



# Environmental Justice & Title VI Assessment of STBG and TA Projects Selected for SCOG Federal Funds in Skagit County

April 2020-April 2023



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# TABLE OF CONTENTS

Introduction.....4

Demographic Profile.....5

Projects Awarded Funds.....8

Project Impacts: Low-Income Tracts .....9

Project Impacts: Minority Blocks.....11

Title VI Transit Assessment.....13

Conclusion.....15

## LIST OF TABLES

Table 1. Projects Awarded STBG or TA Funds in Skagit County: April 2020-April 2023.....8

Table 2. Transit Projects Awarded STBG Funds in Skagit County: April 2020-April 2023.....13

## LIST OF FIGURES

Figure 1. Total Minority Population: 2020.....6

Figure 2. Low-Income Population, Skagit County: 2017-2021.....7

Figure 3. Census Tracts in Proximity to SCOG Funded Projects: 2020-2023.....9

Figure 4. STBG & TA Funding Awarded to Low-Income and Non-Low-Income Tracts in Skagit County...10

Figure 5. Census Blocks in Proximity to SCOG Funded Projects: 2020-2023.....11

Figure 6. STBG & TA Funding Awarded to Minority and Non-Minority Census Blocks in Skagit County..12

Figure 7. Proximity to Transit Stops by Geography Type.....14

# INTRODUCTION

Environmental Justice (EJ) principles protect minority populations and low-income populations from disproportionate adverse effects of programs, policies, and activities. Because the Skagit Council of Governments (SCOG) receives federal funds to conduct the transportation program in Skagit County, EJ protections apply. A component of EJ is assessment of funding decisions made on local projects to determine if funds are being awarded and distributed in a manner that does not have a disproportionate adverse effect on EJ protected populations. This EJ assessment is for transportation projects in Skagit County that have been awarded funds over the past three years, from April 2020-April 2023.

Projects included in this EJ assessment were all awarded Surface Transportation Block Grant Program (STBG) or Transportation Alternatives (TA) funding in Skagit County. These programs are established under federal transportation law, most recently the Infrastructure Investment and Jobs Act (IIJA), which was signed into law in 2021.

Skagit County has a metropolitan planning organization (MPO) due to the fact that it has a federally designated urbanized area. MPOs are designated around the United States, in locations with urbanized areas, to conduct continuous, cooperative, and comprehensive transportation planning processes. SCOG is the MPO for Skagit County.

This EJ assessment includes a description of a demographic profile, completed by SCOG in 2023, which provides the information base on which projects are assessed. Also included is a list of all the projects awarded funds during the April 2020-April 2023 period with the award date(s), award amount, and program which the award was made through. Finally, all projects are assessed along with funding distribution to the Census block (minority) and Census tract (low-income) levels. A 100-foot buffer is applied to all projects to ensure that adjacent Census blocks and tracts are captured in the analysis. A conclusion section at the end of the document presents the findings of the assessment and considerations for future project award decisions incorporating EJ principles into project evaluation decisions prior to selecting funds.

There were other transportation projects within Skagit County that were selected for federal or state funds during the three-year review period, but because SCOG was not involved in the decision to award these other funds, they are not included in this EJ assessment. Only transportation projects that were awarded funds through a SCOG selection process are included.

# DEMOGRAPHIC PROFILE

In 2023, SCOG completed a demographic profile for Skagit County which included identifying the location and concentration of minority and low-income populations around Skagit County. The demographic profile primarily used data available from the U.S. Census Bureau, through the American Community Survey (ACS) and 2020 decennial Census, to identify these protected populations and provide for an analytical basis to assess programs, policies, and activities of SCOG - including funding decisions used to award federal funds to transportation projects in Skagit County.

Environmental Justice began under a 1994 Executive Order of President Clinton, which directed federal agencies to develop strategies that address disproportionately high and adverse effects of programs, policies, and activities on minority populations and low-income populations. Minority populations include self-identified: American Indians and Alaska Natives; Asians; Blacks or African Americans; Hawaiian and Other Pacific Islanders; and Hispanic or Latinos. Low-income persons include self-identified persons whose median income is at or below the federal Department of Health and Human Services poverty guidelines. Subsequent to the Executive Order, the U.S. Department of Transportation, Federal Highway Administration, and Federal Transit Administration issued orders and guidance that apply to SCOG's transportation program.

The 2023 demographic profile included the establishment of thresholds for racial and ethnic populations and thresholds for low-income populations. These thresholds assist with identifying these EJ protected populations and are based upon the percentage of these populations relative to the population of the entire county. The minority population threshold is set at **25.5%**, as this percentage of the total county population is in EJ protected minority populations, according to 2020 decennial Census data. The threshold for low-income persons is set at **11.1%**, as this percentage of the total county population is below the poverty level, according to 2017-2021 ACS estimates.

Other groups are included in the demographic profile that are not EJ protected populations, but protected populations through Title VI of the Civil Rights Act and other nondiscrimination statutes. These groups include: those with limited English proficiency, foreign-born populations, seniors, youth, women, and persons with disabilities. This EJ assessment of awarded funds through the STBG and TA selection process does not include an analysis of these additional groups, though further analysis to include these groups may inform future funding decisions to ensure that actions on funding are not having a discriminatory impact on any populations protected by statutes or regulations.

Hard copies of the demographic profile are available to the public free-of-charge at the SCOG offices, located at 315 South 3rd Street Suite #100, Mount Vernon, Washington 98273. The electronic version of the demographic profile can be found at: [https://www.scog.net/Demographics/2023\\_Skagit\\_County\\_Demographic\\_Profile.pdf](https://www.scog.net/Demographics/2023_Skagit_County_Demographic_Profile.pdf). Maps of minority populations and low-income populations are included as **Figure 1 & 2**.



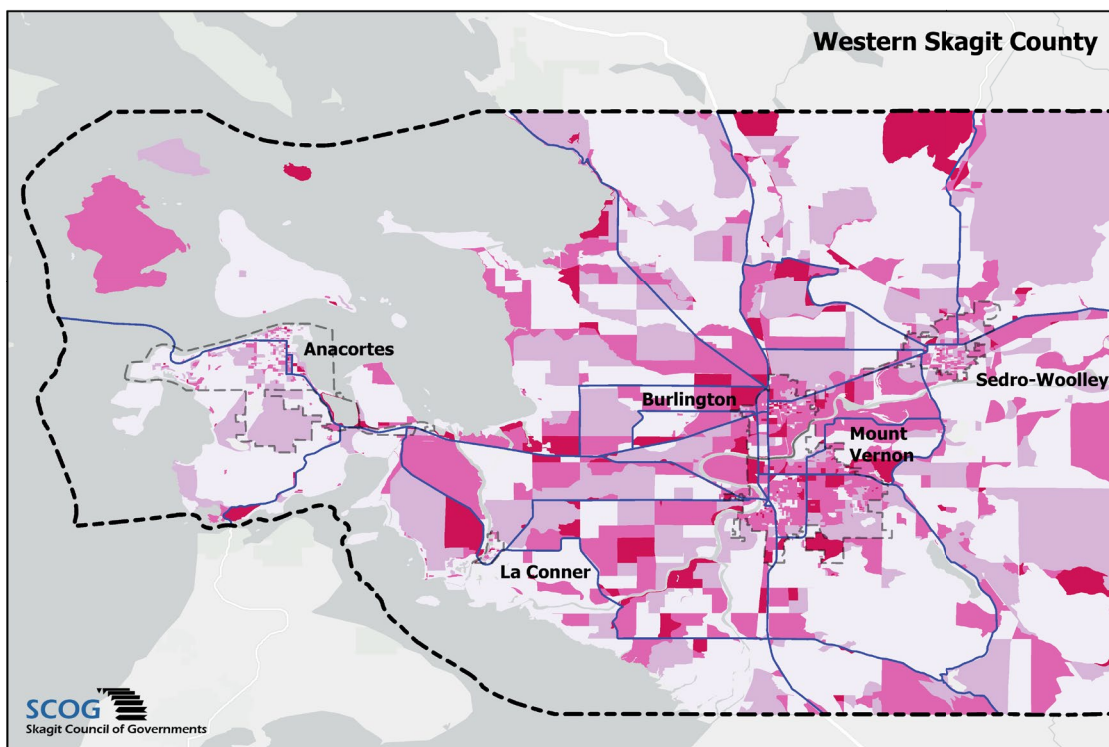
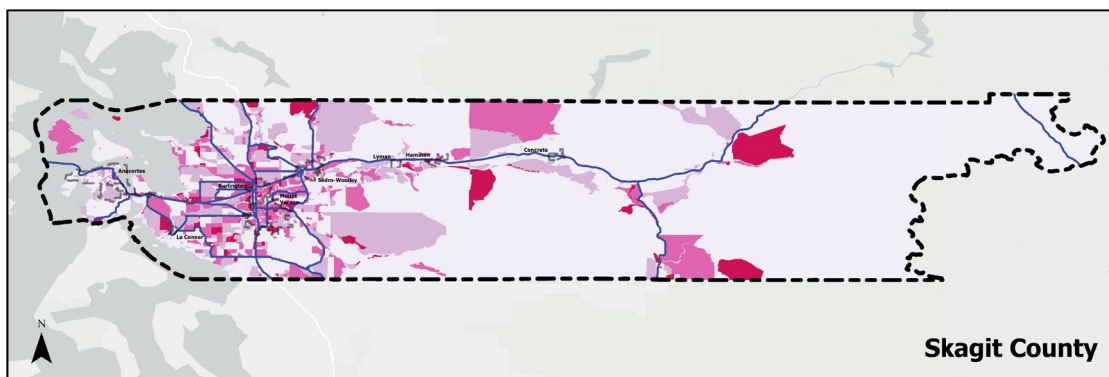
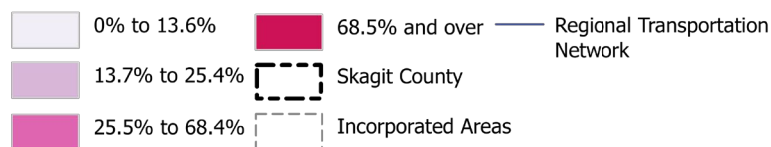
# DEMOGRAPHIC PROFILE

Figure 1.

## Total Minority Population, Skagit County: 2020

Date: 2/7/2023  
Sources: U.S. Census Bureau, Skagit County GIS, ESRI, Skagit Council of Governments

### % Total Minority Population



Source: 2020 U.S. Census Table P1

# DEMOGRAPHIC PROFILE

Figure 2.

## Low-Income Population, Skagit County: 2017-2021 Estimates

Date: 2/7/2023

Sources: U.S. Census Bureau, Skagit County GIS,  
ESRI, Skagit Council of Governments

### % Low-Income Population

0% to 7%

7.1% to 11%

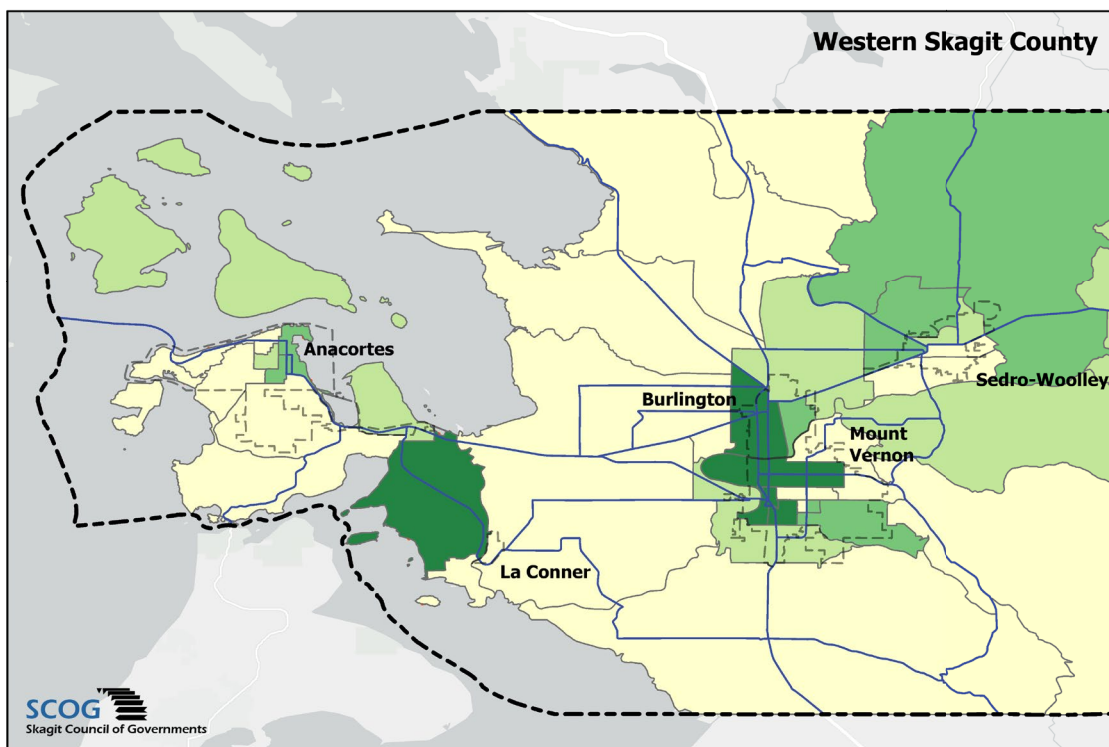
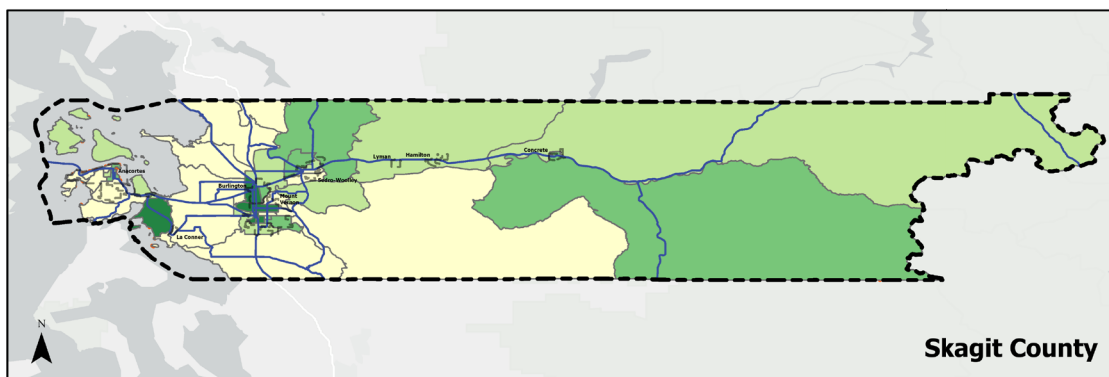
11.1% to 19%

19.1% and over

Skagit County

Incorporated Areas

Regional Transportation  
Network



Source: 2017-2021 American Community Survey Five-Year Estimates, Table B17001

# PROJECTS AWARDED FUNDS

Six projects were awarded either STBG or TA funds from April 2020-April 2023 in Skagit County through a SCOG selection process, which were identified to have a specific geographic impact. Of these projects, all are mapped and included in this Environmental Justice assessment. The list of projects awarded funds is in **Table 1**. Maps of all the projects awarded STBG or TA funds from April 2020-April 2023 in Skagit County through a SCOG selection process are included in **Figure 3** and **Figure 5**, showing the proximity of these projects to Environmental Justice communities.

**Table 1. Projects Awarded STBG or TA Funds in Skagit County: April 2020 - April 2023**

Sponsor	Project	Award Amount	Award Date	Program
Anacortes	R Avenue Long-Term Improvements	\$859,087	Jul-21	STBG
Mount Vernon	Riverside Drive Improvements - 2	\$348,000	Jul-21	STBG
Samish Indian Nation	SR 20/Campbell Lake Road - Intersection Improvement	\$1,285,200	Jul-21	STBG
Skagit County	Peterson Road Improvements	\$261,613	Jul-21	STBG
Samish Indian Nation	Tommy Thompson Trail: Trestle and Causeway Replacement	\$160,650	Jul-21	TA
Mount Vernon	River Dike Trail System - Phase 1	\$263,000	Jul-21	TA



# PROJECT IMPACTS: LOW-INCOME TRACTS

Between April 2020 and April 2023, SCOG selected six projects for STBG or TA funding with a specific geographic impact. Three of these projects were in proximity to Census tracts with a poverty rate higher than the regional average. These projects were located in the incorporated cities of Anacortes and Mount Vernon, and unincorporated Skagit County on Fidalgo Island. Of all 41 Census tracts in Skagit County, 14, or 34.1%, were identified as having a poverty rate higher than the regional average. Of all Census tracts in proximity to funded projects, 37.5%, or 3 out of 8, were identified as Environmental Justice low-income tracts.





Among all funded projects, project types and expected outcomes varied widely. Some projects, such as the City of Anacortes' R Avenue Long-Term Improvements project, construct a non-transversible median, add transit pullouts, non-motorized improvements, street lighting and traffic calming measures. Other projects, such as Skagit County's Peterson Road Improvements, increase economic vitality by improving access to a major industrial area. Many projects improve safety, such as the Samish Indian Nation's SR 20/Campbell Lake Road - Intersection Improvement which adds a three-legged roundabout to improve both safety and access to nearby tribal properties. Additionally, all six projects will add or improve non-motorized infrastructure.

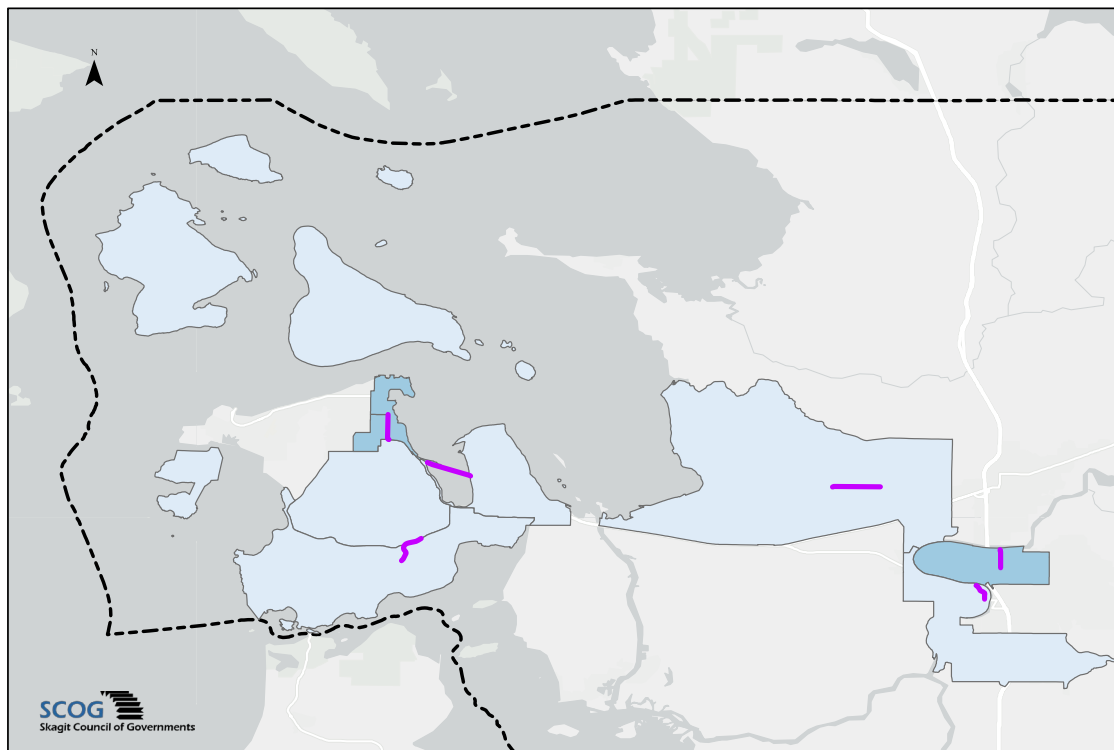
**Figure 3.**

## Census Tracts in Proximity to SCOG Funded Projects: 2020-2023

Date: 3/14/2023  
Sources: U.S. Census Bureau, Skagit County GIS, ESRI,  
Skagit Council of Governments

### Impacted Census Tracts by Income

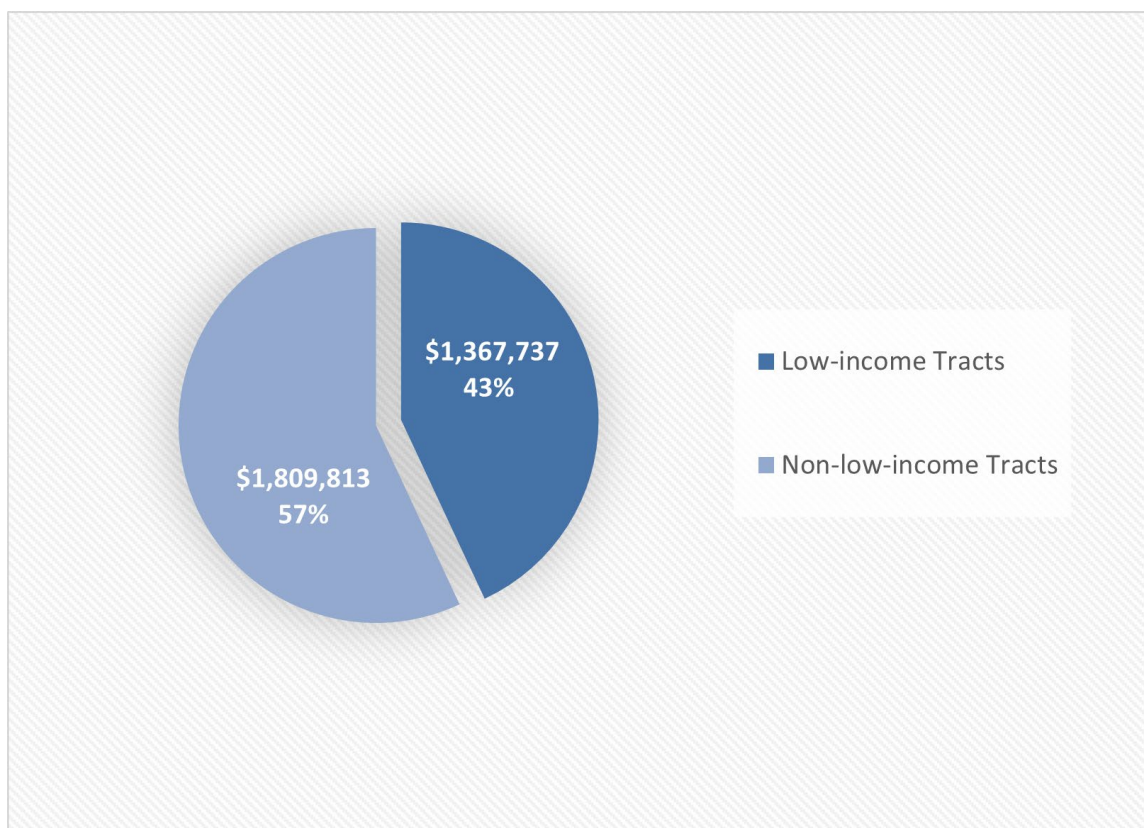
-  Less than 11.1% Low-Income Population
-  11.1% Low-Income Population or Greater
-  SCOG Federally Funded Projects 2020-2023
-  Skagit County Boundary



# PROJECT IMPACTS: LOW-INCOME TRACTS

Out of \$3,175,550 in STBG and TA funds awarded through a SCOG process with a specific geographic impact, 43% of the funds were awarded to projects in proximity to identified low-income Census tracts. **Figure 4** below shows the amount of funding awarded in proximity to low-income and non-low-income Census tracts from April 2020 to April 2023.

**Figure 4. STBG & TA Funding Awarded to Low-Income and Non-Low-Income Tracts in Skagit County: April 2020-April 2023**



This is substantially above the rate of 34.1% identified Environmental Justice Census tracts, or 14 out of 41 tracts, countywide. Investments in these areas aim to increase safety for users of all modes, create new non-motorized and roadway connections, build resilience by improving access for emergency management, and maintain and preserve existing facilities.

# PROJECT IMPACTS: MINORITY BLOCKS

Out of the six projects selected for STBG or TA funding between April 2020 and April 2023, which were identified to have a specific geographic impact, three were in proximity to Census blocks with a self-identified minority population higher than the regional average. These projects were located in the incorporated cities of Anacortes and Mount Vernon. Of all 2,049 Census blocks in Skagit County, 984, or 48%, were identified as having a minority population higher than the regional average. Of all Census blocks in proximity to funded projects, 53.8%, or 21 out of 39, were identified as Environmental Justice minority tracts.





Projects located in proximity to minority Census blocks included intersection and signalization improvements, road maintenance and preservation, nonmotorized facilities, transit capital projects, and capacity expansion projects. The City of Anacortes' R Avenue Long-Term Improvements project impacted the most distinct minority Census blocks, with 8 out of 16 Census blocks touched identified as an Environmental Justice minority block. Two of the three projects not in proximity to minority Census blocks, the Samish Indian Nation's SR 20/Campbell Lake Road Intersection Improvement and the Tommy Thompson Trail: Trestle and Causeway Replacement, are sponsored by a sovereign American Indian nation and tribal community, which is identified as a minority population by the United States Census Bureau.

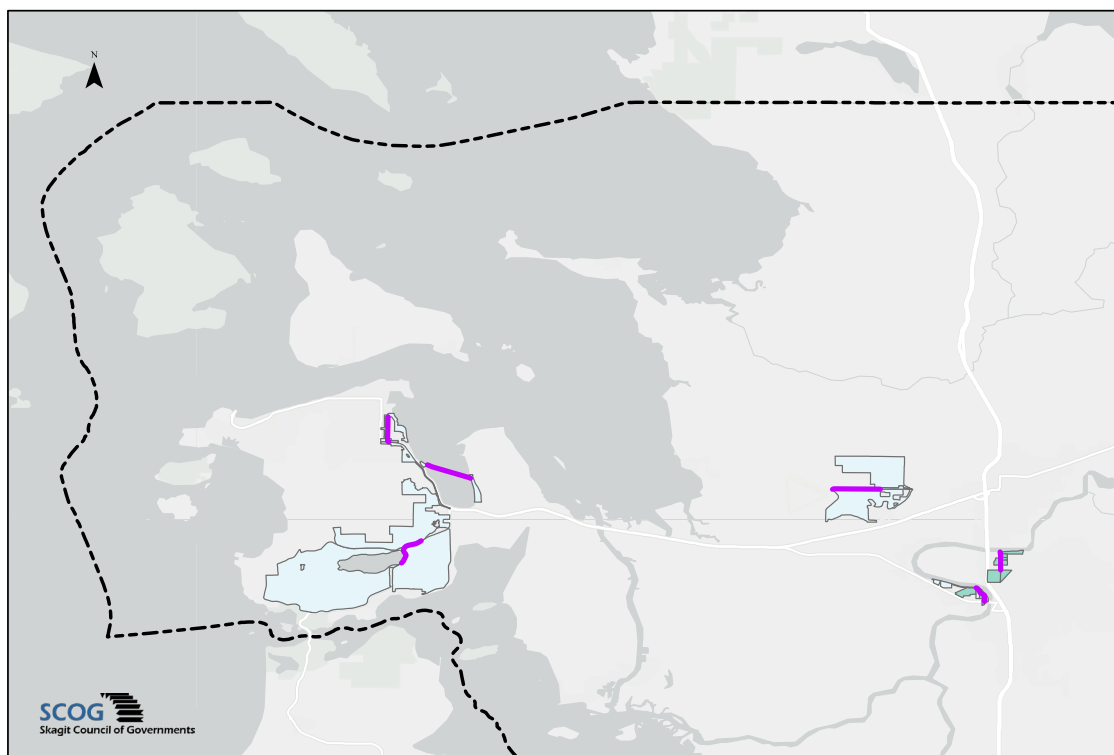
**Figure 5.**

## Census Blocks in Proximity to SCOG Funded Projects: 2020-2023

Date: 3/14/2023  
Sources: U.S. Census Bureau, Skagit County GIS, ESRI,  
Skagit Council of Governments

## Impacted Census Blocks by Minority Population

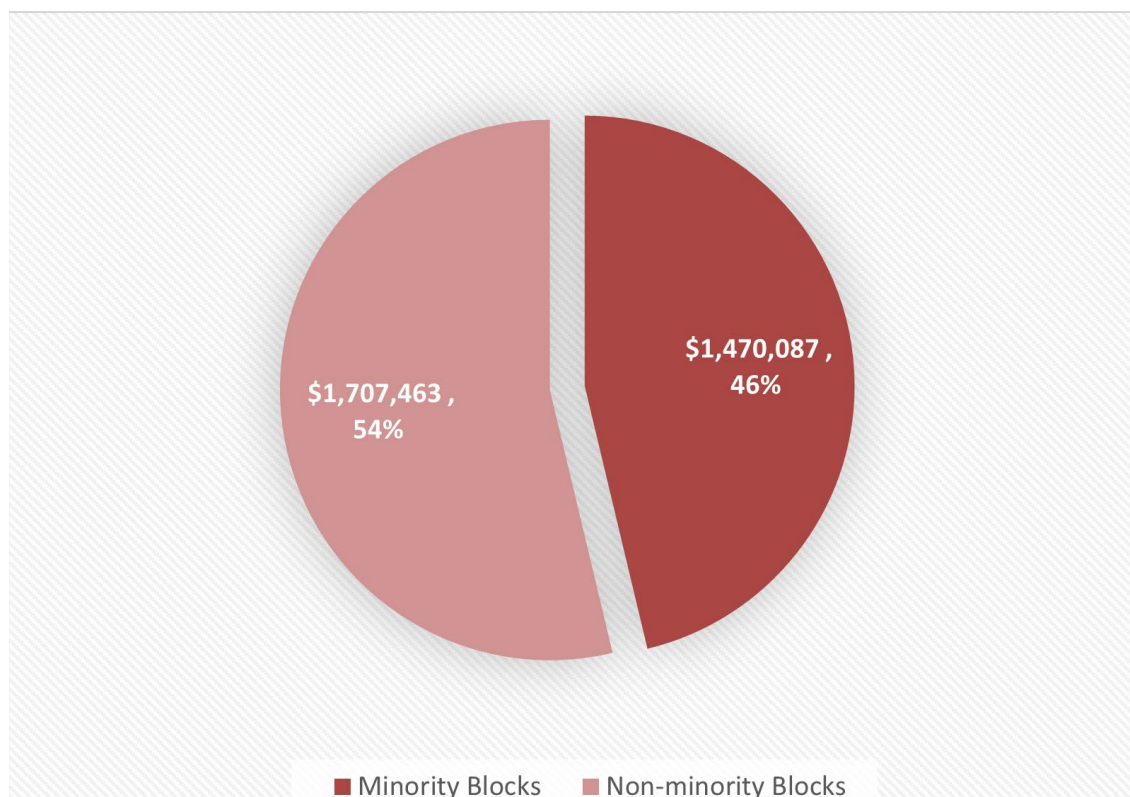
-  Less than 25.5% Total Minority Population
-  25.5% Total Minority Population or Greater
-  SCOG Federally Funded Projects 2020-2023
-  Skagit County Boundary



# PROJECT IMPACTS: MINORITY BLOCKS

Out of \$3,177,550 in STBG and TA funds awarded through a SCOG process with a specific geographic impact, 46% of total funding went to projects located in proximity to identified minority Census blocks. **Figure 6** below shows the amount of funding awarded in proximity to minority and non-minority Census tracts from April 2020 to April 2023.

**Figure 6. STBG & TA Funding Awarded to Minority and Non-Minority Census Blocks in Skagit County: April 2020-April 2023**



Of all STBG and TA funded projects with a specific geographic impact, 53.8% were located in proximity to minority Census tracts, while 46% of funds, or \$1,470,087 were awarded to projects in these areas. This is slightly below the rate of 48% identified Environmental Justice Census blocks, or 948 out of 2,049 blocks, countywide. Investments in these areas aim to improve access to multiple travel modes including roadway preservation and maintenance, capacity expansion for increased mobility, roadway safety and expansion of nonmotorized facilities.

# TITLE VI TRANSIT ASSESSMENT

As a subrecipient of Federal Transit Administration (FTA) funds, SCOG aims to meet the metropolitan planning organization requirements for submitting a Title VI Program as outlined in FTA Circular 4702.1B. SCOG utilizes the demographic profile, updated in 2023, to identify Title VI minority populations; the demographic profile acts as a basis for Environmental Justice, as well as this Title VI, assessment. During the April 2020-April 2023 time period, SCOG selected one project for STBG award specifically for public transit purposes. This project was determined to have no specific geographic impact. Transit projects selected for award are included in **Table 2** below.

**Table 2. Transit Projects Awarded STBG Funds in Skagit County: April 2020-April 2023**

Sponsor	Project	Award Amount	Award Date	Program
Skagit Transit	Bus Stop Amenities	\$56,100	Jul-21	STBG

Total funding awarded to transit projects from April 2020 to April 2023 was \$56,100. None of these funds, were identified to have a specific geographic impact, as the project was determined to benefit the entire region served by Skagit Transit.

Skagit Transit, the region's primary transit agency, does not collect racial or ethnic demographic information about its ridership; however, the percent share of self-identified minority transit commuters is higher than the regional average minority population. According to the most recent available data, the Census Transportation Planning Products 2012-2016, 434 workers over the age of 16, who resided in Skagit County, took the bus as a commute mode. Of those, 31% identified as minority populations. This estimated rate is higher than the county-wide minority population of 25.5%, according to the 2020 Census.<sup>1</sup>

Skagit Transit works to locate transit services in areas with high rates of minority and low-income populations. **Figure 7** illustrates the relationship between fixed route transit availability and minority geographies.

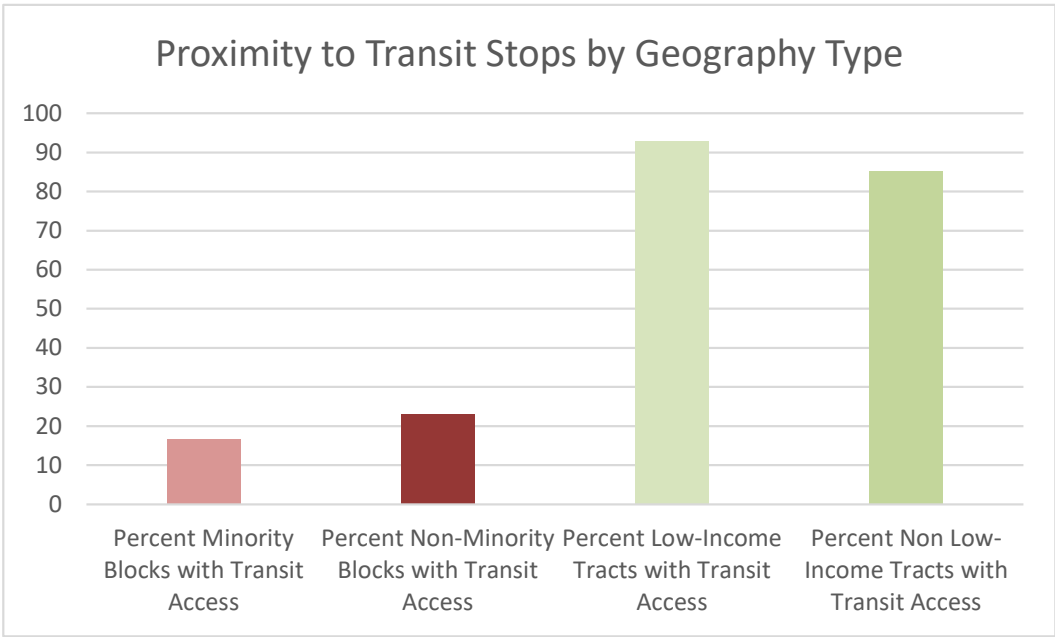
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<sup>1</sup> Source: 2012-2016 Census Transportation Planning Products Table EA-B102201 Minority Status (3) by Means of Transportation (11) (Workers 16 years and over) Note: Estimates for this dataset had a coefficient of variation higher than 15, and should be considered unreliable.

# TITLE VI TRANSIT ASSESSMENT

Out of 638 Census blocks with transit access in proximity to a fixed route transit stop, 165, or 25.8% are identified as having a minority population above the regional average. In total, 16.7% of identified minority blocks have fixed route transit access, as opposed to 23.1% of non-minority Census blocks with transit access. Transit investments that affect the entire Skagit Transit service area are more likely to benefit identified minority Census blocks than non-minority Census blocks.

Figure 7. Proximity to Transit Stops by Geography Type



The one STBGP funded project, which was \$56,100 of funds, did not have a direct geographic impact and accordingly would not directly benefit non-minority populations over minority populations. Based on this assessment of regionwide and geographic impacts, transit-specific projects selected for award through SCOG funding processes are not having a disparate impact on the basis of race, color, or national origin. Rather, transit investments are more likely to provide access in areas with high concentrations of minority populations. Regionwide transit investments are also more likely to benefit these minority geographies.



# CONCLUSION

This Environmental Justice and Title VI Assessment considered STBG and TA funded projects that were awarded funds in Skagit County from April 2020-April 2023 through a SCOG selection process. Thresholds for EJ minority Census blocks and EJ low-income Census tracts were established through a demographic profile completed in 2023 by SCOG just prior to the EJ assessment. These thresholds provided benchmarks for the EJ assessment to determine if EJ populations are encountering a disproportionately high and adverse impact through SCOG selection processes.

The findings of this analysis indicate that from a project selection and funding perspective, projects are not being disproportionately awarded to non-minority Census blocks and that funding for these projects are also not being disproportionately awarded. 46% of funds went to projects in direct proximity to EJ minority blocks, and 43% of funds went to projects in direct proximity to EJ low-income tracts. Additionally, projects selected by SCOG for STBG or TA award were more likely to be in proximity to EJ areas than not; while some projects were in proximity to EJ low-income geographies and others were in proximity to EJ minority geographies, often projects were in proximity to both. Out of six selected projects, four were in proximity to an identified EJ geography. One of the two projects not in proximity to an EJ geography, the Samish Indian Nation's SR 20/Campbell Lake Road Intersection Improvement, is sponsored by a sovereign American Indian nation and tribal community, which is identified as a minority population by the United States Census Bureau. On the whole, four out of six, or 66.6% of SCOG awarded projects were in proximity to either an identified minority or low-income Environmental Justice area.

SCOG works to ensure that funding decisions do not have a discriminatory impact on Environmental Justice protected populations. Identified Environmental Justice geographies are taken into account during the evaluation of STBG and TA project applications, a process which began in 2014.

Further work can be done to assess the impacts of all SCOG funded projects on a regional scale, regardless of thresholds or geographies. Transportation projects have different layers and scales of impact, or benefit and burden, depending on the location, type, and size of the project, as well as the demographic characteristics of surrounding communities and the communities of travelers who utilize a specific facility or mode to meet their travel needs. Future expansions of this analysis may include considering the specific transportation needs and patterns of identified EJ communities, analyzing impacts on other protected populations, and assessing indirect or systemwide impacts of specific transportation projects at a regional level.