



Environmental Justice Assessment
Climate Resilient Riparian Systems Lead

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

Shorelands and Environmental Assistance Program

Washington State Department of Ecology
Olympia, Washington

October 2024, Publication 24-06-021

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[Washington State Department of Ecology Riparian Systems Grants](https://ecology.wa.gov/water-shorelines/puget-sound/helping-puget-sound/riparian-restoration/riparian-systems)²

¹ www.ecology.wa.gov/contact

² <https://ecology.wa.gov/water-shorelines/puget-sound/helping-puget-sound/riparian-restoration/riparian-systems>

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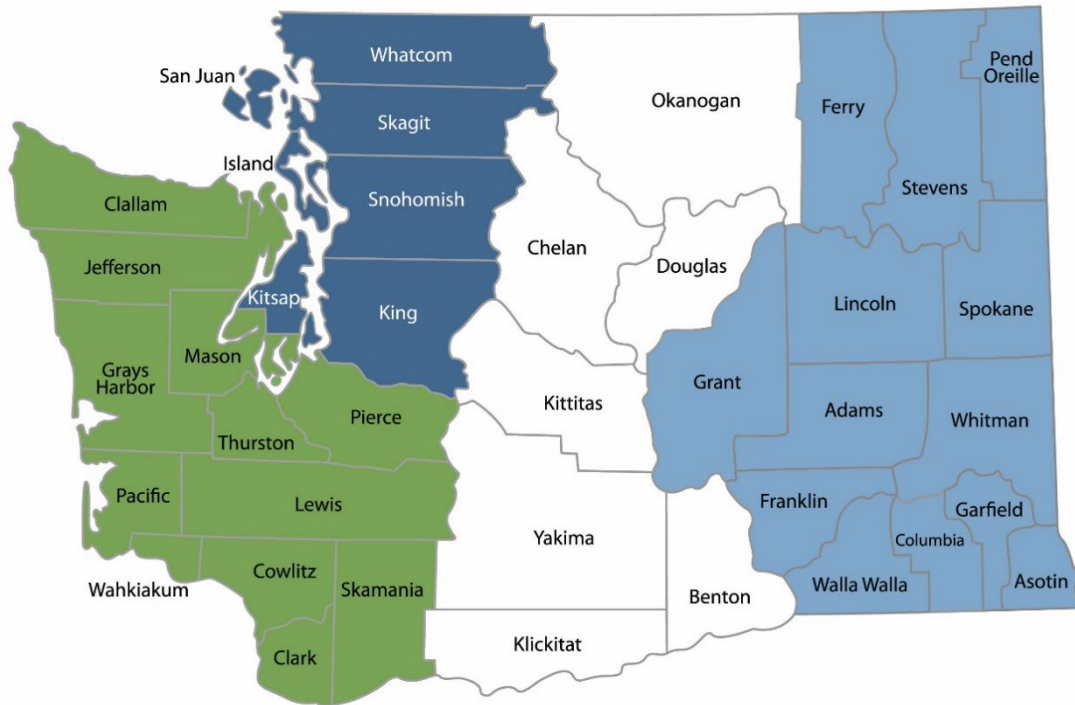
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Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	P.O. Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San 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

Region	Counties served	Mailing Address	Phone
Headquarters	Statewide	P.O. Box 46700 Olympia, WA 98504	360-407-6000

Environmental Justice Assessment Climate Resilient Riparian Systems Lead

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DEPARTMENT OF
ECOLOGY
State of Washington

³ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.02&full=true#70A.02.010>

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Executive Summary

The Environmental Protection Agency has awarded the Washington State Department of Ecology (Ecology) funds to develop a grant program and facilitate subawards of these funds toward improving the climate resiliency of riparian systems in Puget Sound. The Climate Resilient Riparian Systems Lead (CR2SL) program funding is directed at riparian systems recovery projects that will result in greater area of riparian acreage protected, restored, or maintained for climate resilience.

The CR2SL program's geographic scope covers all 19 Water Resource Inventory Areas (WRIA's) in the Puget Sound basin (WRIA's 1-19). This includes the entire watershed areas from the headwaters to where the rivers enter Puget Sound. Many overburdened and vulnerable communities reside within the area and could potentially be impacted by projects implemented by the program. Communities adjacent to rivers or located within riparian areas are those most likely impacted by the program. These include overburdened communities in census tracts located primarily within the urban areas along the I-5 corridor. Most of these census tracts are located within the southern half of Seattle and south into Kent and Tacoma. A small cluster census tracts located north of Seattle, near Everett, and one tract in Mount Vernon were also identified as overburdened communities. It is possible that the program will affect communities located upstream, downstream, or adjacent to projects, however it is unknown where projects will be implemented and at what scale. One potential additional vulnerable population that could be affected by the program is unhoused people utilizing riparian areas for shelter (depends on project locations, TBD).

Surrounding Puget Sound communities, especially those within close proximity to implemented projects, will benefit from resulting riparian restoration efforts as these projects are known to increase canopy cover and green spaces, improve water quality and improve habitat for fish and aquatic life. No negative impacts from the program were identified through community engagement and completion of the EJ assessment.

The CR2SL team performed extensive engagement within the program footprint to include Tribes and community-based organizations representing overburdened communities and vulnerable populations in program design to best support their needs and to increase their efficiency and capacity. This community-centered design approach will foster the identification of multi-benefit project opportunities and promote collaborative riparian area management in Puget Sound watersheds. A number of methods were identified and built into the program design to address equitable distribution of benefits. Potential localized benefits to overburdened communities or vulnerable populations may include but are not limited to:

- Greater access to green space and natural resources;
- Improved water quality in streams;
- Improved fisheries for those reliant on sustenance fishing;
- Increased job opportunities for positions working on restoration projects;

- Improved environmental education opportunities and outreach focused on riparian science and restoration.

The CR2SL program will continue to engage with community partners and Tribes throughout the life of the grant to adapt to the needs of restoration practitioners and maximize the benefits of the program.

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.02⁴](#)), as well as federal commitments in the [Performance Partnership Agreement⁵](#) with the EPA. The assessment process draws on best practices established in [Technical Guidance for Assessing Environmental Justice in Regulatory Analysis⁶](#) and [Promising Practices for EJ Methodologies in NEPA Reviews⁷](#).

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

- The development and adoption of significant legislative rules as defined in RCW.05.328⁸
- 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.

⁴ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.02&full=true>

⁵ <https://ecology.wa.gov/About-us/Accountability-transparency/Government-coordination/Partnering-with-the-EPA>

⁶ <https://www.epa.gov/environmentaljustice/technical-guidance-assessing-environmental-justice-regulatory-analysis>

⁷ https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

⁸ <http://app.leg.wa.gov/RCW/default.aspx?cite=34.05.328>

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

Section 1: Background

The information in this section is provided for the Office of Financial Management's [dashboard](#)⁹ which includes all covered agency's Environmental Justice Assessment notices.

Descriptive title of project/action:

Climate Resilient Riparian Systems Lead grant program

Date EJ Assessment initiated:

8/1/2024

Ecology Program/Office:

Shorelands and Environmental Assistance

Point of contact for EJ Assessment:

Michelle Quast

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:

Write a short summary of the action.

The Washington State Department of Ecology, the Washington State Conservation Commission, and Bonneville Environmental Foundation, established a partnership coalition to promote innovative and sustainable approaches to riparian management. The Climate Resilient Riparian Systems Lead (CR2SL) team will administer subawards to Puget Sound partners that result in greater area of riparian acreage protected, restored, or maintained for climate resiliency. Surrounding Puget Sound communities will benefit from resulting riparian restoration efforts as these projects are known to increase canopy cover and green spaces, improve water quality and improve habitat for fish and aquatic life. The CR2SL team will engage key stakeholders and partners to design the funding program to best support their needs and to increase their efficiency and capacity. This approach will foster the identification of multi-benefit project

⁹ <https://ofm.wa.gov/budget/budget-related-information/agency-activities/environmental-justice-assessment-notices>

opportunities to promote collaborative riparian area management in Puget Sound watersheds, including nature-based solutions to climate resiliency and adaptation.

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

The CR2SL program will use a variety of methods to engage with Puget Sound Tribes, as well as people from overburdened communities and vulnerable populations to inform this work, including: inviting formal consultation with Tribes; hosting virtual listening sessions for Tribal members and staff; distributing a Tribal listening session follow-up worksheet; inviting consultation with the Northwest Indian Fisheries Commission; inviting Tribal participation in the CR2SL advisory group; inviting a tribal liaison to participate in the CR2SL oversight team; hosting virtual and in-person meetings to solicit input from community based organizations operating within the program footprint; web content; and GovDelivery distribution list. Outreach and engagement efforts began in January 2024 and will continue throughout program development and implementation. Outreach and engagement will focus on Tribal engagement and engagement with the Puget Sound watershed restoration community, including community-based organizations that represent overburdened and vulnerable communities that might potentially impacted by the new grant program.

Create/provide an Ecology webpage with information about this proposed action.

Provide link here:

<https://ecology.wa.gov/water-shorelines/puget-sound/helping-puget-sound/riparian-restoration/riparian-systems>

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

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

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.

The following 19 federally recognized Tribes are located within the Puget Sound program footprint where projects will be implemented, however it is unknown who will apply for funding and where projects will be implemented, and therefore it is unknown if any of the Tribes will be affected directly or indirectly:

- Jamestown S'Klallam Tribe
- Lower Elwha Klallam Tribe
- Lummi Nation
- Makah Tribe
- Muckleshoot Indian Tribe
- Nisqually Indian Tribe
- Nooksack Indian Tribe
- Port Gamble S'Klallam Tribe
- Puyallup Tribe of Indians
- Samish Indian Nation
- Sauk-Suiattle Indian Tribe
- Skokomish Indian Tribe
- Snoqualmie Indian Tribe
- Squaxin Island Tribe
- Stillaguamish Tribe of Indians
- Suquamish Tribe
- Swinomish Indian Tribal Community
- Tulalip Tribes
- Upper Skagit Indian Tribe

If it is determined at any other point in the process of the assessment that Tribes have self-identified as being potentially impacted by the action, then include them in the assessment and offer consultation.

N/A - No Tribes self-identified as being potentially impacted by the program.

Describe plans to offer consultation to identified Tribes.

The CR2SL program developed a [Tribal Engagement Plan](#)¹⁰ to guide Tribal engagement and consultation efforts. Tribal engagement is important to guide the development and implementation of the CR2SL program because of the potential direct and indirect impacts and benefits to Tribal interests. Given Tribes’ time immemorial connection to the land, Tribal interest in the program may arise from many different factors. In recognition that Tribal interests in the program may change over time, ongoing communication is built into the Tribal Engagement Plan.

Activities to inform program development

The following Tribal engagement activities have been completed and were carried out to gather Tribal input during program development:

- Notifying Federally recognized Tribes within the Puget Sound program footprint of CR2SL program initiation and inviting Government to Government consultation.
- Presenting to Tribes at meetings coordinated by the NWIFC early in program development and soliciting input to guide development.
- Engaging a Tribal Liaison to participate on the Lead Team to provide advisory support throughout all stages of program development and implementation.
- Inviting a NWIFC representative to participate on the advisory Core Team to provide high-level thinking input at all stages of program development.
- Hosting virtual listening sessions for Tribal members and staff to describe the funding opportunity and solicit input from Tribes and their technical staff on program development.
- Distributing a Tribal listening session follow-up worksheet to solicit additional details on Tribal concerns and program development.

Table 1 - List of completed Tribal engagement activities and when they were completed.

Description	Date
Program initiation notification letter sent via email	01/2024
Presentation of program and input solicitation at NWIFC hosted meeting	03/2024
Invitation extended to Tribal liaison to participate in Lead Team	03/2024
Invitation extended to NWIFC representative to participate in the Core Team	04/2024
Invitations to attend virtual Tribal listening session sent via email	04/2024
Hosted two Tribal virtual listening sessions	05/2024
Follow-up Tribal listening session worksheet sent via email	06/2024

Ongoing Tribal engagement opportunities

Some of the activities listed above will be ongoing activities that reflect the intentions of the CR2SL program to adapt the focus of solicitations throughout the EPA funding cycle based on

¹⁰ <https://apps.ecology.wa.gov/publications/summarypages/2406019.html>

changing needs and feedback received, as well as provide continued coordination amongst Puget Sound riparian professionals to build local momentum and agreement on best practices. The CR2SL program will invite Tribal participation and input throughout the life cycle of the grant program, including through these structured forums:

- Notifying Federally recognized Tribes within the Puget Sound program footprint of CR2SL program proposed updates and inviting input as well as Government to Government consultation.
- Presenting to Tribes at meetings hosted by the NWIFC on proposed program updates and inviting input.
- Inviting Tribal participation in technical workshops focused on various riparian restoration topics, with the goal of building local momentum and agreement on best practices.

Additional Tribal input

The CR2SL team participated in regionally hosted collaborative riparian workshops where local partners and Tribes engaged with CR2SL program staff and provided recommendations on program development. Due to the collaborative nature of these engagement opportunities, Tribal input is woven into the recommendations made by all Puget Sound partners and is holistically represented in the report of engagement findings. None of the input recorded at these engagements identified Tribal specific concerns or opportunities. Feedback received by all participants including Tribal participants in these events is included in the [Summary Report of Input from Puget Sound Riparian Professionals¹¹](#).

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

¹¹ <http://ecyapfaff/Biblio2/SummaryPages/2406013.html>

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.**

One of the primary goals of the CR2SL program is to improve the climate resiliency of riparian areas in Puget Sound. Indigenous peoples are at the forefront of recognizing and experiencing the impacts of climate change, which has numerous impacts to Tribal rights and resources with linkages to riparian systems. The Northwest Indian Fisheries Commission compiled a report, [Climate Change and Our Natural Resources: A Report from the Treaty Tribes in Western Washington Executive Summary](#)¹² (2016), which includes a list of expected climate impacts to Tribes. It is possible that CR2SL funded projects may provide benefit or support to Tribes in relation to some of these climate impacts.

Federally recognized Tribes are eligible recipients for CR2SL funding; therefore, it is possible that the program will have positive impacts to Tribal rights and interests on their Tribal lands, however it is unknown if and which Tribes will apply for funding and where projects will be implemented. Potential impacts could include:

- Improved salmon and other fish habitat;
- Improved critical habitat conditions for downstream Puget Sound orca and other aquatic life;
- Improved wildlife habitat;
- Improvements to existing riparian buffers;
- Increased streamside shade;
- Reduction of invasive weeds on rivers/streams;
- Reduced erosion;
- Climate resilience through creation of microclimates, moderation of air temps.

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

Federally recognized Tribes and Tribal lands are located across the Puget Sound, potentially upstream or downstream of locations where projects could be implemented. It is possible that the program will have positive indirect impacts to Tribal rights and interests on their Tribal lands, however it is unknown where projects will be implemented. Potential impacts could include:

- Improved access to greenspace;
- Increased permanent conservation of lands;
- Increased nutrient distribution in the watershed;
- Water quality improvements;

¹² https://nwifc.org/w/wp-content/uploads/downloads/2017/01/CC_and_Our_NR_Report_2016-1.pdf

- More native plant availability, capacity;
- Job creation, local capacity, career development opportunities;
- Local data improvements, organization, and availability;
- Improved efficiency of restoration crews and programs.

Summarize recommendations from Tribes to:

- Mitigate or eliminate potential harms from the action**
- Equitably distribute benefits from the action**

None of the Tribes or Tribal organizations that provided recommendations noted any significant potential harms from the new program. Tribal recommendations about the new program development were received from high-level Tribal government leaders, workgroups, a Tribal liaison, and natural resource staff. Recommendations provided by individuals are not attributed to them or the Tribe they represent out of respect for privacy. Recommendations provided by individuals during a meeting hosted by the NWIFC are anonymized. Tribal recommendations are sorted below under three categories:

Tribal engagement recommendations

The following recommendations regarding Tribal preferences on engagement are constructive in guiding the CR2SL program towards better equity outcomes:

- NWIFC Riparian Workgroup: Advised CR2SL staff to not assume that NWIFC represents Tribes and to do direct Tribal outreach as well.
- NWIFC Riparian Workgroup: Celebrated previous integrated efforts like Floodplains by Design that allowed Tribes to effectively engage with the agricultural community.
- NWIFC Riparian Workgroup: Overarching sentiment of desire for an effective model to engage Tribes on this effort. Caution against an overemphasis on process, and a desire to as rapidly as possible make tangible improvements for the benefit of salmon populations.

Tribal funding priorities

The following recommendation regarding Tribal funding priorities is constructive in guiding the CR2SL program to equitably distribute benefits:

- NWIFC Riparian Workgroup: The Tribes are aware of at least 5 riparian programs right now, 4 of which include funding. The Tribes are working to track and connect processes so they can provide consistent messaging. The question was posed if CR2SL could fund a position at NWIFC to coordinate this work.

Tribal restoration implementation needs and challenges

The following recommendations regarding restoration implementation needs and challenges faced by Tribes are constructive in guiding the CR2SL program to distribute benefits equitably:

- Flexibility into the funding to support the needs of different watersheds, because the challenges are different in different areas.
- Infrastructure investments to support growing our own native plants, including plant material specific to the region, and culturally significant plants that are not traditional restoration species.

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

Tribal input continues to be solicited and incorporated into the CR2SL program design and development, which will continue to adapt throughout the life of the grant. The entire list below is subject to change based on Tribal feedback that has not yet been received or considered.

Tribal input was considered during all stages of development and sometimes received alongside non-Tribal input during local engagement efforts. For this reason, it is difficult to call out all of the ways that Tribal engagement may have indirectly informed the program, however, the following list summarizes specific points where program design and development directly reflects Tribal recommendations and comments:

- To provide equitable engagement opportunities, Tribal consultation was offered to individual Tribes throughout program development and recommendations received during meetings hosted by the NWIFC were not presumed to represent all Puget Sound Tribes.
- Flexibility has been built into the funding wherever possible to support proposals that will meet the unique needs of each watershed.
- Regional coordination and planning efforts will be eligible elements of proposals including coordination on prioritization, landowner outreach, nursery orders, and best practices.
- The program will provide opportunities for proposals that invest in native plant nursery infrastructure and staff to increase local capacity and support the propagation of native plants, including plant material specific to the region, and culturally significant plants that are not traditional restoration species.
- Eligible costs include capacity funding for Tribes to participate in local coordination efforts on specific proposals.
- The program will require applicants to send awareness letters to any Tribes in the Focus Area of their proposal during the application process.
- The program may provide direct investments to support the Washington Conservation Corps' Environmental Justice crew program, which would provide additional no-cost crew time to Tribes and other eligible applicants to perform riparian restoration activities.
- Application evaluation criteria prioritizes projects that are Tribal led or include a Tribal partner or demonstrated support of a Tribe.

- During contract negotiations, the CR2SL program will contact the Tribes that were identified by recipients during the application process to invite inclusion and provide compensation for consultation and their potential incorporation into the proposal.

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

In addition to the ongoing Tribal engagement opportunities listed in Section 3 that will occur throughout the life of the grant, Table 2 below summarizes more immediate Tribal engagement plans.

Tribal Engagement and Program Milestones for November 2024 Solicitation

Table 2 below includes an outline of the planned Tribal engagement activities and program milestones specific to the program’s first solicitation for proposals in November 2024. This list of activities is subject to change based on Tribal feedback yet to be received.

Table 2 - Program milestones and planned Tribal engagement activities for November 2024 solicitation.

Date	Program Milestones and Expectations	Notification and Consultation
August 23, 2024	Timeline, draft Investment Plan, and draft Tribal Engagement Plan Available for Comment	Ecology will send an email notice to Tribal Chair and natural resource department leads that includes the timeline, draft investment plan, and draft Tribal Engagement Plan, and invitation to participate in the RFP Evaluation Team.
August 23, 2024	Tribal consultation letters sent	Ecology will send an email notice Tribal Chair and natural resource department leads that includes a formal invitation for Government-to-Government consultation.
October 11, 2024	Presentation on draft Investment Plan and draft Tribal Engagement Plan	Tribal engagement on shared documents in a meeting coordinated through the NWIFC.
September 23, 2024	Tribal comments on draft Investment Plan and draft Tribal Engagement Plan due back to CR2SL team	
September 30, 2024	Tribal comments incorporated and final Investment Plan released	
October 28, 2024	Tribal notification of Environmental Justice Assessment letters sent	Ecology will send an email notice to Tribal Chairs of Federally recognized Tribes within the Puget Sound program footprint of the

		completion of the CR2SL Environmental Justice Assessment.
November 5, 2024	Application period opened through EAGL grant application at 8 a.m.	
November 13, 2024	Ecology hosts applicant webinars	
December 10, 2024; January 8, 2025	Applicant technical assistance virtual “office hours”	
January 15, 2025	<u>Application</u> period closes at 5pm	
January 15- March 5, 2025	Application review period	Tribal staff are invited to participate on the RFP Evaluation Team, provided the Conflict-of-Interest policy is met.
March 5, 2025	<u>Application</u> review results announced.	
March 5, 2025	Tribal notification of applications received	Ecology will send an email notice to Tribes about the list of applications received and post a list of applications on the website. Any affected federally recognized tribes will be invited to submit to Ecology a summary of tribal. issues, questions, concerns, or other statements regarding the project, which will become part of the contract negotiation.
March - June, 2025	Anticipated start date for funded grant agreements.	

Section 6: Identification of Overburdened Communities & Vulnerable Populations

This section identifies overburdened communities and vulnerable populations, as identified in the [definitions of RCW 70A.02¹³](#), who will be affected by the action.

Identify Overburdened Communities and Vulnerable Populations

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

¹³ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.02.010>

The geographic footprint of the CR2SL grant program is the boundary of all 19 Water Resource Inventory Areas (WRIA's) that comprise the Puget Sound basin (see Figure 1). This footprint is inclusive of the entirety of the watersheds, from the headwaters to the point where the rivers enter Puget Sound. Eligible grant applicants focused on river restoration and protection, and climate resiliency activities within this area will be eligible for receiving subawards through the CR2SL grant program. Therefore, any census tract within, or intersecting, WRIA's 1-19 have the potential to be affected by this action. Communities adjacent to rivers or located within riparian areas are those most likely impacted by the program. At this time, it is unknown who will apply for funding and where projects will be implemented.

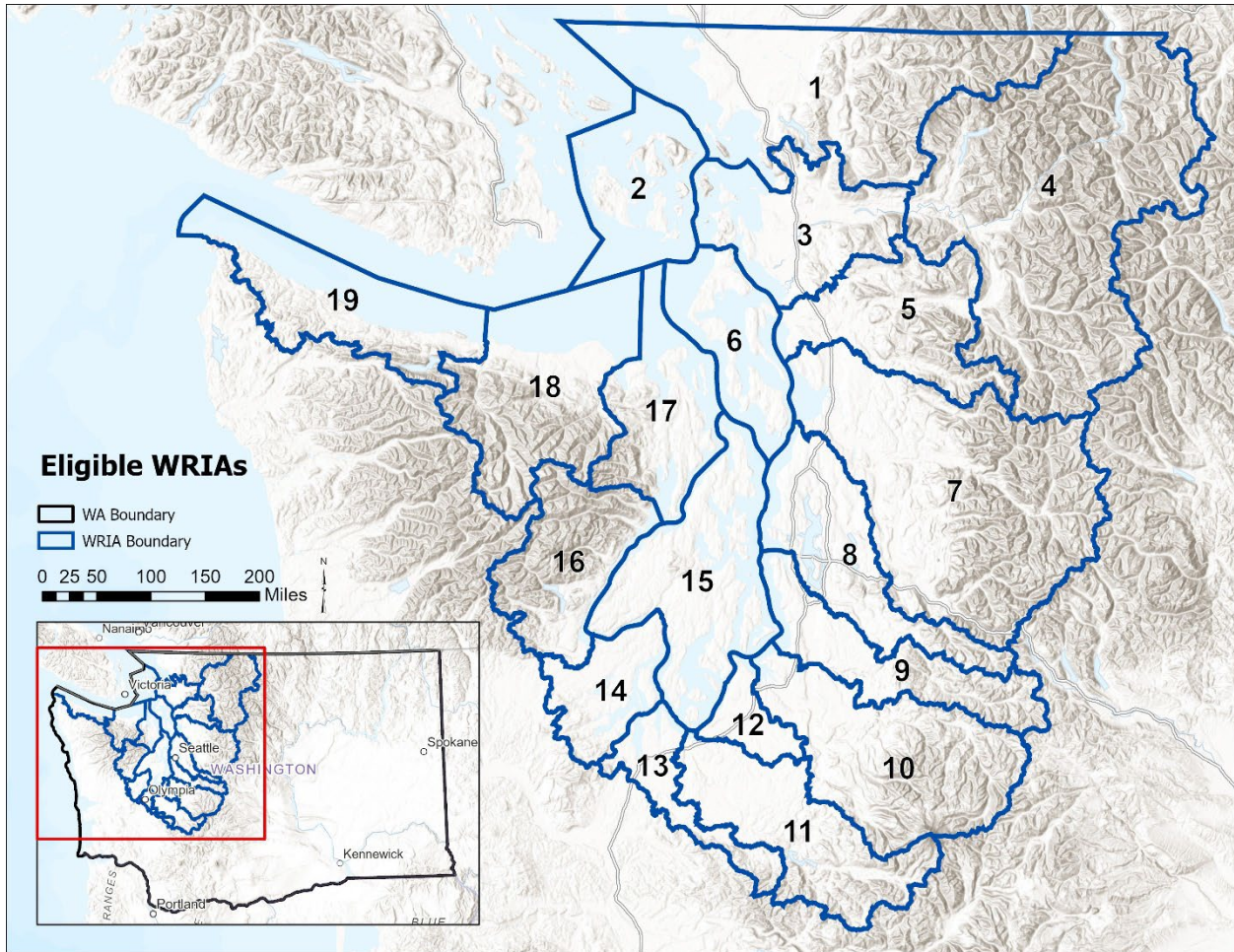


Figure 1 - Map of CR2SL funding program footprint and eligible Water Resource Inventory Areas (WRIAs).

The following list of WRIA's makeup the geographic footprint of the CR2SL grant program:

1. Nooksack
2. San Juan
3. Lower Skagit/Samish
4. Upper Skagit
5. Stillaguamish

6. Island
7. Snohomish
8. Cedar/Sammamish
9. Duwamish/Green
10. Puyallup/White
11. Nisqually
12. Chambers/Clover
13. Deschutes
14. Kennedy/Goldsborough
15. Kitsap
16. Skokomish/Dosewallips
17. Quilcene/Snow
18. Elwha/Dungeness
19. Lyre/Hoko

The following list of WA counties have areas of overlap with the CR2SL grant program footprint:

- Whatcom
- San Juan
- Island
- Skagit
- Snohomish
- King
- Kitsap
- Pierce
- Lewis
- Thurston
- Mason
- Jefferson
- Clallam

When applicable, using the [Washington State Department of Health’s Environmental Health Disparities Map¹⁴ \(EHD Map\)](#), identify the EHD Map rankings for all census tracts likely to be impacted by the action.

The EHD Map rankings of all census tracts that could be affected by the action are shown in Figure 2.

¹⁴ <https://fortress.wa.gov/doh/wtnibl/WTNIBL/>

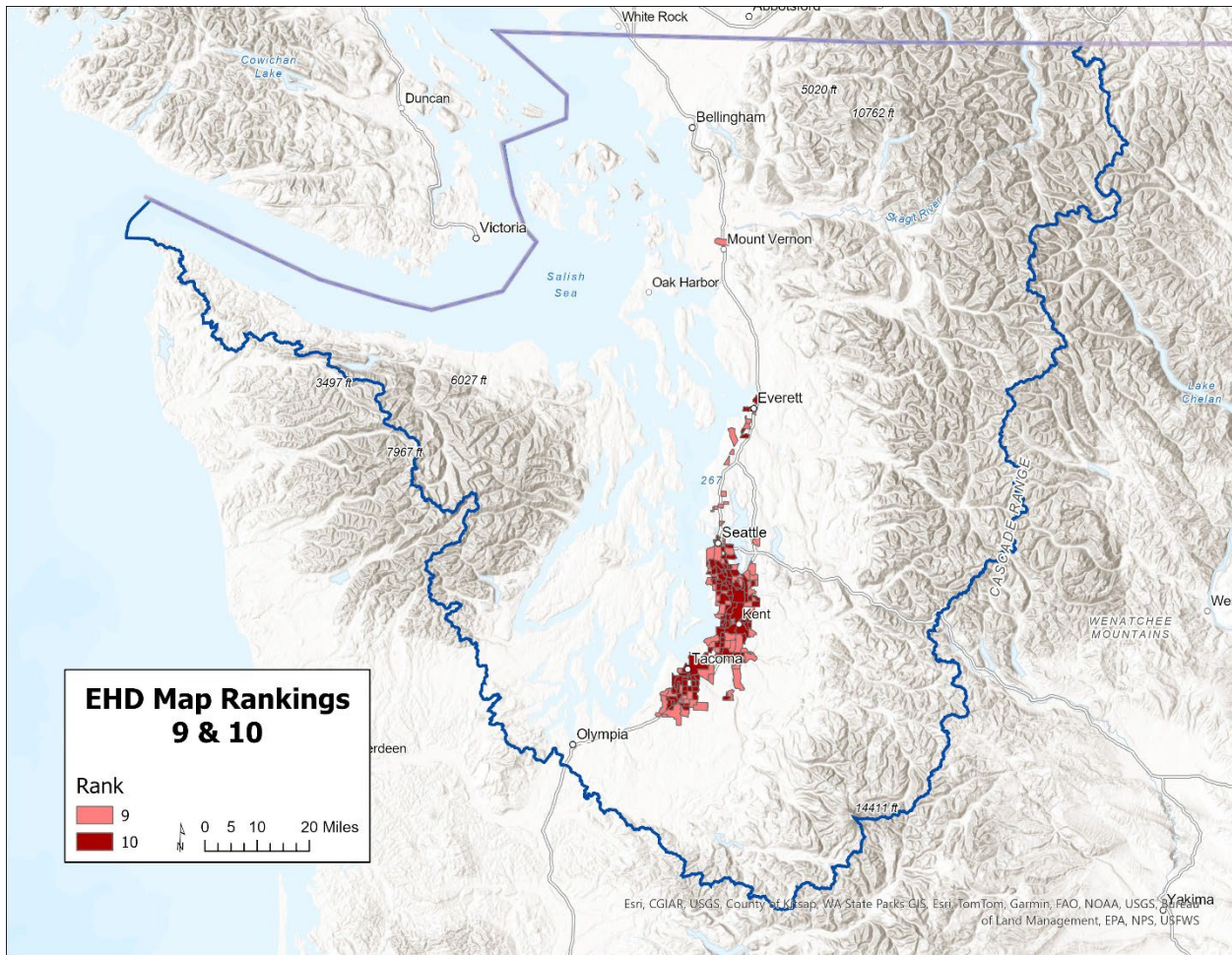


Figure 2 - EHD map of census tracts within program footprint ranked 9 and 10.

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

Yes

No

If yes, describe.

The EHD map identified clusters of census tracts located primarily within the urban areas along the I-5 corridor that are ranked 9 and 10. Most of these census tracts are located within the southern half of Seattle and south into Kent and Tacoma. A small cluster of 9 and 10 ranked tracts is located north of Seattle, near Everett. One tract ranked 9 in Mount Vernon was identified by the EHD map.

Please describe additional cumulative health considerations relevant to this action.

It is possible that the program will have positive indirect impacts to communities located upstream, downstream, or adjacent to projects, however it is unknown where projects will be implemented. Potential health considerations relevant to the program could include:

- Increased climate resilience through creation of microclimates, moderation of air temperatures;
- Improved access to greenspace;
- Water quality improvements.

When applicable, using the [EPA’s Environmental Justice Screening and Mapping Tool¹⁵ \(EJScreen\)](#), identify areas likely to be impacted by the action that are at or above the 80th percentile¹⁶ (in state) for the “People of color” and “Low income” socioeconomic indicators.

See Figure 3 for the “People of Color” socioeconomic indicator and Figure 4 for the “Low income” socioeconomic indicator.

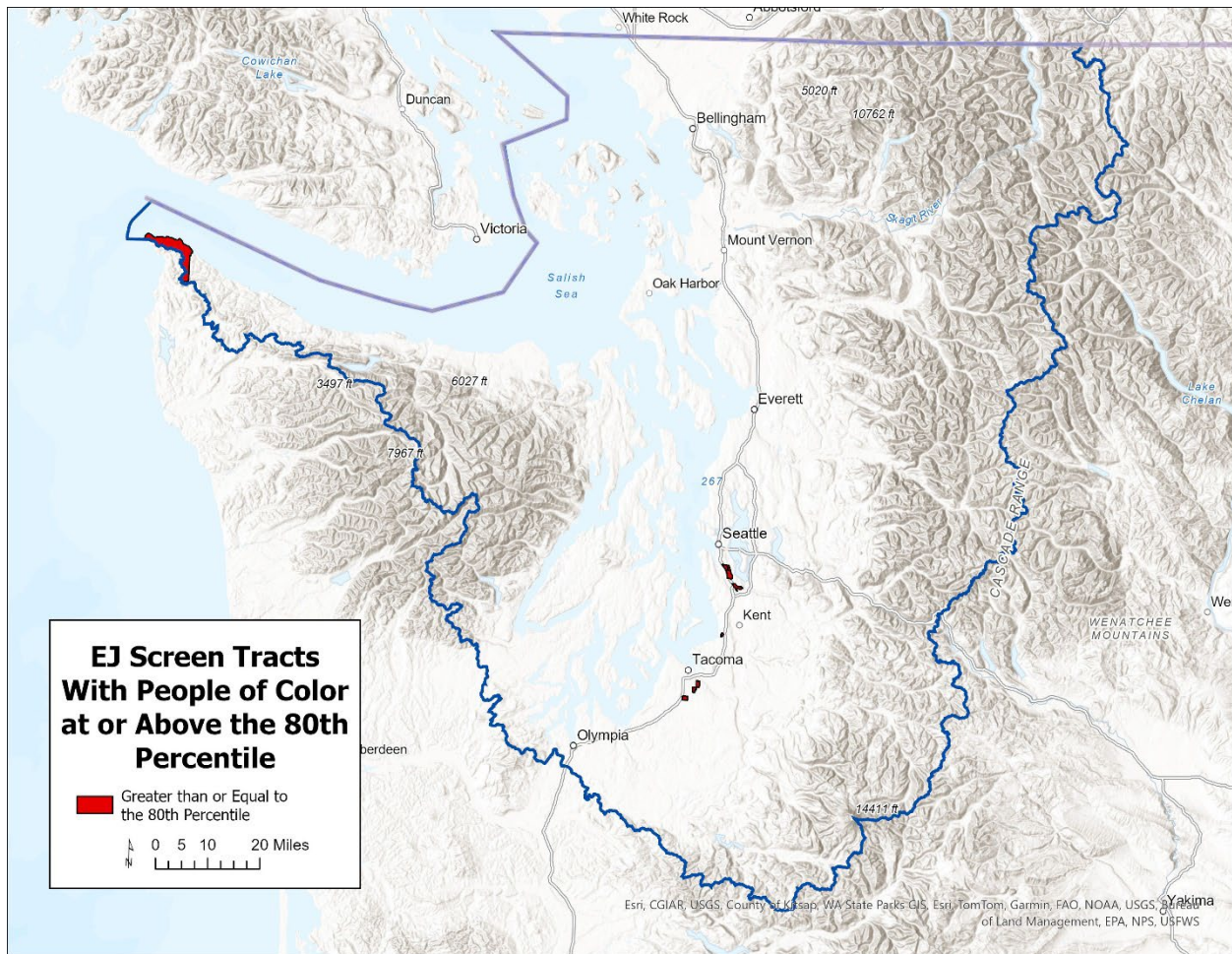


Figure 3 - EJ Screen map of tracts within program footprint with people of color at or above the 80th percentile.

¹⁵ <https://ejscreen.epa.gov/mapper/>

¹⁶ 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>

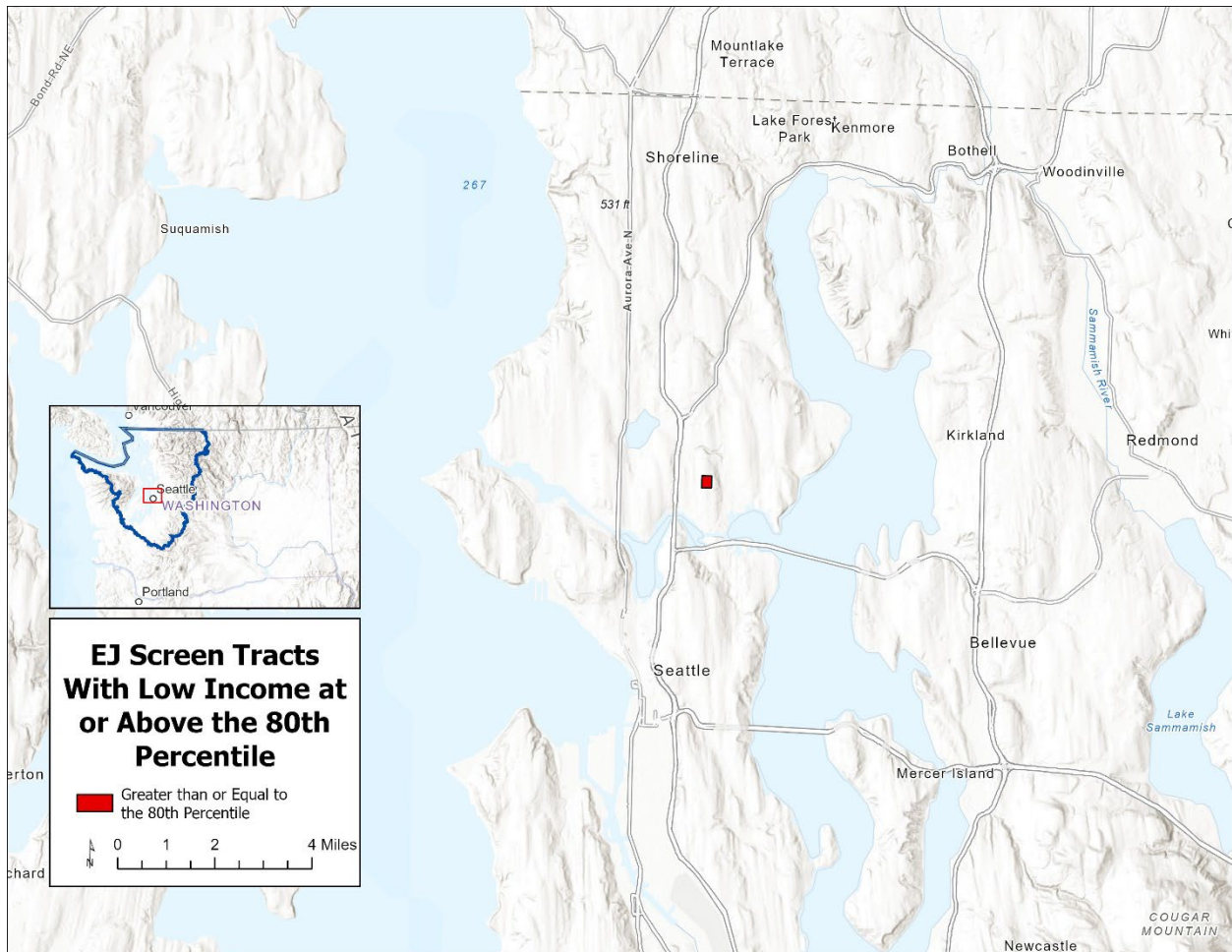


Figure 4 - EJ Screen map of tracts within program footprint with low income at or above the 80th percentile.

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

See Figure 5.

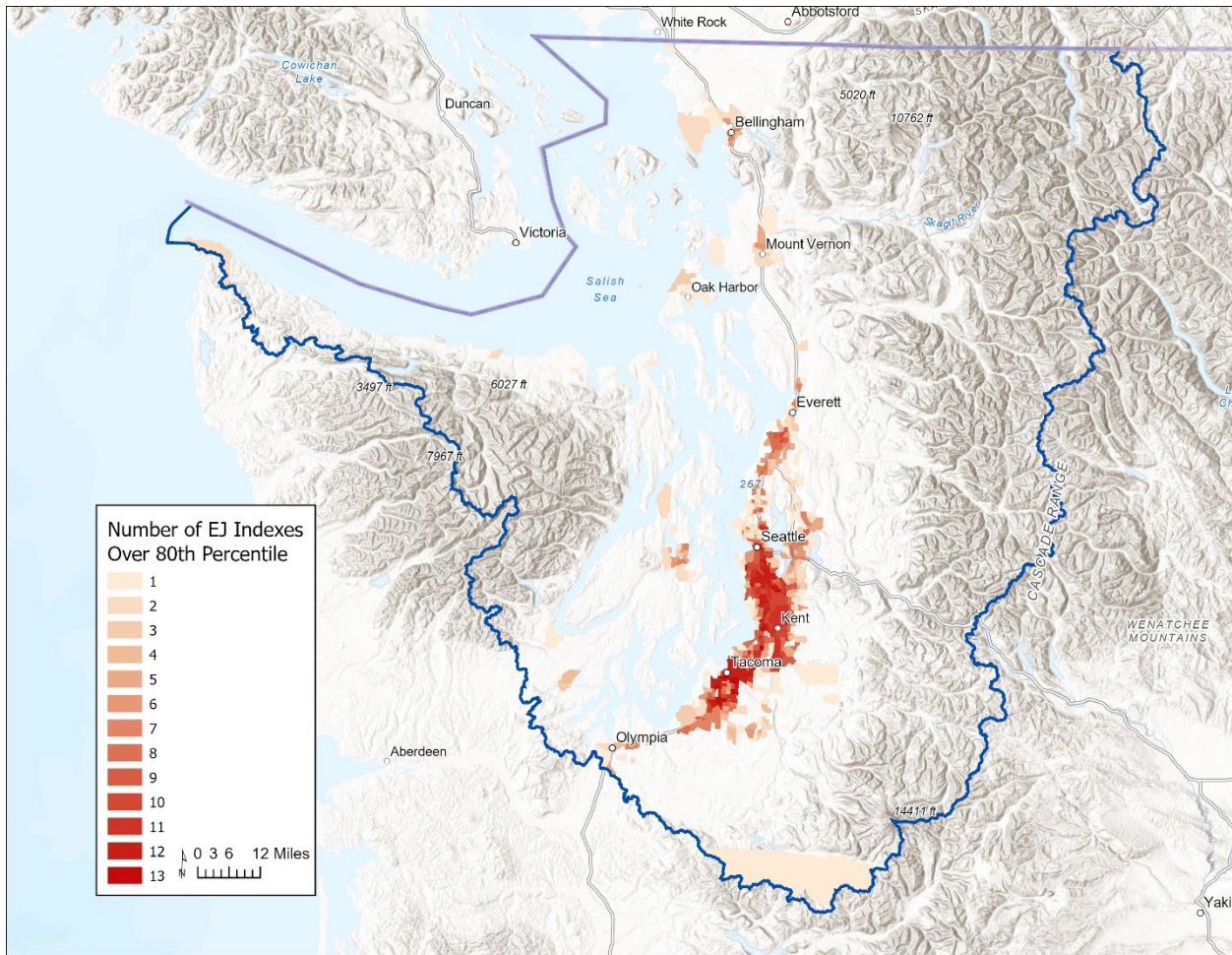


Figure 5 - EJ Screen map of number of EJ indexes over the 80th percentile within project footprint.

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

N/A. Any EJ indexes exceeding the 80th percentile have already been identified in the previous questions.

Using the federal [Climate and Economic Justice Screening Tool \(CEJST\)](#)¹⁷, identify if the potentially affected area is considered disadvantaged for climate risks for additional indicators (as relevant).

See Figure 6.

¹⁷ 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 \(geoplatform.gov\)](https://www.geoplatform.gov/methodology)

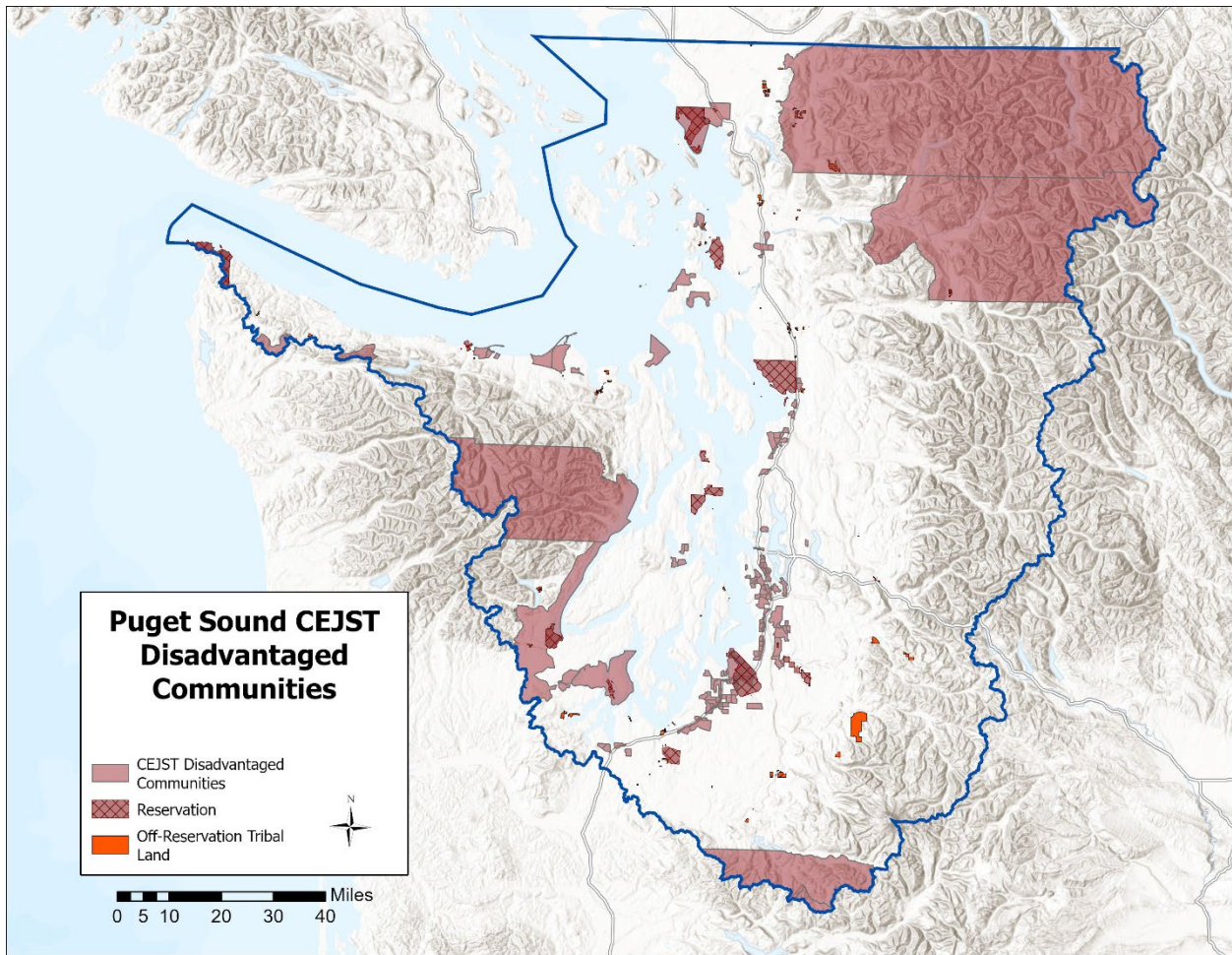


Figure 6 - Map of Puget Sound CJEST disadvantaged communities within the program footprint.

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

See Figure 7.

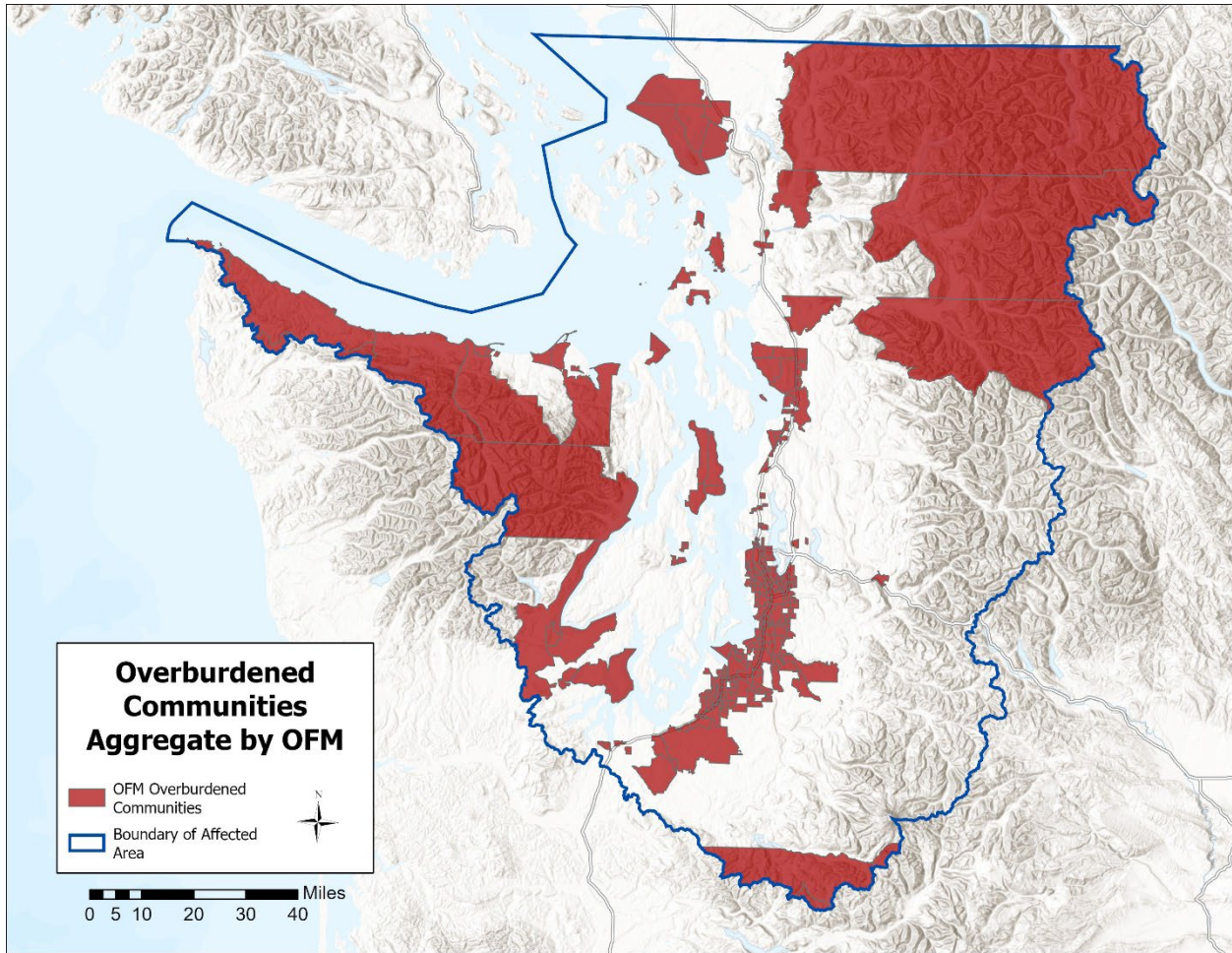


Figure 7 - Map of OFM aggregate dataset identifying overburdened communities within program footprint.

It is possible that the program will affect communities located upstream, downstream, or adjacent to projects, however it is unknown where projects will be implemented and at what scale. One potential additional vulnerable population that could be affected by the program is unhoused people utilizing riparian areas for shelter (depends on project locations, TBD).

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.

Many of the local partners focused on river restoration and protection rely heavily on the workforce provided by the Washington Conservation Corps (WCC) program, which supplies locally based crews of young people focused on natural resource work. These are low-pay, entry-level and temporary positions that can be difficult to fill and keep filled. By providing funding for work crews and other riparian focused staff, the CR2SL grant program may be able to help organizations create higher paying and more durable roles in their organizations,

creating new opportunities for otherwise low-wage workers and improving longevity in this work.

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.

No additional overburdened communities or vulnerable populations were identified to be affected by the program through Tribal Consultation.

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

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

The CR2SL program development included extensive public engagement and outreach within the body of Puget Sound riparian restoration professionals that work in each of the 19 WRIs. Participants in the engagement process included representatives from community based organizations (CBOs) that work on watershed restoration in and with overburdened communities and vulnerable populations. Participating CBOs had the opportunity to provide input on program development in line with the best interest of the communities they serve.

Engagement activities included:

- In-person riparian focused workshops;
- Virtual riparian focused workshops;
- CR2SL presentations and feedback sessions during regularly scheduled watershed Lead Entity and Local Integration Organization meetings.

The following list of CBOs includes some that represent overburdened communities and vulnerable populations as well as other CBOs that were invited to or attended one or more CR2SL engagement opportunities. Some of the communities represented by these CBOs include Spanish speaking and bilingual Latinos, farmers in Whatcom County and San Juan Island youth.

The list is incomplete and does not represent all CBOs that participated and provided feedback, nor does it include Tribes:

- [Latino Educational Training Institute \(LETI\)](#)
- [Skagit Watershed Council](#)
- [Snoqualmie Watershed Forum](#)
- [Mountains to Sound Greenway](#)
- [Whatcom Family Farmers](#)
- [Sound Salmon Solutions](#)
- [Wild Fish Conservancy](#)
- [Skagit Fisheries Enhancement Group](#)
- [Ag Water Board of Whatcom County](#)
- [Northwest Watershed Institute](#)
- [Great Peninsula Conservancy](#)
- [Northwest Straits Foundation](#)
- [Strait Ecosystem Recovery Network](#)
- [North Olympic Salmon Coalition](#)
- [Hood Canal Salmon Enhancement Group](#)
- [Jefferson Land Trust](#)
- [Long Live the Kings](#)
- [North Olympic Land Trust](#)
- [The Madrona Institute](#)
- [Trout Unlimited](#)
- [Islands' Oil Spill Association](#)
- [San Juan County Conservation Land Bank](#)
- [Olympia Ecosystems](#)
- [South Puget Sound Salmon Enhancement Group](#)

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

A number of actions were taken to increase accessibility and encourage participation in engagement activities, including:

- In-person workshops were coordinated by the local watershed leaders and hosted locally, within close proximity to participants' communities.
- A combination of in-person and virtual engagement events were hosted by local watershed leaders.
- Community partners were encouraged to attend any of the events that was most convenient for them, regardless of work area.
- CR2SL provided financial support to the local watershed leaders to host and facilitate the in-person workshops, including meals and beverages.
- CR2SL provided planning support to the local watershed leaders to host and facilitate in-person or virtual riparian workshops.

- CR2SL sent out an online engagement follow-up worksheet to be completed at each participant's convenience.

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

One potentially vulnerable population was not engaged: unsheltered people. Due to the difficulty in engaging with this population, the unknown of where projects will be implemented, and the expectation that any potential impacts would be indirect and mostly positive in nature, the program did not meaningfully engage with this population.

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.

Local partners, including some CBOs that represent overburdened communities and vulnerable populations, provided broad recommendations. A full report of the engagement findings is available here: [Summary Report of Input from Puget Sound Riparian Professionals](#)¹⁸. The following recommendations and considerations were provided to guide equitable distribution of program benefits to overburdened communities and vulnerable populations:

- Support affordable housing opportunities or provide housing stipends for field staff;
- Provide higher pay for field crew staff;
- Provide permanent positions/permanent crews to provide income stability and other benefits;
- Provide funding for professional development opportunities including: environmental education, job training, and volunteer opportunities;
- Prioritize work in watersheds with worst pollution problems.

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

The CR2SL program intends to adapt throughout the life of the grant to best meet the needs of Puget Sound riparian restoration practitioners and the communities that they represent. Data will be collected from funding applicants and recipients to provide insight into any remaining barriers that could be addressed by the program, and ways that the program could build momentum towards identifying multi-benefit approaches and creating long-term solutions.

¹⁸ <http://ecyapfpass/Biblio2/SummaryPages/2406013.html>

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

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

Anticipated environmental benefits, both direct and indirect, may include:

- Improved salmon and other fish habitat;
- Improved critical habitat conditions for downstream Puget Sound orca and other aquatic life;
- Improved wildlife habitat;
- Improvements to existing riparian buffers;
- Increased streamside shade;
- Reduction of invasive weeds on rivers/streams;
- Reduced erosion;
- Climate resilience through creation of microclimates, moderation of air temps;
- Improved access to greenspace;
- Increased permanent conservation of lands;
- Increased nutrient distribution in the watershed;
- Water quality improvements;
- More native plant availability, capacity;
- Job creation, local capacity, career development opportunities;
- Local data improvements, organization, and availability;
- Improved efficiency of restoration crews and programs.

Who will primarily benefit from this action?

Benefits will primarily occur within the immediate communities and watersheds where projects are implemented, but the benefits are not limited to these localized areas. Downstream and upstream affects can have a positive influence on communities at a much broader scale.

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.

Potential localized benefits to overburdened communities or vulnerable populations may include but are not limited to:

- Greater access to green space and natural resources;
- Improved water quality in streams;
- Improved fisheries for those reliant on sustenance fishing;
- Increased job opportunities for positions working on restoration projects;
- Improved environmental education opportunities and outreach focused on riparian science and restoration.

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

Minimal harms are anticipated to have direct or indirect impacts. These may include but are not limited to:

- Minimal construction noise or traffic;
- Improved green spaces may attract undesirable flora or fauna, or encourage gentrification;
- Implemented buffers may reduce views of the river/stream and/or direct access to the water.

Any riparian restoration projects or land acquisitions funded by the CR2SL program will be voluntary in nature and completed with signed permission from participating landowners.

Who will primarily experience the harms?

Harms, if any, would primarily be felt within the immediate area in which an action or impact occurs. It is not expected that there will be any long-lasting negative impacts as a result of actions that may occur due to projects funded by this grant program.

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

This action is not expected to harm overburdened communities or vulnerable populations. Any impacts listed previously of a negative nature are expected to be limited in duration and would not directly or disproportionately impact vulnerable populations in overburdened communities.

There is the potential for unsheltered people who may be living in an area that is adjacent to, or within, a restorable riparian area to be displaced. Due to the nature of riparian restoration and the need for ongoing maintenance and monitoring, these impacted individuals would need to find an alternative living situation. In the unlikely chance that such a case is proposed, project implementors would need to assess all options and opportunities to work with local community resources, the people directly affected, and all jurisdictions affected to provide viable, equitable, and sustainable solutions to the displaced unsheltered population.

Describe how the action would address environmental and health disparities.

Riparian restoration actions primarily address water quality issues and habitat improvement necessary to support healthy populations of flora, fauna, and people. These improvements could offer a greater quality of life for those living in close proximity to a project by providing climate resilient, higher water quality resources that support necessary fisheries and other wildlife, ensure cleaner drinking water, and help alleviate climate impacts through river/stream temperature mitigation.

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

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

The CR2SL program will address equitable distribution of benefits through the following processes:

- Direct award options – The program has the ability to direct awards to state agencies that are focusing on areas that need it the most and will maximize benefit to the wider riparian restoration community;
- Proposal evaluation and scoring criteria – The program has developed evaluation and scoring criteria that prioritizes Tribal and CBO inclusion (especially from overburdened communities and vulnerable populations) in project elements, objectives or as applicants.
- Programmatic proposals – The program emphasizes programmatic proposals that encourage or necessitate local collaboration.
- Focus areas – The program prioritizes proposals for work to be completed in watersheds with documented local plans to address pollution problems, habitat needs and fisheries concerns.

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:

- **Eliminating the disparate impact of environmental harms on overburdened communities and vulnerable populations;**
- **Reducing cumulative environmental health impacts on overburdened communities or vulnerable populations;**
- **Preventing the action from adding to the cumulative environmental health impacts on overburdened communities or vulnerable populations;**
- **Providing equitable participation and meaningful engagement of vulnerable populations and overburdened communities in the development of the significant agency action;**
- **Prioritizing equitable distribution of resources and benefits to overburdened communities;**
- **Promoting positive workforce and job outcomes for overburdened communities;**
- **Meeting community needs identified by the affected overburdened community;**
- **Modifying substantive regulatory or policy requirements; and**
- **Any other mitigation techniques, including those suggested by the council, the office of equity, or representatives of overburdened communities and vulnerable populations.**

The CR2SL program has used and will use the following methods to address equitable distribution of benefits:

- Provided equitable participation and meaningful engagement of vulnerable populations and overburdened communities in the development of the grant program;
- Prioritizing equitable distribution of resources and benefits to overburdened communities;
- Promoting positive workforce and job outcomes for overburdened communities;
- Meeting community needs identified by the affected overburdened community;
- Direct award options – Potentially directing awards to state agencies that are focusing on areas that need it the most and will maximize benefit to the wider riparian restoration community;
- Proposal evaluation and scoring criteria – Developed evaluation and scoring criteria that prioritizes Tribal and CBO (especially from overburdened communities and vulnerable populations) inclusion in project elements, objectives or as applicants.
- Programmatic proposals – Emphasizing and prioritizing programmatic proposals that encourage or necessitate local collaboration.
- Focus areas – Prioritizing proposals for work to be completed in watersheds with documented local plans to address pollution problems, habitat needs and fisheries concerns.

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.

N/A.

Section 10: Executive Summary

The Environmental Protection Agency has awarded the Washington State Department of Ecology (Ecology) funds to develop a grant program and facilitate subawards of these funds toward improving the climate resiliency of riparian systems in Puget Sound. The Climate Resilient Riparian Systems Lead (CR2SL) program funding is directed at riparian systems recovery projects that will result in greater area of riparian acreage protected, restored, or maintained for climate resilience.

The CR2SL program's geographic scope covers all 19 Water Resource Inventory Areas (WRIA's) in the Puget Sound basin (WRIA's 1-19). This includes the entire watershed areas from the headwaters to where the rivers enter Puget Sound. Many overburdened and vulnerable communities reside within the area and could potentially be impacted by projects implemented by the program. Communities adjacent to rivers or located within riparian areas are those most likely impacted by the program. These include overburdened communities in census tracts located primarily within the urban areas along the I-5 corridor. Most of these census tracts are located within the southern half of Seattle and south into Kent and Tacoma. A small cluster census tracts located north of Seattle, near Everett, and one tract in Mount Vernon were also identified as overburdened communities. It is possible that the program will affect communities located upstream, downstream, or adjacent to projects, however it is unknown where projects will be implemented and at what scale. One potential additional vulnerable population that could be affected by the program is unhoused people utilizing riparian areas for shelter (depends on project locations, TBD).

Surrounding Puget Sound communities, especially those within close proximity to implemented projects, will benefit from resulting riparian restoration efforts as these projects are known to increase canopy cover and green spaces, improve water quality and improve habitat for fish and aquatic life. No negative impacts from the program were identified through community engagement and completion of the EJ assessment.

The CR2SL team performed extensive engagement within the program footprint to include Tribes and community-based organizations representing overburdened communities and vulnerable populations in program design to best support their needs and to increase their efficiency and capacity. This community-centered design approach will foster the identification of multi-benefit project opportunities and promote collaborative riparian area management in Puget Sound watersheds. A number of methods were identified and built into the program

design to address equitable distribution of benefits. Potential localized benefits to overburdened communities or vulnerable populations may include but are not limited to:

- Greater access to green space and natural resources;
- Improved water quality in streams;
- Improved fisheries for those reliant on sustenance fishing;
- Increased job opportunities for positions working on restoration projects;
- Improved environmental education opportunities and outreach focused on riparian science and restoration.

The CR2SL program will continue to engage with community partners and Tribes throughout the life of the grant to adapt to the needs of restoration practitioners and maximize the benefits of the program.

Section 11: 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)¹⁹.

¹⁹ <https://ecology.wa.gov/About-us/Who-we-are/Environmental-Justice/HEAL/EJ-Assessments>