



December 12, 2025

Washington State Department of Ecology
Toxics Cleanup Program
Olympia, WA

Re: Public Comments on 2027-29 Cleanup Grant Updates

Dear Ecology TCP Team,

The Port of Bellingham (Port) appreciates the opportunity to comment on the draft 2027-29 cleanup grant updates (November, Publication 25-09-043). Ecology's support of local governments to implement cleanup projects is vital to the success in addressing legacy contamination and economic development at underutilized properties. This letter provides the Port's comments and proposed changes to the draft cleanup grant updates.

Environmental Justice Criteria

We are supportive of Ecology's proposal to use Washington State Department of Health's Washington Environmental Health Disparities Map. Contaminated sediment sites pose direct health risks to tribal communities who often consume fish and shellfish at much higher rates than the general population due to their traditional subsistence lifestyle, and Federal Environmental Justice policies specifically include Tribes. The Port 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.

Recipient Staff Time Costs

The Port is in agreement to manage reimbursement of recipient staff time to 10% or \$100,000; however, it is important to retain grant and project administration. Project administration is to capture the reimbursement of Port project manager and engineer time. This time is required to manage the project, consultants, and contractors to ensure the cleanup work is being conducted in compliance with grant agreements and associated administrative orders.

ORAG Scorecard Updates

The Port and Bellingham community rely on ORAG funding to advance cleanup projects that enable environmental protection and restoration, redevelopment, and economic growth. The proposed changes to the ORAG scorecard should more evenly balance the ability to proceed, risk, and equitable distribution. While the Port is a strong advocate for equitable distribution, if the project timeline is uncertain and there is a low environmental risk based on the site hazard and rating process (SHARP)

then the score weighting should be balanced. We propose the following scoring percentages for each category:

- Category 1: Faster Cleanup and Readiness to Proceed (28%)
- Category 2: Site Hazard Assessment Ranking Process Score (28%)
- Category 3: Equitable Distribution (28%)
- Category 4: Redevelopment and Reuse in Cleanups (16%)

A balanced score weighting will more appropriately reflect the legislative intent for funds to be under contract and spent while also addressing the risk of contamination exposure and severity.

In addition, the proposed scoring for equitable distribution should be based on a tiered approach. The scoring should be based on the Washington Health Disparities (EHD) Map hazard ranking. For example, Category 3.2 (Socioeconomic factors) is currently proposed to score a 0 or 10 while a tiered approach would score between 0 and 10 based on the EHD map hazard rank. For a site in Blaine, Washington this would result in a score of 6 based on the EHD map.

Balancing Certainty and Flexibility

Cleanup projects rely on stable, long-term funding commitments. These sites embody the intertwined challenges of cleanup work: multiple landowners, overlapping jurisdictions, evolving environmental standards, complex risk management, and uncertain and evolving permitting timeframes. Each stage—from investigation and feasibility studies to remedial design, permitting, and construction takes years, not months. And while construction may only take a couple years once funding and permits are in place, **the permitting, design, and funding phases can stretch a much longer timeframe**. These aren't delays caused by inefficiency—they're the result of due diligence, regulatory coordination, and the scientific rigor required to ensure public health and environmental protection. We advocate for Ecology to consider and implement flexibility into the ORAG program in order to prioritize projects that are ready for completion.

Summary

Ports have a valuable role in Washington's cleanup process as we are environmental stewards of public lands, manage complex contaminated sites, leaders in community redevelopment, and drivers of economic vitality. We appreciate Ecology's commitment to supporting cleanup work and understand the stresses on the ability to financially support projects through the ORAG program. Thank you for 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,



Ben Howard
Remediation Program Manager

cc: Brian Gouran – Port of Bellingham
Alan Birdsall – Port of Bellingham