

BEFORE THE MISSOURI DEPARTMENT OF NATURAL RESOURCES

In the Matter of:

City of Jackson

**Proceeding under the
Missouri Clean Water Law**

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Order No. 2025-WPCB-1921

ABATEMENT ORDER ON CONSENT

The issuing of this Abatement Order on Consent (AOC) No. 2025-WPCB-1921, by the Missouri Department of Natural Resources (Department), is a formal administrative action by the State of Missouri and is being issued because the City of Jackson (Respondent) violated the Missouri Clean Water Law (MCWL). This AOC is issued under the authorities of Sections 644.056 and 644.079, Revised Statutes of Missouri (RSMo). Failure to comply with this AOC is, by itself, a violation of Section 644.076.1, RSMo. Litigation may occur without further notice if there is not compliance with the requirements of this AOC. This AOC does not constitute a waiver or a modification of any requirements for the MCWL, or its implementing regulations, all of which remain in full force and effect. Compliance with the terms of this AOC shall not relieve the Respondent of liability for, or preclude the Department from, initiating an administrative or judicial enforcement action to recover civil or administrative penalties for any future violations of the MCWL, or to seek injunctive relief, pursuant to Chapter 644, RSMo.

FINDINGS OF FACT

1. The Respondent is a fourth-class municipality with a population of approximately 15,481 residents. The Respondent owns and operates a wastewater treatment facility (WWTF) that consists of screening, an influent lift station, two oxidation ditches, three final clarifiers, UV

disinfection, an effluent lift station, aerobic digester, sludge processing tank, sludge holding tank, and two sludge storage tanks. The WWTF is located at 2230 Lee Avenue, Jackson, in Cape Girardeau County. The WWTF has a design population equivalent of 17,900, a design flow of 2.4 million gallons per day and an actual flow of 1.73 million gallons per day. Treated effluent discharges through Outfall No. 001 of the WWTF to Goose Creek, subject to the conditions and requirements of Missouri State Operating Permit No. MO-0022853 (Permit).

2. Goose Creek and its tributaries are waters of the State as the term is defined by Section 644.016(31), RSMo.

3. Untreated domestic wastewater is a water contaminant as the term is defined by Section 644.016(28), RSMo.

4. Substances or conditions in sufficient amounts to result in toxicity to human, animal, or aquatic life violate general criteria for water quality standards as defined by 10 CSR 20-7.031(4)(D).

5. On April 8, 2024, the Department staff responded to an environmental concern reporting dead fish near 557 North Donna Drive in Jackson, Missouri. During the investigation, Department staff observed a Sanitary Sewer Overflow (SSO) occurring from a manhole. The SSO traveled into the creek, a Tributary to Goose Creek, upstream of where the dead fish were observed. Samples taken by Department staff indicate that the SSO reduced the dissolved oxygen level in the stream to 0.9 mg/L. Based on the violations documented during the April 8, 2024, investigation, the Department issued Referral Notice of Violation No. SE240018 to the Respondent on April 24, 2024.

6. The MCWL and Section 644.096, RSMo, authorize the state, or any political subdivision or agency, to recover actual damages, including all costs and expenses necessary to

establish or collect any sums under Sections 644.006 to 644.141, RSMo, and the costs and expenses of restoring any waters of the State to their condition as they existed before the violation, sustained by it because of any violation.

STATEMENT OF VIOLATIONS

The Respondent has violated the MCWL, and its implementing regulations as follows:

7. Discharged water contaminants into waters of the State, which reduced the quality of such waters below the Water Quality Standards established by the Missouri Clean Water Commission, in violation of Sections 644.051.1(2) and 644.076.1, RSMo, and 10 CSR 20-7.031; and

8. Caused pollution of waters of the State or placed or caused or permitted to be placed a water contaminant, domestic wastewater, in a location where it was reasonably certain to cause pollution of waters of the State, in violation of Sections 644.051.1(1) and 644.076.1, RSMo.

AGREEMENT

9. The Department and the Respondent desire to amicably resolve all claims that may be brought against the Respondent for violations alleged above in Statement of Violations.

10. The provisions of this AOC shall apply to and be binding upon the parties executing this AOC, their successors, assigns, agents, subsidiaries, affiliates, and lessees, including the officers, agents, servants, corporations, and any persons acting under, through, or for the parties. Any changes in ownership or corporate status, including but not limited to any transfer of assets or real or personal property, shall not affect the responsibilities of the Respondent under this AOC.

11. Sections 644.076.1 and 644.079, RSMo, authorize the imposition of penalties for violations of the MCWL and establish monetary penalties of up to \$10,000 per day per violation. The penalty contained in this AOC was calculated using the Penalty Assessment Protocol described in 10 CSR 20-3.010.

12. The Respondent, in compromise and satisfaction of the Department's claims relating to the above-referenced violations, is ordered and agrees, without admitting liability or fault, to pay an administrative penalty in the amount of \$6,833.50. The penalty is reduced to \$5,466.80 (80 percent of the assessed penalty) if payment is received within 30 days of the date the proposed Order is sent to the Respondent and based on the Respondent's full participation in the conference, conciliation, and persuasion process. The payment shall be in the form of a check made payable to "Cape Girardeau County Treasurer, as custodian of the Cape Girardeau County School Fund." The check in the amount of \$5,466.80 is due and payable upon execution of this AOC by the Respondent if this AOC is signed within 30 days of the date the proposed Order is sent to the Respondent, or \$6,833.50 if it is not. The check and signed copy of the AOC shall be delivered to:

Accounting Program
Department of Natural Resources
P.O. Box 477
Jefferson City, MO 65102-0477

13. The Respondent is ordered and agrees to pay the State's investigative costs, expenses, and damages in the amount of \$407.02. This amount shall be due upon the Respondent's signature and submittal of this AOC. The check shall be made payable to "State of Missouri" and shall be delivered along with a signed copy of the AOC to:

Accounting Program
Department of Natural Resources
P.O. Box 477
Jefferson City, MO 65102-0477

14. The Respondent is ordered and agrees to comply with the MCWL, Chapter 644, RSMo, and its implementing regulations at all times in the future.

15. This AOC shall terminate upon payment of the administrative penalty and the State's investigative costs, expenses, and damages.

SUBMISSIONS

16. All other documentation submitted to the Department for compliance with this AOC shall be submitted within the timeframes specified to cwenf@dnr.mo.gov or:

Madisyn Branch
Department of Natural Resources
Water Protection Program
Compliance and Enforcement Section
P.O. Box 176
Jefferson City, MO 65102-0176

OTHER PROVISIONS

17. Immediately upon becoming aware that a deadline or milestone as set forth in this AOC will not be completed by the required deadline, the Respondent shall notify the Department by telephone or electronic mail: i) identifying the deadline that will not be completed; ii) identifying the reason for failing to meet the deadline; and iii) proposing an extension to the deadline. Within five days of notifying the Department, the Respondent shall submit to the Department, for review and approval, a written request containing the same basic provisions of i, ii, and iii listed above. The Department may grant an extension if it deems appropriate. Failure to submit a written notice to the Department may constitute a waiver of the Respondent's right to request an extension and may be grounds for the Department to deny the Respondent an extension.

18. Should the Respondent fail to meet the terms of this AOC, including the deadlines set out in Paragraphs 9 through 15, the Respondent shall be subject to pay stipulated penalties in the following amount:

<u>Days of Violation</u>	<u>Amount of Penalty</u>
1 to 30 days	\$100 per day
31 to 90 days	\$250 per day
91 days and above	\$500 per day

Stipulated penalties will be paid in the form of a check made payable to "Cape Girardeau County Treasurer, as custodian of the Cape Girardeau County School Fund." Any such stipulated penalty shall be paid within ten days of demand by the Department and shall be delivered to:

Accounting Program
Department of Natural Resources
P.O. Box 477
Jefferson City, MO 65102-0477

19. Compliance with this AOC resolves only the specific violations described herein, and this AOC shall not be construed as a waiver or modification for any other requirements of the MCWL and regulations, or any other source of law. Nor does this AOC resolve any future violations of this AOC or any law or regulation. Consistent with 10 CSR 20-3.010(5), this AOC shall not be construed as satisfying any claim by the state or federal government for natural resource damages.

20. Nothing in this AOC forgives the Respondent from future non-compliance with the laws of the State of Missouri, nor requires the Department or State of Missouri to forego pursuing by any legal means for any non-compliance with the laws of the State of Missouri. The terms stated herein constitute the entire and exclusive agreement of the parties. There are no other obligations of the parties, be they express or implied, oral, or written, except those expressly set forth herein. The terms of this AOC supersede all previous memoranda of

understanding, notes, conversations, and agreements, express or implied. This AOC may not be modified orally.

21. By signing this AOC, all signatories assert that they have read and understood the terms of this AOC, and that they have the authority to sign this AOC on behalf of their respective party.

22. The effective date of the AOC shall be the date the Department signs the AOC. The Department shall send a fully executed copy of this AOC to the Respondent for their records.

COST ANALYSIS FOR COMPLIANCE


23. Pursuant to Section 644.145, the Cost Analysis for Compliance (CAFCOM) addresses the obligations included within this AOC and is attached hereto as Exhibit 1. This CAFCOM does not address future improvements that may be necessary to comply with the MCWL or its implementing regulations. This AOC requires the Respondent to pay an administrative penalty and the State's investigative costs, expenses, and damages.

NOTICE OF APPEAL RIGHTS

24. By signing this AOC, the Respondent consents to its terms and waives any right to appeal, seek judicial review, or otherwise challenge the terms and conditions of this AOC, including the CAFCOM referenced herein, pursuant to Sections 621.250, 640.010, 640.013, 644.056.3, 644.079.2, Chapter 536 RSMo, 644.145, RSMo, 10 CSR 20-1.020, 10 CSR 20-3.010, 10 CSR 20-6.020(5), the Missouri Constitution, or any other source of law.

SIGNATORY AUTHORITY

Agreed to on this 4th day of March, 2025



The Honorable Dwain Hahs, Mayor



Agreed to and ordered on this _____ day of _____, 2025

DEPARTMENT OF NATURAL RESOURCES

John Hoke, Director

Water Protection Program

c: Brad Ledbetter, Director, Southeast Regional Office
Operating Permits Section
General Counsel's Office
Accounting Program
Fiscal Management Section

**Missouri Department of Natural Resources
Water Protection Program
Cost Analysis for Compliance
(In accordance with RSMo 644.145)**

**Jackson Wastewater Treatment Plant
City of Jackson
Missouri State Operating Permit No. MO-0022853**

Section 644.145, Revised Statutes of Missouri (RSMo), requires the Missouri Department of Natural Resources to make a “finding of affordability” when “issuing permits under” or “enforcing provisions of” state or federal clean water laws “pertaining to any portion of a combined or separate sanitary sewer system for publicly owned treatment works.” This cost analysis does not dictate how the city will comply with the Abatement Order on Consent (AOC). This analysis addresses potential costs for the city to comply with Missouri State Operating Permit (Permit) conditions and the Missouri Clean Water Law and to resolve past non-compliance through an AOC.

Requirements Now Being Enforced in the AOC:

The AOC requires the city to pay an administrative penalty. Sanitary sewer overflows (SSOs) are defined as untreated sewage releases and are considered bypassing. Bypasses are prohibited by the permit. A SSO and release occurred from the city’s sanitary sewer collection system.

Flow and Connections

The size of the facility evaluated was chosen based on the permitted actual flow. If significant population growth is expected in the community, or if a significant portion of the flow is due to inflow and infiltration, then the flows and resulting estimated costs may differ. The number of connections was reported by the city on the Financial Questionnaire.

Flow Evaluated: 1,730,000 gallons per day	
Connection Type	Number
Residential	6,361
Commercial	622
Industrial	7
Total	6,990

Data Collection for this Analysis

This cost analysis is based on data available to the department as provided by the city and data obtained from readily available sources. For the most accurate analysis, it is essential that the city provides the department with current information about the city’s financial and socioeconomic situation. The financial questionnaire available to permittees on the department’s website (<https://dnr.mo.gov/document-search/financial-questionnaire-mo-780-2511>) is a required attachment to the permit renewal application. If the financial questionnaire is not submitted with the renewal application, the department sends a request to complete the form with the welcome correspondence. If certain data were not provided by the city to the department and the data are not obtainable through readily available sources, this analysis will state that the information is “unknown”.

Eight Criteria of 644.145 RSMo

The department must consider the eight criteria presented in subsection 644.145 RSMo to evaluate the cost associated with compliance with the AOC.

(1) A community’s financial capability and ability to raise or secure necessary funding;

Table 1. Current Financial Information for the City of Jackson	
Current Monthly User Rates per 5,000 gallons*	\$35.59
Municipal Bond Rating (if applicable)	Unknown
Bonding Capacity**	\$58,460,295
Median Household Income (MHI) ¹	\$75,484

Current Annual Operating Costs (excludes depreciation)	\$1,183,766
Current Outstanding Debt for the Facility	\$580,000
Amount within the Current User Rate Used toward Payments on Outstanding Debt Related to the Current Wastewater Infrastructure	\$9.58

* User Rates were reported by the city on the Financial Questionnaire.

** General Obligation Bond capacity allowed by constitution: Cities: up to 20% of taxable tangible property;

(2) Affordability of pollution control options for the individuals or households at or below the median household income level of the community;

The cost estimates located within this document are for payment of the administrative penalty proposed in the AOC.

Cost Estimate Assumptions:

- This assessment assumes the full administrative penalty proposed in the AOC will be paid upfront upon execution of the AOC by the city of Jackson.

(2A) Administrative Penalty Cost Estimates:

The department anticipates that the payment of an administrative penalty will not impact the monthly user rate for sewer services because it is a short-term expense.

Table 2A. Estimated Costs for Administrative Penalty and Cost Recovery		
(1)	Current Monthly User Cost	\$35.59
(2)	Current Monthly User Cost as a Percent of MHI ²	0.57%

(3) An evaluation of the overall costs and environmental benefits of the control technologies;

The requirements of AOC do not affect the treatment facility's control technology or its implementation.

(4) Inclusion of ongoing costs of operating and maintaining the existing wastewater collection and treatment system, including payments on outstanding debts for wastewater collection and treatment systems when calculating projected rates:

The city reported their outstanding debt for their current wastewater collection and treatment systems to be \$580,000. The city reported that each user pays \$35.59 each month, of which, \$9.58 is used toward payments on the current outstanding debt. As discussed in Criterion 2D, payment of an administrative penalty is not projected to have any impact on the monthly user rate.

(5) An inclusion of ways to reduce economic impacts on distressed populations in the community, including but not limited to low and fixed income populations. This requirement includes but is not limited to:

- Allowing adequate time in implementation schedules to mitigate potential adverse impacts on distressed populations resulting from the costs of the improvements and taking into consideration local community economic considerations.
 - The local community's socioeconomic conditions and potential adverse impacts on distressed populations resulting from the cost of the improvements were considered when establishing the AOC's Schedule of Compliance (SOC).
 - The AOC allows the city to request an extension of milestones in the AOC's SOC. Should the city become aware of a milestone date that they will not be able to meet, the city can propose changes to the milestone due date, based on the city's cost estimate or financial information.
 - If the city can demonstrate that the proposed pollution controls result in substantial and widespread economic and social impact, they may use Factor 6 of the Use Attainability Analysis 40 CFR 131.10(g)(6) in the form of a variance. This process is completed by determining the treatment type with the highest attainable effluent quality that would not result in a socio-economic hardship. For more information on variance requests, please visit the department's water quality standards webpage at <https://dnr.mo.gov/water/what-were-doing/water-planning/quality-standards-impaired-waters-total-maximum-daily-loads/standards/variance>.
- Allowing for reasonable accommodations for regulated entities when inflexible standards and penalties would impose a disproportionate financial hardship in light of the environmental benefits to be gained.
 - An opportunity may exist for the relocation of the point of discharge to a receiving stream capable of a greater mixing zone.

- The city may apply for State Revolving Fund (SRF) financial support in order to help fund a capital improvements plan. Other loans and grants also exist for which the facility may be eligible. More information can be found on the department's Financial Assistance Center website at <https://dnr.mo.gov/water/business-industry-other-entities/financial-opportunities/financial-assistance-center/wastewater>.

Table 5. Socioeconomic Data ^{1,3-7} for the City of Jackson

The following table characterizes the current overall socioeconomic condition of the community as compared to the overall socioeconomic condition of Missouri. The following information was compiled using the latest U.S. Census data.

No.	Administrative Unit	Jackson City	Missouri State	United States
1	Population (2022)	15,394	6,154,422	331,097,593
2	Percent Change in Population (2000-2022)	28.9%	10.0%	17.7%
3	2022 Median Household Income (in 2023 Dollars)	\$75,484	\$68,634	\$78,242
4	Percent Change in Median Household Income (2000-2022)	2.1%	-1.1%	1.9%
5	Median Age (2022)	35.0	38.8	38.8
6	Change in Median Age in Years (2000-2022)	-0.7	2.7	3.5
7	Unemployment Rate (2022)	3.8%	4.3%	5.3%
8	Percent of Population Below Poverty Level (2022)	8.4%	12.8%	12.5%
9	Percent of Household Received Food Stamps (2022)	8.3%	10.0%	11.5%
10	(Primary) County Where the Community Is Located	Cape Girardeau County		

(6) An assessment of other investments and operating costs relating to environmental improvements and public health protection;

The city is in the process of obtaining a SRF loan to implement upgrades at the wastewater treatment plant. The city also has upgrades to the water plant in construction, as well as a water main upgrade planned for the future.

(7) An assessment of factors set forth in the United States Environmental Protection Agency's guidance, including but not limited to the "Combined Sewer Overflow Guidance for Financial Capability Assessment and Schedule Development" that may ease the cost burdens of implementing wet weather control plans, including but not limited to small system considerations, the attainability of water quality standards, and the development of wet weather standards;

(7A) The following table characterizes the community's overall financial capability to raise the necessary funds to meet the AOC requirements.

Table 7A. Financial Capability Indicator

Indicators	Strong (3 points)	Mid-Range (2 points)	Weak (1 point)	Score
Bond Rating Indicator	Above BBB or Baa	BBB or Baa	Below BBB or Baa	Unknown
Overall Net Debt as a % of Full Market Property Value	Below 2%	2% - 5%	Above 5%	3
Unemployment Rate (2022)	Beyond 1% below Missouri average of 4.3%	± 1% of Missouri average of 4.3%	Beyond 1% above Missouri average of 4.3%	2
2022 Median Household Income (in 2023 Dollars)	Beyond 25% above Missouri MHI (\$68,634)	± 25% of Missouri MHI (\$68,634)	Beyond 25% below Missouri MHI (\$68,634)	2
Percent of Population Below Poverty Level (2022)	Beyond 10% below Missouri average of 12.8%	± 10% of Missouri average of 12.8%	Beyond 10% above Missouri average of 12.8%	2
Percent of Household Received Food Stamps (2022)	Beyond 5% below Missouri average of 10.0%	± 5% of Missouri average of 10.0%	Beyond 5% above Missouri average of 10.0%	2

Property Tax Revenues as a % of Full Market Property Value	Below 2%	2% - 4%	Above 4%	3
Property Tax Collection Rate	Above 98%	94% - 98%	Below 94%	3
Total Average Score (Financial Capability Indicator)	--	--	--	2.4

(7B) The **Financial Capability Indicator** and the **Residential Indicator** are considered jointly in the Financial Capability Matrix to determine the financial burden that could occur from compliance with the requirements of the AOC.

- Financial Capability Indicator (from Table 7A): 2.4
- Administrative Penalty and Cost Recovery Residential Indicator (from Table 2A): 0.57%

Table 7B. Financial Capability Matrix:

Financial Capability Indicator	Residential Indicator (User Rate as a % of MHI)		
	Low (Below 1%)	Mid-Range (1.0% to 2.0%)	High (Above 2.0%)
Weak (Below 1.5)	Medium Burden	High Burden	High Burden
Mid-Range (1.5 – 2.5)	Low Burden	Medium Burden	High Burden
Strong (Above 2.5)	Low Burden	Medium Burden	High Burden

- Resulting Financial Burden for Administrative Penalty and Cost Recovery: Low Burden

(8) An assessment of any other relevant local economic condition.

The city did not report any other relevant local economic conditions.

Conclusion and Finding

A SSO from the city's sanitary sewer system resulted in a discharge to waters of the State and caused pollution, requiring the department to negotiate this AOC with the city to resolve the violations. The department considered the eight criteria presented in subsection 644.145 when evaluating the cost associated with the corrective actions needed to meet AOC requirements.

The department estimates the payment of administrative penalty and cost recovery will not impact the monthly user costs. The current user rate is 0.57 percent of the MHI, which the department considers affordable.

Because each community is unique, the department wants to make sure that each community has the opportunity to consider all options and tailor solutions to best meet their needs. The department understands the economic challenges associated with achieving compliance and is committed to using all available tools to make an accurate and practical finding of affordability for Missouri communities. If the community is interested in the funding options available to them, please contact the Financial Assistance Center for more information. <https://dnr.mo.gov/env/wpp/srf/index.html>

This determination is based on readily available data and may overestimate the financial impact on the community.

References

- (A) 2022 MHI in 2022 Dollar: U.S. Census Bureau. (2022). Income in the Past 12 Months (in 2022 Inflation-Adjusted Dollars). *American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1901*. From <https://data.census.gov/table/ACSST5Y2022.S1901?g=160XX00US2952328>
- (B) 2000 MHI in 1999 Dollar: (1) For United States, United States Census Bureau (2003) 2000 Census of Population and Housing, Summary Social, Economic, and Housing Characteristics, PHC-2-1 Part 1. United States Summary, Table 5. Work Status and Income in 1999: 2000, Washington, DC. <https://www.census.gov/content/dam/Census/library/publications/2003/dec/phc-2-1-pt1.pdf>
- (2) For Missouri State, United States Census Bureau (2003) 2000 Census of Population and Housing, Summary Social, Economic, and Housing Characteristics, PHC-2-27, Missouri, Table 10. Work Status and Income in 1999: 2000, Washington, DC. <https://www2.census.gov/library/publications/2003/dec/phc-2-27-pt1.pdf>
- (C) 2023 CPI, 2022 CPI and 1999 CPI: U.S. Department of Labor Bureau of Labor Statistics (2022) Consumer Price Index - All Urban Consumers, U.S. City Average. All Items. 1982-84=100. <https://www.bls.gov/data/>.

- (D) 2022 MHI in 2023 Dollar = 2022 MHI in 2022 Dollar x 2023 CPI / 2022 CPI; 2000 MHI in 2023 Dollar = 2000 MHI in 1999 Dollar x 2023 CPI / 1999 CPI.
- (E) Percent Change in Median Household Income (2000-2023) = (2022 MHI in 2023 Dollar - 2000 MHI in 2023 Dollar) / (2000 MHI in 2023 Dollar).
2. $(\$35.59/(\$75,484/12))100\% = 0.57\%$ (Penalty)
 3. (A) U.S. Census Bureau. (2022). Total Population. *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B01003*. From <https://data.census.gov/table/ACSST5Y2022.B01003?q=B01003&g=0400000US29160000&tid=ACSST5Y2019.B01003>.
(B) Total Population in 2000: (1) For United States, United States Census Bureau (2002) 2000 Census of Population and Housing, Summary Social, Economic, and Housing Characteristics, PHC-1-1 Part 1. United States Summary, Table 9. Age and Sex: 2000, Washington, DC. <https://www.census.gov/content/dam/Census/library/publications/2002/dec/phc-1-1-pt1.pdf>.
(2) For Missouri State, United States Census Bureau (2002) 2000 Census of Population and Housing, Summary Population and Housing Characteristics, PHC-1-27, Missouri, Table 1. Age and Sex: 2000, Washington, DC. <https://www2.census.gov/library/publications/2002/dec/phc-1-27.pdf>.
(C) Percent Change in Population (2000-2022) = (Total Population in 2022 - Total Population in 2000) / (Total Population in 2000).
 4. (A) Median Age in 2022: U.S. Census Bureau. (2022). Median Age by Sex. *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B01002*. From <https://data.census.gov/table/ACSST5Y2022.B01002?q=B01002&g=0400000US29.160000&tid=ACSST5Y2019.B01002>.
(B) Median Age in 2000: (1) For United States, United States Census Bureau (2002) 2000 Census of Population and Housing, Summary Social, Economic, and Housing Characteristics, PHC-1-1 Part 1. United States Summary, Table 9. Age and Sex: 2000, Washington, DC., Page 2. <https://www.census.gov/content/dam/Census/library/publications/2002/dec/phc-1-1-pt1.pdf>.
(2) For Missouri State, United States Census Bureau (2002) 2000 Census of Population and Housing, Summary Population and Housing Characteristics, PHC-1-27, Missouri, Table 1. Age and Sex: 2000, Washington, DC. <https://www2.census.gov/library/publications/2002/dec/phc-1-27.pdf>.
(C) Change in Median Age in Years (2000-2022) = (Median Age in 2022 - Median Age in 2000).
 5. U.S. Census Bureau. (2022). Employment Status for the Population 16 Years and Over. *American Community Survey, ACS 5-Year Estimates Detailed Tables, Table B23025*. From <https://data.census.gov/table/ACSST5Y2022.B23025?q=B23025&g=0400000US29.160000&hidePreview=false&tid=ACSST5Y2019.B23025>.
 6. U.S. Census Bureau. (2022). Poverty Status in the Past 12 Months. *American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1701*. From <https://data.census.gov/table/ACSST5Y2022.S1701?q=S1701&g=0400000US29.160000&hidePreview=false&tid=ACSST5Y2019.S1701>.
 7. U.S. Census Bureau. (2022). Food Stamps/Supplemental Nutrition Assistance Program (SNAP). *American Community Survey, ACS 5-Year Estimates Subject Tables, Table S2201*. From https://data.census.gov/table/ACSST5Y2022.S2201?q=Receipt%20of%20Food%20Stamps&g=0400000US29.050000_29.160000&hidePreview=true&tid=ACSST5Y2019.S2201