%" Limit	23,040	26,340	29,640	32,880	35,520	38,160	40,800	43,440
	"80%" Limit	30,700	35,100	39,500	43,850	47,400	50,900	54,400	57,900
Sierra County	"30%" Limit	14,050	16,050	18,050	20,050	21,700	23,300	24,900	26,500
	"50%" Limit	23,400	26,750	30,100	33,400	36,100	38,750	41,450	44,100
	"60%" Limit	28,080	32,100	36,120	40,080	43,320	46,500	49,740	52,920
	"80%" Limit	37,450	42,800	48,150	53,450	57,750	62,050	66,300	70,600
Siskiyou County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,800	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Solano County	"30%" Limit	16,100	18,400	20,700	23,000	24,850	26,700	28,550	30,400
	"50%" Limit	26,850	30,700	34,550	38,350	41,450	44,500	47,600	50,650
	"60%" Limit	32,220	36,840	41,460	46,020	49,740	53,400	57,120	60,780
	"80%" Limit	42,950	49,100	55,250	61,350	66,300	71,200	76,100	81,000
Sonoma County	"30%" Limit	16,150	18,450	20,750	23,050	24,900	26,750	28,600	30,450
	"50%" Limit	26,950	30,800	34,650	38,450	41,550	44,650	47,700	50,800
	"60%" Limit	32,340	36,960	41,580	46,140	49,860	53,580	57,240	60,960
	"80%" Limit	43,050	49,200	55,350	61,500	66,450	71,350	76,300	81,200
Stanislaus County	"30%" Limit	11,800	13,450	15,150	16,800	18,150	19,500	20,850	22,200
	"50%" Limit	19,600	22,400	25,200	28,000	30,250	32,500	34,750	37,000
	"60%" Limit	23,520	26,880	30,240	33,600	36,300	39,000	41,700	44,400
	"80%" Limit	31,400	35,850	40,350	44,800	48,400	52,000	55,600	59,150

\* Percentages may not be mathematically related to each other. Percents are used as names for the categories because programs' actual names for limits differ.  
Rev 6-16-14

County	INCOME * CATEGORY	NUMBER OF PERSONS IN HOUSEHOLD							
		1	2	3	4	5	6	7	8
Sutter County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Tehama County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Trinity County	"30%" Limit	11,550	13,200	14,850	16,500	17,850	19,150	20,500	21,800
	"50%" Limit	19,250	22,000	24,750	27,500	29,700	31,900	34,100	36,300
	"60%" Limit	23,100	26,400	29,700	33,000	35,640	38,280	40,920	43,560
	"80%" Limit	30,800	35,200	39,600	44,000	47,550	51,050	54,600	58,100
Tulare County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750
Tuolumne County	"30%" Limit	13,300	15,200	17,100	18,950	20,500	22,000	23,500	25,050
	"50%" Limit	22,100	25,250	28,400	31,550	34,100	36,600	39,150	41,650
	"60%" Limit	26,520	30,300	34,080	37,860	40,920	43,920	46,980	49,980
	"80%" Limit	35,350	40,400	45,450	50,500	54,550	58,600	62,650	66,700
Ventura County	"30%" Limit	18,650	21,300	23,950	26,600	28,750	30,900	33,000	35,150
	"50%" Limit	31,050	35,500	39,950	44,350	47,900	51,450	55,000	58,550
	"60%" Limit	37,260	42,600	47,940	53,220	57,480	61,740	66,000	70,260
	"80%" Limit	48,300	55,200	62,100	68,950	74,500	80,000	85,500	91,050
Yolo County	"30%" Limit	15,550	17,750	19,950	22,150	23,950	25,700	27,500	29,250
	"50%" Limit	25,900	29,800	33,300	36,950	39,950	42,900	45,850	48,800
	"60%" Limit	31,080	35,520	39,960	44,340	47,940	51,480	55,020	58,580
	"80%" Limit	41,400	47,300	53,200	59,100	63,850	68,600	73,300	78,050
Yuba County	"30%" Limit	11,500	13,150	14,800	16,400	17,750	19,050	20,350	21,650
	"50%" Limit	19,150	21,900	24,650	27,350	29,550	31,750	33,950	36,150
	"60%" Limit	22,980	26,280	29,580	32,820	35,460	38,100	40,740	43,380
	"80%" Limit	30,650	35,000	39,400	43,750	47,250	50,750	54,250	57,750

References: HUD 04/14/2014

The federal Consolidated Plan regulations Section 91.305 Subpart D refer to the extremely low-income target group, the 30 percent level, used in both HOME and CDBG programs. For CDBG, 24 CFR 570.3 describes that HUD's income limits for the 50 percent and the 80 percent income levels are CDBG's Low- and Moderate-income limits, respectively. For HOME, 24 CFR 92.216 establishes what is called the "60% limit". HOME's income limits for the 50 percent and 80 percent levels are called Very Low- and Low-income, respectively.

[https://onecpd.info/reports/HOME\\_IncomeLmts\\_Natl\\_2014.xlsx](https://onecpd.info/reports/HOME_IncomeLmts_Natl_2014.xlsx)

For all income categories, the income limits for households larger than eight persons are determined as follows: for each person in excess of eight, add eight percent of the four-person "50%" limit to the "50%" limit for eight persons and round the answer to the nearest \$50. For example, the nine-person "50%" limit for Yuba County equals \$38,340 ( \$27,350 \* .08 = \$ 2,188 added to \$ 36,150 = \$ 38,338 rounded to \$ 38,340)

27,350      0.08      2,188      36,150      38,338      38,340

\* Percentages may not be mathematically related to each other. Percents are used as names for the categories because programs' actual names for limits differ.

## EXHIBIT B

### Income Survey Verification: Summary Form for Davenport Community Services District

Tracking Code	Households Annual Income	# of People in Residence	Below Low Mod Income	Above Low Mod Income	Survey Date
DP-007	\$8,749	1	1		9/22/14
DP-135	\$9,828	1	1		11/25/14
DP-047	\$10,000	2	2		9/25/14
DP-134	\$10,500	1	1		11/19/14
DP-085	\$11,000	2	2		11/4/14
DP-044	\$12,600	1	1		9/21/14
DP-014	\$15,120	1	1		9/22/14
DP-058	\$19,200	2	2		11/25/14
DP-132	\$20,000	1	1		10/14/14
DP-055	\$20,400	1	1		10/20/14
DP-041	\$21,000	3	3		9/18/14
DP-008	\$22,451	3	3		9/17/14
DP-040	\$23,000	2	2		9/21/14
DP-090	\$24,000	1	1		9/17/14
DP-027	\$24,813	1	1		10/1/14
DP-051	\$25,000	4	4		9/26/14
DP-042	\$26,280	1	1		9/25/14
DP-080	\$28,000	1	1		10/10/14
DP-045	\$30,000	1	1		10/11/14
DP-102	\$30,000	2	2		11/11/14
DP-013	\$35,000	5	5		11/20/14
DP-104	\$35,000	4	4		9/18/14
DP-036	\$35,340	1	1		10/11/14
DP-094	\$37,000	1	1		11/11/14
DP-109	\$37,200	1	1		9/18/14
DP-031	\$39,600	5	5		11/4/14
DP-037	\$40,768	2	2		9/29/14
DP-069	\$41,659	1	1		10/17/14
DP-105	\$42,000	1	1		10/14/14
DP-025	\$43,000	3	3		9/18/14
DP-006	\$44,000	1	1		9/18/14
DP-091	\$44,000	2	2		10/14/14
DP-101	\$44,000	3	3		10/10/14
DP-018	\$45,000	3	3		10/10/14
DP-011	\$48,000	3	3		9/29/14
DP-059	\$49,000	5	5		9/17/14
DP-005	\$50,000	2	2		11/1/14
DP-067	\$50,000	4	4		10/10/14

DP-111	\$53,000	2	2		9/27/14
DP-084	\$55,000	2	2		10/14/14
DP-092	\$55,000	6	6		9/26/14
DP-077	\$56,000	2	2		11/25/14
DP-115	\$59,000	3	3		10/1/14
DP-030	\$65,000	4	4		11/2/14
DP-046	\$72,000	4	4		9/17/14
DP-002	\$75,000	2		2	9/27/14
DP-012	\$75,000	4		4	9/27/14
DP-108	\$75,000	7	7		10/13/14
DP-052	\$77,000	11	11		10/1/14
DP-114	\$80,000	5	5		10/11/14
DP-088	\$83,000	5		5	11/5/14
DP-054	\$92,589	4		4	9/20/14
DP-049	\$92,995	4		4	10/2/14
DP-043	\$93,000	3		3	9/18/14
DP-070	\$96,000	3		3	9/29/14
DP-026	\$100,000	1		1	10/10/14
DP-100	\$100,000	3		3	10/14/14
DP-061	\$108,000	5		5	10/3/14
DP-071	\$115,000	2		2	10/11/14
DP-078	\$120,000	4		4	11/4/14
DP-038	\$145,000	3		3	9/18/14
DP-064	\$150,000	2		2	10/14/14
DP-066	\$150,000	2		2	11/18/14
DP-001	\$160,000	2		2	9/17/14
DP-096	\$170,000	9		9	10/14/14
DP-110	\$204,805	1		1	9/18/14
DP-021	\$300,000	3		3	9/21/14
<b>Total # of Persons</b>		<b>187</b>	<b>125</b>	<b>62</b>	

An analysis of the individual household data shows that 187 persons were living in the 67 households that responded. Forty-eight (48) households were determined to be LMI, and 19 households were above LMI. Of the 187 persons represented in the survey responses, 125 were living in LMI households. The percentage of LMI was therefore calculated as 66.8 percent for the community (125 LMI persons ÷ 187 total persons) x 100 = 66.8 percent LMI.