

December 11, 2025

Lyndsay Gordon
Washington State Department of Ecology
Toxics Cleanup Program
Olympia, Washington

RE: Public Comment on Proposed Updates to Oversight Remedial Action Grants and Affordable Housing Cleanup Grants

Dear Ecology Toxics Cleanup Program Team,

The Port of Tacoma (the Port) appreciates the opportunity to provide comments on Washington State Department of Ecology (Ecology's) proposed updates to the Oversight Remedial Action Grants (ORAG) and Affordable Housing Cleanup Grants. We appreciate Ecology's continued efforts to support local governments in addressing contaminated sites and advancing environmental justice across Washington State. The Port has reviewed Ecology's *2027-29 Cleanup Grant Updates for Public Comment* (Publication 25-09-043), dated November 2025, and is providing its comments on the proposed changes to the ORAG program.

Environmental Justice Criteria

Ports, including Port of Tacoma, are often located adjacent to communities that have historically borne disproportionate environmental burdens. With the loss of EPA's EJScreen tool, we are supportive of Ecology's proposal to use Washington State Department of Health's Washington Environmental Health Disparities Map. The Port also proposes to Ecology that tribal concerns are more directly evaluated in its grant scoring of overburdened communities; tribal communities and reservations, which are not directly mapped in EPA's EJScreen nor in the Washington Environmental Health Disparities Map. The Port understands that Ecology maintains a GIS dataset of tribal lands and reservations, which would be a useful resource for more fully evaluating populations overburdened by nearby cleanup sites.

ORAG Scorecard Updates

Ports rely heavily on ORAG funding to advance cleanup projects that enable redevelopment, economic growth, and environmental restoration. We have several concerns with the proposed changes:

- **Substantial Progress Review:** Cleanup projects at ports often involve complex permitting, engineering, and construction phases that do not align neatly with biennial cycles. We ask that Ecology maintain flexibility in evaluating "substantial progress" to avoid penalizing projects delayed by regulatory or logistical hurdles.
- **Staff Time Billing Limits:** Limiting reimbursement for staff time would disproportionately affect ports, which must dedicate significant in-house expertise to manage cleanup projects. Unlike larger municipalities, ports often have lean staff structures, and unreimbursed time would strain our capacity to deliver projects.
- **Regional Prioritization:** While we support equitable distribution of funding statewide, prioritizing Eastern Washington projects should not come at the expense of port cleanups in

Western Washington. Ports are critical economic engines, and cleanup delays at port properties can stall redevelopment, job creation, and housing opportunities.

- **Scoring Criteria Updates:** We support incorporating site assessment, time-sensitive construction, and community impact into scoring. However, we ask that Ecology explicitly recognize the statewide economic and environmental benefits of port cleanups when weighting criteria.

Areawide Groundwater Contamination grant

The Port is disappointed to learn that this type of RAG grant will not be offered in the biennium due to low demand in previous biennia. The Port submitted an areawide groundwater contamination grant application for the 2025-2027 biennium, demonstrating that there is demand but was not awarded. Areawide groundwater contamination remains a major issue for the Port, as many of the properties within the Tacoma Tideflats, about half of which the Port owns, are confirmed or suspected contaminated cleanup sites due to historical industrial practices and filing activities. Approximately 22% of the Tideflats area are unlisted, uninvestigated cleanup sites. Groundwater contamination is a key component of each of the cleanup sites because groundwater is encountered at shallow depths throughout the Tideflats. Under Ecology's current framework, groundwater contamination investigations are conducted site-by-site, with similar scopes of work being required at each site, including tidal studies, geochemistry evaluations, and development of cleanup standards. The Port remains committed to conducting more holistic approach to answer questions about groundwater contamination within the Tideflats, including evaluating the extent of PFAs in groundwater, identifying drinking water receptors, and understanding tidal influence. The Port requests that Ecology reconsider areawide groundwater investigation grants during the next biennium.

Summary

Ports play a unique role in Washington's cleanup landscape: we are stewards of contaminated waterfront lands, leaders in community redevelopment, and drivers of statewide economic vitality. We appreciate Ecology's consideration of the Port's comments on the ORAG program, as a partner in advancing cleanup. We look forward to continued collaboration to ensure that cleanup investments support both environmental stewardship and Washington's economic future.

Sincerely,



Robert Healy
Director, Remediation & Water Quality