4.15 Environmental Justice

Presidential Executive Order 12898 on environmental justice requires federal agencies to take appropriate steps to identify and address “disproportionately high and adverse impacts” to minority and low-income populations. Disproportionate impacts are the effects of a project predominately borne by a minority and/or low-income population. USDOT Order 5610.2(a) and Circular FTA C4703.1 provide guidance on how to evaluate and address environmental justice impacts minority and low-income populations. Both documents require that the assessment of “disproportionate impacts” consider (a) impacts, (b) mitigation, and (c) any offsetting benefits that may also result from the project.

This section summarizes how operation and construction of the Center City Connector could potentially impact, negatively and positively, minority and low-income populations within the study area. Appendix D4.15 contains more detailed information.

The selected study area of 0.25 mile around the centerline of the alignment, 1,000 feet around the existing South Lake Union and Chinatown-International District OMFs, and 1,000 feet around proposed turnback tracks along Republican Street encompasses the most likely areas of project impacts on minority and low-income populations. (See Figure 4.6-1.)

4.15.1 Study Area Demographics

Demographic information on minority and low-income populations in the study area was compiled from U.S. Census 2010 data and American Community Survey data. Minority populations were analyzed at the Census block level, the smallest area available, using 2010 Census data; low-income populations were analyzed at the Census block group level using 2008 to 2012 American Community Survey data because data are not available at a smaller geographic scale. Table 4.15-1 shows that the study area has a higher concentration of minority and low-income populations than the rest of the city.

Almost half of study area residents (44 percent) are minorities. The highest concentrations are located at either end of the project, with pockets in South Lake Union and in the Chinatown-International District (Figure 4.15-1). Table 4.15-2 provides information on the minority populations within the study area by neighborhood. Of the minority populations in the
Figure 4.15-1  Minority Populations within the Study Area
study area, most are Asian, with the highest concentration in the Chinatown–International District neighborhood, followed by Black or African American populations concentrated in the Pioneer Square and Commercial Core neighborhoods (see Table 4.15-2). All the neighborhood districts in the study area, except Belltown, have a higher concentration African American populations compared to Seattle’s overall 7.9 percent. However, only the Chinatown–International District greatly exceeds the proportion of Asian population (at 58.7 percent), compared to the overall Seattle Asian population of 13.8 percent. Neighborhood districts slightly exceed representation of Native American and Hispanic minority groups compared with Seattle overall.

Table 4.15-1  Demographic Characteristics

<table>
<thead>
<tr>
<th>Study Area</th>
<th>Seattle</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>20,842</td>
</tr>
<tr>
<td>Minority (%)</td>
<td>44.2</td>
</tr>
<tr>
<td>People Whose Income in the Past 12 Months is Below the Poverty Level (%)</td>
<td>28.5</td>
</tr>
<tr>
<td>Median Household Income</td>
<td>$36,890</td>
</tr>
</tbody>
</table>

Table 4.15-2  Minority Populations in the Study Area

<table>
<thead>
<tr>
<th>Neighborhood District</th>
<th>White</th>
<th>Black or African American</th>
<th>American Indian and Alaska Native</th>
<th>Asian</th>
<th>Native Hawaiian/other Pacific Islander</th>
<th>Hispanic or Latino</th>
<th>Other/Two or more races</th>
</tr>
</thead>
<tbody>
<tr>
<td>Denny Triangle</td>
<td>1,722</td>
<td>100 (4.0%)</td>
<td>11 (0.4%)</td>
<td>427</td>
<td>3 (0.1%)</td>
<td>143 (5.7%)</td>
<td>98 (3.9%)</td>
</tr>
<tr>
<td>Belltown</td>
<td>2,091</td>
<td>378 (11.7%)</td>
<td>73 (2.3%)</td>
<td>294</td>
<td>12 (0.4%)</td>
<td>219 (6.8%)</td>
<td>159 (4.9%)</td>
</tr>
<tr>
<td>Commercial Core</td>
<td>3,727</td>
<td>964 (16.8%)</td>
<td>92 (1.6%)</td>
<td>531</td>
<td>12 (0.2%)</td>
<td>275 (4.8%)</td>
<td>146 (2.5%)</td>
</tr>
<tr>
<td>Pioneer Square</td>
<td>1,392</td>
<td>495 (20.4%)</td>
<td>74 (3.1%)</td>
<td>139</td>
<td>6 (0.2%)</td>
<td>200 (8.3%)</td>
<td>116 (4.7%)</td>
</tr>
<tr>
<td>South Lake Union</td>
<td>1,861</td>
<td>349 (12.3%)</td>
<td>29 (1.0%)</td>
<td>260</td>
<td>16 (0.2%)</td>
<td>189 (6.7%)</td>
<td>128 (4.5%)</td>
</tr>
<tr>
<td>Chinatown–International District</td>
<td>527 (21.2%)</td>
<td>243 (9.8%)</td>
<td>56 (2.2%)</td>
<td>1,461 (58.7%)</td>
<td>4 (0.2%)</td>
<td>127 (5.1%)</td>
<td>72 (2.9%)</td>
</tr>
<tr>
<td>SoDo</td>
<td>101</td>
<td>5 (3.0%)</td>
<td>6 (3.6%)</td>
<td>25</td>
<td>8 (4.8%)</td>
<td>9 (5.4%)</td>
<td>12 (7.2%)</td>
</tr>
<tr>
<td>City of Seattle</td>
<td>422,870</td>
<td>48,316 (7.9%)</td>
<td>4,809 (0.8%)</td>
<td>84,215 (13.8%)</td>
<td>2,351 (0.4%)</td>
<td>40,329 (6.6%)</td>
<td>31,247 (5.1%)</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2010 and 2008-2012
5-Year American Community Survey, 2012
The low-income population in the study area is more than double the percentage for Seattle as a whole, and the median household income for the study area is 60 percent of Seattle’s median income (see Table 4.15-1). Higher concentrations of low-income populations are found in the Commercial Core, Pioneer Square, and Chinatown-International District (Figure 4.15-2).

A number of social service organizations provide services to the minority and low-income populations in the study area, including organizations that provide shelter and food. There are 29 affordable housing facilities in the study area, including 13 that are located adjacent to the proposed project (see Figure 4.15-2):

- Women's Wellness Center
- Plymouth on Stewart
- Yesler Terrace Apartments
- Gatewood Hotel
- Sanitary Market
- Livingston Baker
- Bell Tower Apartments
- Hotel Scargo
- Kasota
- Oxford Apartments
- Market House Condominium
- Pike Market Senior Center
- Lewiston Apartments

In the study area, a little over 47 percent of households do not own an automobile. Households with no vehicle are transit-dependent, which can indicate low income. In Seattle, transit dependence may also be a lifestyle choice because the density of uses and availability of public transportation puts many necessary destinations within walking distance or one transit ride away.

There is a large homeless population in Seattle. King County’s 2015 “One Night Out” Survey documented 3,772 unsheltered individuals in the City on January 23, 2015. However, the number of homeless individuals typically residing within the study area is uncertain. The project will work with the Seattle Human Services Division to identify any areas of use by homeless populations along the project alignment.
Figure 4.15-2  Low-Income Population within the Study Area
Limited-English proficient (LEP) individuals are those individuals who do not speak English as their primary language and who have limited ability to read, speak, write or understand English. While environmental justice guidance does not directly relate to LEP individuals, data on LEP individuals can provide additional information on minority populations in the study area that can provide projects with an awareness of potential language barriers that help makes outreach more effective. About 27 percent of the study area population is LEP (Table 4.15.3). There are larger concentrations in the Chinatown-International District and SoDo neighborhoods.

Table 4.15-3  Languages Spoken at Home

<table>
<thead>
<tr>
<th>Neighborhood District</th>
<th>English Less than Very Well - Spanish</th>
<th>English Less than Very Well - Asian and Pacific Islander Languages</th>
</tr>
</thead>
<tbody>
<tr>
<td>Denny Triangle</td>
<td>0</td>
<td>40 (3.1%)</td>
</tr>
<tr>
<td>Belltown</td>
<td>52 (1.4%)</td>
<td>63 (1.6%)</td>
</tr>
<tr>
<td>Commercial Core</td>
<td>53 (1.1%)</td>
<td>175 (3.6%)</td>
</tr>
<tr>
<td>Pioneer Square</td>
<td>57 (3.6%)</td>
<td>32 (2.0%)</td>
</tr>
<tr>
<td>South Lake Union</td>
<td>55 (1.4%)</td>
<td>204 (5.1%)</td>
</tr>
<tr>
<td>Chinatown-International District</td>
<td>111 (1.9%)</td>
<td>2,225 (39.0%)</td>
</tr>
<tr>
<td>SoDo</td>
<td>66 (7.4%)</td>
<td>90 (10.2%)</td>
</tr>
<tr>
<td>City of Seattle</td>
<td>9,330 (1.5%)</td>
<td>28,592 (4.6%)</td>
</tr>
</tbody>
</table>

a U.S. Census Bureau American FactFinder 1 Year Estimates (DP02)
b 2006-2010 American Community Survey 5 Year estimates

4.15.2 Outreach to Minority and Low-Income Populations

Chapter 7, Public and Agency Outreach, describes the engagement activities performed for the planning and environmental review of the Center City Connector. This section summarizes that information and focuses on efforts targeted to engage minority and low-income populations.

General public outreach for the project has included stakeholder interviews, four open houses, and media events. In addition, the City of Seattle streetcar system website links to a project webpage that provides project information, links that allow people to sign up for updates, and contact information.

In addition, the City of Seattle requires programs and projects to develop an inclusive outreach and public engagement (IOPE) plan. This plan includes an equity analysis and incorporate best practices for reaching out to traditionally underrepresented populations, such as working with Neighborhood Service Center coordinators to distribute project and meeting information, stapling project information sheets onto sack lunches that are provided to homeless persons, providing interpreters for non-English speakers at public meetings, and developing and

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1 Operation Sack Lunch information sheets will let recipients know that construction is coming and provide information about how to get their belongings if they are left in the work zone and about resources and shelters in the area.
distributing translated informational materials. The IOPE plans use Census data to identify translation and interpretation needs.

Early in the project’s development process, SDOT collected information on how best to reach minority and low-income communities and collect stakeholder contact information. It then sought input from minority and low-income populations on the alternatives and screening process. Project staff regularly informed those populations of the status of project development. SDOT provided project information materials to social service providers, low-income housing providers, and homeless shelters. As described below, public input was solicited at open houses and stakeholder interviews, and through coordination with Native American tribes.

When the project conducted a survey on persons’ interests for using transit in downtown, almost 80 percent of respondents were residents within the downtown Center City. Respondents expressed support for exclusive-streetcar trackway to provide reliable and consistent streetcar service. Some respondents expressed concern about street trees, neighborhood character, parking and loading impacts, and traffic impacts. Overall, there were more comments from participants expressing support for the project than any other comment.

As part of project development, SDOT will continue to distribute materials throughout the environmental and design process, inviting the public and stakeholders to open houses and events, and soliciting their comments on the project. SDOT is also updating the IOPE plan.

Open Houses. Five open houses were held at three Center City locations, shown in Table 4.15-4. Invitations for two of them were translated into Chinese, Vietnamese, and Spanish, and more than 1,000 postcards in different languages were distributed at 30 downtown sites, including human and social service agencies and low-income housing locations. In addition, print ads announcing the open house were printed in the *NW Asian Weekly* and *Real Change* newspapers. SDOT provided Mandarin and Spanish interpreters at the first public meeting and it offered sign language as well as Mandarin, Spanish, Vietnamese, and Taiwanese translation services at the meetings, but none were requested. Most of those who commented expressed a desire for the project to move forward quickly. Other concerns focused primarily on construction impacts.

Stakeholder Interviews. SDOT held or attended 24 meetings with 40 stakeholder groups, including community and human services organizations such as Seattle YMCA, Seattle Housing Authority, Plymouth Housing Group, Alliance for Pioneer Square, Historic South Downtown, Seattle Chinatown-International District Preservation and Development Authority, Seattle Chamber of Commerce, and King County Labor Council. These and other groups assisted in contacting minorities and identified other community-based organizations that provide services
to minority and low-income populations.\(^2\) The outreach to these organizations was targeted to try to build engagement in the project development from minority and low-income populations and find out if they or associated service organizations had issues to consider in the environmental analysis process. The resulting feedback included consistent general support for the project, along with concerns focused on effects on business during construction and parking impacts.

**Native American Tribes.** FTA has government-to-government responsibility for coordinating with federally recognized Native American tribes. The study area does not include tribal lands, but tribes are consulted about their interests regarding natural and cultural resources. Therefore, FTA initiated consultation with several potentially interested tribes: the Muckleshoot Indian Tribe, Snoqualmie Tribe, Stillaguamish Tribe, Tulalip Tribes, Confederated Tribes and Bands of the Yakama Nation, and Duwamish Tribal Services (an organization which is not federally recognized). FTA contacted the tribes by letter and offered in-person meetings. None of the Native American tribes expressed an interest in the project or voiced concerns over sensitive resources. FTA and SDOT will continue to consult if any tribes wish to do so.

<table>
<thead>
<tr>
<th>Table 4.15-4</th>
<th>Open Houses</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Date</strong></td>
<td><strong>Open House Forum</strong></td>
</tr>
<tr>
<td>February 6, 2013</td>
<td>City Hall</td>
</tr>
<tr>
<td>June 6, 2013</td>
<td>South Lake Union Discovery Center</td>
</tr>
<tr>
<td>October 29, 2013</td>
<td>Pike Place Market</td>
</tr>
<tr>
<td>November 19, 2014</td>
<td>Pike Place Market</td>
</tr>
<tr>
<td>September 29 and 30, 2015</td>
<td>City Hall</td>
</tr>
</tbody>
</table>

### 4.15.3 Impacts

#### 4.15.3.1 No Build Alternative

The No Build Alternative would not directly affect low-income or minority populations or community facilities.

#### 4.15.3.2 Locally Preferred Alternative

This section analyzes the location, intensity, and duration of the project’s environmental impacts during operation and construction to determine if any of the identified impacts would result in disproportionately high and adverse impacts on minority and/or low-income populations. Each environmental resources analysis is summarized in Appendix D4.15, and more detail is provided

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\(^2\) Findings from stakeholder interviews can be found in Appendix P of the Seattle Center City Connector Transit Study Detailed Evaluation Report, Volume II, available on SDOT’s project website: [http://www.seattle.gov/transportation/centercityconnector.htm](http://www.seattle.gov/transportation/centercityconnector.htm).
in the other sections of Chapter 4 of this EA. This section summarizes key operation and construction impacts potentially affecting Environmental Justice populations.

**Operational Impacts**

The LPA would result in only minor adverse impacts on minority and/or low-income populations. Mitigation will further reduce the impacts. It would eliminate some on-street parking, but there is adequate off-street parking available.

Because the LPA would be within public right-of-way or Seattle-owned property, no acquisition or relocations are necessary. There would be no conversion of land use, and parks and historic properties would remain unharmed and functional as they exist today.

The LPA would improve pedestrian and transit access along First Avenue and Westlake Avenue, connecting the South Lake Union and First Hill Streetcar lines. This will benefit all who live or work in the study area, especially transit-dependent populations. The project would maintain sidewalks and existing street crossings, and, where needed, upgrade crossings to meet ADA guidelines. Ultimately, the LPA would provide people with a convenient, reliable, and frequent transit service to easily and directly connect people in the study area with the neighborhoods currently served by the South Lake Union and First Hill Streetcar lines. The mobility benefits would accrue especially to lower-income and transit-dependent populations, making it easier for them to access jobs, health care, and services.

The potential noise and vibration impacts would be mitigated, there would be a minor change in access to or delay of public services, and the project would meet the design requirements for management of stormwater, seismic standards, and avoidance or cleanup of hazardous materials encountered during construction. The introduction of the streetcar and stations would be a visual change. However, the streetcar line would be visually compatible with the streetscape and incorporate context-sensitive design following neighborhood design guidelines. Minority and low-income populations in the study area would not experience adverse impacts that are materially different than those who are not minority and low-income population or people elsewhere in the city.

**Construction Impacts**

Impacts from the construction of the Center City Connector would be minor and temporary. To minimize impacts in any one area, the project would be staged over a two-year period along work areas of two- to eight-block segments. Work would last no more than eight months within each work area and occur mostly during weekday construction hours, although limited nighttime work would be necessary. The exception would be along Stewart Street where construction would be longer, but limited to weekends and evenings to avoid high traffic periods.
Short-term construction impacts that might be experienced by people in the study area, including low-income and minority populations, would include the following:

- Temporary increases in noise and vibration
- Temporary visual impacts such as the presence, storage, and movement of equipment and materials; lighting for nighttime work; and general visual nuisance around staging and construction areas
- Temporary increases in fugitive dust, construction-related exhaust, and other emissions
- Temporary traffic impacts, including changes in travel patterns, and the loss of on-street parking and loading and unloading access
- Temporary detours for pedestrians

Community facilities, including those that provide services to minority and low-income populations, would also experience similar construction impacts.

As described elsewhere in this EA, the project would fully or partially mitigate each of these impacts. Impacts that could not be fully mitigated would likely be annoying at times, but persons living and working in the area would experience these annoyances for relatively short periods. No known unique vulnerabilities, special exposure pathways, or cultural practices associated with minority populations and low-income populations in the study area would exacerbate the anticipated adverse effects. Compared to individuals elsewhere in the city, the minority and low-income populations in the study area would not suffer high and adverse effects from the construction of the project.

4.15.3.3 Project Benefits

USDOT Order 5610.2(a) directs agencies to consider the benefits of a proposed transportation project when determining whether it could result in disproportionately high and adverse impacts on minority and low-income populations. The operation of the Center City Connector is anticipated to result in the following benefits:

- Improving connections to other neighborhoods for the people in study area neighborhoods, by connecting the First Hill and South Lake Union streetcar segments
- Providing transit travel-time savings and increased transit reliability, because the streetcar would be in exclusive lanes along much of the corridor
- Improving connections to other transit modes, such as Sound Transit Link and Sounder, Colman Dock ferries, and monorail and bus service, which would improve connections both locally and regionally
- Adding up to 22 new jobs to operate and maintain the new streetcar segment

These benefits would apply to all populations who live, work, and visit the study area. For transit-dependent individuals, who tend to be lower-income and could include persons living in the affordable housing locations in the study area, the benefits of reliable transit service, increased transit reliability, and improved connections would be more important.
4.15.3.4 Environmental Justice Conclusion

While there are higher minority and low-income populations in the study area than in the City as a whole, the Center City Connector would not result in adverse impacts on any population. Impacts would not be predominantly borne by a minority or low-income population; the identified impacts would not be greater in magnitude than the impacts that would be experienced by the non-minority and non-low-income populations in the study area; and the project would not result in adverse impacts on cultural and social resources especially important to minority and low-income populations. Any impacts during construction and operation would affect all populations to the same degree. Most project impacts would occur during construction; they would be limited in duration and would be further reduced by implementing the proposed mitigation measures and would not result in any adverse impacts. Complete information on project impacts and mitigation is provided in the other sections of this EA and is summarized in Appendix D4.15.

Additionally, the Center City Connector would provide benefits for the traveling public as a whole, especially minority and low-income populations. Benefits would include a more reliable and efficient transportation system, improved mobility through the study area, and improved connections to other neighborhoods in Seattle due to the connections to the other streetcar lines and public transportation networks.

Based on these conclusions, the Center City Connector would not result in disproportionately high and adverse effects on minority or low-income populations.

4.15.4 Mitigation Measures

As noted above, other subsections of this EA describe specific mitigation measures for project construction and operation. Chapter 6 of this EA collects those measures. They are also summarized in Appendix D4.15. Additionally, the City of Seattle requires programs and projects to develop and implement an IOPE plan that outlines how the City will continue to provide outreach to traditionally underrepresented populations, including low-income, minority, homeless, and LEP individuals. SDOT will translate materials such as project notices into Chinese, Vietnamese, and Spanish, and distribute these materials at social service agencies and at affordable housing sites and offices throughout downtown.

No other mitigation specific to environmental justice would be required.