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Comment 1: The Proposed ORAG Scorecard Scoring Framework Appears to Minimize Scores For Risk to Human Health and the Environment

In the new ORAG Scoring Framework, similar to the 2025-2027 framework, it is clear that the critically important goal to incorporate scoring elements to prioritize sites to reduce health burdens to vulnerable populations and overburdened communities has been achieved. However, the specific scoring approach proposed appears to weigh the location of a site (relative to highly impacted communities) too heavily relative to the actual risk associated with a cleanup project. This appears inconsistent with a goal of reducing risks to human health and the environment overall, and to in particular to those communities that may score just below the threshold in the proposed scoring matrix. For instance, a community ranking an "8" in the equitable distribution scoring categories would receive zero points for those category items (of 40 possible points). This could create scenarios in which sites with high risks to human health and the environment as determined by SHARP scoring would receive no funding, even if they do rate relatively high in Equitable distribution scores; while sites with low risks that are located in a "9" scoring category are prioritized even though ability to reduce the cumulative risk to impacted communities could be lower.

A more appropriate scoring framework could include, in Category 3, some proportion of points available for rankings of less than 9 rather than the current "all or nothing" approach, similar to other scoring categories. Additionally, in Scoring Category 2, "Critical" and "High" risk sites could be weighed much more heavily – these are sites where efforts can "move the needle" for communities much more effectively, and often include sites with sediment or surface water issues that transcend census tracts and impact entire communities that rely on bodies of water that fall outside of those tracts.

Comment 2: Numerical Scoring using the SHARP Tool Appears Unclear

The SHARP reports that I have reviewed have several scores presented on their dashboards. These scores are typically depicted as "Critical," "High", "Medium", and "Low"; with specific media scores of a letter (from A to D) and a single number (from 1 to 4). In the 2025-2027 ORAG scoring criteria, scores were assessed on the overall risk of "Critical," "High," "Medium," or "Low." It is unclear to me how these values can be translated into the numerical score shown in the new proposed ORAG scoring framework. Where are the new numerical rating points (from 0 to 3,500 as described in this update document) shown on the SHARP report and how are they derived?