



Water Quality Program Loan Offer to Hartstene Pointe Water and Sewer District, Environmental Justice Assessment

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

Water Quality Program

Washington State Department of Ecology

Olympia, Washington

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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.

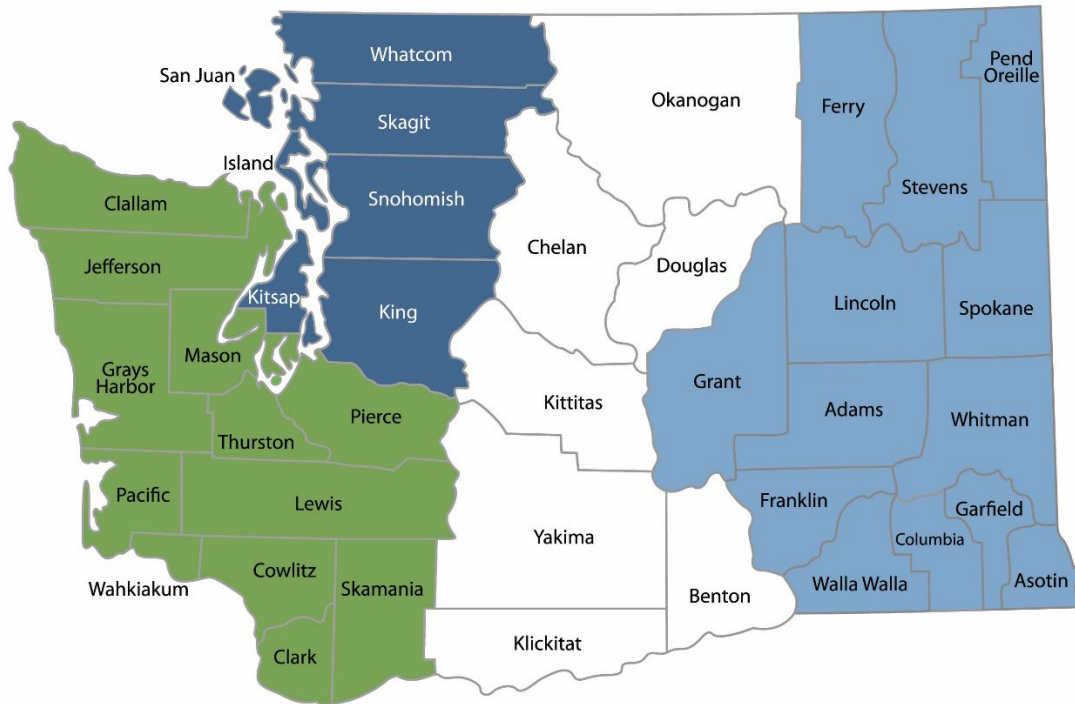
根据华盛顿州环境正义法(RCW 70A.02), 生态管理署在制定某些重大行动时必须进行环境正义评估。该评估需提供对负担过重社区和弱势群体潜在影响的信息, 以及减轻已明确的危害和公平分配已知利益的策略。如需笔译、口译或无障碍协助, 请联系 Courtney Cecale, 电子邮件: courtney.cecale@ecy.wa.gov或电话 (360) 480-6270。

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

Project overview

The purpose of the proposed action is to provide the Hartstene Pointe Water-Sewer District a \$14 million loan for system-wide repairs and the replacement and relocation of a deteriorated sewer main. The project will take place on Harstine Island in Mason County, adjacent to Puget Sound via Case Inlet.

Community considerations

The community affected by this action experiences few environmental burdens compared to other areas of the state. The community includes a high proportion of people older than age 65. Ecology's community engagement began in February and March of 2024, with an online webinar and public comment period. No overburdened communities, vulnerable populations or Tribes engaged with Ecology about this action. The Nisqually Indian Tribe, Skokomish Indian Tribe, and Squaxin Island Tribe were invited to consult with Ecology on this proposed loan offer. The Squaxin Island Tribe provided a letter supporting Hartstene Pointe Water and Sewer District for their application on the proposed project. Tribal members and other people in the area harvest shellfish along nearby beaches.

Anticipated harms and benefits

Other than brief, minimal impacts from system construction, Ecology does not anticipate any harms from this loan action or the project it supports.

Anticipated benefits from this project include:

- Investment of \$14 million in low-interest loan funding from state resources to a small community.
- Offsetting utility costs for utility upgrades, which can mitigate per-capita utility rate increases.
- Avoiding fees and administrative burdens from non-compliance with the Water-Sewer District's National Pollutant Discharge Elimination System Permit.
- Preventing the failure of a main sewer line located on a bluff directly above a marine environment. Such a failure would result in raw sewage flowing into Puget Sound and shoreline, which would threaten public health, geoduck harvesting and shellfish farming, and water quality.
- Preventing rainwater and water underground from flowing into the sewer pipes through leaks and pipe connections (infiltration and inflow).
- Supporting Puget Sound recovery because these changes directly improve the oxygen levels of impaired portions of the Sound.

Overall, Ecology supports this subsidized loan offer to the Hartstene Pointe Water-Sewer District to provide necessary funding for improved water quality infrastructure 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.

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

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>

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 Hartstene Pointe Water-Sewer District (Hartstene Pointe) for Hartstene Pointe Sewer Collection System Improvements (Agreement WQC-2024-HPWSD-00106).

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. Write a short summary of the action.

Project Description:

The purpose of the proposed action is to provide the Hartstene Pointe Water-Sewer District a \$14 million loan for system-wide repairs and the replacement and relocation of a deteriorated sewer main.

The project will take place on Harstine Island in Mason County, adjacent to Puget Sound via Case Inlet.

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

Anticipated benefits from the improvements made with this loan include:

- Providing a small community with limited local revenues an investment of \$14 million in low-interest loan funding.
- Preventing the failure of a main sewer line located a bluff directly above a marine environment. Failure of this sewer main would cause raw sewage to flow into Puget Sound, threatening public health, geoduck harvesting, shellfish farming, and water quality.
- Preventing rainwater and water underground from flowing into sewer pipes through leaks and pipe connections (infiltration and inflow). This can cause inefficiencies in the wastewater system and leak contaminants into the surrounding environment.
- Ensuring Hartstene Pointe’s compliance with the Water-Sewer District’s National Pollutant Discharge Elimination System Permit. Too much inflow and infiltration can overload the wastewater system, violating Hartstene Pointe’s permit and generating fines to Hartstene Pointe, which may be passed on to the local rate payers.
- Restoring Puget Sound. This project directly improves the water quality in portions of the Sound, specifically by increasing dissolved oxygen levels.

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 the Nisqually Indian Tribe, Skokomish Tribe, and Squaxin Island Tribe through formal letters to Tribal Chairs.

Please contact Faith Wimberley at faith.wimberley@ecy.wa.gov with any comments or questions or visit the webpage below to stay informed.

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

[\\$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 Nisqually Indian Tribe, Skokomish Indian Tribe, and Squaxin Island 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.

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.

Ecology does not anticipate any potential impacts directly to Tribal lands.

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

Potential impacts outside of Tribal lands include the improvement of water quality in Puget Sound adjacent to Harstine Island through the replacement of a deteriorated sewer pipe and addressing infiltration and inflow. These actions will help prevent bacteria and nutrient pollution and improve dissolved oxygen levels, which benefits aquatic species including shellfish and finfish resources. These resources are important for Treaty protected harvest rights and facilitate Tribal members' continued access to natural resources in the area.

The Squaxin Island Tribe provided a letter to Hartstene Pointe supporting the funding of this project, noting its shellfish resource benefits.

Construction activities funded by this loan offer could potentially impact cultural and historic resources. However, before construction activities begin, they will undergo review through Section 106 of the National Historic Preservation Act to identify any potential adverse effects, and Ecology will offer consultation again with Tribes at that stage.

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

Not applicable because Ecology did not receive a response from any of the affected Tribes.

- b. Equitably distribute benefits from the action

Not applicable because Ecology did not receive a response from any of the 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.

Ecology did not receive a response to our invitation for consultation from any of the affected Tribes.

However, the Squaxin Island Tribe engaged with the funding applicant during the development of their application and provided a letter of support for this project. The letter notes the project's positive impacts in protecting Treaty shellfish resources.

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

Ecology will consult on this project with any Tribes at their request. This project is also subject to the National Historic Preservation Act Section 106 review, which considers how federally funded projects affect historic properties. Before construction, Ecology will offer consultation 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

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

The project is located on the northern part of Harstine Island in Mason County. Peale Passage and Case Inlet of the Puget Sound surround the island.

Ecology identified the census tract 53045961100 as the affected area because of its proximity to the project location and impacted water bodies. This project is located on an island. We assessed that any environmental effects will be confined to the island.

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

The EHD Map Ranking (V2.0) for the census tract likely to be impacted (53045961100) is a 1, which is the lowest ranking.

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.

Ecology identified no additional cumulative health considerations related to this action.

5. When applicable, using the [EPA's Environmental Justice Screening and Mapping Tool \(EJScreen\)](#), identify areas likely to be impacted by the action that are at or above the 80th percentile⁸ (in state) for the "People of color" and "Low income" socioeconomic indicators.

The population living in the anticipated impacted area for this action is below the state's 80th percentile for "People of color" and below the state's 80th percentile for "Low income".

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

The average age of people living on Harstine Island is higher than the state's average age. This area ranks between 95 – 100th percentile for "over age 64" compared to the state.

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

Harstine Island may be susceptible to a two-foot or greater sea level rise due to climate change according to the National Oceanic and Atmospheric Administration.

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

This action will affect Tribal members and others who harvest shellfish on Harstine Island.

More broadly, the communities that will benefit from this loan offer include a small, rural community lacking the financial resources to locally fund this large infrastructure project. 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 population 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. Rate payers in the community with low incomes may be burdened by increased utility rates.

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 through community engagement.

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>

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 through Tribal consultation.

Section 7: Summary of Community Engagement

This section summarizes community engagement activities. Community Engagement should be tailored to specifically reach overburdened communities and vulnerable populations. Community engagement is required for all significant agency actions, but the engagement methods will vary depending on the size, scope, and topic of the project. The level, type, and form of engagement is based on the likelihood that the actions may cause environmental harm or may affect the equitable distribution of environmental benefits to an overburdened community or a vulnerable population.

Summarizing Community Engagement

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 does not anticipate this action will affect overburdened communities or vulnerable population groups. The impacted community is small and sparsely populated but does not constitute an overburdened community. The population impacted by this project does include an above average percentage of older adults, which could be an indicator of vulnerability but is not anticipated to be relevant to this funding action. Indigenous people, others who harvest shellfish, and people who may be burdened to afford wastewater utility fees may all be impacted by the wastewater project that is proposed to be funded by Ecology's loan action. Ecology did not identify disproportionate high rates of such people within the population impacted by this action.

Engagement activities

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

In February, Ecology notified the public of the intent to offer the subsidized loan to Hartstene Pointe (along with other funding). Ecology sent a blog post to multiple subscriber lists (with a total of 7,000 subscribers) and to 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 had the ability to influence Ecology's loan offer.

Ecology issued a press release announcing the final funding. The press release was sent to about 7,000 subscribers on multiple subscriber lists maintained by Ecology. Ecology sent the press release to two journalists at the Shelton Mason County Journal, which is the newspaper of highest circulation in the area. Ecology also sent the press release to the Hartstene Pointe Homeowners Association for distribution in their newsletter to households on the island.

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

Ecology addressed barriers to meaningful engagement for grant and loan applicants from the start of the application and awarding process. 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. This competitive program is standardized for all applicants with many opportunities to receive one on one 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, such as:

- Ecology converted public meetings into webinars to increase access and attendance
- 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:
 - a. PDF document
 - b. Spreadsheet
 - c. 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.

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 provided recommendations about 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.

The Hartstene Pointe Water and Sewer District will lead the infrastructure project and engage with any vulnerable populations that later self-identify. However, as the funder, Ecology can ensure vulnerable populations are protected and involved through the contracting process. The formal, legally binding agreement between Ecology and the recipient requires community engagement actions to ensure the loan funding promotes equity in the project's implementation.

Specific terms and conditions include:

- Project evaluations: survey, interviews, and site inspections.
- Translating materials into languages other than English in accordance with civil rights requirements.
- Completing cultural resources review to avoid, minimize, or mitigate adverse effects to archaeological and historic archaeological sites, historic buildings/structures, traditional cultural places, and sacred sites in accordance with the National Historic Preservation Act.
- Offers to consult with Tribes during cultural resources reviews
- Contracting for project implementation with firms from small, minority owned, and women's businesses (40 CFR, Part 33)
- Providing accommodations that ensure access to materials and participation in public forums for individuals with disabilities (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 funded project.
- Using best practices to communicate with different segments of the population who may be impacted.
- Implementing transparent public processes and fund management.
- Procuring goods and services in fair, legal, and open public processes without benefiting people with conflicts of interest.

Section 8: Potential Environmental Benefits & Harms from Action

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

Identify Potential Environmental Benefits & Harms from Action

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

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

- Funding water quality projects in small and rural areas like Harstine Island 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 low-interest loan helps the Hartstene Pointe community ease costs of wastewater treatment.
- The subsidized loan funding for this project creates an opportunity for the Hartstene Pointe Water and Sewer District to minimize rate impacts to residents served by the wastewater utility.

This loan offer supports Hartstene Pointe's efforts to improve environmental and water quality benefiting aquatic life and people on Harstine Island and around the Peale Passage and Case Inlet in the Puget Sound. This loan offer will help the Hartstene Pointe Water-Sewer District implement infrastructure projects to improve their wastewater treatment plant's ability to reduce pollution (total suspended solids, coliform) released into Case Inlet and Puget Sound. This project helps prevent beach closures which could impact the use of Peal Passage and Case inlet for fishing, recreation, aquaculture, water related businesses, and for cooling during extreme heat.

Benefits from the infrastructure improvements made with this loan include:

- Hartstene Pointe can meet many permit provisions and regulatory requirements. This project could reduce permit violations to the facility's National Pollutant Discharge Elimination System Permit. Permit violations result in fines to the local community.
- Implementing operations and maintenance best management practices outlined in engineering reports and permits to avoid future environmental and water quality impacts.
- Reducing and preventing infiltration and inflow (I/I). I/I can cause sanitary sewer overflows. It can also wear down the sewer system and limit the community's growth potential. Infrastructure improvements will prevent the release of untreated wastewater by eliminating inflow and infiltration of stormwater and ground water into the sewer conveyance system.

- Preventing the failure of a main sewer line by relocating the sewer main away from the bluff and installing a series of lift stations to collect and convey the sewage away from the bluff and to the wastewater treatment plant (WWTP).
- Increasing wastewater treatment capacity and capability to meet future demand and loading, allowing for continued population growth on Harstine Island.

2. Who will primarily benefit from this action?

The improvements will benefit people who use Peale Passage and Case Inlet waters for many purposes such as fishing and recreation. Households that use wells for clean drinking water will benefit from this action's protection of the groundwater supply. The water quality improvements resulting from this action will protect aquatic life, including salmon populations, and associated Tribal treaty rights. Additionally, subsidized loan funding will reduce financial impacts to Hartstene Pointe Water-Sewer District rate payers located within the service area, particularly for lower income households such as elderly people in retirement and on fixed incomes.

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.

No overburdened communities or vulnerable populations were identified in the area impacted by this project. This action benefits the Hartstene Pointe community and those living on Harstine Island.

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

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.

No overburdened communities or vulnerable populations were identified in the area impacted by this project. Ecology does not anticipate loan offer will harm 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.

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 Hartstene Pointe Water-Sewer District and their subcontractors. To address these possible concerns, Hartstene Pointe and their subcontractors will follow all legal and permit requirements for conducting construction in the area, which will be a Term and Condition 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:
 - 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.

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.

This action will financially support Hartstene Pointe in meeting its permitted pollutant limits, which will improve the quality of the water released back to the environment; however, treated wastewater will still be discharged. Wherever people live, contaminants from human waste are released to the environment. Wastewater treatment plants such as the one funded by this action, treat the waste, reducing pollution levels and releasing 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 that will reduce infiltration and inflow, reduce sewer overflows, prevent line failure, and increase the capacity of the wastewater treatment plant.