



Water Quality Loan offer to Seattle Public  
Utilities for a Tunnel Effluent Pump Station

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

For the

**Water Quality Program**

Washington State Department of Ecology  
Olympia, Washington

October 2025, Publication 25-10-045

## Publication Information

This document is available on the Department of Ecology's website at:

<https://apps.ecology.wa.gov/publications/summarypages/2510045.html>

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<sup>1</sup> [www.ecology.wa.gov/contact](http://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.cecale@ecy.wa.gov](mailto: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](mailto: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](mailto: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](mailto: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](mailto:courtney.cecale@ecy.wa.gov) 또는 전화 360-480-6270으로 문의하십시오.

# Department of Ecology's Regional Offices

## Map of Counties Served



<b>Southwest Region</b> 360-407-6300	<b>Northwest Region</b> 206-594-0000	<b>Central Region</b> 509-575-2490	<b>Eastern Region</b> 509-329-3400
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Region	Counties served	Mailing Address	Phone
<b>Southwest</b>	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	P.O. Box 47775 Olympia, WA 98504	360-407-6300
<b>Northwest</b>	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	P.O. Box 330316 Shoreline, WA 98133	206-594-0000
<b>Central</b>	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W. Alder St. Union Gap, WA 98903	509-575-2490
<b>Eastern</b>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 North Monroe Spokane, WA 99205	509-329-3400
<b>Headquarters</b>	Statewide	P.O. Box 47600 Olympia, WA 98504	360-407-6000

# Water Quality Loan offer to Seattle Public Utilities for Tunnel Effluent Pump Station

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**An Environmental Justice Assessment (per RCW 70A.02.060)<sup>2</sup>**

Water Quality Program  
Washington State Department of Ecology  
Olympia, WA

**October 2025 | Publication 25-10-045**



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

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<sup>2</sup> <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 the proposed action** is to provide \$35.2 million in loan funding to Seattle Public Utilities to support the construction of a new pump station, associated infrastructure, and conveyance pipes under approximately seven city blocks that will transport combined sewage and rain runoff to the West Point Treatment Plant. The pump station is a key component of the ongoing and much larger Lake Washington Ship Canal Water Quality Project, designed to capture wastewater flows in a storage tunnel and transport them to King County's West Point Wastewater Treatment Plant for treatment before release to Puget Sound.

**The project site is located within the Ballard neighborhood of Seattle.** Nearby streets will be impacted during construction for access to below-ground infrastructure. The project will improve water quality in the Ship Canal, a waterway connecting Lake Union and Salmon Bay to Shilshole Bay of Puget Sound.

**The community impacted by this action is not designated as overburdened or disadvantaged based on** standard environmental justice data sets. Segments of the Ship Canal and Shilshole Bay are listed as impaired under the federal Clean Water Act and the Ship Canal ranks high for wastewater discharge risks by the Washington Department of Health. This means the water is polluted. The project is designed to reduce water pollution.

**Community engagement for this action** began in January and February of 2025 with focused outreach to community-serving organizations, the City of Seattle, and the public with an online webinar and public comment period. We did not receive any engagement from overburdened communities or populations with vulnerabilities from these outreach strategies. Ecology initially heard from two organizations interested in coordination but did not receive further engagement.

**Ecology invited Tribal consultation** with the Muckleshoot Indian Tribe, Port Gamble S'Klallam Tribe, Puyallup Tribe of Indians, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians, Suquamish Tribe, and the Tulalip Tribes. No Tribal government responded to our invitation to consult.

**Ecology identified no environmental harms** from the investment of this loan offer, but Ecology notes the following potential temporary harms during the construction phase of the project:

- Temporary restrictions on public spaces and waterfront access may affect those who rely on the public pier and pedestrian areas for social interaction and recreation.
- An increase in noise and vibrations may result from the excavation, tunneling, and installation of major infrastructure from heavy equipment.
- Diesel emissions from machinery, along with dust and other particulate matter from excavation, may temporarily reduce local air quality.
- Construction will require lane closures, parking restrictions, and periods of flagger-directed traffic, increasing congestion and limiting access to nearby homes and businesses. Pedestrians and cyclists will experience detours, and those who rely on these routes may face increased travel times.

**Ecology assessed ways to minimize construction harms and maximize benefits** resulting from this action. Construction impacts will be managed according to construction laws and permit requirements.

**Anticipated benefits** from this loan offer are extensive. The \$35.2 million low-interest loan from the State to Seattle Public Utilities is expected to provide several important benefits:

- Provides needed capital with favorable terms to support local solutions to water quality problems.
- Helps modernize Seattle’s public utility infrastructure to improve efficiency and meet state and federal clean water requirements.
- Supports compliance with applicable water quality permit requirements for combined sewer overflows (CSOs).
- Reduces the amount of harmful pathogens, nutrients, and toxic substances entering the Lake Washington Ship Canal, which connects to Shilshole Bay and Lake Union.
- Improves water quality to benefit fish and other aquatic species, which plays a role in supporting Treaty-protected fishing rights.
- Creates construction jobs and provides positive benefits to the local economy by supporting recreation and tourism in cleaner, accessible public areas.

**Overall, Ecology supports this subsidized loan offer to Seattle Public Utilities** to uphold water quality improvements in an area with a pressing need to reduce combined sewer overflows to culturally relevant and high-traffic waterways.

# Environmental Justice Assessment

## Purpose

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<sup>3</sup>](#)).

The HEAL Act directs Ecology to complete an EJ assessment for the following actions:

- Development and adoption of significant legislative rules, as defined in RCW.05.328<sup>4</sup>.
- Creation and adoption of a new grant or loan program that a covered agency is explicitly authorized or required by law to carry out.
- Award of a capital project, grant, or loan of at least \$12 million, or a transportation project, grant, or loan of at least \$15 million.
- Submission of agency request legislation to the Governor’s Office or the Office of Financial Management (OFM) for approval.

An EJ assessment does not need to be comprehensive or exhaustive. It does not require new quantitative or economic analysis of the proposed agency action.

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

<sup>4</sup> <http://app.leg.wa.gov/RCW/default.aspx?cite=34.05.328>

# Section 1: Background

## Background information

1. Descriptive title of project/action:

Water Quality loan offer to Seattle Public Utilities for Tunnel Effluent Pump Station<sup>5</sup>

2. Write a short summary of the action.

Ecology proposes to award a \$35.2 million low-interest loan to Seattle Public Utilities to help build a new pump station, some underground conveyance pipes, and supporting infrastructure, Figure 1 below. The pump station is part of the Ship Canal Water Quality Project, which is already under construction. It will carry combined sewage and stormwater runoff to the West Point Wastewater Treatment Plant.

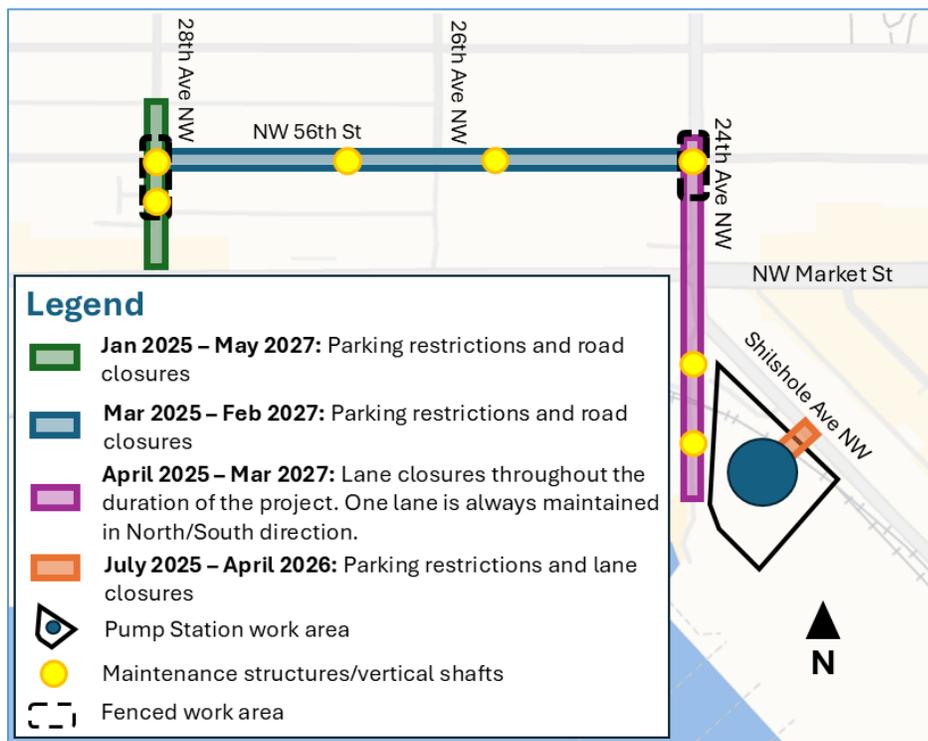


Figure 1: Location of project components

The comprehensive Ship Canal Water Quality Project will control untreated discharges from seven outfalls, significantly reducing the volume of untreated sewage and stormwater that overflows into the Lake Washington Ship Canal. These events, known as combined sewer overflows (CSOs), degrade water quality, harm public health and stress the aquatic ecosystem.

The project location is in a densely populated part of northwest Seattle and directly affects the Lake Washington Ship Canal. This man-made waterway connects Lake Union and Salmon Bay to

<sup>5</sup> WQC-2026-SeaPUD-00307

Shilshole Bay and Puget Sound. It provides important access to the Cedar and Sammamish River systems for several salmon species, including Chinook (listed under the Endangered Species Act), as well as coho, sockeye, chum, steelhead, and Southern Resident orcas.

In addition to their ecological importance, salmon species are central to the culture and identity of Washington's Tribes, which have long emphasized the need to protect the Salish Sea, salmon, and salmon habitat. This project supports Washington's Treaty obligations by helping restore these vital cultural and natural resources.

By reducing combined sewer overflows, the project will improve water quality, protect at-risk species, and support a healthier environment for everyone who relies on these waters.

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

Provide link here:

[Ecology proposes to fund 102 clean water projects across the state - Washington State Department of Ecology](#)<sup>6</sup>

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<sup>6</sup> <https://ecology.wa.gov/blog/february-2025/ecology-proposes-to-fund-102-new-clean-water-projects-across-the-state>

## 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.

Tribes that may be affected by this proposed action include the Muckleshoot Indian Tribe, Port Gamble S'Klallam Tribe, Puyallup Tribe of Indians, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians, Suquamish Tribe, and the Tulalip Tribe.

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.

4. Describe plans to offer consultation to identified Tribes.

Ecology offered consultation to all potentially affected Tribes through formal written 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 and engagement

Tribal consultation informed all the answers to 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.

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

This state-funded investment in water quality infrastructure will benefit aquatic species and fisheries that support Treaty-protected harvest rights. These improvements support broader goals of environmental justice and the long-term stewardship of Washington's waterways.

Construction may affect cultural and historic resources. To evaluate potential impacts, this project will go through a review in compliance with the National Historic Preservation Act Section 106. Ecology will invite consultation with Tribes again during that process.

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

Not applicable. Ecology did not receive a response from any of the potentially affected Tribes identified in Section 3.

- b. Equitably distribute benefits from the action

Not applicable. Ecology did not receive a response from any of the potentially affected Tribes identified in Section 3.

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

Not applicable. Ecology did not receive a response from any of the potentially affected Tribes identified in Section 3.

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

If a Tribe requests consultation on this project, Ecology will honor and respond to that request.

This project is subject to Section 106 review under the National Historic Preservation Act, which requires consideration of how federally funded projects may affect historic properties. Before construction begins, Ecology will consult with each Tribe's Tribal Historic Preservation Officer to assess potential impacts to cultural resources.

## Section 6: Identification of overburdened communities and vulnerable populations

This section identifies overburdened communities and vulnerable populations, as defined in the [RCW 70A.02<sup>7</sup>](#) as well as more broadly, who will be affected by the action. For this Environmental Justice Assessment, Ecology used census tracts from 2010 to identify the areas affected by this action. We chose 2010 census tracts because the Department of Health's Environmental Health Disparities map also uses them. That map includes environmental and social health information for Washington, so using the same tracts gave us a clear and practical way to measure impacts.

### Identify overburdened communities and vulnerable populations

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

This action will affect areas along the Lake Washington Ship Canal in Seattle's Ballard neighborhood. It will improve water quality in the Ship Canal and Shilshole Bay of Puget Sound.

Seattle Public Utilities and the King County Department of Natural Resources and Parks are working together on a large and ongoing project. Overall, the project is to design and build a combined sewage storage tunnel and associated infrastructure to reduce the amount of sewage and rain runoff (stormwater) that overflows into the Ship Canal from the Ballard, Fremont, Wallingford, and Magnolia neighborhoods.

This funding supports the construction of the Tunnel Effluent Pump Station (TEPS), some of the underground conveyance pipes, and a building that will house mechanical systems and odor control equipment. The TEPS will pump wastewater flows stored in the tunnel to King County's West Point Wastewater Treatment Plant.

Construction of the TEPS will occur at 5425 Shilshole Ave. NW, Seattle, WA 98107. The project will also affect:

- 24th Avenue NW at NW 56th Street, a road with separate bike and vehicle lanes
- 28th Avenue NW between NW 56th Street and NW Market Street, a shared roadway for bikes and vehicles

The following 2010 U.S. Census tracts are expected to be affected, listed from east to west:

- 53033005400 (eastern-most affected area along the Ship Canal)
- 53033006000

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<sup>7</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.02.010>

- 53033004900
- 53033005900
- 53033004800
- 53033004700
- 53033005801
- 53033003200
- 53033005700 (western-most affected area along the Ship Canal and location of the West Point Wastewater Treatment Plant)

2. When applicable, using the [Washington State Department of Health’s Environmental Health Disparities Map \(EHD Map\)](#)<sup>8</sup>, identify the EHD Map rankings for all census tracts likely to be impacted by the action.

The EHD Map provides a cumulative environmental health disparities ranking for each census tract. Rankings are based on environmental exposures, environmental effects, socioeconomic , and physiological sensitivity factors. These rankings indicate where residents may be more vulnerable to environmental and health impacts.

The 2010 census tracts expected to be affected by this action have moderate to low overall EHD rankings:

- 53033005400 – Rank 5
- 53033006000 – Rank 5
- 53033004900 – Rank 7
- 53033005900 – Rank 5
- 53033004800 – Rank 4
- 53033004700 – Rank 4
- 53033005801 – Rank 4
- 53033003200 – Rank 2
- 53033005700 – Rank 3

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.

While the census tracts likely to be affected by this action have moderate to low overall health disparity rankings, many were ranked 9 or 10 for environmental exposures, environmental effects, or both.

This indicates that, despite lower overall rankings, these communities may still experience significant environmental burdens that should be considered in planning and decision-making.

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<sup>8</sup> <https://fortress.wa.gov/doh/wtnibl/WTNIBL/>

## Proximity to heavy-traffic roadways

The following census tracts have high rankings for proximity to heavy-traffic roadways:

- 53033005400 — Rank 10
- 53033006000 — Rank 9

The area affected by this action already experiences heavy traffic, and construction from the project funded is expected to increase vehicle activity. This will add short-term pressure to already-stressed roadways<sup>9</sup>. Construction may also cause:

- Increased air pollution from heavy machinery
- Parking disruptions
- Temporary road closures

## Diesel exhaust emissions

The EHD tool includes estimates of particulate matter emissions from diesel engines. Diesel engines emit harmful compounds such as ultrafine particles, nitrogen dioxide, benzene, and formaldehyde.<sup>10</sup> All census tracts in the project area show high EHD ranks for diesel exhaust emissions. While the project is not expected to cause long-term increases in emissions, diesel exhaust may increase during construction due to more vehicle and equipment use. Any increase would be short-term and localized.

## Wastewater discharge and environmental health risk

In this area, pipes carry stormwater and sewage to the West Point Wastewater Treatment Plant for treatment during low flows, but during high flows this combined stormwater and wastewater is discharged untreated to the Ship Canal. The purpose of the project subject to the loan offer and this EJA is to reduce these untreated discharges to the Ship Canal, thus reducing environmental health risks from wastewater discharges in the relevant census tracts. Discharge is associated with poor health outcomes such as the prevalence of hypertension.<sup>[1]</sup> Wastewater discharge does not have a significantly high ranking in the project area, but it may still contribute to an increased cumulative health burden for people there<sup>11</sup>.

## Public health risks from combined sewer overflows (CSOs)

This part of Seattle has a combined sewer system that carries both stormwater runoff and wastewater in the same pipes. These older systems can become overwhelmed during heavy rain. When this happens, untreated sewage and stormwater may be released into nearby waterways, a process called a combined sewer overflow (CSO). A significant portion of Salmon Bay is classified as impaired for E. coli and fecal coliform bacteria, in part due to these frequent

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<sup>9</sup> [Proximity to Heavy Traffic Roadways | Washington Tracking Network \(WTN\)](#)

<sup>10</sup> Betha R, Balasubramanian R. Emissions of particulate-bound elements from biodiesel and ultra low sulfur diesel: size distribution and risk assessment. *Chemosphere*. 2013 Jan;90(3):1005-15.

<sup>[1]</sup> Karouna-Renier, N., Rao, K., Lanza, J., Davis, D., & Wilson, P. (2007). Serum profiles of PCDDs and PCDFs, in individuals near the Escambia Wood Treating Company Superfund site in Pensacola, FL. *Chemosphere*, 69(8), 1312-9.

<sup>11</sup> This project will not reduce the overall amount of wastewater treated at the West Point Treatment Facility.

CSO events. This project will help to limit exposure to untreated sewage by reducing CSOs into the Lake Washington Ship Canal and Salmon Bay.

CSOs can carry harmful pollutants and pathogens into the environment. These overflows can:

- Harm fish and other aquatic life.
- Increase health risks to people who may recreate (ex: swim, boat, fish) in nearby waters. Exposure to untreated sewage can cause skin, eye, and gastrointestinal infections, especially for children, older adults, and people with weakened immune systems.
- Release unpleasant odors and cause disruption to people who may rely on the public pier and pedestrian areas for social interaction and recreation.

5. Identify areas likely to be impacted by the action that are at or above the 80<sup>th</sup> percentile (in state) for the “People of color” and “Low income” socioeconomic indicators. You can do this by looking at the EHD map rankings for these individual indicators (rank 9 or higher roughly approximates those census tracts at or above the 80<sup>th</sup> percentile), and/or by downloading the appropriate data on these indicators from the [Washington Tracking Network](#) or the [Census Bureau](#)’s American Community Survey 5-year estimates and running additional analysis to determine percentiles.

According to the census data and the EHD map, none of the 2010 census tracts likely to be impacted by the action are at or above the 80<sup>th</sup> percentile (in state) for the “People of color” or “Low income” socioeconomic indicators.

6. Using the EHD map and/or data from Washington Tracking Network, identify any other indicators pertaining to socioeconomic characteristics, health disparities, and/or climate and environmental impacts at or above 80<sup>th</sup> percentile (in state) that are most relevant to this action.

### **Sensitive populations**

Some areas affected by this project may include sensitive populations. For example, census tract 53033004900 shows:

- Rank 9 for deaths from cardiovascular disease
- Rank 9 for low birth weight

After construction, this project will reduce CSOs, leading to improved water quality. These improvements may support better health outcomes, particularly for sensitive populations.

### **Unaffordable housing**

Most census tracts in the project area are ranked high for unaffordable housing on the EHD Map. Housing is considered unaffordable when monthly housing costs exceed 30% of a household’s gross income. This includes:

- Rent or mortgage payments
- Property taxes
- Utilities

- Homeowners' insurance
- Other housing-related expenses

When housing becomes unaffordable for lower-income populations, it can have a disproportionate impact on people of color. High housing prices may put additional strain on low-income households and may have created barriers for people of color in this area<sup>12</sup>.

This action may affect household and business wastewater rates. The funding will help the City of Seattle cover infrastructure costs. This funding in turn will reduce or prevent utility rate increases and limit additional financial strain on low-income ratepayers.

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

#### **Vulnerable population: Bicycle commuters**

Pedestrians and bicyclists may be negatively affected by this action during construction. Construction may temporarily disrupt access to sidewalks, crosswalks, bike paths, and roads near the project site as well as decrease local air quality. Additionally, increased travel times and congestion could contribute to idling vehicles emitting more pollutants than moving vehicles, further decreasing air quality.

Pedestrians and cyclists may face greater health risks than people in vehicles due to their direct exposure to air pollution. Bike commuters are especially vulnerable if they lack alternative transportation and need to bike for employment.

#### **Vulnerable population: Unhoused people**

Unhoused individuals often live near city centers where they can access shelters, public transit, and other essential services. Ecology explored whether unhoused people could be impacted by the construction phase of this project. Due to site security and safety measures implemented during the construction phase, direct impacts are unlikely. Individuals who live near the construction area may face:

- Increased exposure to temporary noise and air pollution during construction
- Risk of forced relocation

Unhoused populations may be especially vulnerable due to limited access to health care, transportation, and housing stability. Construction-related disruptions may worsen these conditions.

#### **Other potentially impacted populations: Local businesses**

The presence and vitality of local businesses is an indicator of community resilience, identity, and economic opportunity. This action will possibly harm local businesses due to construction activities but will provide long-term water quality benefits.

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<sup>12</sup> Mehdipanah, R. (2023). Without Affordable, Accessible, and Adequate Housing. *Milbank Quarterly*, 101 Suppl 1(S1), S419-443.

Construction may temporarily disrupt access to sidewalks, streets, and bike paths near the Ship Canal. Parking could be limited, and traffic patterns may change, leading to congestion and reduced foot traffic. These issues could affect:

- Business deliveries and operations
- Worker commutes
- Customer access

Although these impacts are temporary, they may cause financial strain for local businesses. The City of Seattle is already working with local businesses to address construction impacts. In the long term, the project is expected to benefit businesses by improving water quality and attracting more visitors and commercial investment.

8. 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.

Ecology's community engagement efforts did not identify any additional overburdened communities or vulnerable populations likely to be affected by this action.

8. 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.

Not applicable. No Tribes accepted Ecology's invitation for Tribal consultation on this action.

## Section 7: Summary of community engagement

This section summarizes community engagement activities. Community engagement should be tailored to specifically reach overburdened communities and vulnerable populations.

Community engagement is required for all significant agency actions, but the engagement methods will vary depending on the size, scope, and topic of the project. The level, type, and form of engagement is based on the likelihood that the actions may cause environmental harm or may affect the equitable distribution of environmental benefits to an overburdened community or a vulnerable population.

### Summarizing community engagement

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

Ecology did not identify overburdened communities expected to be impacted by the project. Ecology took several steps to engage with potential vulnerable populations when this funding offer was proposed.

- Ecology contacted Seattle Public Utilities (SPU) to coordinate messaging and understand community outreach already in progress. SPU has conducted engagement over the past 10 years to raise awareness and gather input on the broader Ship Canal Water Quality Project.
  - In other parts of the project, SPU worked with the City's Unified Care Team to follow outreach protocols when unhoused individuals needed to be relocated near construction sites. The city is not aware of unhoused people living near the TEPS site.
- Ecology contacted Commute Seattle to request data about bicycle commuters in Ballard and how construction might affect them.
- Ecology shared information about the proposed loan and project impacts — both short-term construction and long-term water quality benefits — with:
  - Ballard Alliance: a nonprofit neighborhood and business improvement organization designed to support and enhance the Ballard community economically, socially and aesthetically. They serve a wide range of audiences including local businesses, people who live here, and tourists.
  - Sustainable Ballard: This organization's mission is to educate, inspire, and engage neighbors to live more sustainably. Their goal is to create a community that is diverse, equitable and environmentally healthy. Their main audience includes households in Ballard, volunteers, and local businesses.
  - Puget Sound Keeper Alliance: This organization's mission is to protect and enhance the waters of Puget Sound for the health and restoration of aquatic ecosystems and the communities that depend on them.

In addition, Ecology provided general mechanisms for the public to provide input on this loan action and the overall list of projects proposed for funding in the Water Quality Combined Fund for State Fiscal Year 2026 (July 2025-June 2026).

- Ecology announced the proposed funding on Feb. 5, 2025, through multiple channels:
  - Blog post on Ecology’s website and sent to Ecology’s media list of 7,000+
  - Newsletter sent to more than 2,000 subscribers
  - Social media posts (Instagram and Facebook)
  - Direct emails to news outlets
- Ecology held a 30-day public comment period and hosted a webinar to explain the funding process, decisions, and the two loan offers subject to the HEAL Act. The public was invited to provide feedback on the full list of proposed State Fiscal Year 2026 Water Quality Combined Fund projects, including this action.
- All public comments received were reviewed and responded to by Ecology.

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

Ecology took the following steps to reduce barriers for both funding applicants and members of the public, particularly those unfamiliar with funding programs or technical project details:

- Reached out to local media and community organizations that serve the wider public and may include vulnerable populations (see list in question 1 above).
- Hosted an online public meeting to improve accessibility and participation.
- Provided public materials in multiple accessible digital formats:
  - PDF document
  - Searchable spreadsheet
  - Interactive dashboard and map
- Offered documentation in commonly spoken languages other than English.
- Helped applicants during the application process, including support with the online portal.
- Hosted recipient workshops to provide an orientation and technical assistance on grant management.

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

Ecology is not aware of any overburdened communities or additional vulnerable populations affected by this loan offer.

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

Ecology did not receive any comments or recommendations from overburdened communities or vulnerable populations identifying harm or requesting changes to this loan action.

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

Ongoing engagement related to this action will be led by SPU, the loan recipient. SPU will lead the community engagement about the TEPS phase of the Ship Canal Water Quality Project.

As the funder, Ecology will ensure that equity and engagement requirements are upheld through the legal loan agreement. This binding contract includes provisions to ensure that community engagement continues during project implementation and that the project equitably benefits any potential vulnerable populations that are identified throughout the process.

## **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.

This low-interest loan helps Seattle Public Utilities (SPU) maintain wastewater treatment affordability for the utility.

The loan supports the Tunnel Effluent Pump Station (TEPS) project, part of a larger Ship Canal Water Quality Project, which is expected to deliver multiple benefits:

- Better local water quality
- Improved public health
- Support for Tribal Treaty-protected cultural and environmental resources
- Stronger regulatory compliance
- Job creation and local economic investment

#### **Water quality and public health benefits**

Ecology's loan funding supports a project that will prevent about 75 million gallons of untreated sewage and stormwater from entering local surface waters each year.

By reducing Combined Sewer Overflows (CSOs), the project will:

- Lower the amount of pathogens, nutrients, and toxic substances in local waters
- Improve conditions for fish and aquatic life
- Reduce beach closures after storms
- Support safer subsistence and recreational fishing
- Reduce the risk of waterborne illness in the community

#### **Cultural and environmental benefits for Tribes**

The Lake Washington Ship Canal is a man-made waterway that links traditional fishing areas and is important to culturally significant species, including salmon. It also flows into Puget

Sound, home to the Southern Resident orcas; species that hold deep cultural meaning for many Tribes in the region.

Reducing CSOs helps:

- Protect habitat needed for fish survival, migration, and harvest
- Support Tribal members' ability to exercise Treaty rights
- Safeguard ecosystems that are central to cultural identity and subsistence practices

The pump station site will also feature artwork by Jamestown S'Klallam Tribal member Jeffrey Veregge. The artwork will celebrate Coast Salish heritage and the historical significance of the area.

### **Regulatory compliance**

The project helps SPU and King County meet state and federal requirements related to the control of combined sewer overflows.

In addition, modernizing this critical infrastructure strengthens Seattle's climate resilience by helping the city better manage more frequent and intense rainstorms.

### **Job creation and economic investment**

This \$35 million state investment helps ease financial pressure on the utility. This multi-year project will:

- Create construction jobs
- Provide contract opportunities for local businesses
- Inject tens of millions of dollars into Seattle's economy

Over time, operating and maintaining the pump station may create municipal job opportunities. Cleaner, healthier water also helps support local recreation, fishing, and tourism-based businesses.

## **2. Who will primarily benefit from this action?**

This project will primarily benefit residents and communities in Ballard, Fremont, Wallingford, Magnolia, and North Interbay by improving water quality in the Ship Canal.

People who live in or visit Seattle — and who use or enjoy the Lake Washington Ship Canal — will benefit from cleaner water and healthier ecosystems. The project also helps protect iconic species such as salmon and Southern Resident orcas, which are important to the region's environmental and cultural identity.

Local businesses and/or governments will benefit from:

- Jobs created during project construction
- Easier compliance with water quality regulations
- Economic activity from tourism, recreation, and neighborhood livability

CSO events can restrict access and allowed uses of the receiving waters, limiting recreation and tourism opportunities and reducing support for local businesses, which can lower the overall

desirability of the area. Cleaner water and a more attractive environment can boost local spending on recreation, dining, transit, shopping, and other services.

3. How is the action expected to benefit specifically overburdened communities or vulnerable populations? If there is no benefit, identify potential barriers to benefitting from the action.

This low-interest loan reduces the cost of wastewater treatment improvements for SPU. Lower project costs can help the utility limit future rate increases, easing financial pressure for customers vulnerable to housing insecurity from lower incomes and high housing costs.

Reducing CSOs will improve water quality in the Lake Washington Ship Canal and connected waters. Cleaner water supports public health, especially for children, seniors, and people with compromised immune systems, who are more vulnerable to illness from bacteria and viruses in contaminated water.

Tribal communities with Treaty-protected fishing rights in these waters may also benefit. The project will improve water quality, which supports culturally important fishing practices and healthier ecosystems.

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

Ecology does not anticipate ongoing harms from this loan offer to any population, including overburdened communities or vulnerable populations. Since the project will involve construction, there will be some temporary localized harms related to traffic revisions, noise, and dust.

People may experience:

- Increased noise, dust, and vibration
- Frequent use of heavy equipment, often from early morning to evening, with some night work
- Temporary increases in diesel emissions and airborne dust, which may decrease air quality

Transportation impacts may include:

- Lane closures and parking restrictions
- Traffic delays due to flagger-controlled areas
- Detours for pedestrians and cyclists, which may increase travel time and cause stress for people who rely on those routes

There may also be temporary restrictions on public spaces and waterfront access.

5. Who will primarily experience the harms?

People who live, work, recreate, or travel near the construction sites will experience the identified impacts.

Pedestrians and bicyclists will face detours around active work zones. While alternate routes will be available, the project affects a popular bike corridor, which may cause additional inconvenience for people who rely on non-motorized transportation.

People who recreate on land or water in the Lake Washington Ship Canal, Salmon Bay, Shilshole Bay, or nearby areas may be affected during construction. Access to locations such as the 24th Avenue public dock may be temporarily limited. Recreators may also be exposed to increased noise and localized air pollution.

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

The neighborhoods near the project site are not designated as overburdened under Washington’s environmental justice law.

During construction, sensitive populations such as children, older adults, and people with respiratory or sensory conditions may be especially vulnerable to:

- Short-term declines in air quality from diesel emissions and dust
- Increased noise and vibration
- Added stress or disruption to daily life

For people with existing health issues like asthma, these conditions may worsen symptoms or contribute to broader health risks.

Disruptions to travel routes and public spaces may also disproportionately affect vulnerable populations.

- People who walk, bike, or use public transit and don’t have other transportation options may face more exposure to construction impacts and longer travel times.
- People with limited mobility may have more difficulty adjusting their routines due to detours or reduced access to public areas.

Unhoused people who are dwelling nearby construction sites may face:

- Increased exposure to noise and air pollution
- Greater health and safety risks
- Risk of forced relocation

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

This action helps reduce environmental and health disparities by improving water quality in the Lake Washington Ship Canal for Tribal people and people who are disproportionately sensitive to pollution risks in water. Cleaner water benefits people who use the water.

Waterborne pathogens and pollutants can be especially harmful to people with weakened immune systems or limited access to healthcare. By reducing these risks, the project supports more equitable access to safe outdoor activities like swimming, fishing, and shoreline use. It also helps prevent contamination of fish and shellfish, which is important for both food safety and cultural practices.

The project also improves SPU’s ability to adapt to climate change. Upgraded infrastructure will help manage larger volumes of stormwater during heavy rain events, reducing pollution and protecting community health during extreme weather.

## Section 9: Options to eliminate, reduce, or mitigate harm 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 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.

#### Reducing cost impacts

While Ecology does not set utility rates, this funding action reduces the overall cost of the project. That can help Seattle Public Utilities (SPU) ease financial pressure on ratepayers — especially people with high housing costs and lower incomes who are more vulnerable to rate increases.

#### Reducing construction impacts

SPU and its subcontractors will be responsible for following all legal and permit requirements during construction to protect human health. They will also take specific steps to reduce the impact of construction on surrounding communities, including:

- Using newer, fuel-efficient, and well-maintained equipment
- Minimizing engine idling and promoting carpooling among workers
- Transporting materials by barge or rail when possible, to reduce truck traffic
- Using low-emission concrete and safer chemicals in tunnel boring
- Following traffic control plans, quiet hours, and public notification requirements

These actions help reduce air pollution, noise, traffic congestion, and other disruptions that may affect nearby residents, especially those with existing health or mobility challenges.

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.

Ecology will use the signed funding agreement with SPU to ensure that SPU and its subcontractors follow all legal and environmental requirements. Ecology staff will meet regularly with the City throughout the life of the funding agreement to monitor progress and ensure accountability.

SPU will also be responsible for continuing outreach to any vulnerable or overburdened populations identified during the project.

Ecology also requires loan recipients to make a good-faith effort to inform minority-owned, women-owned, and disadvantaged businesses about contractor and subcontractor bidding opportunities. This helps ensure more equitable access to the economic benefits of the project.

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.

Not applicable. Ecology expects construction impacts to be addressed through SPU's contracting process, enforcement of permit conditions, and agency oversight of SPU's construction activities.

## Section 10: 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](#)<sup>13</sup>.

## Section 11: Notification of Completed Assessment

1. Send the completed EJ assessment to [OEEJHelp@ecy.wa.gov](mailto:OEEJHelp@ecy.wa.gov). See the OEEJ SharePoint for further instructions.

OEEJ will:

- Post the completed assessment on the on the agency's external dashboard of ongoing and completed Environmental Justice Assessments
- Share the assessment over the Environmental Justice GovDelivery list

2. After receiving the weblink from OEEJ to the assessment, share the link with:

- Any affected Tribes (or share the assessment via methods identified during consultation).
- People who provided contact information through community engagement

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<sup>13</sup> <https://ecology.wa.gov/About-us/Who-we-are/Environmental-Justice/HEAL/EJ-Assessments>