



## Iowa Department of Natural Resources Disadvantaged Community Analysis

Regulated Entity or Community Name: \_\_\_\_\_

NPDES # (if applicable): \_\_\_\_\_

### Part 1: Purpose of Form Submittal

This form is for use by regulated entities or communities who believe that compliance with federal or state wastewater regulations or an Administrative order from DNR regarding wastewater treatment could result in substantial and widespread economic and social impact (SWESI) to the ratepayers; possibly qualifying the entity or community as disadvantaged. Regulations that could potentially cause SWESI will often be contained in a proposed NPDES permit. This form may also be used by entities or communities who believe they may qualify as disadvantaged for the purposes of a Clean Water State Revolving Fund (SRF) loan. For more information on the applicability of this form, contact the DNR staff listed at the end of the form.

#### Check only one:

Form is being submitted for determination of disadvantaged status under the disadvantaged community rule:

or

Form is being submitted for consideration of a lower SRF loan rate:

### Part 2: Proposed Total Annual Project Costs

Total Annual Project Costs are the current costs of wastewater treatment in the community (if any) plus the future costs of proposed wastewater treatment that will meet or exceed all applicable federal or state regulations or requirements of a DNR Administrative Order regarding wastewater treatment. Total Annual Project Costs will include all current and proposed facility operation and maintenance (O&M) costs and any existing and proposed debt of the system as expressed in current and proposed sewer rates. The costs of the proposed wastewater treatment will assume a 30 year loan period at an interest rate equal to the current state revolving fund interest rate. Awarded grant funding must be subtracted from the Total Annual Project Costs. The Total Annual Project Costs must be determined as part of preparing a project plan to meet the federal or state regulations or DNR Administrative order regarding wastewater treatment.

Total Annual Project Costs = [(Estimated costs to design and build proposed project - Awarded grant funding) amortized over 30 years] + Current annual system budget, including O&M and existing debt service + Future annual O&M

**Derive the total annual project costs, complete all of the following information, and attach supporting documentation to this form.**

**A. Estimated costs to design and build proposed project:** \$ \_\_\_\_\_

Short description of proposed project (type of wastewater treatment): \_\_\_\_\_

Source of project cost estimate: \_\_\_\_\_

Additional documentation of proposed project and project cost estimate attached:

**B. Awarded grant funding:** \$ \_\_\_\_\_

Source of grant funding: \_\_\_\_\_

**C. Current annual system budget, including O&M and any existing debt service:** \$ \_\_\_\_\_

Documentation of current annual system budget, O&M and existing debt service attached:

**D. Future annual O&M costs:** \$ \_\_\_\_\_

Documentation of future O&M costs attached:

**E. Additional information regarding the calculation of the total annual project costs is attached:**

[(A-B) amortized over 30 years] + (C+D) = Total Annual Project Costs    **Total Annual Project Costs:** \$ \_\_\_\_\_



**Part 3: Number of Households or Ratepayers**

The number of households or ratepayers that will be affected by the wastewater regulations or a DNR Administrative order and the source of this number must be provided on this form. Household or ratepayer information can be obtained from recent census data or from a recent community survey. If the regulated entity or community conducted the survey that determined the number of households or ratepayers, that survey must be attached. This analysis will consider the current number of households or ratepayers, but information on future projections (anticipated population trends) may be included at the discretion of the regulated entity or affected community.

Complete only one of the following two rows:

Number of Households: \_\_\_\_\_ Data Source: \_\_\_\_\_

or

Number or Ratepayers: \_\_\_\_\_ Data Source: \_\_\_\_\_

Survey Attached (if necessary):

**Part 4: Bond Rating of the Community (if available)**

The community or entity must provide the bond rating of the community over the last year, if a bond rating is available. If the community does not have a bond rating, state that below.

Bond Rating of the Community: \_\_\_\_\_

**Part 5: User Rates**

The regulated entity or community must submit the current user rates as part of this analysis, as follows. Complete only one of the following three:

- A. Check if analysis is completed for a **municipality or other community**:   
 If this analysis is for a municipality or other community, the regulated entity or community must submit the current sewer rate ordinances, including the sewer rates of any industrial users.  
All current sewer rate ordinances including the sewer rates of any industrial users attached:
- B. Check if analysis is completed for a **water treatment plant**:   
 If this analysis is for a water treatment plant, the regulated entity or community must submit the water rate schedules or tables.  
All water rate schedules or tables attached:
- C. Check if analysis is completed for an **entity other than a municipality, community, or water treatment facility**:   
 If this analysis is for an entity other than a municipality, community, or water treatment facility, the regulated entity or community must submit the monthly ratepayer charge for wastewater treatment as part of this analysis.  
All monthly ratepayer charge for wastewater treatment attached:

**Part 6: Additional MHI or Ratepayer Income Information**

If no median household income (MHI) information is available for the community for whom this DCA is submitted, the regulated entity or community should conduct an income survey to determine the MHI. MHI information is available in the most recent American Community Survey. If an income survey is necessary, the survey must be conducted in accordance with the Iowa Community Development Block Grant income survey guidelines and must be attached.

A. If this DCA is being submitted by or for a municipality, community, or water treatment facility, complete one of the following:

MHI from most recent American Community Survey (U.S. census data): \_\_\_\_\_  
Available from the State Data Center of Iowa ([www.iowadatacenter.org/](http://www.iowadatacenter.org/))

or

MHI Determined by Recent Community Income Survey (if necessary): \_\_\_\_\_ Survey Attached:   
Available from the Iowa Economic Development Authority ([www.iowaeconomicdevelopment.com](http://www.iowaeconomicdevelopment.com))



**B. If this DCA is being submitted by or for an entity other than a municipality, community, or water treatment facility, the DCA must also contain either:**

- 1) for entities with more than ten households or ratepayers; the median household or ratepayer income, as determined by an income survey conducted by the regulated entity based on the Iowa Community Development Block Grant income survey guidelines, or
- 2) for entities with ten or fewer households or ratepayers; an estimate of median household or ratepayer income.

**Entity in this DCA is not a municipality, community, or water treatment plant** (checked "C" under Part 5):

**Check one of the following if the entity in this DCA is not a municipality, community, or water treatment plant:**

Entity has more than ten households or ratepayers:

Number of households or ratepayers: \_\_\_\_\_ MHI Determined by Recent Community Income Survey: \_\_\_\_\_  
Survey Attached:

**or**

Entity has ten or fewer households or ratepayers:

Number of households or ratepayers: \_\_\_\_\_ MHI or ratepayer income Estimate: \$ \_\_\_\_\_  
Source of Estimate Attached:

**Part 7: Explanation of why compliance will result in SWESI**

Explain below why the compliance with proposed wastewater requirements will result in substantial and widespread economic and social impact (SWESI) to the ratepayers of the community. List all applicable requirements that could lead to SWESI. Attach additional pages as needed.

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**Part 8: Signature of Responsible Party Submitting Analysis:**

This analysis must be signed and dated by a responsible party from the regulated entity or community submitting the analysis. The responsible party of a regulated entity can be the president or vice-president of the entity. The responsible party of a community can be the mayor, the public works director, the city manager, the city superintendent, or a similar community official. Responsible parties can also include county officials or Utility Management Organization officials.

Responsible Official Name:
Responsible Official Title:
Signature:
Date:

**Part 9: Submittal of DCA and Assistance**

**This Analysis and all required attachments must be submitted to:**

Iowa Department of Natural Resources, NPDES Section, 502 East 9<sup>th</sup> St., Des Moines, IA 50319

**For assistance completing this Analysis, please contact:**

Courtney Cswercko at [courtney.cswercko@dnr.iowa.gov](mailto:courtney.cswercko@dnr.iowa.gov) or 515-281-7206