



Water Quality Program Loan Offer to The City of Washougal

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

Water Quality Program

Washington State Department of Ecology

Olympia, Washington

January 2025, Publication 24-10-039

Publication Information

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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.

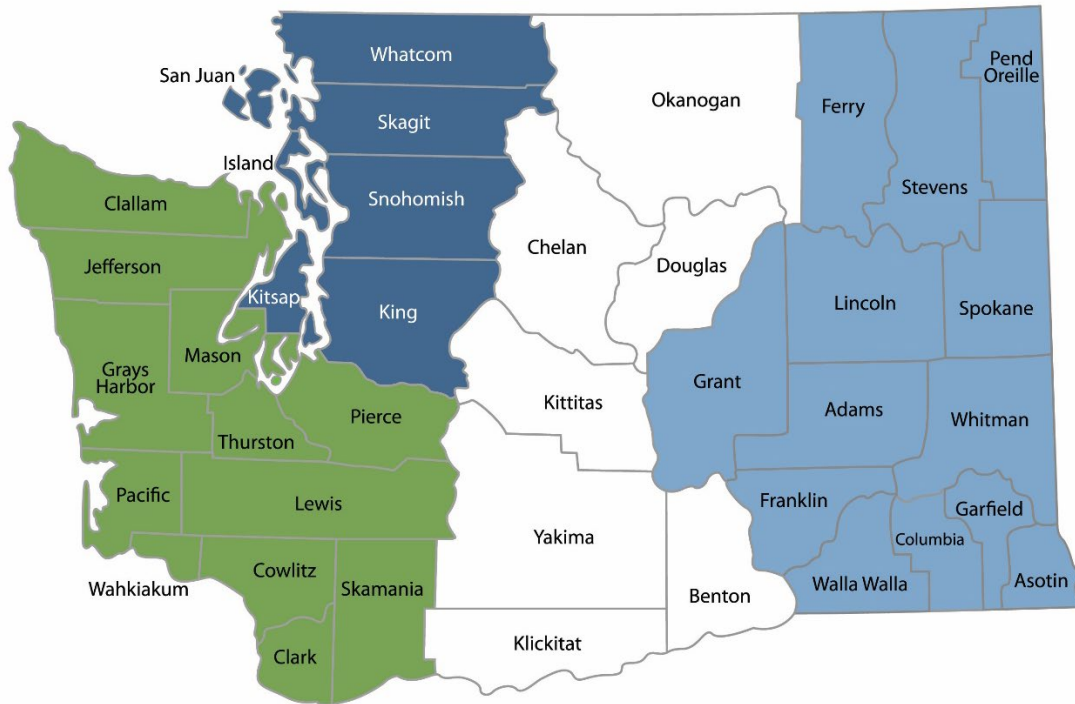
根据华盛顿州环境正义法(RCW 70A.02)，生态管理署在制定某些重大行动时必须进行环境正义评估。该评估需提供对负担过重社区和弱势群体潜在影响的信息，以及减轻已明确的危害和公平分配已知利益的策略。如需笔译、口译或无障碍协助，请联系 Courtney Cecale，电子邮件：courtney.cecale@ecy.wa.gov或电话 (360) 480-6270。

Theo luật Công Bằng Môi Trường của tiểu bang (RCW 70A.02), Bộ Môi Sinh được yêu cầu tiến hành Đánh Giá Công Bằng Môi Trường trong quá trình triển khai một số hành động quan trọng. Đánh giá này cung cấp thông tin về các tác động tiềm ẩn đối với các cộng đồng đang chịu tổn hại và các nhóm dân cư dễ bị tổn hại cũng như các chiến lược nhằm giảm thiểu tác hại đã xác định và phân chia công bằng các lợi ích đã biết. Để được hỗ trợ về thông dịch, giải thích hoặc sự giúp đỡ cho người khuyết tật, vui lòng liên hệ với Courtney Cecale theo địa chỉ courtney.cecale@ecy.wa.gov hoặc (360) 480-6270.

주 환경부는 중요한 조치를 계획할 때 환경 정의 평가를 수행해야 합니다. 이 평가는 취약계층 지역사회와 취약인구에 대한 잠재적 영향 관련 정보와, 확인된 피해를 완화하고 알려진 혜택을 공정하게 분배하기 위한 전략을 제공합니다. 번역, 통역, 또는 장애인 서비스 지원은 담당자 (Courtney Cecale)에게 이메일 courtney.cecale@ecy.wa.gov 또는 전화 (360) 480-6270으로 문의하십시오.

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

Water Quality Program Loan Offer to The City of Washougal

An Environmental Justice Assessment (per RCW 70A.02.060)¹

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Washington State Department of Ecology
Olympia, WA

January 2025 | Publication 24-10-039



DEPARTMENT OF
ECOLOGY
State of Washington

¹ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.02&full=true#70A.02.010>

Table of Contents

List of Figures and Tables	7
Figures.....	7
Executive Summary	8
Environmental Justice Assessment	10
<i>Purpose of the Environmental Justice Assessment</i>	10
Section 1: Background	12
Section 2: Notification that an Environmental Justice Assessment has been Initiated	14
Section 3: Identify Affected Tribes	14
<i>Preparing for Tribal Consultation</i>	14
Section 4: Offer Consultation:	15
Section 5: Summary of Tribal Consultation & Engagement	15
<i>Summary of Tribal Consultation</i>	15
Section 6: Identification of Overburdened Communities & Vulnerable Populations	16
<i>Identify Overburdened Communities and Vulnerable Populations</i>	16
Section 7: Summary of Community Engagement	19
<i>Summarizing Community Engagement</i>	19
<i>Identify Potential Environmental Benefits & Harms from Action</i>	22
Section 9: Options to Eliminate, Reduce, or Mitigate Harms and Equitably Distribute Benefits	24
<i>Identify Options to Eliminate, Reduce, or Mitigate Harms & Equitably Distribute Benefits</i>	24
Section 10: Executive Summary	25
Section 11: Notification of Completed Assessment	26

List of Figures and Tables

Figures

Figure 1. EJScreen map of the affected area showing the potential floodplain changes in the next 100 years..... 18

Executive Summary

The purpose of this action is to provide the City of Washougal with \$22,564,700 in loan funding to update the infrastructure at the City of Washougal’s wastewater treatment plant including a new biological selector, new biosolids management facilities, and odor control facilities.

The loan project is located at the City of Washougal’s wastewater treatment plant at 3900 SE Lewis and Clark Hwy, Washougal, WA. The project will release treated wastewater into the Columbia River, which empties into the Pacific Ocean.

The community affected by this action experiences moderate environmental burdens compared to other areas of the State. The area includes two Superfund sites that contain environmental contamination. Wastewater discharge monitoring suggests more community burdens from wastewater discharge than other areas in the state. Finally, nearby neighbors and facility employees are impacted by odors from hydrogen sulfide emissions. The odor issues should resolve with the treatment plant upgrades. No significant community vulnerabilities due to socioeconomic factors were identified in Ecology’s analysis.

Community engagement in this action began in February and March of 2024, with an online webinar and public comment period. We did not receive comments from overburdened communities or populations with vulnerabilities from these outreach strategies. Employees of the facility and neighbors affected by the odors have been in communication with the City of Washougal wastewater facility operators in search of a resolution to the emissions.

Ecology invited Tribal consultation from Yakama Nation, the Quinault Indian Nation, and Cowlitz Indian Tribe. No Tribal government responded to our invitation to consult.

The only harm identified from taking this action is that neighbors and travelers may experience construction impacts during facility renovations.

Ecology assessed ways to minimize harms resulting from this action.

- Construction nuisances will be managed according to local laws and construction permit requirements as required by the loan contract.

Anticipated benefits resulting from this loan offer will include:

- This loan action invests \$22,564,700 in low-interest loan funding, distributing financial resources outside the State’s economic and urban centers and resourcing a small community that otherwise has limited local revenues.
- Implementing operations and maintenance best management practices and permit provisions to avoid future environmental and water quality impacts.
- Replacing the existing lagoons with a mechanical thickening and dewatering process to achieve groundwater and wetland protections.
- Future decommissioning of the existing lagoons to open several acres of publicly owned land for reuse.
- Lowering biosolids treatment and disposal costs.

- Resolving odor issues.
- Increasing wastewater treatment capacity, allowing for continued growth in the City.

Overall, Ecology supports this subsidized loan offer to the City of Washougal, in support of water quality improvements in a small community that already experiences environmental burdens and has a small economy with limited financial capabilities.

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.02²](#)), as well as federal commitments in the [Performance Partnership Agreement³](#) with the EPA. The assessment process draws on best practices established in [Technical Guidance for Assessing Environmental Justice in Regulatory Analysis⁴](#) and [Promising Practices for EJ Methodologies in NEPA Reviews⁵](#).

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

- The development and adoption of significant legislative rules as defined in [RCW.05.328⁶](#)
- 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.

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

³ <https://ecology.wa.gov/About-us/Accountability-transparency/Government-coordination/Partnering-with-the-EPA>

⁴ <https://www.epa.gov/environmentaljustice/technical-guidance-assessing-environmental-justice-regulatory-analysis>

⁵ https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

⁶ <http://app.leg.wa.gov/RCW/default.aspx?cite=34.05.328>

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.

Section 1: Background

The information in this section is provided for the Office of Financial Management's [dashboard](#)⁷ which includes all covered agency's Environmental Justice Assessment notices.

1. Descriptive title of project/action:

Water Quality Program draft loan offer to the City of Washougal

EAGL number and project title: WQC-2025-WashPW-00068 - Construction of a New Biosolids Management Facility

2. Date EJ Assessment initiated:

02.02.2024

3. Ecology Program/Office:

Water Quality Program

4. Point of contact for EJ Assessment:

Faith Wimberley, Environmental Justice Planner

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. Short summary of the action.

The purpose of this action is to provide the City of Washougal with \$22,564,700 in loan funding to construct infrastructure updates at the municipality's wastewater treatment plant including: a new biological selector, new biosolids management facilities, and odor control facilities.

These upgrades will increase the facility's capacity to process wastewater and address operational issues that have impeded the plant's ability to meet Ecology's permit requirements and respond to odor nuisances.

The loan project is located at the City of Washougal's wastewater treatment plant at 3900 SE Lewis and Clark Hwy, Washougal, WA.

Anticipated benefits from the improvements made with this loan include:

⁷ <https://ofm.wa.gov/budget/budget-related-information/agency-activities/environmental-justice-assessment-notices>

- Investment of \$22,564,700 in low-interest loan funding resources to a small community that has limited local revenues.
- Meeting many permit provisions and regulatory requirements.
- Implementing operations and maintenance best management practices outlined in engineering reports and permits to avoid future environmental and water quality impacts.
- Replacing the existing lagoons with a mechanical thickening and dewatering process to achieve groundwater and wetland protections.
- Future decommissioning of the existing lagoons to open several acres of publicly owned land for reuse.
- Lowering biosolids treatment and disposal costs.
- Resolving odor issues.
- Increasing wastewater treatment capacity and capability to meet future demand and loading, allowing for continued growth in the City and protection of water quality.

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

Ecology conducted public engagement in February and March of 2024, with an online webinar and public comment period.

Ecology invited Tribal consultation with identified impacted Tribes including the Confederated Tribes and Bands of the Yakama Nation, Quinalt Indian Nation, and Cowlitz Indian Tribe. Ecology was prepared to engage in consultation in formats requested by the Tribes that create opportunities for their meaningful involvement in this funding decision.

Please contact Faith Wimberley at faith.wimberley@ecy.wa.gov with any comments or questions about Ecology's engagement activities.

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

[\\$386 million in clean water projects planned for Washington - Washington State Department of Ecology](#)

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.

Yakama Nation, the Quinault Indian Nation, and Cowlitz Indian Tribe may be affected by the proposed action.

3. 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.

No additional Tribes have self-identified as being potentially impacted.

4. Describe plans to offer consultation to identified Tribes.

Ecology offered consultation to all potentially affected Tribes through formal letters to Tribal chairs and Department of Natural Resource directors on April 15th, 2024.

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.

There are no anticipated potential impacts directly to Tribal lands.

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

Potential impacts not on Tribal lands include improved treatment capability and capacity, and protected ground and surface water quality for the Columbia River. The protection of water quality benefits aquatic species including finfish resources, which are important for Treaty-protected harvest rights.

Cultural and historic resources could potentially be impacted by construction activities. This project will undergo review through Section 106 of the National Historic Preservation Act to identify any potential adverse effects prior to the project proceeding. Ecology will consult again with Tribes at that stage.

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

N/A. Ecology did not receive a response from any of the potentially affected Tribes.

- b. Equitably distribute benefits from the action

N/A. Ecology did not receive a response from any of the potentially affected Tribes.

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

N/A. Ecology did not receive a response from any of the potentially affected Tribes. It is anticipated that this project will provide water quality and public health benefits to the larger community, including Tribal communities.

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

Should any of the potentially affected Tribes request consultation, Ecology will respond to concerns. Since this project is subject to Section 106 review under the National Historic

Preservation Act, Ecology will consider the effects on historic properties. Ecology will consult with each Tribe's Tribal Historic Preservation Officer regarding cultural resources that may be impacted by the project before project construction.

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

The project location, including the wastewater treatment plant and surrounding areas, is in the City of Washougal. The city is located along the Columbia River, which flows westward through several counties in Washington and Oregon and into the Pacific Ocean.

For this assessment, Ecology chose to designate the following census tracts as the affected area because of their proximity to the project location and impacted water body.

- 53011040509 (project location)
- 53011041500 (most adjacent downstream)
- 53011040507 (upstream with minimal impacts)
- 53011041400 (downstream with minimal impacts)

3. 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.

The EHD Map Rankings (V2.0) for the census tracts likely to be impacted include:

- 53011040509 (project location) = 7
- 53011041500 (most adjacent downstream) = 7
- 53011040507 (upstream with minimal impacts) = 8
- 53011041400 (downstream with minimal impacts) = 6

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

Yes

No

If yes, describe.

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

Wastewater discharge is an indicator of environmental quality that impacts public health considerations, is directly related to this action, and is ranked highly (poorly) for this geographic

area compared to other areas of the state. If Ecology makes a loan offer to the City of Washougal, the action will alleviate threats to the community from wastewater discharge.

Wastewater refers to the used waste and solids that are released as sewage from homes and businesses, treated at a wastewater treatment plant, and eventually discharged to receiving waters. The discharge from wastewater plants can pollute the nearby groundwater and surface water if not carefully managed. In such cases, the contaminated water can lead to poor health outcomes, such as hypertension, cancer, and waterborne infections, when used for drinking, agriculture, and recreation. In addition, leaked untreated wastewater can degrade soil and emit dangerous odors.

According to the Washington Tracking Network⁸, the conditions in the area create several other cumulative health considerations that pose threats to the local community. While these don't directly relate to this action, they demonstrate a variety of challenges posed to the community that can erode quality of life and health. The following indicators of environmental health disparities are ranked at 8 or higher for some census tracts in the impacted area:

Environmental Effects rank = 10, which is determined by the following:

Lead Risk from Housing = 9

Proximity to National Priorities List Facilities (Superfund Sites) = 9

Proximity to Risk Management Plan Facilities = 10

Wastewater Discharge = 10

Health Disparities rank = 8, which is determined by the following:

Social Determinants = 8

Economic Determinants = 8

Planning for Health = 8, which is determined by the following:

Education (some college, no degree) = 9

Built Environment, alcohol outlet density per 10,000 = 10

Low voting rate = 8

Ozone concentration and particulate matter (PM2.5) concentrations are also elevated in this project location. Both ozone and particulate matter contribute to air pollution, which is hazardous and can result in poor health outcomes such as respiratory disease and cardiovascular disease.

This action will occur near a National Priority List Facility (Superfund Site) and is in proximity to Risk Management Plan Facilities. Generally, communities living in areas where facilities release toxic chemicals are at greater risk of poor outcomes caused by accidents or unsafe management practices.

6. 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.

⁸ [Washington Tracking Network \(WTN\) | Washington State Department of Health](#)

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>

No portion of the area impacted by this action is at or above the 80th percentile (in state) for socioeconomic indicators of “People of color” or “Low income.”

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

No portion of the area impacted by this action is at or above the 80th percentile (in state) for other “Socioeconomic” or “Health Disparities” indicators.

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

The impacted area faces potential flooding impacts from climate change. The map below illustrates the project area’s 100-year floodplain. A 100-year floodplain refers to an area that statistically has a 1-percent chance of experiencing a flood in any given year.



Figure 1. EJSscreen map of the affected area showing the potential floodplain changes in the next 100 years.

9. 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).

The potential affected area is not considered disadvantaged.

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

Wastewater treatment facility employees, likely no more than 70 individuals, are currently impacted by odor at the facility due to the degraded infrastructure. Additionally, residents who live close to the facility are affected by the odor and some have issued complaints about the problem.

11. Through community engagement, were additional overburdened communities and vulnerable populations identified who are likely to be affected by the action? Describe

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

additional communities or populations identified, and the reasons they would be considered overburdened and vulnerable.

During community engagement, no additional overburdened communities or vulnerable populations were identified as likely to be affected by this action.

12. 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.

During community engagement, no additional overburdened communities or vulnerable populations were identified as 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.

Identified population vulnerabilities

Based on the directives and subsequent analysis of community indicators, Ecology identified three potential segments of the population who may be disproportionately affected by this action. Ecology did not identify any statutorily defined overburdened communities or vulnerable populations affected by the action of this loan offer.

If Ecology takes this action, commuters and residents along the roadways and nearby the facility may experience construction impacts during the infrastructure upgrades.

If Ecology does not take this action, and the City is not able to then move forward with these infrastructure upgrades, two segments of the population will continue to experience related environmental risks:

- People living in the area and using waters in the Columbia River experience some disproportionate impacts from environmental conditions such as proximity to nearby hazards (Superfund, etc.) and wastewater quality impacts¹¹.
- Employees of the facility are currently impacted by odors from hydrogen sulfide emissions at the treatment plant facility.

Engagement activities for the treatment plant employees

Ecology communicated with the treatment plant employees through coordination with the treatment plant management. Odor issues from the treatment plant are an ongoing complaint and point of discussion between the management, staff, and neighbors. The issue has been discussed at internal staff meetings on several occasions. This action of a loan offer will help alleviate the odor issue for the people affected.

Engagement activities for the public

Ecology chose to communicate broadly with the entire Washougal community instead of restricting messaging to a smaller segment of the population for efficiency and because the same messaging would benefit everyone.

In February, Ecology announced and notified interested parties of our intent to fund the subsidized loan to the City of Washougal¹². Ecology advertised a public comment period by sending a blog to multiple subscriber lists (with a total of 7,000 subscribers) and to many news outlets. Ecology consulted the public during the 30-day public comment period and hosted a 90-minute webinar to explain the funding process, funding decisions, and some elements of the funding award offers. Ecology considered and responded to all comments received. Comments may influence Ecology’s loan offer.

Ecology sent an email (to about 7,000 subscribers statewide) announcing the final funding. Ecology sent a press release with a specific note about funding the City of Washougal’s project to the Camas Washougal Post and The Columbian, the most prominent newspapers in the area.

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

This significant agency action is part of a larger program that distributes subsidized loans and grants to Washington’s utility providers to upgrade deteriorated infrastructure. The program is competitive and is standardized for all applicants with many opportunities for applicants to receive technical assistance in submitting their applications. Ecology takes steps to minimize barriers to engagement for applicants, specifically smaller entities and entities without internal technical knowledge to manage these funding investments.

- Ecology converted public meetings for the program into webinars to increase access and attendance.

¹¹ [Discharge Monitoring Report \(DMR\) Loading Tool along with the Risk-Screening Environmental Indicators \(RSEI\) model](#)

¹² [State Fiscal Year 2025 Final Water Quality Funding Offer List and Intended Use Plan](#)

- Ecology provides accessible communications related to this action. Notice of all Ecology’s Water Quality Program final loan offers are provided in three digital formats:
 - 1. PDF document
 - 2. Spreadsheet
 - 3. Interactive data dashboard/map
 - All of Ecology’s documentation related to this action can be provided in languages other than English.
 - Ecology staff provide technical assistance to potential applicants throughout the application process and with the online application portal.
2. Identify overburdened communities or vulnerable populations potentially affected by the action who were not engaged and explain why not.

Ecology has sought to engage with vulnerable populations through the mechanisms described above in Section 7, Question 1.

3. 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.

Ecology received no recommendations from members of overburdened communities or vulnerable populations.

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

Ecology has no current plans to engage directly with the specified vulnerable populations related to this action.

The City of Washougal is responsible and suited to implement the infrastructure project and will therefore be the entity to pursue engagement with vulnerable populations and overburdened communities. However, as the project funder, Ecology has an opportunity to ensure vulnerable populations are protected and engaged through our investments. Ecology uses a contracting process that is formalized with a signed agreement to require specific engagement-oriented actions. As the agreement is a legally binding, written contract between both parties, it offers the strongest method available to Ecology to ensure the loan funding is used to enhance equity in the ongoing implementation of this construction project.

Specific terms and conditions include:

- Translating materials into languages other than English in accordance with civil rights requirements.
- Completing cultural resources review (and consultation with Tribes) to avoid, minimize, or mitigate adverse effects to archaeological and historic archaeological sites, historic

buildings/structures, traditional cultural places, sacred sites in accordance with the National Historic Preservation Act.

- Contracting for project implementation with firms from small, minority owned, and women’s businesses (40 CFR, Part 33)
- Ensuring access to materials or participating in public forums for individuals with disabilities that would otherwise create barriers (as per Section 504 of the Rehabilitation Act, codified in 40 CFR Part 7).
- Communicating regularly with Ecology and other interested parties on the progress of this action.
- Using best practices to communicate with different segments of the population impacted and transparency on public process and funding decisions.
- Procuring goods and services in fair, legal, and open public processes without advancing leaders who have conflicts of interest.

Section 8: Potential Environmental Benefits & Harms from Action

Identify Potential Environmental Benefits & Harms from Action

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

This loan offer promotes the equitable distribution of resources across the state.

- This low-interest loan helps the City of Washougal mitigate high per-capita costs for wastewater treatment, potentially reducing utility rate increases, especially benefiting income-constrained residents.
- Funding water quality projects in small and rural areas like Washougal redistributes economic wealth out of urban and political centers to invest in communities with less local revenues and technical competencies to make large scale infrastructure updates.

This loan offer supports the City’s efforts to improve environmental and water quality benefiting aquatic life and people. Specifically, neighbors, workers, and those who use the Columbia River will benefit from this project. Many people rely on the Columbia River for drinking water, fishing, recreation, agriculture, water related businesses, and for cooling during extreme heat.

Benefits from the infrastructure improvements made with this loan include:

- The City of Washougal can meet many permit provisions and regulatory requirements.

- Implementing operations and maintenance best management practices outlined in engineering reports and permits to avoid future environmental and water quality impacts.
- Replacing the existing lagoons with a mechanical thickening and dewatering process to achieve groundwater and wetland protections.
- Future decommissioning of the existing lagoons to open several acres of publicly owned land for reuse.
- Lowering biosolids treatment and disposal costs.
- Increasing wastewater treatment capacity and capability to meet future demand and loading, allowing for continued growth in the City and protection of water quality.

2. Who will primarily benefit from this action?

The primary beneficiaries of this action include the customers of the City of Washougal wastewater utility and nearby neighbors and plant employees who are impacted by the facility odor. Subsidized loan funding will reduce financial impacts to rate payers within the Washougal utility service area.

The secondary beneficiaries of this action are numerous. Improved facility operation and upgrades will protect environmental quality, water quality, and public health protection, alleviating environmental health disparities in the community listed above in Section 6.4. Improvements will benefit people that use the Columbia River and downstream waters out to the Pacific Ocean for many purposes including fishing, recreation, and drinking water. Improved water quality will protect aquatic life including salmon populations. Tribes will benefit as this action will support treaty protected natural resources.

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.

This action benefits the whole community and downstream communities along the Columbia River. Vulnerable populations are primary beneficiaries as described in S8.2 above.

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

Ecology does not anticipate harms from this action, the loan offer, to any population, including overburdened communities or vulnerable populations.

Since the project will involve construction, there may be some temporary localized impacts related to traffic revisions, noise, and dust.

5. Who will primarily experience the harms?

Local people and businesses located near areas of construction and those traveling through areas of construction may be affected by construction nuisances.

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

Ecology does not anticipate harms from this action, the loan offer, to any population including overburdened communities or vulnerable populations.

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

There are no anticipated human health disparities resulting from this action.

The Washougal community experiences lower environmental quality due to wastewater discharge than other areas in the State. If Ecology makes a loan offer to the City of Washougal, the action will fund infrastructure upgrades that alleviate some threats to the community from wastewater discharge.

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.

Harms from construction

Travel disruptions and environmental contaminants released during project construction (such as fine particle dust and noise) will be mitigated by the project implementer (The City of Washougal) and their subcontractors. To address these possible concerns, the City and their subcontractors will follow all legal and permit requirements for conducting construction in the area, which will be Term and Condition #8 of the funding agreement. Traffic mitigations, quiet hours, and providing communications and alternate routes to impacted travelers are all routine components of large-scale construction projects and are enforced by other jurisdictions, not Ecology.

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:

See answer to Section 9, #1 above.

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.

Wherever people live, contaminants from human waste are released to the environment. Wastewater treatment facilities treat the waste, reducing pollution levels and discharging the improved water to land or a natural water body through an outfall. Discharge of treated water from the facility is a necessary result of wastewater treatment. This action funds infrastructure to support the facility meeting its permitted pollutant limits, which will improve the quality of the water discharged; however, treated water will still be discharged.

Section 10: Executive Summary

The purpose of this action is to provide the City of Washougal with \$22,564,700 in loan funding to update the infrastructure at the City of Washougal’s wastewater treatment plant including: a new biological selector, new biosolids management facilities, and odor control facilities.

The loan project is located at the City of Washougal’s wastewater treatment plant at 3900 SE Lewis and Clark Hwy, Washougal, WA. The project will release treated wastewater into the Columbia River, which empties into the Pacific Ocean.

The community affected by this action experiences moderate environmental burdens compared to other areas of the State. The area includes two Superfund sites that contain environmental contamination. Wastewater discharge monitoring suggests more community burdens from wastewater discharge than other areas in the state. Finally, nearby neighbors and facility employees are impacted by odors from hydrogen sulfide emissions. The odor issues should resolve with the treatment plant upgrades. No significant community vulnerabilities due to socioeconomic factors were identified in Ecology’s analysis.

The only harm identified from taking this action is that neighbors and travelers may experience construction impacts during facility renovations.

Community engagement in this action began in February and March of 2024, with an online webinar and public comment period. We did not receive any comments from overburdened communities or populations with vulnerabilities from these outreach strategies. Employees of the facility and neighbors affected by the odors have been in communication with the City of Washougal wastewater facility operators in search of a resolution to the emissions.

Ecology invited Tribal consultation from Yakama Nation, the Quinault Indian Nation, and Cowlitz Indian Tribe. No Tribal government responded to our invitation to consult.

Ecology assessed ways to minimize harms resulting from this action.

- Construction nuisances will be managed according to local laws and construction permit requirements as required by the loan contract.

Anticipated benefits from this loan offer will include:

- Implementing operations and maintenance best management practices and permit provisions to avoid future environmental and water quality impacts.
- This loan action invests \$22,564,700 in low-interest loan funding, distributing financial resources outside the State’s economic and urban centers and resourcing a small community that otherwise has limited local revenues.
- Replacing the existing lagoons with a mechanical thickening and dewatering process to achieve groundwater and wetland protections.
- Future decommissioning of the existing lagoons to open several acres of publicly owned land for reuse.
- Lowering biosolids treatment and disposal costs.
- Resolving odor issues.
- Increasing wastewater treatment capacity, allowing for continued growth in the City.

Overall, Ecology supports this subsidized loan offer to the City of Washougal, in support of water quality improvements in a small community that already experiences environmental burdens and has a small economy with limited financial capabilities.

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)¹³.

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