

ENVIRONMENTAL JUSTICE MEMORANDUM

TO: HARRY HASLAM
FROM: ROSS WIDENER
SUBJECT: ANALYSIS OF POSSIBLE PROJECT IMPACTS ON EJ POPULATIONS
DATE: 1/18/2017

In compliance with the Presidential Executive Order 12898, DOT Order 5610.2., FHWA Order 6640.23., and Title VI of the Civil Rights Act of 1964, an environmental justice analysis was conducted for the College Way (SR 538) @ I-5 Project in Mount Vernon, Washington. The purpose of this EJ analysis is to identify minority and low-income groups in the project area, keep these groups informed about project plans and activities, and encourage their participation in the project. Regarding communications with the public, the City of Mount Vernon will comply with adopted Title VI plans.

EJ populations comprised of both minority and low-income groups were identified in the project area via a demographics study that utilized 2010 census data and data from the American Community Survey (ACS) within 0.5 miles of the project area and verified with local school data (Mount Vernon School District). Demographic data for the study area are summarized in the table below. This study area includes portions of 2010 U.S. census tracts 9522, 9525, and 9526.

Study Area Demographics

Total Population	910
White	82%
Black	0%
American Indian	2%
Asian	8%
Pacific Islander	0%
Some Other Race	7%
Population Reporting 2 or More Races	1%
Total Hispanic Population	9%
Total Non-Hispanic Population	91%
Minority Population	21%
State Mean Minority Population	29%
Speaks English "less than very well"	12%
Income below \$15,000	35%

Low income population	69%
State Mean Low Income Population	30%

It should be noted that the U.S. Census Bureau defines races and Hispanic origin (aka. Ethnicity) as two separate concepts. Individuals that identify as Hispanic can be of any race and are thus separated from the other races in the table above.

Non-minorities comprised approximately 79% of the population in the study area. Minority populations within the project area consisted primarily of Hispanics (9%) and Asians (8%). 8% of the population is linguistically isolated and 69% of the population is low income. Refer to the attached ACS summary and 2010 census data for specific demographics of the study area. Local school data from the Mount Vernon School District indicate that the study area has a lower minority population and slightly higher low income population than the surrounding areas within the City of Mount Vernon. The demographics of the Mount Vernon School District are summarized in the table below and are also attached.

Mount Vernon School District Demographics

Total Student Body	6755
White	38.9%
Black	0.9%
American Indian / Alaskan native	0.6%
Asian	1.7%
Pacific Islander	0.7%
Hispanic / Latino of any race(s)	54.9%
2 or More Races	2.3%
Free or Reduced Price Meals	62.9%
Transitional Bilingual	24.9%

The project proposes to improve the interchange on College Way at the underpass of I-5 to provide congestion relief, safety, and extend the life of the interchange. Two additional lanes will be added to College Way, existing retaining walls will be moved, and the existing roadway will be re-channelized to add left turn capacity. Short-term noise increases would be the primary impacts to the populations within the study area during construction of this project. These noise increases would be the result of construction equipment operation. These short-term noise impacts would affect all populations equally, and as there are far more non-EJ populations in the study area, they would not result in disproportionately adverse impacts to EJ populations. Short-term noise impacts due to construction activities would be minimized by conducting project activities Monday through Friday during normal business hours.

Noise modeling for this project indicates that there will be minimal long-term noise impacts in the vicinity of adjacent businesses. Noise abatement measures were fully evaluated in

accordance with FHWA and WSDOT noise abatement policy. It was concluded that none of the abatement options were reasonable and feasible due to access issues. This project also meets regional air quality conformity requirements and did not warrant an air quality analysis as the project is not within a Non-Attainment or Maintenance area.

The project site is primarily within the current public right-of-way (ROW). 0.21 acre of ROW will need to be acquired to incorporate the widening of College Way within the project area. This includes 0.12 acre of temporary construction easements and 0.09 acre of permanent ROW acquisition. This ROW acquisition will involve minor strip takes along several commercial properties along College Way. There will be no demolition or relocation as part of this project and there will be no change in existing access to businesses. All business access will also be maintained throughout construction and the proposed minor strip takes will not result in adverse effects to adjacent businesses. No other environmental, social, or economic impacts are anticipated as a result of this proposed project.

Based on the analysis presented in this memo, it is concluded that EJ populations will not experience disproportionately high and adverse impacts as a result of this project. Both EJ and non-EJ populations would benefit from the project long-term due to the decrease in congestion and improvement of pedestrian safety measures within the project area.

Decision Matrix for Small Projects (CE/PCE/DCEs)

EAs and EISs will require analysis – See the Decision Matrix for Complex Projects.

The following step-by-step matrix uses a series of yes/no questions to determine if analysis is warranted for small projects that are unlikely to have environmental impacts (CEs/DCEs). Answer the questions using the best available existing environmental data and project description or design.

1. Are any protected populations present within the proposed limits of the project’s impacts?

Yes: Proceed to Question 2

No: document findings in ECS. Include demographic data (TSK 458-b). Findings must be confirmed by 2 data sources.

2. Does the proposed project:

a. Require any right of way acquisition or relocations? Yes No

b. Require any traffic detours during construction? Yes No

c. Result in any noise impacts to surrounding sensitive receptors, specific to affected populations present? Yes No

d. Result in any air quality impacts? Yes No

e. Result in changes in the existing access to the roadway, adjacent residences or businesses? Yes No

f. Divide the community, restrict access to services, or affect the overall cohesion of the community? Yes No

g. Result in, or increase exposure to, hazardous materials or other health effects? Yes No

If you answered “YES” to *any* of the previous questions, documentation is required. Use [Figure 458-1 in the EPM](#) to determine the appropriate level of documentation.

If you answered “No” to *all* of the previous questions, proceed to Question 3.

3. Will the proposed project result in any other impacts to any known protected populations?

Yes: Describe and analyze the proposed project’s potential to result in impacts to the protected population as described in [Chapter 458](#) and [supporting web page](#).

No: Document findings in ECS. No further analysis is required

Location: User-specified polygonal location
 Ring (buffer): 0.5-mile radius
 Description: College Way (SR 538) @ I-5

Summary of ACS Estimates		2010 - 2014
Population		910
Population Density (per sq. mile)		1,174
Minority Population		187
% Minority		21%
Households		407
Housing Units		426
Housing Units Built Before 1950		24
Per Capita Income		17,121
Land Area (sq. miles) (Source: SF1)		0.78
% Land Area		100%
Water Area (sq. miles) (Source: SF1)		0.00
% Water Area		0%

	2010 - 2014 ACS Estimates	Percent	MOE (±)
Population by Race			
Total	910	100%	612
Population Reporting One Race	898	99%	1,147
White	745	82%	636
Black	0	0%	44
American Indian	19	2%	37
Asian	75	8%	144
Pacific Islander	0	0%	12
Some Other Race	60	7%	274
Population Reporting Two or More Races	12	1%	42
Total Hispanic Population	84	9%	598
Total Non-Hispanic Population	826		
White Alone	723	79%	417
Black Alone	0	0%	44
American Indian Alone	19	2%	37
Non-Hispanic Asian Alone	75	8%	144
Pacific Islander Alone	0	0%	12
Other Race Alone	0	0%	180
Two or More Races Alone	9	1%	26
Population by Sex			
Male	416	46%	386
Female	494	54%	262
Population by Age			
Age 0-4	28	3%	152
Age 0-17	253	28%	228
Age 18+	657	72%	252
Age 65+	161	18%	74

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available.

Source: U.S. Census Bureau, American Community Survey (ACS) 2010 - 2014.

Location: User-specified polygonal location
 Ring (buffer): 0.5-mile radius
 Description: College Way (SR 538) @ I-5

	2010 - 2014 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	597	100%	225
Less than 9th Grade	14	2%	121
9th - 12th Grade, No Diploma	66	11%	78
High School Graduate	181	30%	100
Some College, No Degree	257	43%	135
Associate Degree	103	17%	86
Bachelor's Degree or more	80	13%	69
Population Age 5+ Years by Ability to Speak English			
Total	882	100%	495
Speak only English	739	84%	339
Non-English at Home ¹⁺²⁺³⁺⁴	143	16%	343
¹ Speak English "very well"	37	4%	258
² Speak English "well"	49	6%	111
³ Speak English "not well"	43	5%	91
⁴ Speak English "not at all"	15	2%	50
³⁺⁴ Speak English "less than well"	58	7%	104
²⁺³⁺⁴ Speak English "less than very well"	107	12%	151
Linguistically Isolated Households*			
Total	31	100%	49
Speak Spanish	20	66%	46
Speak Other Indo-European Languages	1	3%	13
Speak Asian-Pacific Island Languages	10	31%	28
Speak Other Languages	0	0%	12
Households by Household Income			
Household Income Base	407	100%	119
< \$15,000	141	35%	89
\$15,000 - \$25,000	68	17%	68
\$25,000 - \$50,000	117	29%	83
\$50,000 - \$75,000	46	11%	62
\$75,000 +	37	9%	81
Occupied Housing Units by Tenure			
Total	407	100%	119
Owner Occupied	151	37%	99
Renter Occupied	256	63%	109
Employed Population Age 16+ Years			
Total	706	100%	326
In Labor Force	282	40%	272
Civilian Unemployed in Labor Force	19	3%	117
Not In Labor Force	423	60%	197

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2010 - 2014.

*Households in which no one 14 and over speaks English "very well" or speaks English only.

Location: User-specified polygonal location

Ring (buffer): 0.5-mile radius

Description: College Way (SR 538) @ I-5

	2010 - 2014 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	882	100%	495
English	N/A	N/A	N/A
Spanish	N/A	N/A	N/A
French	N/A	N/A	N/A
French Creole	N/A	N/A	N/A
Italian	N/A	N/A	N/A
Portuguese	N/A	N/A	N/A
German	N/A	N/A	N/A
Yiddish	N/A	N/A	N/A
Other West Germanic	N/A	N/A	N/A
Scandinavian	N/A	N/A	N/A
Greek	N/A	N/A	N/A
Russian	N/A	N/A	N/A
Polish	N/A	N/A	N/A
Serbo-Croatian	N/A	N/A	N/A
Other Slavic	N/A	N/A	N/A
Armenian	N/A	N/A	N/A
Persian	N/A	N/A	N/A
Gujarathi	N/A	N/A	N/A
Hindi	N/A	N/A	N/A
Urdu	N/A	N/A	N/A
Other Indic	N/A	N/A	N/A
Other Indo-European	N/A	N/A	N/A
Chinese	N/A	N/A	N/A
Japanese	N/A	N/A	N/A
Korean	N/A	N/A	N/A
Mon-Khmer, Cambodian	N/A	N/A	N/A
Hmong	N/A	N/A	N/A
Thai	N/A	N/A	N/A
Laotian	N/A	N/A	N/A
Vietnamese	N/A	N/A	N/A
Other Asian	N/A	N/A	N/A
Tagalog	N/A	N/A	N/A
Other Pacific Island	N/A	N/A	N/A
Navajo	N/A	N/A	N/A
Other Native American	N/A	N/A	N/A
Hungarian	N/A	N/A	N/A
Arabic	N/A	N/A	N/A
Hebrew	N/A	N/A	N/A
African	N/A	N/A	N/A
Other and non-specified	N/A	N/A	N/A
Total Non-English	N/A	N/A	N/A

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2010 - 2014.

*Population by Language Spoken at Home is available at the census tract summary level and up.

Location: User-specified polygonal location
 Ring (buffer): 0.5-mile radius
 Description: College Way (SR 538) @ I-5

Summary	Census 2010
Population	811
Population Density (per sq. mile)	1,045
Minority Population	289
% Minority	36%
Households	385
Housing Units	406
Land Area (sq. miles)	0.78
% Land Area	91%
Water Area (sq. miles)	0.08
% Water Area	9%

Population by Race	Number	Percent
Total	811	-----
Population Reporting One Race	788	97%
White	609	75%
Black	9	1%
American Indian	15	2%
Asian	32	4%
Pacific Islander	3	0%
Some Other Race	119	15%
Population Reporting Two or More Races	23	3%
Total Hispanic Population	227	28%
Total Non-Hispanic Population	584	72%
White Alone	522	64%
Black Alone	5	1%
American Indian Alone	6	1%
Non-Hispanic Asian Alone	32	4%
Pacific Islander Alone	2	0%
Other Race Alone	1	0%
Two or More Races Alone	15	2%

Population by Sex	Number	Percent
Male	382	47%
Female	429	53%

Population by Age	Number	Percent
Age 0-4	61	8%
Age 0-17	202	25%
Age 18+	609	75%
Age 65+	134	17%

Households by Tenure	Number	Percent
Total	385	
Owner Occupied	162	42%
Renter Occupied	223	58%

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.

Source: U.S. Census Bureau, Census 2010 Summary File 1.

Mount Vernon School District

Superintendent Carl Bruner
360.428.6110

124 E LAWRENCE ST MOUNT VERNON 98273-2999 Grade Span: PK-12
Northwest Educational Service District 189

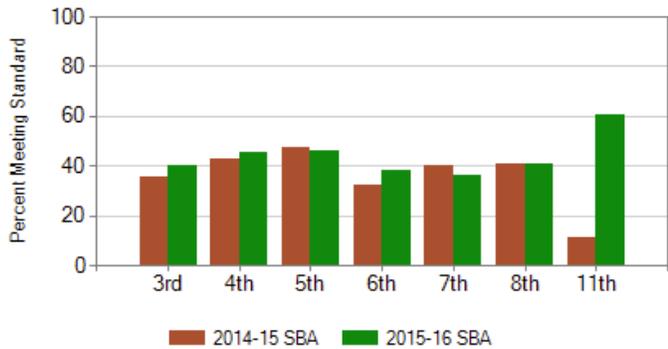
Select a year:

2015-16 Results (Administration Info)		
Grade Level	SBA ELA	SBA Math
3rd Grade	40.2%	55.9%
4th Grade	45.2%	46.5%
5th Grade	45.8%	41.0%
6th Grade	38.3%	30.0%
7th Grade	36.5%	29.6%
8th Grade	40.6%	28.2%
11th Grade	60.4%	23.3%

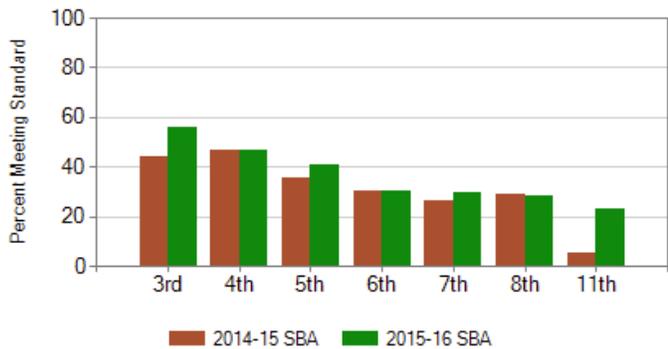
Grade Level	MSP Science
5th Grade	49.3%
8th Grade	46.1%

Grade Level *	EOC Biology
10th Grade	56.7%

English Language Arts



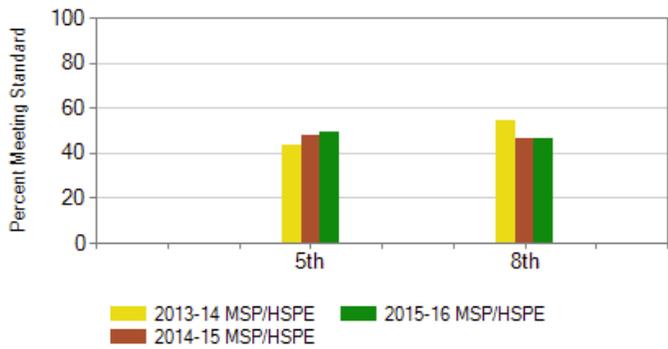
Math



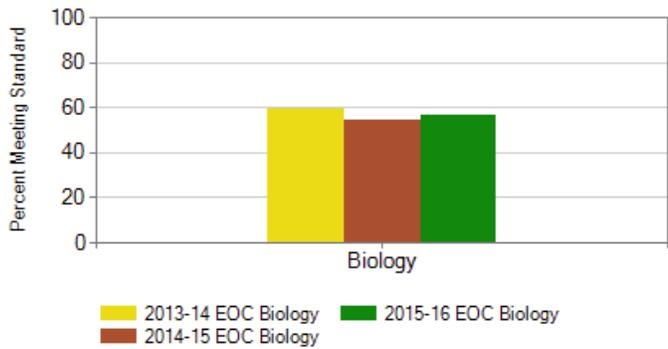
Student Demographics	
Enrollment	
October 2015 Student Count	6,755
May 2016 Student Count	6,624
Gender (October 2015)	
Male	3,413 50.5%
Female	3,342 49.5%
Race/Ethnicity (October 2015)	
Hispanic / Latino of any race(s)	3,708 54.9%
American Indian / Alaskan Native	42 0.6%
Asian	114 1.7%
Black / African American	59 0.9%
Native Hawaiian / Other Pacific Islander	47 0.7%
White	2,630 38.9%
Two or More Races	155 2.3%
Special Programs	
Free or Reduced-Price Meals (May 2016)	4,166 62.9%
Special Education (May 2016)	890 13.4%
Transitional Bilingual (May 2016)	1,650 24.9%
Migrant (May 2016)	762 11.5%
Section 504 (May 2016)	166 2.5%
Other Information (more info)	
Unexcused Absence Rate (2015-16)	8,319 1.2%
Adjusted 4-Year Cohort Graduation Rate (Class of 2015)	68.7%
Adjusted 5-year Cohort Graduation Rate (Class of 2014)	72.3%
College/University enrollment rates of graduates	

Teacher Information (2015-16) (more info)	
Classroom Teachers	393
Hispanic / Latino of any race(s)	25
American Indian / Alaskan Native	1
Asian	6
Black / African American	2
White	357
Two or More Races	2
Average Years of Teacher Experience	12.1
Hispanic / Latino of any race(s)	7.1
American Indian / Alaskan Native	2
Asian	10.2
Black / African American	7.9
White	12.6
Two or More Races	6
Teachers with at least a Master's Degree	60.6%
Total number of teachers who teach core academic classes	255
% of teachers teaching with an emergency certificate	0.3%
% of teachers teaching with a conditional certificate	0.0%
Total number of core academic classes	968
ESEA Highly Qualified Teacher Information	
% of classes taught by teachers meeting ESEA highly qualified (HQ) definition	95.7%
% of classes taught by teachers who do not meet ESEA HQ definition	4.3%
% of classes in high poverty schools taught by teachers who meet ESEA HQ definition	98.4%
% of classes in high poverty schools taught by teachers who do not meet ESEA HQ definition	1.6%

Science



EOC Biology



not meet ESEA HQ definition	1.6%
% of classes in low poverty schools taught by teachers who meet ESEA HQ definition	95.7%
% of classes in low poverty schools taught by teachers who do not meet ESEA HQ definition	4.3%

* End of Course (EOC) Biology is administered in any grade in which the course is offered. Prior to 2015, EOC Math exams were given in any grade in which the course is offered and served as the state's accountability test in mathematics. As of 2015, EOC Math tests are taken only for the purpose of meeting assessment graduation requirements by students in the classes of 2018 and prior.

** The "Makeup" exam was given to students who had already completed the Year 1 or Year 2 coursework. It was not a "retake".