



Air Quality in Overburdened Communities Grant Program

**An Environmental Justice Assessment (per RCW
70A.02.060)**

By

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For the

Air Quality Program

Washington State Department of Ecology
Olympia, Washington

August 2024, Publication 24-02-033

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¹ www.ecology.wa.gov/contact

Language Access

Under the state Environmental Justice law (RCW 70A.02), Ecology is required to conduct Environmental Justice Assessments during development of certain significant actions. This Assessment provides information about the potential impacts to overburdened communities and vulnerable populations, and strategies to mitigate identified harms and fairly distribute known benefits. For translation, interpretation, or accessibility assistance, please contact Courtney Cecale at courtney.cecale@ecy.wa.gov or (360) 480-6270.

Bajo la ley estatal de Justicia Medioambiental (RCW 70A.02), Ecología está obligada a realizar Evaluaciones de Justicia Medioambiental durante el desarrollo de ciertas medidas importantes. Esta evaluación proporciona información sobre los posibles impactos en las comunidades sobrecargadas y las poblaciones vulnerables, y las estrategias para mitigar los daños identificados y distribuir justamente los beneficios conocidos. Para asistencia de traducción, interpretación o accesibilidad, por favor póngase en contacto con Courtney Cecale escribiendo a courtney.cecale@ecy.wa.gov o llamando al (360) 480-6270.

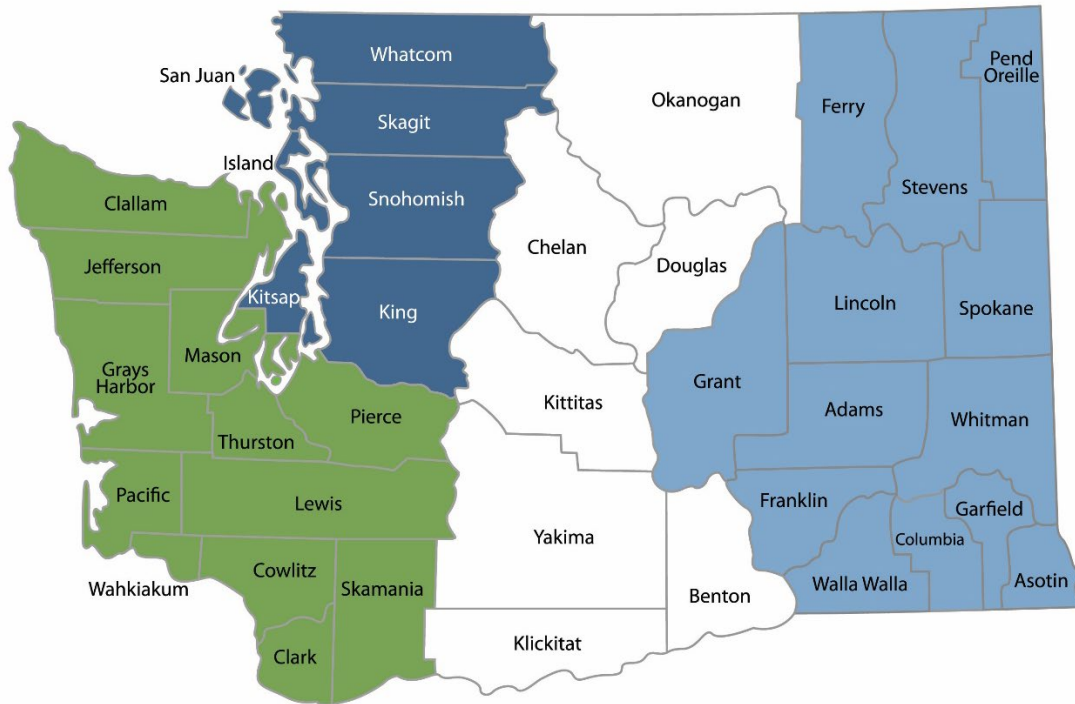
根据华盛顿州环境正义法([RCW 70A.02](#))，生态管理署在制定某些重大行动时必须进行环境正义评估。该评估需提供对负担过重社区和弱势群体潜在影响的信息，以及减轻已明确的危害和公平分配已知利益的策略。如需笔译、口译或无障碍协助，请联系 Courtney Cecale，电子邮件：courtney.cecale@ecy.wa.gov或电话 (360) 480-6270。

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Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
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Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	P.O. Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	P.O. Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 West Alder Street Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 North Monroe Spokane, WA 99205	509-329-3400
Headquarters	Statewide	P.O. Box 46700 Olympia, WA 98504	360-407-6000

Air Quality in Overburdened Communities Grant Program

An Environmental Justice Assessment (per RCW 70A.02.060)²

Air Quality Program
Washington State Department of Ecology
Olympia, WA

August 2024 | Publication 24-02-033



² <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.02&full=true#70A.02.010>

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Executive Summary

Ecology is developing a new grant program to incentivize and support the reduction of non-regulated sources of criteria air pollutant emissions in communities overburdened and highly impacted by air pollution, including Tribes participating in Ecology's Initiative to Improve Air Quality in Overburdened Communities Highly Impacted by Air Pollution. \$10M will be available to organizations serving these communities to identify, develop, and implement local projects to reduce criteria air pollution in communities that are historically overburdened with health, social, and environmental inequities. Community engagement is a critical part of the identification and development of these projects and will be required for all grants. Locally led projects will empower people to create change in their communities. Reducing criteria air pollution will improve the health of people living in these communities and will help to reduce environmental and health disparities across the state.

As Ecology developed the new Air Quality in Overburdened Communities Grant Program, we sought input on various aspects of the program to ensure our work was aligned with accessibility and equity requirements, and the goals of the program. We hosted virtual listening sessions with Tribes, representatives from community-based organizations, and the public in May and June 2024, alongside an online written comment period. We met with organizations with expertise in environmental justice, public health, and air quality to receive focused input. We sought and received input on eligible expenses, scoring and evaluation, technical support, impacts to the community, mitigating and/or eliminating potential harm, and equitable distributing the benefits.

A potential harm from this grant program may be that one-time funding may begin work in overburdened communities, but not create meaningful impact within them, as well as potentially create feelings of distrust about continuous funding for this program within these communities. To mitigate this, Ecology will:

- Clearly communicate with applicants that at this time this is one time funding so applicants can plan accordingly
- Allow for grants funds to be combined with other funding sources to leverage the dollars and create seamless integration into existing programs, while still ensuring the scope of work and distinct use of grant funds is clear.
- Consider seeking future funding for this grant program to mitigate the potential harms cause by one-time funding.

In addition to the potential harm, we have identified through engagement the following anticipated barriers to participating in the grant program and equitably distributing the benefits and how Ecology plans to eliminate, mitigate, or reduce them.

- Short period of performance: We expect to extend the project period for up to two years, dependent upon Ecology receiving approval to extend the time to spend the funds.

- Limited community engagement: In an effort to make grant funds available to communities quicker, our community engagement was limited to about six weeks. In future grant cycles, we will expand our community engagement opportunities for development of grant guidelines, extend their duration, and work to make them more accessible. This round of grant projects will require community engagement in the design of the projects to ensure they reflect the priorities, values, and needs of each community.
- Reimbursement payments only: Due to current state agency processes that ensure efficient and effective use of public funds, we are not able to offer prepayment options for grantees in this grant cycle. We understand the burden this may place on some applicants and strive to make the reimbursement request process as quick and easy as possible.
- Administrative burden: We have reduced the number of application forms and questions and will provide clear instructions, templates, and technical assistance through listening sessions, office hours, and individual assistance.

Ecology welcomes feedback on our processes and will incorporate where possible. This funding cycle will open August 29th and close October 24th of 2024. Ecology intends to offer awards by December 2024.

Environmental Justice Assessment

Purpose of the Environmental Justice Assessment

The Environmental Justice (EJ) Assessment process helps assess the environmental justice impacts of Significant Agency Actions (SAAs). The assessment informs and supports consideration of overburdened communities and vulnerable populations when making decisions. This information assists with the equitable distribution of environmental benefits, the reduction of environmental harms, and the identification and reduction of health disparities.

The EJ assessment process aligns with Washington’s Environmental Justice law called the Healthy Environment for All (HEAL) Act ([RCW 70A.02³](#)), as well as federal commitments in the [Performance Partnership Agreement⁴](#) with the EPA. The assessment process draws on best practices established in [Technical Guidance for Assessing Environmental Justice in Regulatory Analysis⁵](#) and [Promising Practices for EJ Methodologies in NEPA Reviews⁶](#).

Environmental justice assessments are to be completed for the following actions:

- The development and adoption of significant legislative rules as defined in RCW.05.328⁷
- The development and adoption of any new grant or loan program that a covered agency is explicitly authorized or required by statute to carry out
- A capital project, grant, or loan award of at least \$12,000,000 or a transportation project, grant, or loan of at least \$15,000,000
- The submission of agency request legislation to the office of the governor or the office of financial management for approval
- (Covered actions are expected to expand in 2025)

This assessment is not required to be a comprehensive or an exhaustive examination of all potential impacts of a significant agency action and does not require novel quantitative or economic analysis of the proposed significant agency action.

The time and resource investment, and depth of assessment, will be influenced by the reasonable applicability of the questions to the agency action.

Ecology plans to update this document and incorporate what we learn through practice, community engagement, Tribal consultation, and any guidance we may receive from the Environmental Justice Council.

This Environmental Justice Assessment is adapted for publication and does not include internal agency process instructions.

³ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.02&full=true>

⁴ <https://ecology.wa.gov/About-us/Accountability-transparency/Government-coordination/Partnering-with-the-EPA>

⁵ <https://www.epa.gov/environmentaljustice/technical-guidance-assessing-environmental-justice-regulatory-analysis>

⁶ https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

⁷ <http://app.leg.wa.gov/RCW/default.aspx?cite=34.05.328>

Section 1: Background

The information in this section is provided for the Office of Financial Management's [dashboard](#)⁸ which includes all covered agency's Environmental Justice Assessment notices.

1. Descriptive title of project/action:

Improving Air Quality in Overburdened Communities Grant Program

2. Date EJ Assessment initiated:

June 5, 2024

3. Ecology Program/Office:

Air Quality Program / Lacey Headquarters Office

4. Point of contact for EJ Assessment:

Kaitlyn Kelly (Kaitlyn.Kelly@ecy.wa.gov)

5. Significant Agency Action type, select one or more:

- Rulemaking
- New grant or loan program
- New capital project, grant, or loan of \$12 million or more
- Request legislation
- Other, explain:

6. Write a short summary of the action.

Section 3 of the Climate Commitment Act, RCW 70A.65.020, requires Ecology to take actions to reduce criteria air pollutant emissions in identified overburdened communities highly impacted by air pollution. To help meet these reduction requirements, Ecology is developing and implementing a new grant program to incentivize and support the reduction of non-regulated sources of criteria air pollutant emissions in communities overburdened and highly impacted by air pollution. Ecology will lead an inclusive outreach effort to engage with local municipalities and community-based organizations in these communities, as well as Tribes, to seek input on the design of the grant program. \$10M will be available to organizations serving these

⁸ <https://ofm.wa.gov/budget/budget-related-information/agency-activities/environmental-justice-assessment-notices>

communities, and Tribes, to conduct community engagement, plan, and implement projects to reduce criteria air pollution. Reducing criteria air pollution will improve air quality and protect public health in overburdened communities and will help to reduce environmental and health disparities. This grant program is supported with funding from Washington’s Climate Commitment Act (CCA).

7. Identify the method(s) for the public to comment on this proposed action for this assessment.

We will use a variety of methods to engage with people from overburdened communities and vulnerable populations to inform this work, including inviting formal consultation with Tribes and a virtual listening session for Tribal members and staff; virtual listening sessions for organizations serving overburdened communities, including community groups and local municipalities; an online public comment period; as possible, direct outreach and education, including tabling at community events and attending existing community meetings; web content; and GovDelivery distribution list. Outreach and engagement efforts will occur in May and June 2024 and focus on the communities Ecology identified as overburdened and highly impacted by air pollution and Tribes.

8. Create/provide an Ecology webpage with information about this proposed action.
Provide link here:

ecology.wa.gov/AQCommunityGrants

Section 2: Notification that an Environmental Justice Assessment has been Initiated

This section instructs Ecology staff to notify OFM about the initiation of the action.

Section 3: Identify Affected Tribes

This section summarizes preliminary planning for Tribal Consultation. Ecology must offer consultation with Tribes on significant agency actions that affect federally recognized Tribes’ rights and interest in their tribal lands.

Preparing for Tribal Consultation

1. Is the proposed action likely to have any local or regional impacts to federally reserved Tribal rights and resources, including but not limited to, those protected by treaty, executive order, or federal law? Choose one of the following:

- Yes
- No
- Unsure

2. List any federally recognized Tribes that are expected to be affected by the proposed action. If it is determined during consultation that Tribes do not wish to be included, then do not include them.

All Tribes with land, territories, and usual and accustomed land in Washington are potentially affected by the proposed action. Tribes participating in Ecology’s initiative to Improve Air Quality in Overburdened Communities are eligible to apply to this grant program. Ecology will not finalize any Tribal reservation land, managed under jurisdiction of a federally recognized Tribal government, as overburdened communities highly impacted by air pollution without express interest and permission reached through Tribal decision-making processes. To begin the process of participation in the initiative, Tribes must contact Abby Ruskey, Air Quality Program Environmental Justice Planner. A Memorandum of Understanding (MOU) will be required to participate in the initiative. Ecology analyzed air quality data and Washington State Tribal Lands and identified seven Tribes with elevated levels of criteria air pollution, which this grant program is designed to address. The seven Tribes are the Confederated Tribes of the Colville Reservation, Confederated Tribes and Bands of the Yakama Nation, Muckleshoot Indian Tribe, Nooksack Indian Tribe, Puyallup Tribe, Stillaguamish Tribe of Indians, Tulalip Tribes. Ecology is currently in government-to-government consultation with potentially interested Tribes.

3. Describe plans to offer consultation to identified Tribes.

On March 27th, 2024, Ecology sent a letter to the seven Tribes identified as potentially having lands and communities that may be highly impacted by criteria air pollution. This letter invited government-to-government consultation to provide pathways for Tribes to participate in Ecology’s initiative to Improve Air Quality in Overburdened Communities initiative. Participating in the initiative qualifies each Tribe to expanded air monitoring, input and access to air quality information, and eligibility to apply for funding to reduce criteria air pollution emissions through this grant program.

Additionally, on May 9th, 2024, Ecology sent a letter to all chairpersons and natural resources directors of federally recognized Tribes with land, territories, and usual and accustomed land in Washington. This letter extended an invitation for government-to-government consultation about two new Ecology Air Quality Program grant opportunities: the Improving Air Quality in Overburdened Communities Grant Program and the Landfill Methane Emissions Reduction Grant Program. Ecology requested input on the development of the grant programs and offered a joint Tribal-only listening session for both programs on Wednesday, May 29th from 2 – 4 p.m., as well an invitation to meet and consult on any issues of concern related to the grant programs.

Section 4: Offer Consultation:

This section directs Ecology staff to offer consultation with Tribes on significant agency actions that affect federally recognized Tribes' rights and interest in their tribal lands.

Section 5: Summary of Tribal Consultation & Engagement

Tribal consultation is intended to inform the answers to all questions in this section.

Summary of Tribal Consultation

1. Describe potential impacts (including harms and benefits) to federally recognized Tribal rights and interests in their tribal lands.
 - Do not share sensitive data or location information attributable to individual sites.
 - Do not share any information that Tribes have requested that you not share.

Our listening session with Tribes included attendees from Colville Reservation, Nez Perce Tribe, Shoalwater Bay Tribe, and Spokane Tribe. During our listening session we discussed the following:

- What is your community interested in working on to reduce air pollution?
- What expenses would you like to see included as eligible for this grant?
- What do you think about our proposed scoring categories?
- What can we do to help you be a successful applicant and recipient?
- What are the positive and/or negative impacts this grant program could have on your community?
- How can we mitigate or eliminate potential harms of this grant program and/or equitably distribute the benefits?

We did not receive input on the potential impacts to federally recognized Tribal rights and interest in their tribal lands as a result of the grant program. However, based on input received in broader listening sessions that included Tribal members and air quality expertise at Ecology, we believe potential positive impacts of the grant program include improvement to local air quality and protection of public health and funding for Tribal members to participate in the development of grant projects.

2. Describe potential impacts related to Tribal rights and interests that are not in Tribal lands?

Potential impacts related to Tribal rights and interests that are not in Tribal lands were not identified during the listening session with Tribes. However, based on input received in broader listening sessions that included Tribal members and air quality expertise at Ecology, reducing

sources of air pollution can improve air quality for Tribal members living in communities not in Tribal lands.

3. Summarize recommendations from Tribes to:
 - a. Mitigate or eliminate potential harms from the action

During our listening sessions with Tribes, we heard the following input for mitigating or eliminating potential harms:

- Provide technical assistance and help applicants through the grant application process
- Help new organizations get involved

- b. Equitably distribute benefits from the action

During our listening session with Tribes, we asked how we can equitably distribute the benefits of this grant program but did not receive any input on this topic. Separately, we met with environmental and public health organizations, including a Tribal government staff member, and we heard that dedicating a percentage of the funds for tribal use only (for example, 10% of the total funding) would help equitably distribute the benefits of this grant program.

4. Describe how consultation, engagement, and analyses of impacts to Tribes has informed the development of the action. If it has not, explain why.

Based on the input we received, we have incorporated the following elements into the grant program to address impacts to Tribes:

- Ecology grants staff will reach out directly to all Tribes participating in the initiative and offer technical assistance during the grant application period.
- We will offer an award to an eligible applicant in each of the identified overburdened communities and to each Tribe participating in the initiative. While there is currently not a percentage of the funds set aside for Tribal use only, this award selection process guarantees an award for each participating Tribe that proposes an eligible project.
- Ecology grants staff will provide technical assistance and grant management guidance to all grantees, including Tribes, during the grant period.

5. Describe any plans to continue consultation or engagement with Tribes related to this action.

As part of the overall initiative to Improve Air Quality in Overburdened Communities, Ecology is conducting a concerted outreach effort to engage with Tribes and Tribal organizations, this includes continued communication about the grant program. Ecology grants staff will continue to provide outreach to Tribes to communicate the grant requirements and timelines, and to

offer technical assistance and share other resources available during the grant application period.

Section 6: Identification of Overburdened Communities & Vulnerable Populations

This section identifies overburdened communities and vulnerable populations, as identified in the [definitions of RCW 70A.02](#), who will be affected by the action.

Identify Overburdened Communities and Vulnerable Populations

1. Identify the geographic area(s) anticipated to be affected by the action.

This action will provide funding for organizations to engage with people, develop, and implement projects to reduce criteria air pollutants in communities identified by Ecology as [overburdened and highly impacted by air pollution](#) (Figure 1). Organizations serving the identified communities are eligible to apply for this grant, and the impacts of the awards are likely to be greatest in identified communities. Ecology has identified and prioritized [16 areas in Washington that are overburdened and highly impacted by criteria air pollution](#) (Figure 1). These geographic areas are anticipated to be affected by this grant program by nature of being recipients of its benefits. Details on the identification of the communities is available in the [“Improving Air Quality in Overburdened Communities Highly Impacted by Air Pollution: 2023 Report.”](#) The communities include:

- Ellensburg
- Everett
- George and West Grant County
- South King County
- Mattawa
- Moxee Valley
- Northeast Puyallup
- North Seattle and Shoreline
- South Seattle
- Spokane and Spokane Valley
- South and East Tacoma
- Tri-Cities to Wallula
- Vancouver
- Wenatchee and East Wenatchee
- East Yakima
- Lower Yakima Valley

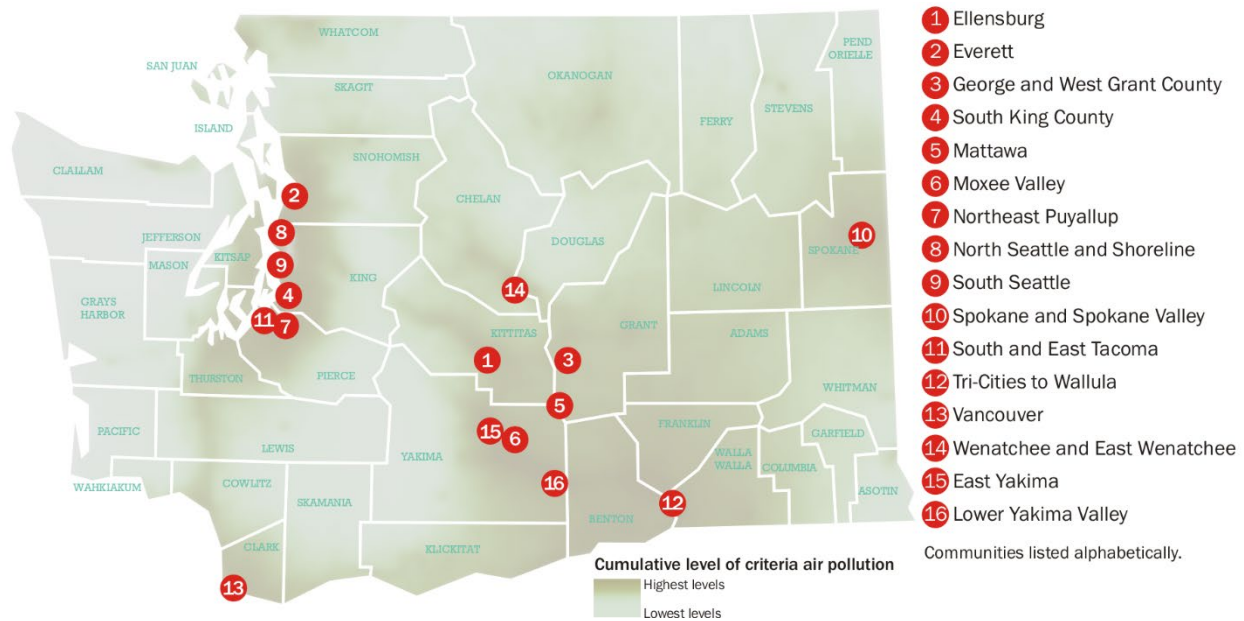


Figure 1: Communities overburdened and highly impacted by criteria air pollution.

2. When applicable, using the [Washington State Department of Health’s Environmental Health Disparities Map \(EHD Map\)](#), identify the EHD Map rankings for all census tracts likely to be impacted by the action.

Ecology used the EHD map and the Environmental Protection Agency’s EJScreen mapping tool in identifying the communities who are eligible for this grant program. The communities represent more than 1.2 million people across many census tracts in a mix of urban, suburban, and rural areas of the state. All areas ranked high on both the EHD map and EJScreen.

3. From the rankings identified in question 2, are there any census tracts ranked 9 and 10?

All 16 overburdened communities eligible for this grant program include census tracts ranking 9 or 10 on the Environmental Health Disparities map.

4. Please describe additional cumulative health considerations relevant to this action.

This grant program will help people from and organizations that serve communities overburdened by air pollution to identify and develop projects that reduce sources of criteria air pollutants and community exposure. Exposure to air pollution can contribute to a wide range of diseases and public health outcomes, including impacts to individuals respiratory and cardiovascular systems. Ecology’s 2023 baseline report, [Improving Air Quality in Overburdened Communities Highly Impacted by Air Pollution](#) provides evidence of criteria air pollutions greater impact on people who are most vulnerable in overburdened communities such as the elderly and children. The [report shows](#) that there is a higher mortality rate associated with PM2.5 and a higher risk of respiratory and heart disease, especially for people of color.

5. When applicable, using the [EPA’s Environmental Justice Screening and Mapping Tool \(EJScreen\)](#), identify areas likely to be impacted by the action that are at or above the 80th percentile⁹ (in state) for the “People of color” and “Low income” socioeconomic indicators.

This grant program will provide funding to communities that have been identified as overburdened and highly impacted by air pollution using several tools and data sources, including EJScreen’s Demographic Index. The threshold for identification of communities overburdened and highly impacted by air pollution was >90th percentile.

6. Identify other EJScreen “Socioeconomic” and “Health Disparities” indicators at or above 80th percentile (in state) that are most relevant to this action.

This grant program will provide funding to communities that have been identified as overburdened and highly impacted by air pollution using several tools and data sources, including EPA’s EJScreen. Ecology’s 2023 baseline report, [Improving Air Quality in Overburdened Communities Highly Impacted by Air Pollution](#) provides more detail on socioeconomic and health disparities indicators.

7. Using EJScreen, identify additional anticipated impacts from climate change in the impacted area, if relevant.

This grant program will provide funding to communities that have been identified as overburdened and highly impacted by air pollution using several tools and data sources, including EPA’s EJScreen. Ecology’s 2023 baseline report, [Improving Air Quality in Overburdened Communities Highly Impacted by Air Pollution](#) provides more detail on socioeconomic and health disparities indicators.

8. Using the federal [Climate and Economic Justice Screening Tool \(CEJST\)](#)¹⁰, identify if the potentially affected area is considered disadvantaged for climate risks for additional indicators (as relevant).

Of the 16 communities identified as overburdened and highly impacted by air pollution, nine are also considered disadvantaged for climate risk for the following CEJST indicators: expected

⁹ The EPA identified the 80th percentile as an initial starting point and potential indicator of environmental justice considerations. <https://www.epa.gov/ejscreen/frequent-questions-about-ejscreen>

¹⁰ This is a national tool and may provide relevant information and understanding of the climate related context of the action. Learn more about the methodology for identifying if a community is disadvantaged for climate risks here: [Methodology & data - Climate & Economic Justice Screening Tool \(geoplatform.gov\)](#)

agriculture loss rate, expected building loss rate, expected population loss rate, projected flood risk, projected wildfire risk, low income. The nine communities include: : East Yakima, George and West Grant County, Mattawa, Moxee Valley, South and East Tacoma, Spokane and Spokane Valley, Tri-Cities to Wallula, Vancouver, and Wenatchee and E. Wenatchee.

9. Identify additional overburdened communities and vulnerable populations that are likely to be affected by the action.

This grant program will address criteria air pollution in communities identified as overburdened and highly impacted by air pollution and participating Tribes. Reduction in air pollution will benefit the following sensitive groups and vulnerable populations with increased risk to air pollution¹¹, including but not limited to:

- People with respiratory or cardiovascular conditions
- Children
- Older adults
- Pregnant people
- People of color
- Tribal and indigenous people
- People with low income
- Outdoor workers

10. Through community engagement, were additional overburdened communities and vulnerable populations identified who are likely to be affected by the action? Describe additional communities or populations identified, and the reasons they would be considered overburdened and vulnerable.

Ecology has received some feedback to help improve our identification of overburdened communities impacted by criteria air pollution, including expanding our initial list of communities. While Ecology will continue to refine and improve this process, the grant must fund projects to reduce criteria air pollutant emissions in the areas currently identified communities. We will continue to share information we learn with the team who is responsible for identifying the overburdened communities highly impacted by air pollution.

11. Through Tribal Consultation, were additional overburdened communities and vulnerable populations identified who are likely to be affected by the action? Describe additional communities or populations identified, and the reasons they would be considered overburdened and vulnerable.

¹¹ Improving Air Quality in Overburdened Communities Highly Impacted by Air Pollution: 2023 Report

At this time, Tribal consultation has not identified additional overburdened communities and vulnerable populations who are likely to be affected by this action.

Section 7: Summary of Community Engagement

This section summarizes community engagement activities. Community Engagement should be tailored to specifically reach overburdened communities and vulnerable populations.

Community engagement is required for all significant agency actions, but the engagement methods will vary depending on the size, scope, and topic of the project. The level, type, and form of engagement is based on the likelihood that the actions may cause environmental harm or may affect the equitable distribution of environmental benefits to an overburdened community or a vulnerable population.

Summarizing Community Engagement

1. Describe the engagement activities with identified overburdened communities and vulnerable populations.

As Ecology developed the new [Air Quality in Overburdened Communities Grant Program](#), we sought input on various aspects of the program to ensure our work was aligned with accessibility, equity, and the environmental justice and air quality goals of the program. To this end, we hosted virtual listening sessions in May and June 2024 alongside a 28 day online [written comment period](#). (See here the recordings of the [June 10](#) and [June 12](#) public listening sessions.) To make these more accessible, we translated our presentation and online comment page into Spanish. We also met individually with 21 organizations that work on environmental justice, public health, and air quality in the identified communities to get input on the development of the grant program.

The [summary of our engagement and response to comments](#) provides summary of the input we received alongside whether, how, and why we incorporated it into the grant program.

2. What actions were taken to help address barriers to meaningful engagement?

To accommodate schedules, we offered virtual listening sessions at different times of the day. To comply with Title VI of the Civil Rights Act, all materials and meetings met state and federal accessibility standards and Ecology provided information on how to request language access. We recorded the presentation portion of the listening sessions so that those unable to attend could watch later and use the information to inform their comments. We translated the meeting presentation and online comment page to Spanish. We also accommodated a request to extend the comment period by a week to provide more time for thorough comments. We did not provide stipends or reimbursements for participation because the targeted audience of our engagement was organizational staff from potential eligible entities. Currently, the Department of Ecology is not able to compensate organizations or organizational employees who participate in our public processes during paid work time as representatives of their organization. When conducting outreach to inform people and organizations of the opportunities to engage, we sought to share the information with contacts in all identified communities, including sharing the information via Ecology's website; social media; a variety of

email distribution lists that Ecology, the Environmental Justice Council, and other government agencies manage; and with regular working group meetings across communities and topics areas, like the Department of Health, Puget Sound Clean Air Agency, University of Washington, and Department of Commerce.

3. Identify overburdened communities or vulnerable populations potentially affected by the action who were not engaged and explain why not.

When conducting outreach to inform people and organizations of the opportunities to engage, we sought to share the information with contacts in all identified communities. We ultimately had participation from all seven of the 16 identified communities. This could be due to the time and financial limitations, a lack of interest, or not enough opportunities to provide input in familiar or preferred formats such as in person sessions. We had participation from people representing the following communities:

- Ellensburg
- George and West Grant County
- South King County
- Spokane and Spokane Valley
- South and East Tacoma
- Tri-Cities to Wallula
- Wenatchee and East Wenatchee

4. Summarize recommendations from members of overburdened communities and vulnerable populations to mitigate or eliminate potential harms from the action and/or equitably distribute benefits from the action.

We heard the following benefits of the grant program:

- Pollution reduction
- Funding for communities
- Building trust with government

We heard the following concerns about barriers to participation and equitably distributing the benefits of the program:

- People living in these communities might not be involved due to lack of network.
- The timeline for implementation and project period may not allow for projects to be completed or create meaningful change in communities.
- Proposed projects may not be the most meaningful to the community if there is a lot of competition for funding and the application period isn't long enough to develop a collaborative project.

- The application period isn't long enough for applicants to develop a collaborative project.
- Reimbursement-based payment requirements create barriers to entry. Smaller organizations are unable to bear the up-front costs of new projects and programs.
- There is significant administrative burden of applying to and managing grants. The best organizations to do the work may not apply or be able to complete projects.
- Timeline for outreach and input was inaccessible and unequitable.
- Overburdened communities are inundated with requests for input on government actions.

We heard the following recommendations to reduce, eliminate, or mitigate harm to participating in the grant program and equitable distribute benefits:

- Provide technical assistance to applicants and grantees.
- Extend project timeline past June 30, 2025.
- Seek ongoing funding.
- Increase accessibility and address language barriers.
- Do not require grantees to contribute a proportional amount of funds compared to the grant funds requested.
- Allow for full or partial upfront payments rather than requiring payment be reimbursed.
- Coordinate and align with community-based grants administered by other state agencies.
- Translate materials and provide interpreters at meetings.
- Provide materials in non-electronic forms.
- Plan a longer timeline of engagement, provide more structure and details on how to participate, and work with communities in advance of comment periods.
- As an agency, work to better understand limitations on grant-making, constraints of funding source, successful scoring procedures, and how similar funding has been implemented in the past.
- Allow for costs associated with administrative overhead to be eligible under the grant program.
- Increase the number of allowable projects per identified overburdened community.

During community engagement, participants expressed the following potential harms from the grant program:

- One-time funding may begin work in these communities, but not create meaningful impact within them, as well as potentially create feelings of distrust about continuous funding for this program within these communities.
- Funding one project per identified community reduces the opportunities for people from Tribes to participate in the grant program. For example, Tribal communities living in urban areas may not have representation from a nearby Tribal government.

5. Describe any plans for ongoing engagement with overburdened communities and vulnerable populations related to this action.

Ecology will share the completed Environmental Justice Assessment, including the input we heard and how we incorporated it into the grant program with people that participated in the community engagement process. We will also continue to seek input from applicants and grantees throughout the grant process on how we can improve the grant program.

Section 8: Potential Environmental Benefits & Harms from Action

This section summarizes anticipated benefits and harms from the potential action, and to assess impacts on overburdened communities and vulnerable populations. The level, type, and form of engagement is based on the likelihood that the actions may cause environmental harm or may affect the equitable distribution of environmental benefits to an overburdened community or a vulnerable population. Answers to the questions in this section may have helped in strategizing our approach to engagement.

Identify Potential Environmental Benefits & Harms from Action

1. Describe the anticipated benefits (direct and/or indirect) from this action.

Grants funded through this program will identify, develop, and implement projects to reduce criteria air pollution in Washington communities that are historically overburdened with health, social, and environmental inequities and are highly impacted by criteria air pollution, such as ozone and fine particles. Reducing criteria air pollution will improve people's health. Grant funding can also bring economic benefits to the community. This grant program prioritizes community engagement and locally led projects helping to employ and empower people to create change in their communities. Many potential projects that may be funded through this grant program have co-benefits like reduced water and noise pollution and indoor air quality.

2. Who will primarily benefit from this action?

- People who live, work, and play in the communities identified as overburdened and highly impacted by air pollution and participating Tribes
- Organizations serving communities identified as overburdened and highly impacted by air pollution and participating Tribes
- Nearby and adjacent communities will benefit since air pollution is dynamic and often impacts a large area.

3. How is the action expected to benefit specifically overburdened communities or vulnerable populations? If there is no benefit, identify potential barriers to benefitting from the action.

Grants will fund projects to identify, develop, and implement projects that reduce criteria air pollution and address disparities in Washington communities that are historically overburdened with health, social, and environmental inequities and are highly impacted by criteria air pollution, such as ozone and fine particles. Funding projects to reduce criteria air pollution in communities identified as being overburdened will improve the health of people living in these communities and help to address environmental and health disparities across the state. This grant program also requires community engagement and locally led projects that empower people to create change in their communities.

4. Describe anticipated harms (direct and/or indirect) from this action.

A possible harm from this grant program is that one-time funding may begin work in the grant recipient's communities, but not create meaningful impact within them, and as a result it may create feelings of distrust about continuous funding for this program within these communities.

5. Who will primarily experience the harms?

This grant program seeks to reduce environmental and public health harms from exposure to criteria air pollutants. The identified harms may impact eligible applicants and grantees and people living in the identified communities who are more at risk of impacts from criteria air pollution.

6. Describe how the action may harm overburdened communities or vulnerable populations? Be as specific as possible.

An anticipated harm from this grant program may be that one-time funding may begin work in overburdened communities, but not create meaningful impact within them, as well as potentially create feelings of distrust about continuous funding for this program within these communities and vulnerable populations.

7. Describe how the action would address environmental and health disparities.

Grants funded through this program will identify, develop, and implement projects to reduce criteria air pollution in Washington communities that are historically overburdened with health, social, and environmental inequities and are highly impacted by criteria air pollution, such as ozone and fine particles.

Section 9: Options to Eliminate, Reduce, or Mitigate Harms and Equitably Distribute Benefits

This section summarizes options identified for eliminating, reducing, or mitigating harms, as well as options for equitably distributing anticipated benefits. The answers in this section should be informed by engagement, answers from the previous subsections, and any legislative or regulatory boundaries that limit possible decision making.

Identify Options to Eliminate, Reduce, or Mitigate Harms & Equitably Distribute Benefits

1. Describe options to reduce, mitigate, or eliminate the identified probable harms to overburdened communities and vulnerable populations; and options to equitably distribute the benefits.

To reduce mitigate, or eliminate the potential harm of one-time grant funding, Ecology will:

- Clearly communicate with applicants that at this time this is one time funding so applicants can plan accordingly.
- Allow for grants funds to be combined with other funding sources to leverage the dollars and create seamless integration into existing programs, while still ensuring the scope of work and distinct use of grant funds is clear.
- Consider seeking future funding for this grant program to mitigate the potential harms cause by one-time funding.

The options to reduce, mitigate, or eliminate barriers to participating in the grant program and equitably distribute the benefits include:

- Extend the period of performance for projects that need more time.
- Expand our community engagement opportunities and make them more accessible, including addressing language barriers.
- Allow for full or partial upfront payments rather than requiring payment be reimbursed.
- Allow costs related to language services and the accessibility of outreach and engagement materials to be eligible under the grant program.
- Reduce administrative burden of grant application and management.
- Seek ongoing funding to create meaningful change in the communities.

2. Describe methods chosen for this action to reduce, mitigate, or eliminate the identified probable harms to overburdened communities and vulnerable populations; and methods chosen to equitably distribute the benefits. You must consider the following methods, but are not limited to them:

To reduce mitigate, or eliminate the potential harm identified probable harms of one-time grant funding, Ecology will:

- Clearly communicate with applicants that at this time this is one time funding so applicants can plan accordingly.
- Allow for grants funds to be combined with other funding sources to leverage the dollars and create seamless integration into existing programs, while still ensuring the scope of work and distinct use of grant funds is clear.
- Consider seeking ongoing funding for this grant program as possible to mitigate the potential harms cause by one-time funding.

The methods chosen to address barriers to participating in the grant program and equitably distribute the benefits include:

- Extending the project period for grantees needing additional time. This is contingent on the ability to reappropriate the funding for this program.
- In future grant cycles, we will expand our community engagement opportunities, extend their duration, and work to make them more accessible, through offering more translated materials, providing materials in non-electronic forms, and providing interpreters at meetings.
- Ensure costs related to language services and accessibility of outreach and engagement materials are eligible under the grant program. The grant program guidelines will include requirements for how grantees must work to ensure that the outreach and engagement they conduct is as accessible to a diverse audience as is reasonable.
- Reduce administrative burden by providing clear instructions, reducing the number of application forms and questions, providing templates, and offering additional staff capacity to provide technical support.
- We will host three info sessions to answer questions, share important information from the grant guidelines, and provide an overview of the application process. We will also host virtual office hours during which organizations interested in applying can ask us questions about the grant or the application. We will also be available by email (AQcommunitygrants@ecy.wa.gov) and phone during standard working hours. While we cannot provide help with writing the application itself, we can direct applicants to two technical assistance centers that may provide free help: The Center for Environmental Health Equity and The Northwest Environmental Justice Center.

3. If the agency determines it does not have the ability or authority to eliminate, reduce, or mitigate environmental harms caused by the action, or address the equitable distribution of environmental benefits, explain why that determination was made.

At this time Ecology has the ability to mitigate the potential harms a by:

- Clearly communicate with applicants that at this time this is one time funding so applicants can plan accordingly
- Allowing for grants funds to be combined with other funding sources to leverage the dollars and create seamless integration into existing programs, while still ensuring the scope of work and distinct use of grant funds is clear.
- Considering seeking future funding for this grant program to mitigate the potential harms cause by one-time funding.

One of the options for addressing the equitable distribution of benefits that Ecology cannot address at this time is prepaying expenses instead of requiring grantees to submit invoices for reimbursement after costs have been incurred. Due to current state agency process that ensures efficient and effective use of public funds, we are not able to offer prepayment options for grantees at this time. We understand the burden this may place on some applicants and strive to make the reimbursement request process as quick and easy as possible.

Section 10: Notification of Completed Assessment

This section summarizes processes for staff to take once they have completed their assessment, including steps for sharing the final product. Learn more about all ongoing and completed Environmental Justice Assessments on our [agency webpage](https://ecology.wa.gov/About-us/Who-we-are/Environmental-Justice/HEAL/EJ-Assessments)¹².

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