Spokane River Toxics Reductions Grant Program

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

For the

Water Quality Program

Washington State Department of Ecology
Olympia, Washington

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[1] www.ecology.wa.gov/contact

Language Access

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

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Department of Ecology's Regional Offices

Map of Counties Served

Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400

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
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Spokane River Toxics Reduction Grant Program

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

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

Table of Contents

List of Figures and Tables

Figures

Executive Summary

Project Overview

The Washington Department of Ecology is planning a new grant program that will fund locally led projects to address toxics and other emerging contaminants in the Spokane River watershed.

The Spokane River watershed faces many issues, including pollution. Toxic chemicals enter the water from a variety of sources, such as stormwater runoff, historic toxic chemicals use, and wastewater management. Many parts of the river and its tributaries don't meet state and federal clean water requirements. Because of the presence of polychlorinated biphenyls (PCBs) in fish, the Washington Department of Health issued a Health Advisory limiting fish consumption. When people are exposed to waterborne toxics, they can experience a variety of health impacts, some as severe as cancer and infant fatality[3]. Still, people use these waters for swimming, boating, fishing, household use, agriculture and industrial processes, and as a source of drinking water after treatment.

The area of Washington impacted by this action includes approximately 95 river miles of the Spokane River watershed, from the Washington-Idaho state line to the confluence of the Columbia River and all the tributaries that feed into that portion of the river. The area includes a mix of urban, suburban, and rural areas. Eligible groups serving the Spokane River watershed can apply for this grant funding. Impacts from this program should benefit the entire watershed and anywhere downstream through the Columbia River to the Pacific Ocean.

Community considerations

Many of the people impacted by this action are in communities designated as overburdened. All the census tracts along the river through Spokane's urban core rank high for environmental health disparities[4]. Vulnerable populations are also affected including the following–

- People of color
- People with low incomes
- People who are sensitive to waterborne toxics such as older adults, pregnant people, small children, and people with compromised immune systems.
- People who are frequently in contact with local water such as workers at facilities and irrigating farms, and fishers who rely on local catch for food security.
- People who may experience barriers to understanding how river toxics can harm them and their environment including immigrant groups, people with limited English proficiency, and people who do not have a high school diploma.

[3] Addressing priority toxic chemicals - Washington State Department of Ecology
[4] Information by Location | Washington Tracking Network (WTN)

Ecology invited Tribal consultation with the Spokane Tribe of Indians, Colville Confederated Tribes, Coeur d'Alene Tribe, Kalispel Tribe. No Tribal government responded to our invitation to consult for this new grant program. However, Ecology has consulted with Tribal governments on toxics in the watershed before and routinely coordinates with Tribe's natural resource staff on river toxics.

Tribal people use aquatic resources in the Spokane waterways and riparian areas. According to a 2019 Upper Columbia United Tribes (UCUT) website regarding their Toxics Reduction Project, "the outcome is to recover the ability for tribal communities to access and connect to traditional foods, recreation, fisheries, plants, and animals of the aboriginally occupied landscapes. For the UCUT Tribes this is a sovereignty issue. Just as clean water and salmon recovery is vital to tribal communities and sovereignty, the benefits of clean water, healthy landscapes, and abundant fish will be for the benefit of all."[5]

This grant program is part of a larger multi-partner effort to reduce toxics in the watershed and prevent future contamination. Ecology coordinates with Tribes, community-based organizations, concerned community members, state agency, local governments, and permitted facilities. In both the historic Spokane River Regional Toxics Task Force and the current Spokane River Toxics Advisory Committee, limited local funding to implement projects was identified as a significant barrier to river cleanup.

Community engagement on this issue has been ongoing since 2012 and will continue for this grant program as Ecology staff deliver technical assistance and outreach on the grant application, awarding, and fund management processes. If the legislature funds this program in future biennia, Ecology will reach out to vulnerable populations and overburdened communities to learn what changes they want in the grant program.

Recommendation

Overall, Ecology supports this significant agency action of establishing the Spokane River Toxics Reduction Grant Program for the watershed and the communities who rely on it.

People will benefit from grant funded projects that invest state money in local entities and implement toxic reduction strategies. Because the area that receives economic and water quality benefits from this grant program includes overburdened communities, this grant program also moves Washington toward eliminating environmental health disparities statewide. Since toxics like PCBs build up in fish tissue slowly, the sooner this program is started, the greater the benefit to people with a high rate of fish consumption, such as Tribal people and other vulnerable fishers.

Anticipated benefits from this grant program include:

- Investment of approximately $1 million in grant funding to distribute financial resources to communities where toxics reduction funding was previously limited.
- Improved water quality in the Spokane River and its tributaries.

[5] Upper Columbia River Basin Toxics Reduction (CRTRLE) Project | Upper Columbia United Tribes

- Reduced waterborne toxic pollution from industrial, aquicultural, utility, and household actions.
- Moving Spokane waters towards meeting Washington's water quality requirements for PCBs and other toxics.

Ecology does not anticipate harms from this grant program. However, ongoing funding is uncertain, which could impede applicants who need multiyear support to implement projects. Without sustained funding, progress toward cleaning up the river could stall, as some toxic reduction strategies may never be completed.

Environmental Justice Assessment

Purpose of the Environmental Justice Assessment

The Environmental Justice (EJ) Assessment process helps assess the environmental justice impacts of Significant Agency Actions (SAAs). The assessment informs and supports consideration of overburdened communities and vulnerable populations when making decisions. This information assists with the equitable distribution of environmental benefits, the reduction of environmental harms, and the identification and reduction of health disparities.

The EJ assessment process aligns with Washington's Environmental Justice law called the Healthy Environment for All (HEAL) Act (RCW 70A.02[6]).

Section 1: Background

1. 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:

2. Short summary of the action

Ecology proposed a new grant program that will invest approximately $1 million in a Spokane River Basin Toxics Reduction program. The funding for this program comes from the state 2025-2027 operating budget.

Projects will be prioritized based on

- Benefits to overburdened communities
- Toxics reduction outcomes
- Project feasibility

[6] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.02&full=true

- Watershed benefits
- Tribal government priorities
- Alignment with other established watershed protection plans

Projects eligible for funding should align with established watershed protection plans and reduce toxics in the river. These could be through the following activities:

- Education and outreach to the public about ways to reduce their risk of exposure to toxics in the river.
- Education and outreach to the public on ways they can avoid contributing to toxics pollution in the river.
- Implementing nonstructural best management practices that reduce toxics at known sources that are not otherwise funded, such as employee training, changing practices to identify and use toxics free alternatives for products, etc.
- Monitoring projects that identify the prevalence and nature of toxics in the watershed.
- Reviewing research and data to identify data gaps and make recommendations for future study.

Eligible applicants include

- Federally recognized Tribes
- Nonprofit organizations
- Conservation districts, irrigation districts
- Counties, cities, towns
- Institutions of higher education if the project is not included in the institution's statutory responsibilities
- Local health jurisdictions

This grant program will invest state funds in Spokane watershed communities, including Tribal communities, for projects that reduce pollutants found in the river. These projects will support cleaner water and healthier fish that are safer to eat.

3. Ecology webpage with information about this proposed action:

ecology.wa.gov/SpokaneRiver

ecology.wa.gov/grants/spokanetoxics

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 Ecology's preliminary planning for Tribal consultation. Ecology must invite 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 impact on 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.

Spokane Tribe of Indians, Colville Confederated Tribes, Coeur d'Alene Tribe, Kalispel 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.
4. Describe plans to offer consultation to identified Tribes.

On Feb. 6, 2025, Ecology sent a letter inviting formal government-to-government consultation to federally recognized Tribes that may be affected by this action. The letter provided information on the proposed grant program and its purpose to reduce toxics in the Spokane River watershed.

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 prompts in this section.

1. Describe potential impacts (including harms and benefits) to federally recognized Tribal rights and interests in their tribal lands.

Toxics in the water threaten the diversity and resiliency of this ecosystem as well as natural, cultural, ceremonial, and historic resources and sacred spaces, many of which are protected by Treaties, court decisions, and other legal commitments. Acres of land and miles of riverbed in the Spokane watershed are Tribal lands and many more are significant for the four Tribes who are potentially impacted and have been invited to Tribal consultation in Section 3 Prompt 2. Indigenous people use the Spokane watershed waterways and areas along the riverbank for fishing and collecting food as well as other important practices.

The proposed grant program will invest approximately $1 million of state funds into projects that benefit Spokane area Tribal lands and surrounding areas including the river and its tributaries (smaller creeks and streams that flow into the river). Tribes are eligible applicants for this funding and may benefit economically as well as from environmental and cultural benefits from the implemented projects.

We expect the projects that result from this grant program will meet Tribal interests in:

- Reducing legacy pollution
- Restoring wetlands
- Improving environmental and public health
- Providing cleaner habitat for fish
- Having local fish populations that are safe to eat

This grant program will directly benefit Tribal natural resources by reducing toxics in the Spokane watershed. Toxics can affect both the abundance and health of fish and other aquatic organisms.

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

Industries and development in the watershed have contributed to the toxics in the water that impact the Tribes' abilities to use natural resources and areas. This grant program provides an opportunity to address this problem by decreasing the amount of toxics in the environment.

This grant program may fund activities, such as soil investigation, clean-up, and watershed restoration that could disturb or impact cultural and historic resources that are protected by federal and state law. To mitigate or eliminate those impacts prior to the project proceeding, Ecology will require state grant funded projects to undergo review through the state Executive Order 21-02. Grantees will consult with Tribes again at that stage. In addition, projects with ground-disturbing activities are required to have Inadvertent Discovery Plans onsite. These reviews and plans would identify any specific concerns so they can be addressed and mitigated.

3. Summarize recommendations from Tribes to:

    a. Mitigate or eliminate potential harms from the action
    b. Equitably distribute benefits from the action

No Tribes have accepted Ecology's invitation to consult on the development of this grant program.

However, Tribes have been actively engaged with Ecology on issues from toxics in the Spokane River for many years. The Spokane Tribe of Indians has communicated their interest to achieve safe unrestricted fish consumption from the Spokane River. Noted in one letter from the Spokane Tribe of Indian's Natural Resources Director to then Ecology Water Quality Eastern Region Section Manager, "The Tribe will always support actions in the region that have the potential to improve the water quality of the Spokane River. Accordingly, the Tribe fully supports …[bringing] the Spokane River into compliance with applicable water quality standards for PCBs."

Further recommendations from our ongoing and historic engagement include:

Water Quality Cleanup Plan for PCB: The Spokane Tribe of Indians sought to establish a water clean-up plan, TMDL, for PCBs in the Spokane River through legal action and direct communication with the EPA and Ecology[7]. During development of the Spokane River PCBs TMDL, the Environmental Protection Agency staff met with representatives of the Spokane Tribe and Coeur d'Alene Tribe on several occasions[8]. EPA issued the final TMDL in 2024 and Ecology is responsible for implementation[7].

General engagement on toxics: Tribal staff toxicologists and natural resource managers engage with Ecology in SRTRAC meetings; in strategic meetings about watershed management statewide; and related activities to engage on their priorities for the Spokane River. While staff typically do not share recommendations in routine meetings, their participation is part of their ongoing commitment to clean water and may demonstrate engagement to the extent that the information is then discussed with Tribal council for follow-up and action.

Fund implementation for clean water: The Spokane Tribe of Indians applied for and was awarded a grant agreement from the Department of Ecology for habitat restoration and maintenance for riparian buffers on tributaries of the Spokane River that can reduce environmental toxics. The Tribe has two other active grants to address fish abundance and another two to address climate resilience with the Department of Ecology.

William Ruckleshaus Center Assessment: In 2023, Ecology commissioned the William Ruckleshaus Center, an impartial resource dedicated to collaborative problem solving, to conduct a situation assessment for toxics in the Spokane River. This is an interview-based effort used to understand and explore relevant issues and interests of involved parties pertaining to Ecology's work on toxics in the Spokane River. Ecology's goal was to learn how to improve our engagement with all impacted communities. In the assessment, the Center asked Tribes about

[7] ORDER denying EPA's 200 Motion for Summary Judgment signed by Judge Barbara J. Rothstein. (TH)
[8] https://www.epa.gov/system/files/documents/2024-10/spokane-pcb-tmdls-final-10-28-2024.pdf

barriers to engagement on this issue. The responses listed below cover a wide range of views and may not reflect every Tribe's perspective.

- Lack of trust
- History of insufficient and intermittent Tribal engagement
- Differences in water quality standards for PCBs between Washington and the Spokane Tribe of Indians
- Difficult communications with Tribal Council and staff
- Concern that consensus or collaborative engagement might limit Tribal sovereignty

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

Tribal engagement in the Spokane River shaped Ecology's priorities on toxics and contributes to a heightened level of interest from people in the area. Years of Tribal consultation and engagement highlighted the need to invest state funds in local solutions that address toxic threats in the Spokane River. Projects in the new grant program that align with Tribal priorities will receive funding priority.

The Spokane Tribe of Indians supported EPA's development of a formal cleanup plan (called a Total Maximum Daily Load) to reduce PCB levels in the river[9]. As Ecology begins to implement this cleanup plan, this grant program can support projects that move us closer to achieving clean water that meets our state water quality standards and protects significant Tribal resources.

Tribal input on other Ecology grant programs has highlighted inequities in Tribes' abilities to find, apply for, contract, and manage Ecology funds. These are due to barriers in Ecology's processes and systems. In response, Ecology will provide technical assistance on proposal writing, grant management, and implementation of funded projects.

Ecology used the findings from the 2023 William Ruckleshaus Center assessment to inform the Spokane River Toxics Advisory Committee and this grant program. The Center asked a wide range of questions about toxics of concern, fostering broad and diverse engagement, collaboration, and identification of issues, challenges, opportunities and barriers to toxics reduction on the Spokane River.

Our Spokane River Toxics Advisory Committee meets regularly. Tribes with interests in the watershed are invited to participate as well as Tribal staff and individuals. We hold in-person meetings in the Spokane area with a virtual option to increase accessibility and remove barriers for Tribal participation.

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

[9] US District Court, Seattle. 2022. Consent Decree between Serra Club and the Spokane Tribe of Indians. No. C11-1759BJR. 10 pp.

Ecology plans to finalize the grant program structure and start accepting applications in the fall of 2025. Further consultation and engagement on the grant program can continue, and changes can be implemented for future application cycles.

Because of the Spokane Tribe of Indians' ongoing participation in Ecology's efforts to address toxics in the Spokane watershed, Ecology will work to facilitate more direct consultation with them and Ecology will contact them directly to provide technical assistance on a potential application for funding and to learn how we can better incorporate their priorities into future funding cycles.

Ecology will continue to work regularly with Tribal staff from all Tribes with interest in the Spokane Watershed on improving water quality and habitat restoration practices.

- Ecology is available for formal government-to-government consultation at any time.
- Ecology's Spokane River Toxics Advisory Committee continues to be open to Tribal participation and works to incorporate the priorities of the four Tribes who are potentially impacted and have been invited to Tribal consultation.
- Ecology's water quality staff will continue their project work with Tribal staff, to identify and implement on the ground actions that improve Tribal people's access to clean water, fish, and the environment.
- Ecology and Tribal Council representatives hold ad hoc independent meetings to discuss priority issues and sensitive topics.
- Ecology's Water Quality Program planning, watershed management, and water quality monitoring efforts are ongoing and Ecology staff in these disciplines are eager to learn from and incorporate Tribal interests into these processes.

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[10], who will be affected by the action.

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

The area covered by this proposed action is the Spokane River watershed in Washington State, starting at the Washington-Idaho border and ending where the river meets the Columbia River [see Appendix A, Figure 1 for a map]. The full length of the river runs 111 miles from Lake Coeur D'Alene, but this grant program focuses on approximately 95 river miles, from the state line to the Columbia River. This program also covers all the smaller streams and creeks that flow into that portion of the river.

[10] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.02.010

Eligible groups serving the Spokane River watershed can apply for this grant funding. Impacts from this program will benefit anywhere in the watershed and waters downstream through the Columbia River to the Pacific Ocean.

2. When applicable, using the Washington State Department of Health's Environmental Health Disparities Map (EHD Map)11, identify the EHD Map rankings for all census tracts likely to be impacted by the action.

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

X Yes

☐ No

If yes, describe.

The census tracts likely to be impacted by this action include all of those in the Spokane River watershed, a mix of urban, suburban, and rural areas of the state. The rankings of the census tracts closest to the river through Spokane's urban core are 9 and 10, with the rest ranging from 2 to 7. See Appendix B for a full list of these census tracts.

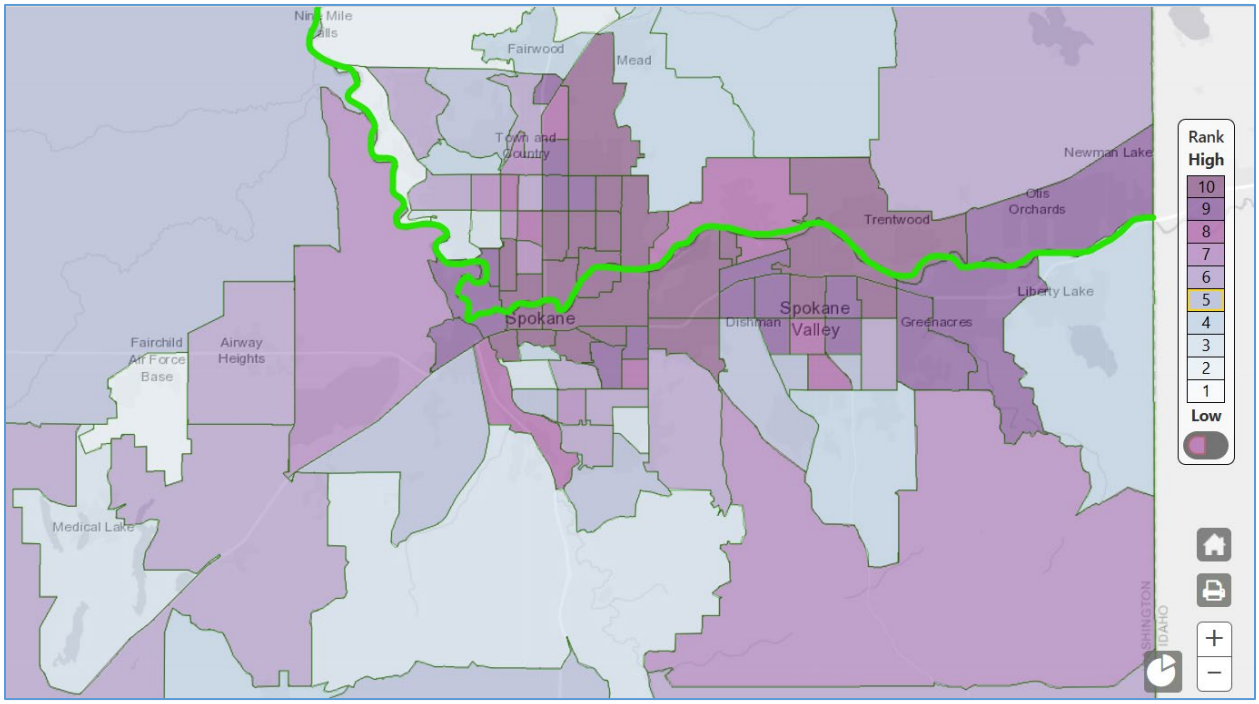

Figure 1. Census tracts in the Spokane River watershed

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

This grant program will reduce the prevalence and variety of toxics in the Spokane watershed waterways and increase people's knowledge on ways to reduce their exposure to waterborne

[11] https://fortress.wa.gov/doh/wtnibl/WTNIBL/

toxics. Exposure to toxics can contribute to a wide range of diseases and public health outcomes. Priority toxic chemicals are problematic because they stay in the environment for a long time (persistent) and accumulate in plants, animals, and people over time (bioaccumulative). They can have both immediate effects, such as damage to the lungs, and long-term effects, such as increasing the risk of cancer[12]. While toxics in the river threaten anyone who is exposed, their presence is most risky for sensitive populations such as older adults, pregnant people, young children, and people with compromised immune systems.

Toxics enter the watershed through a variety of pathways including stormwater runoff from roadways, toxic releases from facilities, and wastewater discharge that exceeds permitted allowances. For some chemicals, the Spokane River is designated impaired, meaning it's too polluted for people to use it safely to do the things they'd expect like eat fish from the river.

One of these chemicals, Polychlorinated Biphenyls (PCBs) has an EPA-issued cleanup plan due to the threats it poses. PCBs have toxic effects on the immune, reproductive, nervous, and endocrine systems in people and other organisms. PCBs also cause cancer in animals and are likely to cause cancer in people. PCBs bioaccumulate in fish tissue. When too many PCBs are in fish tissue, the fish are not safe to eat. This is a problem for fishers, including fishers from the four Tribes identified as potentially impacted by this action whose diets and cultural practices center on fish consumption.

While PCBs are the most studied and understood toxic in the Spokane River watershed, other toxics are present[13] including dissolved metals, 2,3,7,8-TCDD (dioxin), 4-4 DDE (legacy pesticide degradation), methyl mercury, polybrominated diphenyl ethers (PBDEs, flame retardants), and Per- and polyfluoroalkyl substances (PFAS). PFAS is an increasing concern as we learn how widespread contamination is and how it can harm humans as it builds up in bodies over time[14.]

Toxic chemicals pose numerous health risks, such as:

- Increased risk of cancer[15]
- Immune system suppression[16]
- Reproductive and developmental issues[17]
- Endocrine system disruption[13]
- Skin Conditions[14]
- Neurological problems in children[13]
- High cholesterol[18]
- Ulcerative colitis[18]
- Thyroid issues[18]

[12] Addressing priority toxic chemicals - Washington State Department of Ecology
[13] Assessment & 303d List - Washington State Department of Ecology
[14] PFAS - Washington State Department of Ecology
[15] PCBs | Washington State Department of Health
[16] Spokane and Little Spokane Rivers PCBs Total Maximum Daily Loads - October 28, 2024
[17] 6PPD and 6PPDQ | Washington State Department of Health
[18] PFAS - Washington State Department of Ecology

- Pregnancy-induced hypertension[18]

4. Identify areas likely to be impacted by the action that are at or above the 80th 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 80th 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.

Census tract 53065941000 is the primary tract that is above the 80th percentile for "People of Color". It encompasses the Spokane Tribe of Indians Reservation.

There are multiple census tracts that are ranked at or above the 80th percentile for "Population Living in Poverty" as shown in Figure 2 below. For a full list of these census tracts, reference Appendix C.

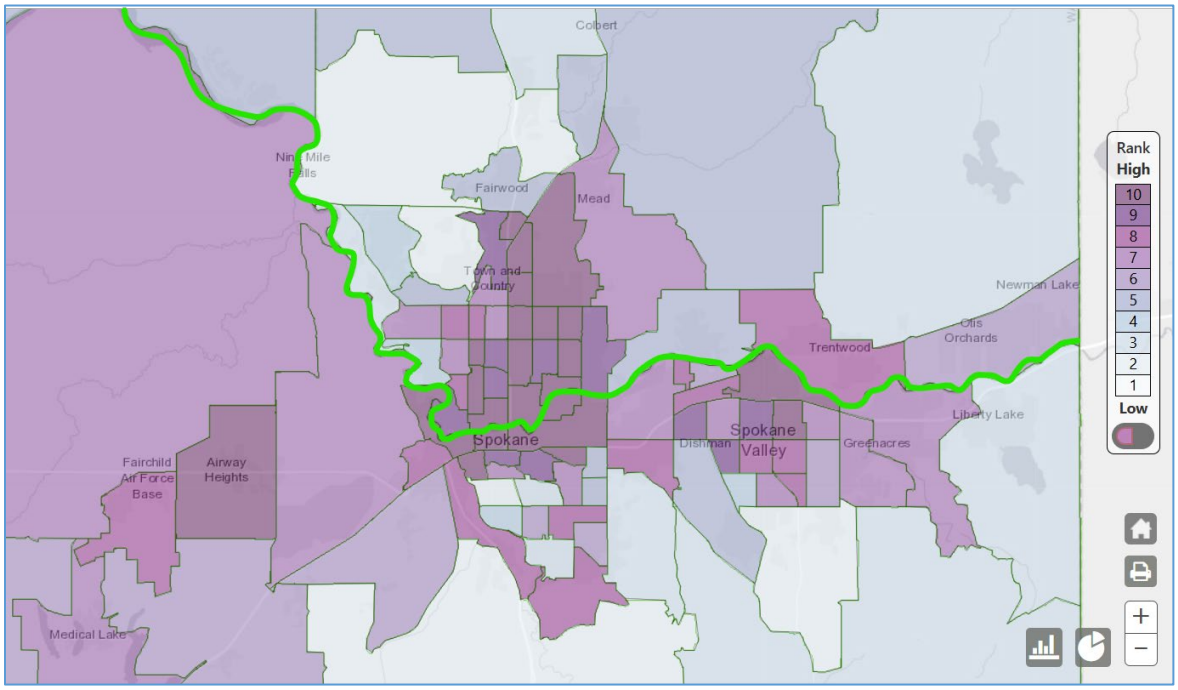

Figure 2. Census tracts for populations in poverty

5. 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 the 80th percentile (in state) that are relevant to this action[19].

[19]As appropriate for the action, you may also consult the Climate Vulnerability Index and/or the Climate Mapping for a Resilient Washington interactive maps for supplementary data on climate impacts, beyond what is available via WTN

According to the EHD map, there are census tracts at or above the 80th percentile for the following socioeconomic characteristics and health disparities that are relevant to this action:

No High School Diploma

Because earth sciences and systems are often taught in high school, people who haven't had access to that education may not have had the same opportunities to learn how exposure to environmental toxics can put people at risk. This grant program could fund education and outreach that provides technical assistance and information in plain language.

Primary Language other than English

Translating important data and toxics information into languages other than English is important when people need to make choices about their exposure to toxics. This grant program could award projects that translate technical information about waterborne toxics.

Proximity to Heavy Traffic Roadways

Some toxics are transported into the water through erosion and stormwater runoff. Toxics that are readily transported in this manner include PCBs, 6PPDQ, heavy metals, and mercury.

Toxics Releases from Facilities

When chemicals are emitted from industrial facilities into surrounding air, land, and water, people's exposure to toxics may increase. For those living near these facilities and the facility workers, high levels of emissions lead to poor health outcomes. While the census tracts that include rankings of 9 and 10 are focused on Greenacres and the Spokane Valley, these toxics released impact people downstream too because toxics move with the flow of water. Depending on which toxics are being released, the health impacts will vary.

Wastewater Discharge

Wastewater is the used water and waste that households and businesses release through the pipes – including toilets and sinks. It flows into treatment plants, but if not properly treated, it can carry pollutants and pathogens into nearby groundwater and surface water. Along the Spokane River—from the Washington-Idaho border to where it meets the Columbia—every census tract is ranked 9 or 10 for environmental effects from wastewater discharge. Wastewater can carry toxics such as PCBs, PFAS, and pharmaceuticals and personal care products that standard treatment plants cannot fully remove, or that enter the environment during a spill, overflow, or leak.

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

The Spokane area has many vulnerable populations that may currently be threatened by toxics in the watershed and their water sources. This grant program can reduce people's exposure to toxics from historical, industrial, or utility point sources. The grant program can also help people make choices, so they are not unknowingly contributing to toxic pollution. Education and outreach projects can help vulnerable populations:

- Understand the impacts of waterborne toxics.

- Learn what personal and household products contain toxics and what are safer alternatives.
- Make informed choices to protect themselves and people around them.
- Connect with educators and participate in public decision-making processes about toxics.

In some situations, the risks associated with exposure to some toxics at various levels are still unknown. Further research and regulatory interventions will continue to clarify how and to what extent people are at risk from exposure to some toxics. This grant program may contribute to this understanding.

Workers at facilities that use toxics may be vulnerable when:

- Permit limits are exceeded.
- Safety protocols are not properly followed.
- Extreme weather events or other emergencies cause unexpected releases of toxics into the environment.

Funds awarded through this grant program could be used to implement protective measures and conditions at municipal, industrial, agricultural, and other sites to protect workers from exposure to toxics.

People who are experiencing homelessness are disproportionately exposed to toxics in the river. They may be drawn to camp along the river for access to water to bathe or cook, and because the riverbank may be more private and stable than other parts of the city. Homelessness can put people at risk of not being able to receive important information, as well as at risk of exposure to toxics in stormwater runoff. This grant program could potentially fund programs to educate people experiencing homelessness and protect them from these toxic exposures.

As climate change continues to exacerbate seasonal conditions in the areas, toxics in the river may become increasingly problematic, particularly for communities of color and low-income communities[20]. They may have less access to healthcare, alternative water sources, or resources to mitigate exposure and respond to crisis. Industrial sites, wastewater outfalls, and flood-prone zones are closer to communities of color and low-income communities, which increases exposure and risk to toxics released from these areas during extreme weather or other emergency conditions.

Tribes are significantly impacted by toxics in the river, its tributaries, and adjacent areas as discussed above in Section 5.

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

[20] Morello-Frosch, R., Pastor, M., Sadd, J., & Shonkoff, S. B. (2023). The Climate Gap and the Color Line — Racial Disparities in Climate Change–Related Health Impacts. *New England Journal of Medicine, 389*(14), 1291–1294. https://doi.org/10.1056/NEJMsb2213250

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

Through direct local engagement, Ecology identified the Airway Heights neighborhood in Spokane's West Plains area as overburdened. Some residents in Airway Heights and West Plains who source their water from private wells are directly impacted by PFAS in their well water used for drinking, agriculture, and household use. They face multiple environmental harms and health impacts due to PFAS contaminated groundwater in the northeast West Plains near Spokane and rank 10 for Socioeconomic Factors on the Environmental Health Disparities map.

Through discussions with local partners and the City of Spokane, Ecology understands that many recent immigrants to the area (within the past five years) may encounter challenges accessing information about toxics in the Spokane River. Factors such as limited familiarity with local systems, community networks, and environmental regulations—as well as resettlement patterns influenced by housing and support services—can make it more difficult to learn about potential risks. As a result, some community members may face higher exposure to existing environmental toxics, such as through eating fish from a waterbody under public health advisories.

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.

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.

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

Ecology has a long history of working alongside local Tribes, overburdened communities, and community-based groups that support vulnerable populations, to develop lasting solutions for cleaning up the Spokane River. These historical efforts built a shared understanding that local funding would be essential to achieving measurable progress on reducing toxics in the river.

From 2012-2022, the Spokane River Regional Toxics Task Force served as a collaborative effort to identify and reduce sources of PCBs to the Spokane River. Task force participants included

conservation and environmental interest groups, the Spokane Tribe of Indians, Spokane Regional Health District, the National Pollutant Discharge Elimination System (NPDES) permittees in the Spokane River basin, Ecology, and other relevant partners. The group co-created their vision, goals, and plans to identify and reduce toxics in the Spokane River. In their founding documents and comprehensive plans, the Task Force identified funding constraints in reaching their goal.

> *"Significant efforts, collaboration and funding by many organizations will be required to identify and reduce the sources of toxics to the Spokane River. The Task Force will play a prominent role in this effort." – Task Force Charter.*

Since 2012, Ecology has received petitions and proposals from individuals, local governments, and community-based groups asking for state funding to make local changes that reduce toxic threats in the Spokane River. These requests consistently demonstrate that the lack of local revenue streams directly impede progress on cleaning up the river.

In 2016, the Task Force sent a letter to Washington's Governor requesting $800,000 for the 2017-2019 biennium. They wrote "the past success of the Spokane River Regional Toxics Task Force has been possible largely because of state funding, which was matched by private dollars. As the Spokane River Regional Toxics Task Force leans more towards the implementation of control actions, continued progress depends upon direct funding of its efforts."

Starting in 2021, the Legislature has continued to fund water quality improvements in the Spokane river and directly required engagement with overburdened communities and consultation with the Spokane Tribe of Indians in the development of these improvement strategies. Though the Task Force dissolved in 2022, these historic efforts have been carried forward into the methods Ecology uses to engage with vulnerable populations, overburdened communities, and locally concerned and involved groups today.

Since the ending of the Task Force in 2022, three collaborative efforts have directly informed Ecology's decision to create the Spokane River Toxics Reduction Grant Program.

Spokane River Toxics Advisory Committee (SRTAC) was created after receiving feedback from people encouraging Ecology to take a firmer regulatory role. This Ecology-led committee meets monthly and serves as an advisory forum with the goal of addressing and mitigating toxics in the Spokane River. Members of the committee include municipalities, nonprofit organizations, natural resource staff from the four potentially impacted Tribes, government agencies, community members, and Ecology employees.

The Spokane River Forum is a nonprofit organization dedicated to promoting regional dialogue around sustaining a healthy Spokane River while addressing the needs of a growing population. This organization hosts a conference once per year called the Spokane River Forum and invites all interested partners to attend and participate.

The William D. Ruckelshaus Center completed a situation assessment on Engaging the Public on Mitigating Toxics in the Spokane River Watershed[21]. Ecology commissioned The Ruckelshaus

[21] SRT_AssmtRept_final (003).pdf

Center to perform an interview-based analysis that explored relevant issues and interests of involved parties. Ecology's goal was to learn how to improve our engagement with all people in the community on toxics reduction in the Spokane River. This report provided valuable information on engagement barriers and opportunities and identified that once meaningful and effective collaboration is established with partners, funding from the state legislature could be made available via grants to leverage, complement, and build on the collaboration. The confidential interviews included 45 representatives of interested and affected parties.

Ecology presented on this new grant program three times at the Spokane River Toxics Advisory Committee meetings and at the 2025 Spokane River Forum. These presentations included collaborative discussions about priorities for the grant program, interesting project ideas, and grant program details such as budgets and timelines.

Ecology invited the Spokane Tribe of Indians and the Cour d'Alene Tribe and the Airway Heights residents to join our mailing list and attend these collaborative discussions about the new grant program. Airway Heights representatives attend meetings regularly. Ecology provides them with one-on-one technical assistance to develop a viable project proposal. The Spokane Tribe of Indians staff also participate in this Advisory Committee and Ecology will also directly invite the Tribe to receive technical assistance should they choose to apply for funding.

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

Ecology took the following steps to reduce barriers for community engagement:

- Offered both in-person and virtual options for people to participate in the Spokane River Toxics Advisory Committee meetings.
- Provided public materials in multiple accessible digital formats.
- Delivered technical assistance to community members to develop project proposals.
- Offered compensation for people's participation.
- Involved the Ruckelshaus Center to give community members a third-party facilitator for sharing their perspectives on this issue.
- Presented in-person at community meetings such as the 2025 Spokane River Forum Conference.
- Regularly distributes newsletters on the Spokane River Toxics Advisory Committee meetings and this grant program.

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

Ecology has tried to make the entire Spokane area community aware of the issues related to toxics in the river when the Spokane River Regional Toxics Task Force was still meeting. That group included a workgroup dedicated to education and outreach efforts and included sending out flyers in utility bills, playing recorded advertising on local radio stations, and providing infomercial videos on Facebook. While Ecology has also invited broad participation in the Spokane River Toxics Advisory Committee, there are still many people in overburdened areas and from vulnerable populations who do not know about these issues and haven't shown interest in this grant program. The reasons for this are diverse and complex.

- Some people lack knowledge of the severity of the issues; others may be indifferent.
- Most people are focused on daily living or other social and political issues.
- Some see river toxics as an issue that requires technical solutions and regulatory enforcement.
- Ecology may not have provided enough opportunities for public input in familiar or preferred formats.

Still, there are approximately 1,300 people included on Ecology's mailing list on this issue and dozens participate in committee meetings and presentations on this topic.

Ecology's goal with the new grant program is to partner with trusted local entities—like nonprofits and local governments, and to engage Tribal governments—to receive grant awards and work directly with people on ways to reduce toxics in the river. Through these awards, partners can carry out engagement-oriented and technical toxics reduction work. Because many of them already work closely with vulnerable and overburdened populations, this collaboration helps us reach broader audiences through a variety of approaches.

Local governments play a key role. They represent people in their jurisdictions and have been actively engaged with Ecology and Tribes on these issues and in shaping the proposed program. Officials from the City of Spokane, Spokane County, and the City of Liberty Lake regularly attend meetings and provide one-on-one technical assistance. These jurisdictions also encompass all the river tracts identified by the Department of Health as overburdened.

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.

Strong support for a Spokane River watershed grant program has been shown through our community engagement efforts. There is a broad consensus that:

- Reducing toxics in the river will protect vulnerable people.
- Grant support will lead to interventions that are currently unaffordable.
- If the funds were reserved exclusively for Ecology-led initiatives, local partners would have fewer opportunities to develop and implement broad-reaching solutions.

Airway Heights neighborhood representatives and participants of the Spokane River Toxics Advisory Committee have made several recommendations that Ecology is incorporating into this grant program:

- Provision of technical assistance for project development and grant application development for this grant program.
- Prioritization of projects that directly benefit overburdened communities or vulnerable populations in the watershed.
- Designating nonprofit organizations, Tribes, and coalitions as eligible applicants and direct recipients of funds, rather than limiting eligibility to local governments.

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

This grant program's guidelines and application packet are finalized for this inaugural funding cycle based on input from this Environmental Justice Assessment as well as other regulatory and procedural requirements. At the time of publication, Ecology is open to receiving applications from eligible applicants and to providing technical assistance on the application components. Ecology will invite members of overburdened communities and vulnerable populations in the watershed to apply for these funds through strategic and direct solicitations.

For future funding cycles, Ecology is committed to meaningful outreach to overburdened areas of Spokane and to vulnerable populations in the watershed. This outreach may include participating in local events, community meetings, and engaging with the Washington State Office of Equity to seek guidance on developing new ways to engage with the previously identified vulnerable populations. Feedback on grant requirements, eligibility, awards, and processes will inform future grant documents and open application periods. Information from recipient reports - including deliverables, closeout reports, and outcomes reports - will help identify the most effective interventions for preventing toxics exposure to vulnerable populations and guide the program towards amplifying these best practices.

Going forward, Ecology seeks to engage with lower-income communities to better understand their use of local waterways and the barriers they face in using the river and its tributaries due to pollution. Some of the considerations we hope to understand more include:

- Whether people with lower-incomes rely on the river more than wealthier counterparts for cooling during extreme heat, recreation, social connection, and for the mental and physical health benefits of nature.
- Whether limited transportation can further restrict access to recreational areas, and if lack of digital connectivity may hinder timely access to environmental health and safety information.

Through this grant program, Ecology aims to illuminate these challenges and strengthen partnerships that expand access and protection for vulnerable populations.

Section 8: Potential Environmental Benefits & Harms from Action

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

Reducing known toxics: Grants funded through this program will identify, develop, and implement projects that help to reduce toxics overall and eliminate some toxics from the Spokane River watershed. Reducing toxics will benefit all the populations that use water or consume fish from the river and the downstream watersheds.

Ecosystem benefits: The river system provides environmental benefits such as natural water filtration, flood and erosion control, biodiversity support, and climate change mitigation through carbon storage. It improves water quality for human and wildlife use and provides vital habitats and corridors for wildlife movement.

Advancing research and effective policies: This action has the potential to increase knowledge about the prevalence of toxics in the river for the state, other governments, and other

interested parties. This information can inform future prioritization, research, and practices to protect people and reduce threats from waterborne toxics.

Human empowerment: The education and outreach efforts this program may fund can also provide lasting benefits. With more knowledge about toxics, people may feel better equipped to advocate for toxic mitigation policies and to choose safer alternatives when they are available.

Public trust: As evidenced through Ecology's direct engagement and the Ruckelshaus evaluation, the local community wants the state to support toxics reduction efforts in the Spokane river. People want to know that the state is truly committed to restoring their river and protecting their health. This grant program is a tangible demonstration of that commitment and investment. When the public trusts that their state government is working alongside them, they are willing to partner with us—creating the right conditions for real progress in cleaning up the river.

2. Who will primarily benefit from this action?

The primary beneficiaries of this action include the Tribes, nonprofit organizations, and local governments who will apply for and receive funds to reduce toxics in the Spokane River. These funds distribute state resources into the Spokane watershed communities, creating economic opportunities, jobs, technology and infrastructure investments.

This proposed grant program funds public health and environmental outcomes that will benefit people who live, work, and play in the Spokane River such as fishers and fish consumers, swimmers, recreators, and boaters. All people in the Spokane River watershed and downstream communities benefit from a healthy and ecologically diverse river system. Healthy rivers also contribute to the overall well-being of the community by offering recreational opportunities, natural beauty, and a sustainable water supply.

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.

Most of the tracts along the Spokane River corridor are designated overburdened communities (see Section 6 Prompt 4). This grant program will fund projects that identify, develop, and implement projects that will help to reduce toxics for the entire watershed and those downstream. This includes those highly impacted people in the overburdened census tracts nearest the river.

The two identified overburdened communities who are specifically engaged on this grant program include:

- The Spokane Tribe of Indians and all Tribes with rights and interest in the Spokane watershed benefit by the ability to safely consume fish from the river in the quantities that reflect their traditional lifestyle and culture. Tribes also benefit from the program's prioritization of projects that align with Tribal interests and toxics reduction for the watershed's natural resources.
- The Airway Heights neighborhood benefits include accessing funding through this grant program. The funding could address any eligible project including public participation,

monitoring, contributing to research, public education, and watershed protection from PFAS or other toxics. This community has and will continue to receive technical assistance.

Ecology identified relevant vulnerable populations (see Section 6, Prompts 5 and 6). These vulnerable populations' material conditions are improved when toxics in the river are reduced or eliminated:

- People with less than a high school education
- People with limited English proficiency
- People experiencing homelessness
- People near heavy traffic roadways
- People who live, work, and play in areas near toxic releases from facilities and elevated wastewater discharges

The grant program is very relevant to fishers who rely on local catch for food security or income. Since bioaccumulation in fish tissue takes time, the sooner we start this program and work to reduce toxics, the sooner the fish tissue will be safe to consume in larger quantities for local and Tribal fishers.

Ecology designed the grant program to prioritize proposals that benefit overburdened communities and vulnerable populations. Applications that propose to support these groups will receive higher scores in the competitive evaluation and are therefore more likely to receive funding.

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

Ecology does not anticipate any environmental harm resulting from this grant program or the projects it will fund.

However, because addressing toxic contamination in the Spokane River requires long-term, collaborative efforts, a one-time grant cannot fully achieve the level of environmental remediation needed. Furthermore, Ecology lacks the authority and capacity to guarantee future funding; ongoing support would require approval through the state's legislative budget process.

5. Who will primarily experience the harms?

Everyone in the area would benefit from a cleaner Spokane watershed and will conversely experience less protection if we can't achieve a full cleanup of the river.

Applicants who would have applied for funds and implemented projects but won't be able to in future years if funding in future biennium is not allocated will experience economic uncertainty and reductions which could be harmful to staff and operational productivity. This could be especially harmful to groups whose projects require multiple years to fully implement. This could cause them to lose motivation to work with the agency and decrease momentum towards finding solutions for toxic reduction efforts.

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

Members of overburdened communities and vulnerable populations will experience the same harms described in Section 9, Prompt 5 above. However, because of a historic lack of investment in overburdened areas, the action may have more severe and lasting consequences for people in those communities by further marginalizing them from Ecology's future actions to protect and restore the environment.

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

Since most census tracts along the river are designated as overburdened, this grant program has the potential to reduce disparities for all the people who live, work, and play in the river from those nearby census tracts.

Over time, the reduction of PCBs and toxics in the river will make the fish from the Spokane River and its tributaries safe to eat again and reduce exposure risks for people who consume or directly access water from the watershed.

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.

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.

The Washington State legislature has allocated funds to address toxics in the Spokane River. Ecology had four potential options for using these funds:

A. Hire an outside organization through a contract to use the funds and complete projects as directed by Ecology.
B. Use the funds internally to support Ecology's water quality management work in the Spokane River watershed.
C. Explore adding these projects into existing grant programs that already have long-term funding.
D. Develop a grant program that gives money to local public and private groups to design and implement projects to reduce toxics in the watershed.

Ecology has chosen to work on implementing all four options towards our goal of reducing toxics in the Spokane Watershed. Option D is considered the Significant Agency Action[22], and the details of this action are further described in prompt 2 below.

[22] Chapter 70A.02 RCW: ENVIRONMENTAL JUSTICE

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 created this new grant program as a strategy to equitably distribute resources to overburdened communities in the Spokane watershed. In doing so, the agency responded to years of community input to designate funds that invest state dollars locally into community-led projects. This is the most practical, fair, and transparent way to achieve that goal. A competitive funding process gives every eligible applicant the same chance to apply for support, using clear and consistent rules for managing funds.

Ecology structured the program to prioritize overburdened communities and vulnerable populations to increase benefits to those groups by:

- Helping applicants with project planning and writing grant applications
- Prioritizing projects that directly benefit overburdened communities or vulnerable populations in the watershed
- Including nonprofit organizations, Tribes, and coalitions to receive direct funds, rather than limiting eligibility to local governments

To prepare for the potential of a reduced budget allocation in future years, Ecology will focus on running a strong, inclusive program that demonstrates clear value and makes a compelling case for continued support from lawmakers. Ecology can mitigate potential harm from disrupted or one time funding by taking the following steps:

- Clearly communicate with applicants that at this time this is one time funding so applicants can plan accordingly
- Allow award recipients to combine these grant funds with other funding sources to leverage resources and create seamless integration into existing programs, while still ensuring the scope of work and distinct use of grant funds is clear.
- Explore other potential sources of funding to help ensure more consistent and reliable support for future cycles

Specifically related to vulnerable populations, Ecology plans to take the following future steps:

- Find new and meaningful ways to engage with more members of overburdened and vulnerable populations to improve understanding of toxics and the risks they pose in our watershed.
- Expand community engagement opportunities and make them more accessible, including addressing language barriers.

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.

Currently Ecology does not have the ability to guarantee future funding cycles under this grant.

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[23].

Section 11: Notification of Completed Assessment

This section instructs Ecology staff to notify the appropriate public audiences of the completion of this assessment through direct communication or general distribution.

[23] https://ecology.wa.gov/About-us/Who-we-are/Environmental-Justice/HEAL/EJ-Assessments

Appendix A. Spokane River Watershed Map

The Spokane River Watershed includes all areas within the pink boundary lines.

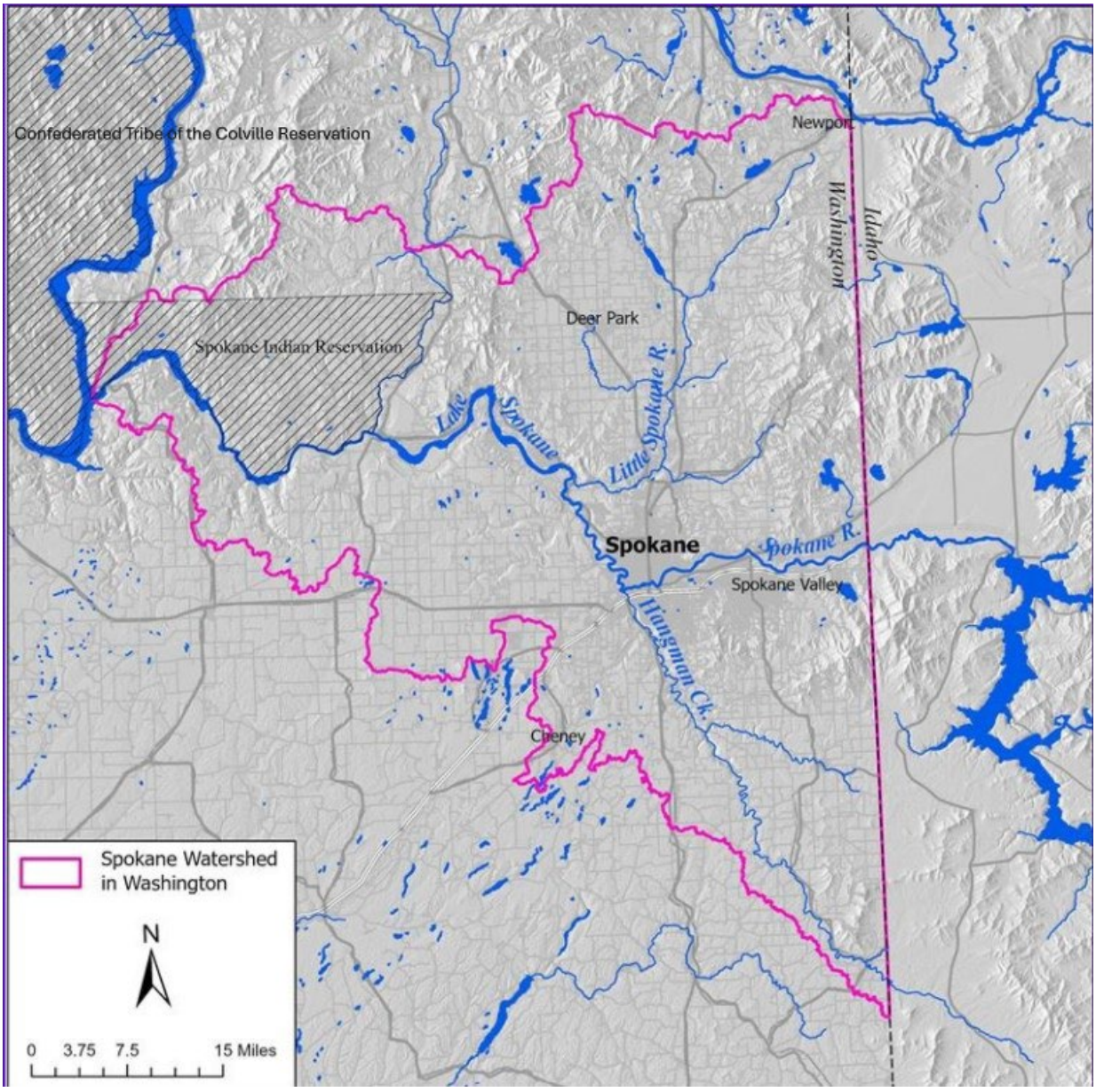

Figure 3. Map of Spokane River Watershed

Appendix B. Census tracts ranking 9 or 10

The census tracts that rank 9 and 10 for the Environmental Health Disparities ranking Environmental Exposures includes:

- Tract 53063013201- ranks 9

- Tract 53063013100- ranks 10
- Tract 53063011400- ranks 10
- Tract 53063013000- ranks 10
- Tract 53063012901- ranks 10
- Tract 53063012902- ranks 10
- Tract 53063011702- ranks 10
- Tract 53063011800- ranks 10
- Tract 53063012701- ranks 10
- Tract 53063012600- ranks 9
- Tract 53063012000- ranks 10
- Tract 53063012401- ranks 9
- Tract 53063012100- ranks 9
- Tract 53063011701- ranks 9
- Tract 53063011600- ranks 9
- Tract 53063011300- ranks 9
- Tract 53063013401- ranks 10
- Tract 53063012300- ranks 10
- Tract 53063011500- ranks 9
- Tract 53063012200- ranks 9
- Tract 53063014500- ranks 10
- Tract 53063002600- ranks 9
- Tract 53063002500- ranks 10
- Tract 53063002900- ranks 10
- Tract 53063004602- ranks 9
- Tract 53063004700- ranks 9
- Tract 53063004400- ranks 9
- Tract 53063004500- ranks 10
- Tract 53063004601- ranks 10
- Tract 53063003000- ranks 10
- Tract 53063003100- ranks 10
- Tract 53063004600- ranks 9
- Tract 53063004200- ranks 9
- Tract 53063004100- ranks 9
- Tract 53063003200- ranks 9
- Tract 53063003500- ranks 9
- Tract 53063002400- ranks 9
- Tract 53063003600- ranks 9
- Tract 53063004000- ranks 9
- Tract 53063004300- ranks 9
- Tract 53063003900- ranks 9

Appendix C. Census tracts for population living in poverty

The census tracts that rank 9 and 10 for the Environmental Health Disparities ranking People in Poverty include:

- 53063011702- ranks 10
- 53063011800- ranks 10
- 53063011900- ranks 9
- 53063012500- ranks 9
- 53063012100- ranks 9
- 53063014400- ranks 9
- 53063014500- ranks 10
- 53063002600- ranks 10
- 53063003000- ranks 10
- 53063003100- ranks 9
- 53063003200- ranks 9
- 53063004000- ranks 10
- 53063001800- ranks 10
- 53063001600- ranks 10
- 53063000200- ranks 10
- 53063011201- ranks 10
- 53063010800- ranks 10
- 53063010900- ranks 9
- 53063011102- ranks 10
- 53063011101- ranks 10
- 53063000300- ranks 10
- 53063001500- ranks 9
- 53063000400- ranks 10
- 53063001400- ranks 10
- 53063002500- ranks 10
- 53063003500- ranks 10
- 53063002400- ranks 10
- 53063001900- ranks 9
- 53063001300- ranks 9
- 53063002000- ranks 10
- 53063001200- ranks 10
- 53063002300- ranks 9
- 53063003600- ranks 10
- 53063010401- ranks 10
- 53063014002- ranks 9
- 53063014001- ranks 10

- 53065941000- ranks 10
- 53065951100- ranks 9
- 53063010301- ranks 9