



Water Quality Program Loan Offer to the Snoqualmie Pass Utility District

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

Water Quality Program

Washington State Department of Ecology

Olympia, Washington

January 2025, Publication 25-10-006

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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.

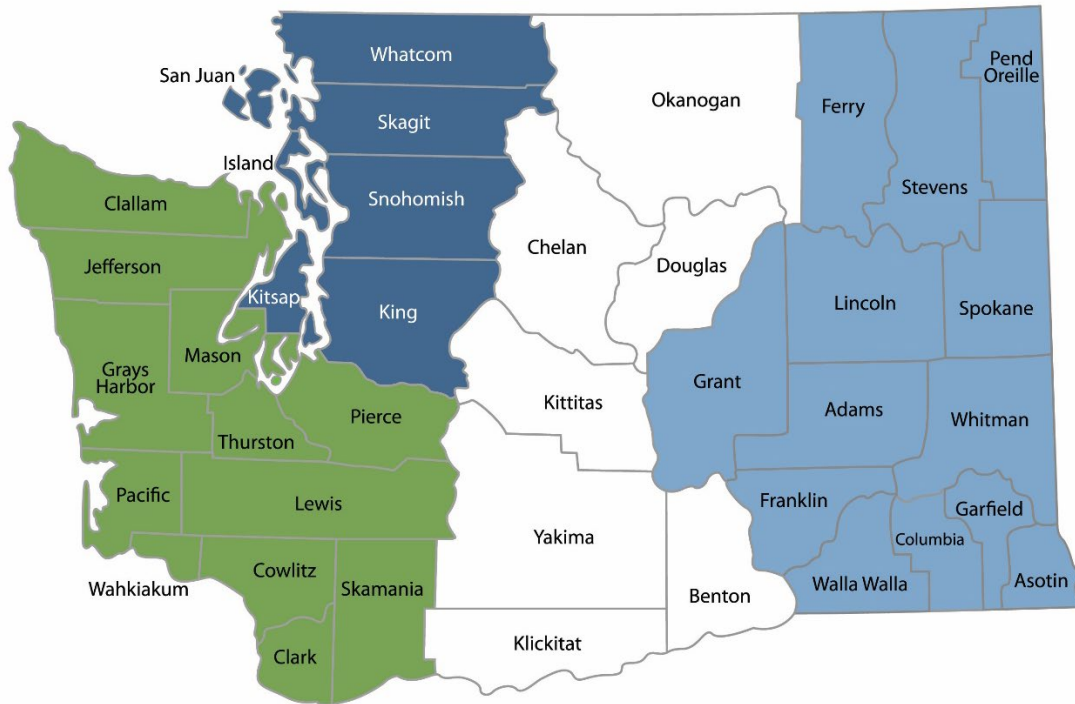
根据华盛顿州环境正义法(RCW 70A.02)，生态管理署在制定某些重大行动时必须进行环境正义评估。该评估需提供对负担过重社区和弱势群体潜在影响的信息，以及减轻已明确的危害和公平分配已知利益的策略。如需笔译、口译或无障碍协助，请联系 Courtney Cecale，电子邮件：courtney.cecale@ecy.wa.gov或电话 (360) 480-6270。

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

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DEPARTMENT OF
ECOLOGY
State of Washington

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

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Executive Summary

The purpose of this action is to provide the Snoqualmie Pass Utility District with \$13,200,000 in loan funding to construct updates to their wastewater treatment infrastructure. These investments will help the district phase out the outdated current land treatment system to meet current water quality standards. Infrastructure upgrades include a membrane bioreactor, solids handling facilities, aerobic digestion, sludge dewatering, drying beds, and associated instrumentation and controls. Currently, the wastewater is applied to 45 acres of U.S. Forest Service land. After completing these improvements, the Snoqualmie Pass Utility District will treat wastewater and discharge it to Keechelus Lake, downstream from Coal Creek.

The project location includes the treatment plant at 370 Treatment Plant Road, Snoqualmie Pass, WA 98068. Effluent will discharge into Keechelus Lake.

Impacted communities

The community affected by this action includes a small residential community, part-time residents, and recreational skiers. The community does not appear to experience cumulative environmental burdens or population vulnerabilities based on 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 any comments from overburdened communities or populations with vulnerabilities from these outreach strategies.

Tribal considerations

Ecology invited Tribal consultation from the Confederated Tribes and Bands of the Yakama Nation, the Muckleshoot Indian Tribe and the Snoqualmie Indian Tribe. The Snoqualmie Indian Tribe responded to our invitation to consult. The Snoqualmie Indian Tribe discussed options to reduce the amount of water moving from WRIA 7 (Snoqualmie watershed) to WRIA 39 (Upper Yakima watershed). The Tribe is specifically concerned about instream flows in WRIA 7 for salmonids and to maintain Snoqualmie Falls as a cultural site. While Ecology cannot use this action to change the water rights or utility planning, Ecology discussed voluntary mitigation options with the Snoqualmie Pass Utility District (SPUD). They plan to address water efficiency in subsequent upgrades to support instream flow in WRIA 7.

Anticipated harms and benefits:

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

Anticipated benefits from the investments made with this loan include:

- **\$13.2M low-interest loan** to support a small community with limited revenue.
- **Improved water quality:** New membrane bioreactor system treats wastewater better than existing lagoons.
- **Cleaner discharge** to Keechelus Lake from the new treatment technology.

- **Land recovery:** U.S. Forest Service will recover 45 acres of land with the intent to restore it to natural habitat.

Overall, Ecology supports this subsidized loan offer to the Snoqualmie Pass Utility District, to provide necessary funding for improved water quality in the area.

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.

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.

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>

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:

Loan offer to Snoqualmie Pass Utility District for wastewater treatment plant membrane bioreactor improvements

Application/Agreement number: WQC-2023-SnPaUd-00098

2. Date EJ Assessment initiated:

02.02.2024

3. Ecology Program/Office:

Water Quality Program

4. Point of contact for EJ Assessment:

Faith Wimberley

Water Quality Program | Environmental Justice Planner

faith.wimberley@ecy.wa.gov

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

Rulemaking

New grant or loan program

New capital project, grant, or loan of \$12 million or more

Request legislation

Other, explain:

6. Write a short summary of the action.

The purpose of this action is to provide the Snoqualmie Pass Utility District with \$13,200,000 in loan funding to construct updates to the the wastewater treatment infrastructure to meet surface water quality standards and phase out the current land treatment system.

Infrastructure upgrades include a membrane bioreactor, solids handling facilities, aerobic digestion, sludge dewatering, drying beds, and associated instrumentation and controls.

Currently, the district's wastewater is land applied to 45 acres of U.S. Forest Service property.

After completing these improvements, the Snoqualmie Pass Utility District will treat

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

wastewater and discharge it to Keechelus Lake, downstream from Coal Creek, as part of a Water Quality Permit from the Department of Ecology.

The project location includes the treatment plant at 370 Treatment Plant Road, Snoqualmie Pass, WA 98068. Effluent will discharge into Keechelus Lake.

Anticipated benefits from the investments made with this loan include:

- Investment of \$13,200,000 in low-interest loan funding resources to a small community that has limited local revenues.
- Meeting many permit provisions and regulatory requirements.
- The treated wastewater that will come out of the new membrane bioreactor system will be a higher water quality than the treated wastewater that comes out of the existing lagoon system.
- The new treatment technology will discharge cleaner wastewater to Keechelus Lake.
- The Forest Service will recover the land application site and allow it to return to natural habitat conditions.

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. We were prepared to respond to comments regarding environmental justice, overburdened communities, or vulnerable populations and to seek further involvement as needed to address concerns. However, no relevant comments were received.

Ecology invited Tribal consultation with impacted Tribes including the Confederated Tribes and Bands of the Yakama Nation, the Muckleshoot Indian Tribe and the Snoqualmie Indian Tribe.

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.

The Confederated Tribes and Bands of the Yakama Nation, the Muckleshoot Indian Tribe and the Snoqualmie Indian Tribe may be potentially 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.

Section 4: Offer Consultation:

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

Section 5: Summary of Tribal Consultation & Engagement

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

Summary of Tribal Consultation

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

There are no anticipated potential impacts directly to Tribal lands. The Confederated Tribes and Bands of the Yakama Nation's Tribal lands are concentrated well upstream of the treatment facility, and Snoqualmie lands are concentrated well downstream.

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

There are potential beneficial impacts not on Tribal lands such as reduced pollution discharge, improved treatment capability, and improved water quality for Keechelus Lake. Improved water quality is beneficial to aquatic species, including bull trout, listed as Threatened under the Endangered Species Act.

Cultural and historic resources could be potentially impacted by construction activities initiated with funds from this action. This project will undergo review through Section 106 of the National Historic Preservation Act to identify any potential adverse effects before the project proceeds. Ecology will invite consultation with Tribes again at that stage.

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

The Snoqualmie Indian Tribe has expressed concerns regarding the withdrawal of water from domestic wells in WRIA 7 (Snoqualmie watershed) with eventual discharge into WRIA 39 (Upper Yakima watershed). The funding applicant has been discharging water from WRIA 7 to WRIA 39 for decades. The Snoqualmie Indian Tribe representatives shared with us that this proposed action perpetuates the unwanted movement of water out of the Snoqualmie watershed. The Tribe is specifically concerned about instream flows for salmonids and maintaining Snoqualmie Falls as a cultural site. The Tribe requested Ecology require the funding applicant to consider voluntary measures to mitigate the withdraw and transfer of water in WRIA 7.

- b. Equitably distribute benefits from the action

During consultation, the Snoqualmie Indian Tribe requested consideration of recharging water sources in WRIA 7 (Snoqualmie watershed) instead of the planned eventual discharge into WRIA 39, the Yakima basin.

No specific concerns have been raised by the Confederated Tribes and Bands of the Yakama Nation or the Muckleshoot Indian Tribe.

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

Ecology consulted with the Snoqualmie Indian Tribe regarding its concerns around protecting instream flow. Separate from this proposed action by Ecology, Snoqualmie Pass Utility District has completed planning and design work associated with the construction of a new treatment facility. Conversations with the Snoqualmie Indian Tribe have led to discussion of potential voluntary mitigation measures that the Snoqualmie Pass Utility District can take to reduce the impact of this project on streamflow. The Snoqualmie Pass Utility District is working to secure additional funding to re-pipe portions of the collection system and address issues related to infiltration and inflow. This action may reduce the quantity of water in both WRIA 7 and WRIA 39 that is unnecessarily being conveyed and treated for discharge into the Upper Yakima watershed.

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

Should any of the affected Tribes request further engagement, Ecology will consult with them. This project is subject to Section 106 review. This means that during initiation of the project, Ecology will consult with each Tribe's Tribal Historic Preservation Officer regarding cultural resources that may be impacted by the project.

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 includes the treatment plant at 370 Treatment Plant Road, Snoqualmie Pass, WA 98068 and outfall location. The project also impacts Keechelus Lake, where treated effluent will be discharged.

For the purposes of this assessment, Ecology chose to designate the following census tracts as the affected area because of their proximity to the project location and affected water bodies:

- 53037975100 (this census tract encompasses the project site and Keechelus Lake)

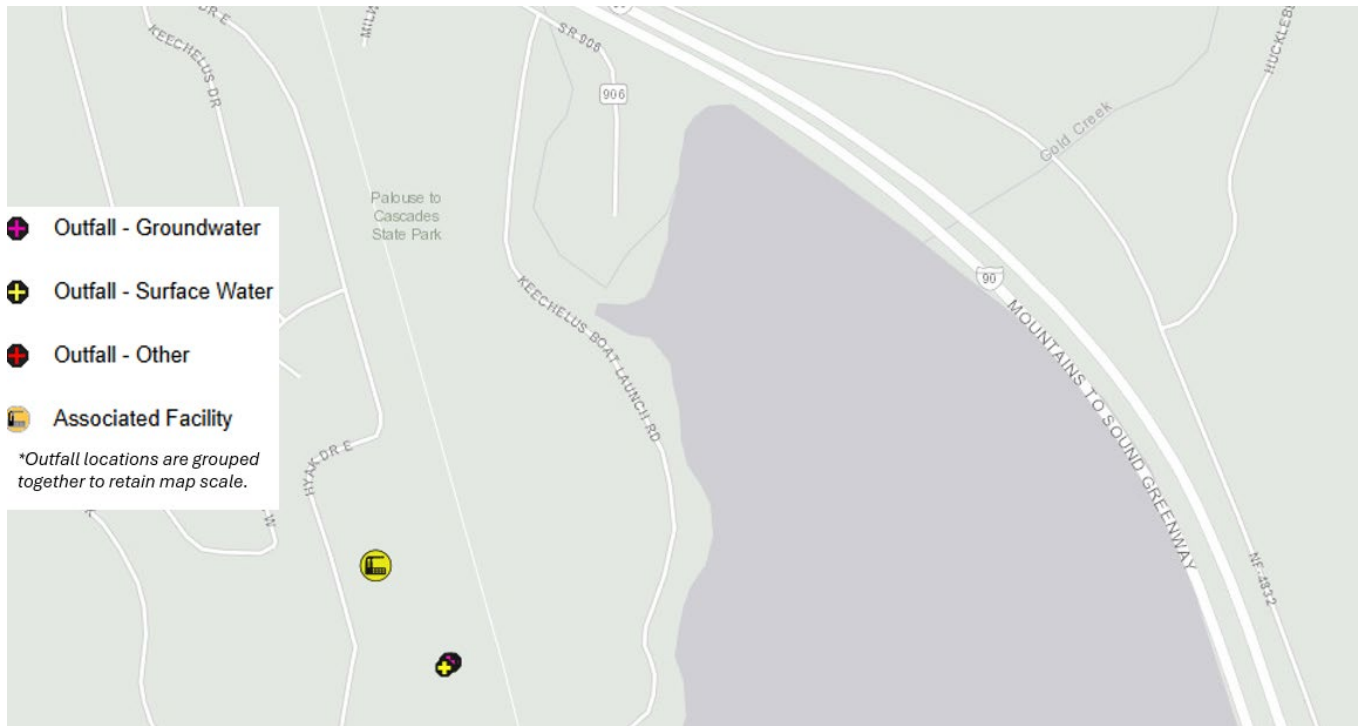


Figure 1. Topographic map showing the current outfall locations located on land to the west of a Keechelus Lake and to the north and south of the associated wastewater treatment facility. The new outfall will discharge at the mouth of Coal Creek, at northernmost end of Keechelus Lake. Source: Ecology’s Water Quality Atlas.

1. 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:

- 5307975100 = 2

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

Yes

No

If yes, describe.

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

No cumulative health considerations were identified as relevant for this action. Ecology considered fishers, recreators, and others who may rely on Keechelus Lake in this analysis and was not able to identify impacts from this action on those communities.

The proposed loan offer will help the Snoqualmie Pass Utility District pay for upgrades to its wastewater treatment system, including shifting away from land treatment to discharging effluent to Keechelus Lake. Ecology anticipates that the upgrades will help to protect water quality by ensuring wastewater is adequately treated prior to discharge.

4. 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 percentile⁸ (in state) for the "People of color" and "Low income" socioeconomic indicators.

The "People of color" and "Low income" socioeconomic indicators in EJ Screen are below the 80th percentile.

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

No socioeconomic or health disparities indicators are above the 80th percentile.

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

Wildfire risk is in the 90-95th percentile according to EJ Screen.

7. Using the federal [Climate and Economic Justice Screening Tool \(CEJST\)](#)⁹, identify if the potentially affected area is considered disadvantaged for climate risks for additional indicators (as relevant).

CEJEST does not identify this area as disadvantaged.

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

This project is in a remote area, serving a ski community and small local economy. Ecology did not identify any significant environmental health burdens or social or housing vulnerabilities during research and inquiry on this population. The population who lives in this area has ample access to outdoor recreation and a small local economy with access to a larger regional economy in King County.

While unaffected by this action, it is important to note that the community does experience risks from unwanted environmental effects. Air quality concerns from wildfire smoke and high ozone concentrations are the most prominent environmental effect in the area. Health risks from higher ozone concentrations include higher rates of asthma and increased daily deaths. In addition, exposure to ozone has been associated with increased cardiovascular and respiratory mortality. These effects are known in general and not cited here as directly identified in this specific community.

⁸ 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>

⁹ 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 \(geoplatform.gov\)](#)

The communities this loan offer is intended to benefit include a small, rural community that lacks the financial resources to locally fund this large infrastructure project. While the Snoqualmie area community does not include a high percentage of low-income people, the low resident density means that any costs from these upgrades that get passed on to utility rate payers will be higher per capita than in areas with more density and higher volume of rate payers. The low population means each household could have a relatively high share of costs for the wastewater treatment system depending on how much of the total cost of the project is passed onto utility rate payers.

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.

No additional overburdened communities or vulnerable populations 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.

No additional overburdened communities or vulnerable populations were identified.

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 ensuing analysis of community indicators described above in Section 6, Ecology identified no overburdened communities and no indicators of vulnerability for this community.

Engagement activities

Ecology did not perform engagement activities specific to overburdened communities or vulnerable populations because none were identified.

Ecology communicated on this action to the public. In February, Ecology notified people of the intent to fund the subsidized loan to the Snoqualmie Pass Utility District (along with other funding). Ecology sent a blog to multiple subscriber lists (with a total of 7,000 subscribers) and many news outlets to advertise a public comment period. 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. Comments received during the public comment period were considered and responded to [[State Fiscal Year 2025 Final Water Quality Funding Offer List and Intended Use Plan](#)]. Comments could influence Ecology's loan offer. Ecology issued a press release (to about 7000 subscribers) announcing the final funding and sent the press release with a specific note about funding the Snoqualmie Pass Utility District project to the Northern Kittitas County Tribune; the newspaper of highest circulation 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 across applicants. Ecology takes steps to minimize barriers to engagement for the public and applicants such as the Snoqualmie Pass Utility District.

- Ecology converted public meetings for the program into webinars to increase access and attendance. Ecology's communications related to this action are accessible. Notice of all Ecology's Water Quality Program final loan offers are provided in three 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.

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

Not applicable. No overburdened communities or vulnerable populations were identified as affected by this action. Please note Tribal engagement activities previously described in sections 3 – 5.

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.

Not applicable. No overburdened communities or vulnerable populations were identified as affected by this action.

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

No overburdened communities or vulnerable populations were identified as affected by this action.

However, Ecology expects ongoing engagement with the fund recipient pertaining to environmental justice. Many of these engagement opportunities are included in the funding agreement's Terms and Conditions. To support funding recipients with potential barriers to successfully completing the loan offer requirements, Ecology will provide the Snoqualmie Pass Utility District a project management team who will provide direct technical assistance required for the implementation of this action. The Snoqualmie Pass Utility District will also have access to permit specialists and engineers for assistance with their infrastructure operations and water quality standard requirements more broadly.

The Snoqualmie Pass Utility District will be required to comply with terms and conditions of the loan agreement that serve to safeguard the funding process and protect and enhance equity in this action. These include:

- Project evaluation: survey, interviews, and site inspections.
- Crediting Ecology in distributed materials about the project.
- 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 Snoqualmie Pass Utility District (SPUD) mitigate high per-capita costs for wastewater treatment, potentially reducing utility rate increases, especially benefiting lower income residents.
- Funding water quality projects in small and rural areas like Snoqualmie Pass 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.

The subsidized loan funding for this project inherently helps the Snoqualmie Pass Utility District minimize rate impacts to residents served by the wastewater utility, and improve the utility's ability to support the region's economic growth.

This action helps the Snoqualmie Pass Utility District (SPUD) address environmental and water quality improvements through constructing updates to wastewater treatment infrastructure to meet surface water quality standards and phase out the current land treatment system. The treated wastewater that will come out of the new membrane bioreactor system will be a higher water quality than the treated wastewater that comes out of the existing lagoon system. These improvements mean the facility will no longer release treated wastewater to land, which will prevent runoff to a nearby lake during part of the year. The new treatment technology will discharge cleaner wastewater to Keechelus Lake and allow the U.S. Forest Service to recover the land application site to return to natural habitat conditions before determining the ongoing use of this land.

2. Who will primarily benefit from this action?

Subsidized loan funding will reduce financial impacts to rate payers located within the service area. Although no notable socioeconomic or health disparities were identified in the project area, rate payers will benefit from the low interest loan this action provides to the SPUD.

This loan action helps SPUD improved facility operations through needed upgrades, which improve environmental, water quality, and public health protection that benefit aquatic life in Keechelus Lake and people in the surrounding area. Through consultation, the Snoqualmie Indian Tribe recognized benefits to water quality and associated aquatic life from the improvements made in wastewater treatment from this loan action. Depending on the U.S. Forest Service's determination on the future use, future generations may gain access to 45 acres of U.S. Forest Service property that were used for wastewater land application.

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.

Not applicable. No overburdened communities or vulnerable populations were identified as affected by this action.

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.

Through consultation, the Snoqualmie Indian Tribe noted this action perpetuates an unwanted movement of water from the Snoqualmie Watershed (WRIA 7), which may be experienced as a harm.

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 to overburdened communities or vulnerable populations.

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

Typically, these large infrastructure projects are funded through local revenue streams, including charging higher utility rates to rate payers. This loan offers financing from outside the local community, making the infrastructure updates less expensive to the small, local population, who may be sensitive to price increases.

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.

No overburdened communities or vulnerable populations were identified.

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:

No overburdened communities or vulnerable populations were identified.

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.

Reduction of contaminants from wastewater discharge

Wherever people live, contaminants from human waste will be released to the environment. Wastewater treatment facilities provide an opportunity to treat the waste, reduce pollution levels and discharge the treated water to a natural water body through an outfall. This action funds new treatment technology to discharge cleaner wastewater to Keechelus Lake. These improvements mean the facility will no longer release treated wastewater to land, which will prevent runoff to a nearby lake during part of the year.

Eliminating harms identified by Snoqualmie Indian Tribe

The Snoqualmie Indian Tribe raised concerns over water leaving the Snoqualmie watershed. The Snoqualmie Pass Utility District has water rights and has already completed planning and design work associated with the construction of a new treatment facility. Ecology has no jurisdiction through this action to change water rights or SPUD's past planning and utility infrastructure. This loan action is related but not responsive to the Tribes concerns.

Recouping land for preferred use

The U.S. Forest Service will recover the 45 acres of land previously used as the wastewater application site and have stated they plan to allow it to return to natural habitat conditions. Ecology has no role in the future designated use of these U.S. Forest Service lands.

Mitigate utility costs to rate payers

When public utility service infrastructure, maintenance, and operating costs increase, those costs are often distributed to rate payers. Rate payers are responsible for the fees from their use of wastewater disposal and processing from their homes and businesses. When utility operators (owners) update large scale infrastructure investments, the costs are substantial and distributed across time to current and future rate payers in small rate increases. Ecology has no jurisdiction to inform these rate amounts or how they are distributed to rate payers. This action of a low-interest loan inherently supports SPUDs efforts to minimize impacts to rate payers, but the specific allocation of costs is not a component of this action or Ecology's authority.

Section 10: Executive Summary

The purpose of this action is to provide the Snoqualmie Pass Utility District with \$13,200,000 in loan funding to construct updates to the district's wastewater treatment infrastructure. These investments will help the district phase out the outdated current land treatment system to meet current water quality standards. Infrastructure upgrades include a membrane bioreactor, solids handling facilities, aerobic digestion, sludge dewatering, drying beds, and associated instrumentation and controls. Currently, the wastewater is applied to 45 acres of U.S. Forest Service land. After completing these improvements, the Snoqualmie Pass Utility District will treat wastewater and discharge it to Keechelus Lake, downstream from Coal Creek.

The project location includes the treatment plant at 370 Treatment Plant Road, Snoqualmie Pass, WA 98068. Effluent will discharge into Keechelus Lake.

Impacted communities:

The community affected by this action includes a small residential community, part-time residents, and recreational skiers. The community does not appear to experience cumulative environmental burdens or population vulnerabilities based on 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 any comments from overburdened communities or populations with vulnerabilities from these outreach strategies.

Tribal considerations

Ecology invited Tribal consultation from the Confederated Tribes and Bands of the Yakama Nation, the Muckleshoot Indian Tribe and the Snoqualmie Indian Tribe. The Snoqualmie Indian Tribe responded to our invitation to consult. The Snoqualmie Indian Tribe discussed options to reduce the amount of water moving from WRIA 7 (Snoqualmie watershed) to WRIA 39 (Upper Yakima watershed). The Tribe is specifically concerned about instream flows in WRIA 7 for

salmonids and to maintain Snoqualmie Falls as a cultural site. While Ecology cannot use this action to change the water rights or Utility planning, Ecology discussed voluntary mitigation options with the Snoqualmie Pass Utility District (SPUD). They plan to address water efficiency in subsequent upgrades to support instream flow in WRIA 7.

Anticipated harms and benefits:

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

Anticipated benefits from the investments made with this loan include:

- **\$13.2M low-interest loan** to support a small community with limited revenue.
- **Improved water quality:** New membrane bioreactor system treats wastewater better than existing lagoons.
- **Cleaner discharge** to Keechelus Lake from the new treatment technology.
- **Land recovery:** U.S. Forest Service will recover 45 acres of land with the intent to restore it to natural habitat.

Overall, Ecology supports this subsidized loan offer to the Snoqualmie Pass Utility District, to provide necessary funding for improved water quality in the area.

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)¹⁰.

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