



Cities of Aberdeen and Hoquiam Flood Protection Program: 2023 State Legislature Provision For a One-time Grant Project

An Environmental Justice Assessment (per RCW 40A.02.060)

By
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For the

Office of Chehalis Basin
Washington State Department of Ecology
Olympia, Washington
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¹ www.ecology.wa.gov/contact

Language Access

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

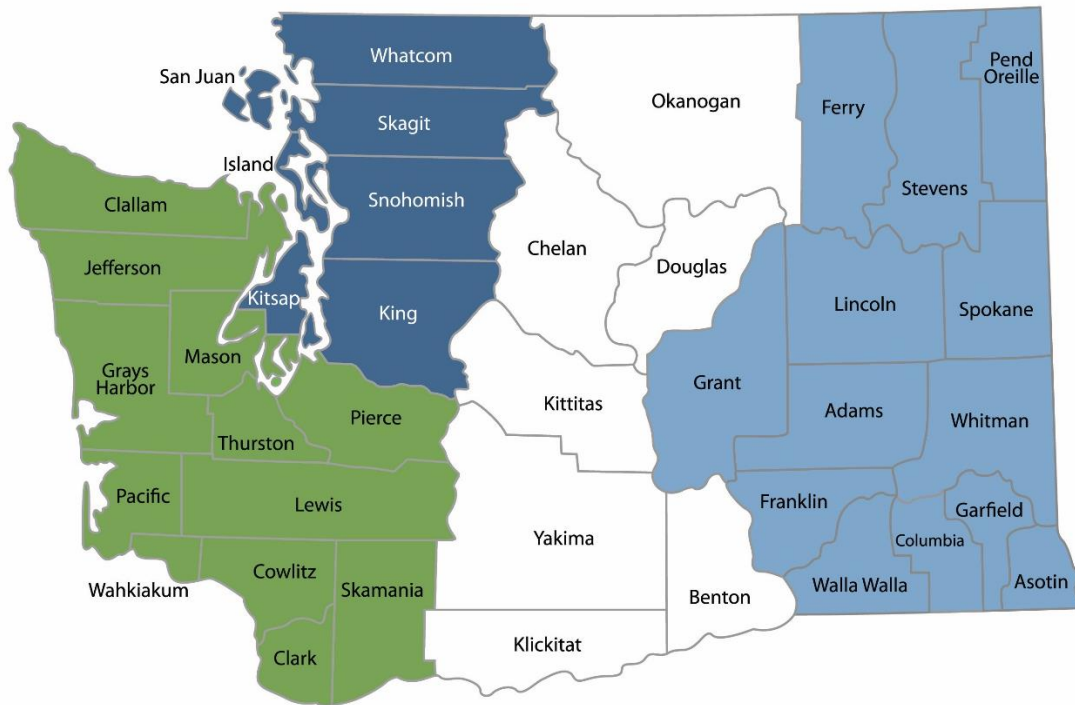
根据华盛顿州环境正义法(RCW 70A.02)，生态管理署在制定某些重大行动时必须进行环境正义评估。该评估需提供对负担过重社区和弱势群体潜在影响的信息，以及减轻已明确的危害和公平分配已知利益的策略。如需笔译、口译或无障碍协助，请联系 Courtney Cecale，电子邮件：courtney.cecalle@ecy.wa.gov或电话 (360) 480-6270。

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.cecalle@ecy.wa.gov hoặc (360) 480-6270.

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Department of Ecology's Regional Offices

Map of Counties Served



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

Cities of Aberdeen and Hoquiam
Flood Protection Program
Washington State Legislature Provision
for a One-time Grant Program

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

Office of Chehalis Basin
Washington State Department of Ecology
Olympia, WA

December 2024 | Publication 24-13-002



DEPARTMENT OF
ECOLOGY
State of Washington

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

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Executive Summary

The Washington State Legislature provided a 2023-25 Capital Budget Proviso to Ecology's Office of Chehalis Basin (OCB) for the cities of Hoquiam and Aberdeen that provides additional state investments to match the local and federal funding for the existing NorthShore Levee project.

2023-25 Budget Provision:

NEW SECTION. Sec. 3036. FOR THE DEPARTMENT OF ECOLOGY 20 North Shore Levee (92000200)

The appropriation in this section is subject to the following conditions and limitations: The appropriation is provided solely as state grant assistance to the cities of Aberdeen and Hoquiam to match federal funding for the Aberdeen-Hoquiam flood protection project, north shore levee and north shore levee-west segments. The legislature intends to provide funds in the amount of \$35,500,000 over the course of the 2023-2025 and 2025-2027 fiscal biennia in grant funds for construction of the north shore levee project.

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.02](#)³), as well as federal commitments in the [Performance Partnership Agreement](#)⁴ with the EPA. The assessment process draws on best practices established in [Technical Guidance for Assessing Environmental Justice in Regulatory Analysis](#)⁵ and [Promising Practices for EJ Methodologies in NEPA Reviews](#)⁶.

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

- The development and adoption of significant legislative rules as defined in [RCW.05.328](#)⁷
- 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.

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

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

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

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

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

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

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

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

Section 1: Background

Background Information

1. Descriptive title of project/action:

Establishing a one-time grant program and expending a single award over \$12 million dollars, 2023-25 Capital Budget Proviso to Ecology-Office of Chehalis Basin (OCB) for the cities of Hoquiam and Aberdeen that provides additional state investments to match the local and federal funding for the existing NorthShore Levee project.

2. Date Environmental Justice Assessment initiated:
September 25, 2024

3. Ecology Program or Office:
Office of Chehalis Basin (OCB)

4. Point of Contact for EJ Assessment
Pat Brommer, OCB Fiscal Manager

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:
2023-25 Capital Budget Proviso
- Request Legislation
- Other, explain

6. Write a short summary of the action:

The purpose of this action came from the 2023 State Legislature which provided a 2023-25 Capital Budget appropriation for a one-time grant award solely as state assistance to the cities of Aberdeen and Hoquiam to match federal funding for:

- Aberdeen-Hoquiam Flood Protection Project
- North Shore Levee
- North Shore Levee-West Segments

The legislative budget proviso is part of a larger federally funded project, the goal of which is to mitigate catastrophic flood events and protect potentially impacted people and businesses, as well as critical infrastructure such as wastewater treatment facilities, roads, bridges, and other utilities. The legislative provision is a one-time state grant to the Cities of Hoquiam and Aberdeen to match federal funding dollars for a \$160.5 million flood mitigation effort that includes 10.9 miles of levees and several industrial-

size pump stations to help keep low-lying urban areas dry. Ecology is serving as the pass-through but did not design the project, and has little, if any, discretion over project development.

The project location is within the Grays Harbor area between the Cities of Aberdeen and Hoquiam.

Anticipated benefits from the 2023-25 Capital Budget proviso include providing matching state funds that supplement other local, state, and federal funds for the ongoing Northshore Levee mitigation efforts for flood control by the communities in Hoquiam and Aberdeen.

The project once constructed will remove large areas of Aberdeen and Hoquiam from the floodplain and will place them in a mapped Zone X through a Letter of Map Revision (LOMR) from the Federal Emergency Management Agency (FEMA). In addition to increased public safety, protected properties will additionally benefit from the elimination of mandatory flood insurance through the National Flood Insurance Program (NFIP), which should lower costs to residents and businesses. The levee system will include a levee, and an interior drainage pump system as required by FEMA.

The North Shore Levee implementation efforts bring significant environmental and public health benefits. Residential households, developers, shellfish industry and consumers, and Tribes may experience these benefits.

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

Ecology's Office of Chehalis Basin (OCB) plans to conduct engagement, focused on connecting with overburdened communities and vulnerable populations, for the purpose of the environmental justice assessment of this 23-25 Legislative provision in October 2024.

OCB will conduct public engagement in October 2024, through an informational blog post and article in area media outlets, as well as invite public comments, and strategically connect with organizations representing vulnerable populations within the project area to invite public comments through emails to OCB contacts. We will respond to comments and continue to seek further involvement with vulnerable populations as needed to address concerns of adverse or positive impacts from this project. OCB will work with local organizations representing vulnerable populations to identify additional opportunities for engagement of overburdened communities and vulnerable populations in Grays Harbor County and the local communities and provide opportunities for their involvement in this legislative funding opportunity.

OCB will invite Tribal consultation and conduct staff outreach with impacted Tribes which includes but may not be limited to the Quinault Indian Tribe and Confederated Tribes of the Chehalis Reservation.

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

Office of Chehalis Basin does not have this 2023-25 Legislative Proviso listed on an Ecology public facing webpage. The public engagement blogpost is linked here : [Keeping Chehalis basin communities safe and prosperous - Washington State Department of Ecology](https://ecology.wa.gov/blog/october-2024/keeping-chehalis-basin-communities-safe-and-prosperous)⁸

⁸ <https://ecology.wa.gov/blog/october-2024/keeping-chehalis-basin-communities-safe-and-prosperous>

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

Notification to the Office of Equity and Environmental Justice (OEEJ) is required when initiating the EJ Assessment

1. Notify Office of Financial Management (OFM) so the action can be added to the Healthy Environment for All (HEAL) Interagency Work Group dashboard. See instructions on the Environmental Justice Assessment SharePoint page for more information.
2. Email your answers to “Section 1: Background” to OEEJhelp@ecy.wa.gov

OEEJ will:

- Post information about the action on the agency’s external dashboard of all ongoing and completed EJ assessments
- Email a notification of EJ assessment initiation through our EJ GovDelivery System

Section 3: Identify Affected Tribes:

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.

- The Confederated Tribes of the Chehalis Reservation
- The Quinault Indian Nation

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 self-identified as being potentially impacted by the action

4. Describe plans to offer consultation to identified Tribes.

The cities of Aberdeen and Hoquiam have offered and continue Tribal engagement and consultation.

Ecology offered consultation to all potentially affected Tribes through formal letters to Tribal chairs and Department of Natural Resource Directors

Section 4: Offer Consultation

- Offer Consultation with identified Tribes
- Summarize consultation in the next section, “Section 5: Summary of Tribal Consultation and Engagement

Section 5: Summary of Tribal Consultation and Engagement

Summary of Tribal Consultation

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

For this EJ Assessment, Ecology has not yet heard back from the Tribes identified as potentially impacted regarding this action. However, through analyses conducted by Ecology, no impacts have been identified to Tribes or Tribal lands.

Beyond this EJ Assessment, this project is currently undergoing additional review through Section 106 of the National Historic Preservation Act as part of the National Environmental Policy Act (NEPA) to identify any potential adverse effects prior to the project proceeding, including potential impacts to cultural and historic resources that could be impacted by construction activities. Ecology will continue to gather information from the Federal Section 106 NEPA outcomes and information to inform this agency action.

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

Potential impacts not on Tribal lands include removing large areas of Aberdeen and Hoquiam from the floodplain, and protecting residential and local business properties, and the shellfish industry from the negative impacts of future catastrophic flood events.

For this EJ Assessment, Ecology has not yet heard back from the Tribes identified as potentially impacted regarding this action. However, through analyses conducted by Ecology, few impacts have been identified to Tribal rights and interests not in Tribal lands.

The identified potential impacts include nearby traffic and construction effects that may impact off-reservation businesses in impacted areas, mitigated harms from future flood events (including damage to property, businesses, infrastructure, and human wellbeing), and decreased costs from changed insurance requirements.

Beyond this EJ Assessment, this project is currently undergoing additional review through Section 106 of the National Historic Preservation Act as part of the National Environmental Policy Act (NEPA) to identify any potential adverse effects prior to the project proceeding, including potential impacts to cultural and historic resources that could be impacted by construction activities. Ecology will continue gather information

from the Federal Section 106 NEPA outcomes and information to inform this agency action.

Ecology will continue gather information from the Federal Section 106 NEPA outcomes and information to inform this agency action.

3. Summarize recommendations from Tribes to:

a. Mitigate or eliminate potential harms from the action

For this EJ Assessment, Ecology has not yet heard back from the Tribes identified as potentially impacted regarding this action. However, through analyses conducted by Ecology, no impacts have been identified to Tribes or Tribal lands.

b. Equitably distribute benefits from the action

For this EJ Assessment, Ecology has not yet heard back from the Tribes identified as potentially impacted regarding this action. The benefits identified will impact all residents, business, people who recreate in the area, and infrastructure located in what would have previously been a flood zone. Because the benefits are for a location-specific infrastructure project, Ecology has not identified opportunities to equitably distribute them.

Ecology has not heard back from Tribes regarding their request for interest in Tribal consultation

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

In addition to Ecology's invitation for Tribal consultation, Tribal recommendations identified through the Section 106 process as part of the National Environmental Policy Act (NEPA) and lead by the Cities of Aberdeen and Hoquiam would be shared with Ecology. The cities are lead agency for the Section 106 process and any positive or negative impacts of the project to Tribes would be shared with Ecology.

Ecology has not heard back from Tribes regarding their request for interest in Tribal consultation.

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

Ecology will continue an open invitation for Tribal consultation and incorporate any positive or negative effects identified through the federal Section 106 of the National Historic Preservation Act as part of the National Environmental Policy Act (NEPA) process lead by the Cities of Aberdeen and Hoquiam.

Ecology has not heard back from Tribes regarding their request for interest in Tribal consultation.

Section 6: Identification of Overburdened Communities and Vulnerable Populations

Identify Overburdened Communities and Vulnerable Populations

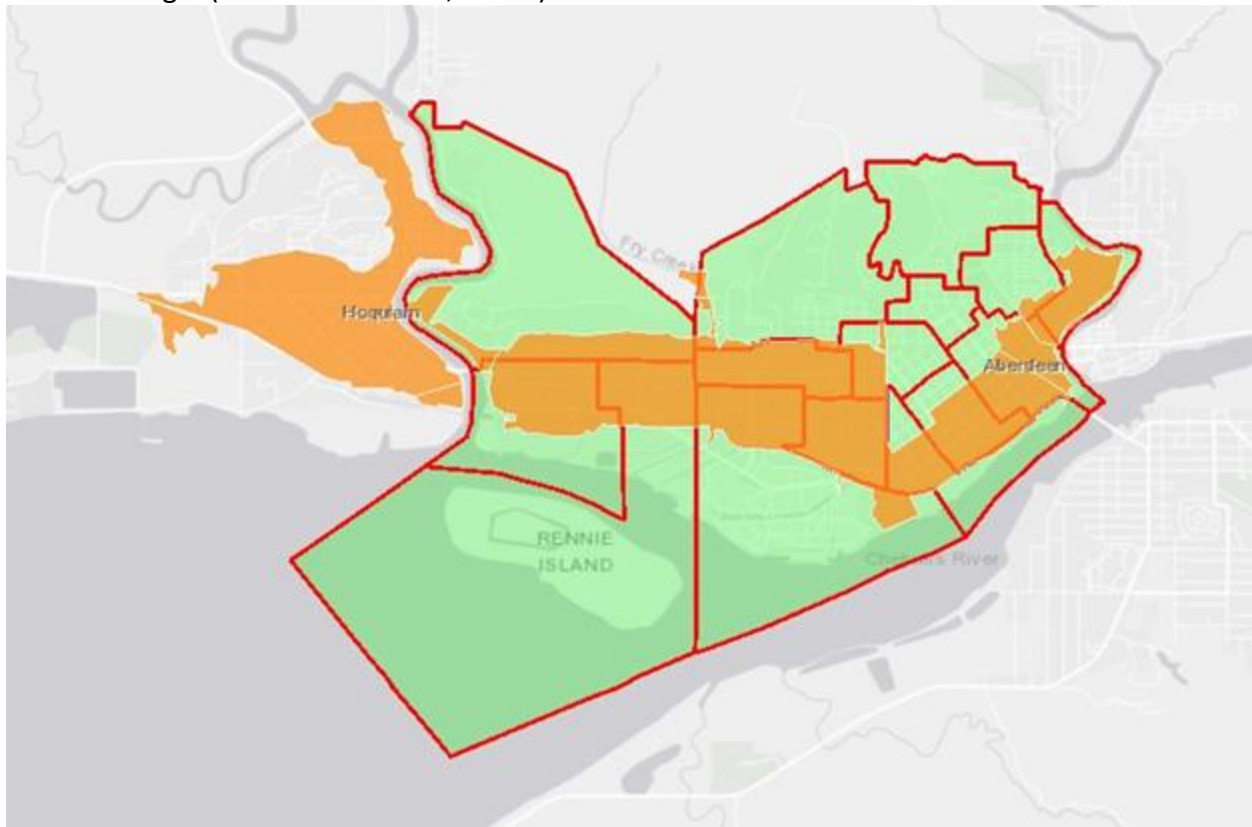
1. Identify the geographic area(s) anticipated to be affected by the action.
The project location is within the Grays Harbor area between the cities of Aberdeen and Hoquiam. For this assessment, Ecology chose to designate the following census block groups as the affected area because of their proximity to the project location and water bodies:

Aberdeen 530270010002	Aberdeen 530270012002
Aberdeen 530270010003	Aberdeen 530270012003
Aberdeen 530270010004	Aberdeen 530270012004
Aberdeen 530270011002	Aberdeen 530270012005
Aberdeen 530270011003	Hoquiam 530270013002
Aberdeen 530270011004	Hoquiam 530270013003
Aberdeen 530270011005	Hoquiam 530270013004
Aberdeen 530270012001	

Figure 1: Project Map, North Shore Levee shown in yellow (source, City of Hoquiam)



Figure 2: Census block groups in the project- affected area in green, overlaid with flood risk area in orange. (sources: EJScreen, FEMA)



2. When applicable, using the [Washington State Department of Health’s Environmental Health Disparities Map \(EHD Map\)](#),⁹ identify the EHD Map rankings for all census tracts likely to be impacted by the action.

Of the four census tracts potentially impacted by the action, one tract ranked is ranked 8 on the Health Disparities Map. This area has potentially higher cumulative environmental and health disparities in comparison to other areas of the state and the other affected tracts which ranked 7, 5, and 2.

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

Yes

No

If yes, describe.

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

Health conditions related to this action include ensuring residential and commercial developments in the project area are protected from flood related illnesses, lack of housing, and loss of income or revenue.

The Northshore Levee and pump systems will mitigate adverse effects from coastal flooding, riverine flooding during elevated flows in the Chehalis, Wishkah, and Hoquiam Rivers, and localized flooding when excessive rain events overwhelm the stormwater drainage system. Additionally, the project will protect local residents, build resiliency, and prevent any further damage during flood events to local housing and businesses located in the floodplain.

5. When applicable, using the [EPA’s Environmental Justice Screening and Mapping Tool \(EJScreen\)](#)¹⁰, identify areas likely to be impacted by the action that are at or above the 80th percentile¹¹ (in state) for the “People of color” and “Low income” socioeconomic indicators.

In the project affected area, 12 of the 15 census block groups are at or above the 80th percentile for low-income individuals in the state.

In the project affected area, 2 of the 15 census block groups are at or above the 80th percentile for people of color in the state.

⁹ <https://fortress.wa.gov/doh/wtnibl/WTNIBL/>

¹⁰ <https://ejscreen.epa.gov/mapper/>

¹¹ 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>

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

Four of the 15 census block groups in the project affected area are at or above the 80th percentile in the state for children under age 5. Of these four, two are also over the 80th percentile in people of color populations, and all four are over the 80th percentile in low-income populations. This is relevant to the action due to the impacts of severe floods and associated disease and injury risks to children, which this project aims to mitigate.

Eight of the 15 census block groups are at or above the 90th percentile in the US* for asthma rates (all are at or above the 80th percentile in the US). This is relevant to the action due to the impacts of project construction.

In the project affected area, 11 of the 15 census block groups are at or above the 80th percentile in the US for low life expectancy. Four of the 15 census block groups are at or above the 80th percentile in the US for cancer. 12 are in the 95th to 100th percentile in the US for persons with disabilities (all are at or above the 80th percentile for this indicator). These are relevant to the action because of possible interactions with both the risks and benefits associated with this project.

*For the purpose of this EJA, we are using the percentile in the US for health disparities indicators, as these are more readily available in EJScreen than state percentiles.

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

In the project affected area, 12 of the 15 census block groups are at or above the 80th percentile in the state for flood risks. The southernmost block groups abutting water bodies (see Figure 2 above) are also within a 100 year floodplain and are at risk of sea level rise. Under scenarios of 3-4ft increases in sea level, both these and block groups farther inland are at risk.

8. Using the federal [Climate and Economic Justice Screening Tool \(CEJST\)](https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5)¹², identify if the potentially affected area is considered disadvantaged for climate risks for additional indicators (as relevant).

Three of the four census tracts in the project affected area are considered disadvantaged because they meet 1 burden threshold and the associated socioeconomic threshold.

¹² <https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5>. This is a national tool and may provide relevant information and understanding of the climate related context of the action.

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

No additional overburdened communities and vulnerable populations were identified that are likely to be affected by the action.

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

None were identified.

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

None were identified.

Section 7: Summary of Community Engagement

Summarizing Community Engagement

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

On Oct. 30 and 31, 2024, Ecology wrote, posted, and distributed a department blog notifying 68 media outlets in southwest Washington about our intent to provide a one-time \$18.5 million state grant to the cities of Hoquiam and Aberdeen in Grays Harbor County to help them match federal funding to design, permit, and build the Aberdeen-Hoquiam Flood Protection Project.

Ecology continues to outreach to NGOs to seek feedback from residents and businesses who could be directly affected by the state investment as part of its environmental justice assessment for the grant. In addition to distributing information about this Agency action through the blog via email to 3,802 recipients on Ecology’s news alert listserv, Ecology identified 4 community resource groups to distribute additional outreach materials throughout the project. Ecology will continue outreach efforts during the project to the following community resource organizations:

- [Coastal Community Action Program](#)¹³
- [Olympic Area on Aging](#)¹⁴
- [Grays Harbor Conservation District/StreamTeam](#)¹⁵
- [Grays Harbor Scanner Page](#)¹⁶
- [Timberland Library locations in Hoquiam and Aberdeen](#)¹⁷

2. What actions were taken to help address barriers to meaningful engagement?
Ecology notified the Aberdeen Daily World, Centralia Chronicle, and other media outlets in Grays Harbor County which included Ecology contact information.
Ecology provided an open invitation for public comment throughout the project. The blogpost – [Keeping Chehalis basin communities safe and prosperous - Washington State Department of Ecology](#)¹⁸, was provided to the cities, Aberdeen Daily World, and Centralia Chronicle for distribution to local populations impacted by the project. Ecology will provide documentation related to this action in languages other than English: Spanish, Chinese, Korean, and Vietnamese as requested by community organizations throughout this project.

¹³ www.coastalcap.org

¹⁴ www.o3o.org

¹⁵ streamteam@graysharborcd.org

¹⁶ www.ghscanner.com

¹⁷ asklib@trl.org

¹⁸ <https://ecology.wa.gov/blog/october-2024/keeping-chehalis-basin-communities-safe-and-prosperous>

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

Ecology is not aware at this time if there are overburdened communities or vulnerable populations affected by the legislative match provision who were not engaged.

Through additional research efforts, Ecology has found one of the difficulties is identifying Non-governmental Organizations (NGOs) and other groups that represent the communities in the project area because there is low economic investment and organization outside of government.

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

Ecology has not received any recommendations from members of overburdened communities or vulnerable populations in Grays Harbor County about mitigating or eliminating potential harms from the state grant investment in the flood damage reduction project for the cities of Aberdeen and Hoquiam, nor equitably distributing the benefits.

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

Ecology will continue outreach communication and access to providing comments to Ecology through identified local community service organizations. Opportunities for ongoing engagement are included in the funding agreement's Terms and Conditions. The Cities of Hoquiam and Aberdeen will be required to comply with those terms and conditions once we enter into the one-time grant agreement. The following bulleted items are touch points and funding agreement requirements identified throughout the life of the grant project where Ecology will have opportunities for ongoing engagement with affected populations:

- Project site inspections.
- Translating materials into languages other than English that meet state and federal civil rights requirements.
- 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).
- Implementing the project by contracting with firms from small, minority-owned, and women's businesses (40 CFR, Part 33)
- 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 and Harms from Action

Identify Potential Environmental Benefits and Harms from Action

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

The pass-through funds provided by Ecology for the Cities of Hoquiam and Aberdeen support the project's expected benefits, including to protect more than 5,100 properties, 1,350 businesses, and 1,290 jobs, protecting affected populations, and protection of the city wastewater treatment facility. In addition to improving health and resiliency of local communities by reducing flood damage, it has a potential positive economic impact to local populations and businesses by reducing flood insurance requirements. The project will result in property owners and businesses saving an estimated \$2.2 million annually in required FEMA flood insurance premiums. Additionally, levee construction is expected to generate approximately \$10 million in state sales tax

2. Who will primarily benefit from this action?

The pass-through funds provided by Ecology for the Cities of Hoquiam and Aberdeen would primarily benefit flood-prone residents and business owners in the project area, building local resilience to climate change as local sea levels rise.

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.

The pass-through funds would benefit local communities, residents and local businesses within the Cities of Aberdeen and Hoquiam. Some of the census block groups likely to benefit most from this action are those directly adjacent to water bodies. This is due to the current risks of sea level rise, flooding, and associated health and safety concerns. Of these census block groups, one is at or above the 95th percentile in the state for people of color populations, and three are at or above the 95th percentile in the state for low-income populations. This project is expected to benefit these communities by reducing risks of flooding, including the associated health and economic burdens. This project will also reduce the need for flood insurance in the affected area. This may have particular benefit for low-income individuals in the flood zone, may benefit all residents equally, or may have proportionally less benefit for low-income residents, depending on a range of factors.

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

- The pass-through funds provided by Ecology for the Cities of Hoquiam and Aberdeen would potentially cause impacts including:

- Raised road segments may require roads to be closed during construction.
- The levee may impact wetlands or riverbank habitats impacting fish and wildlife or water quality.
- Higher levee segments may block views or unrestricted access to the river. Access to docks will be maintained after construction; however, in areas where a floodwall is close to the riverbank, there would not be unrestricted access to the water.
- Based on final levee engineering design and construction and potential for levee openings necessary by design, City staff may not be able to close all openings quickly in the event of a flood. If the levee is engineered with too few openings, shoreline or property access may be restricted.
- Annual operation and maintenance work, and any future repairs, would require access through private property.
- Construction would create noise and vibrations, temporary air emissions, increase truck traffic around the construction area, and may require some detours or traffic delays in some locations

5. Who will primarily experience the harms?

The pass-through funds provided by Ecology for the Cities of Hoquiam and Aberdeen would potentially cause harms to local businesses, homeowners and potentially renters in the project area.

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

Long-term construction of the levee will impact travel, commuters, and bus routes throughout the project area, in addition to access to local businesses and community resources. Other potential impacts from this agency action to overburdened communities or vulnerable populations may include delays for emergency vehicles, community cohesion, and access to community areas due to noise or air pollution and traffic and pedestrian safety.

Impacts of construction, including noise, vibration, and temporary air emissions, are most likely to impact areas closer to the levee. Traffic considerations could take into account that Census block group 530270010002 in particular is near proposed levee construction sites, is ranked at or above the 95th percentile in the state for both people of color and low-income individuals and is at or above the 95th percentile in the state for traffic proximity. It is also in the 90th to 95th percentile nationally for asthma and at or above the 95th percentile in the state for young children under 5.

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

This Agency action addresses large-scale flooding events, and mitigates adverse effects from coastal flooding, riverine flooding during elevated flows in the Chehalis, Wishkah, and Hoquiam Rivers, and localized flooding when excessive rain events overwhelm the stormwater drainage system. Flooding can be accompanied by health risks including

contamination from waste or other disease vectors. The construction of the levee has the potential to reduce the risk of these additional disease burdens.

The project addresses disparities among counties within the state by providing funding to two under-resourced cities for critical infrastructure improvements.

In addition to protecting local residents from adverse health impacts this project will build resiliency and prevent any further damage during flood events to local housing and businesses located in the floodplain.

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

Identify Options to Eliminate, Reduce, or Mitigate Harms and 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.

Construction:

Construction would create noise and vibrations, temporary air emissions, increase truck traffic around the construction area, and may require some detours or traffic delays in some locations. Raised road segments may require roads to be closed during construction. These harms are likely to be more heavily concentrated around levee construction areas. At least one census block group was identified in the above analysis that could be disproportionately harmed by construction-related impacts, due to residents' proximity and vulnerability indicators. Given this, extra consideration could be taken in planning construction traffic routes in this area and other affected block groups, to ensure that these impacts do not disproportionately harm overburdened communities and/or vulnerable populations.

Wetlands and fisheries:

The levee may impact wetlands or riverbank habitats impacting fish and wildlife, which could affect Tribal fishing rights, or water quality, which could impact Tribal communities and other residents. The cities could consider these impacts and ensure that the levee's construction and operation does not adversely or significantly impact water quality and aquatic life.

Impacts to property and waterfront access:

Higher levee segments may block views or unrestricted access to the river, and in areas where a floodwall is close to the riverbank, there would not be unrestricted access to the water. Additionally, annual operation and maintenance work, and any future repairs, would require access through private property. It is unknown whether these impacts would disproportionately harm overburdened communities or vulnerable populations. We have not identified options for mitigating these harms.

Based on final levee engineering design and construction and potential for levee openings necessary by design, City staff may not be able to close all openings quickly in the event of a flood. If the levee is engineered with too few openings, shoreline or property access may be restricted. It is unknown whether these impacts would

disproportionately harm overburdened communities or vulnerable populations. Potential impacts on residents could be mitigated through the cities' thorough review of the engineering design.

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:
 - 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.

Ecology does not have the authority to choose among the available options for mitigating harms (listed above in 9.1) but will encourage the Cities of Hoquiam and Aberdeen to take these into consideration in project planning.

Ecology will continue community engagement as noted in Section 7 to encourage the Cities to address any community needs identified by residents and/or community groups.

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. Ecology is serving as the pass-through but did not design the project, and has little, if any, discretion over project development. Because of this, Ecology does not have the authority to mitigate the harms noted in Section 9.1 but will encourage the Cities of Hoquiam and Aberdeen to take these into consideration in project planning.

Section 10: Executive Summary

The purpose of the 2023-25 Capital Budget Proviso is to provide additional state investments to match the local and federal funding for the existing North Shore Levee project.

This action came from the 2023 State Legislature, which provided a 2023-25 Capital Budget appropriation for a one-time grant solely as state assistance to the cities of Aberdeen and Hoquiam to match federal funding for:

- Aberdeen-Hoquiam flood protection project.
- North shore levee.
- North shore levee-west segments.

The project location is within the Grays Harbor area between the cities of Aberdeen and Hoquiam.

The communities impacted by this action are designated as overburdened or disadvantaged. Identified vulnerabilities for the local population include:

- Income constraints which may affect people's ability to fund additional utility fees or increases.
- Susceptibility to flooding in the geography.

Community engagement for this action began in October and November 2024, with an Ecology blog post and email mechanism for the public to provide comments. We did not receive any comments from overburdened communities or populations with vulnerabilities from the outreach strategy. The identified vulnerable populations were not targeted for specific engagement, due to how unrelated they are from Ecology's jurisdiction and relevance to this action.

Ecology invited Tribal consultation with the Federated Tribes of the Chehalis and the Quinault Indian Nation. Neither Tribal government responded to our invitation to consult.

The North Shore Levee project will remove large areas of Aberdeen and Hoquiam from the floodplain, which will have public health, environmental, and economic benefits, including the elimination of mandatory flood insurance. Residential households, developers, shellfish industry and consumers, and Tribes may experience these benefits. This action provides socio-economic and environmental benefit to improve risks from catastrophic flooding events and creates capacity for population and economic growth in a small community.

Ecology identified environmental harms in the geographic area impacted by this action, including proximity to a 100-year flood plain. The project implementation is anticipated to substantially reduce these harms and their impact on low-income communities, people of color communities, and Tribal communities in the area. The project implementation may also create potential harms, including impacts on wetlands, construction-related nuisances, such as dust and noise, and impacts on property and shoreline access.

Ecology is serving as the pass-through agency but did not design the project, and has little, if any, discretion over project development.

Ecology will minimize harms and maximize benefits resulting from this action by continuing outreach and engagement with local community groups and by encouraging the Cities of Aberdeen and Hoquiam to take construction impacts, wetland impacts, and property and shoreline access into consideration in project planning. Construction nuisances will be managed according to local laws and construction permit requirements, not by Ecology.

Ecology supports moving forward with this 2023-25 legislative provision and one-time grant, in support of flood mitigation in an economically disadvantaged area of Washington.

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.

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