



Response to Comments Site Hazard Assessment and Ranking Process Updates

For the

Toxics Cleanup Program

Washington State Department of Ecology
Olympia, Washington

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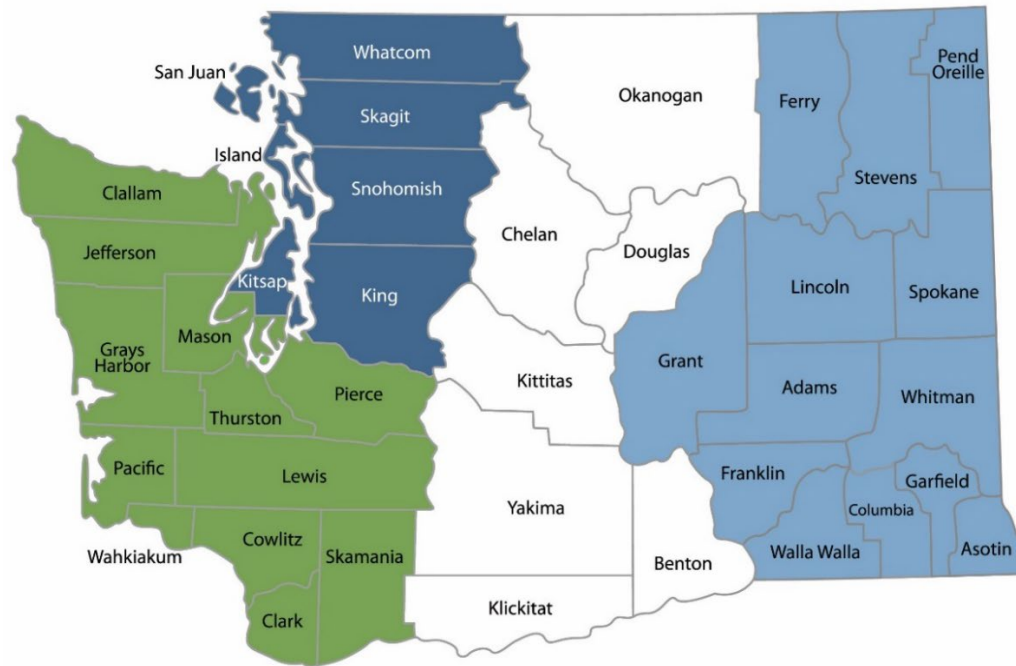
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Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region
360-407-6300

Northwest Region
206-594-0000

Central Region
509-575-2490

Eastern Region
509-329-3400

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder Street Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
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DEPARTMENT OF
ECOLOGY
State of Washington

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Summary of Public Comment Period

Ecology accepted public comments on proposed [Updates to the Site Hazard Assessment and Ranking Process \(SHARP\)](#)² from December 23, 2025, through January 25, 2026. Proposed updates included increasing the weight of “B” exposure scores and adding a question to better assess plant and animal exposure to contaminants in surface water.

During the comment period, Ecology published the update document, posted notices in the [Contaminated Site Register](#),³ and emailed community stakeholders.

Ecology received comments from:

- Glen DeWillie representing the Camas Earth Day Society.
- The Downtown Camas Association Director and Caroline Mercury representing the Downtown Camas Association.
- Alexandra Johnson representing the Duwamish River Community Coalition.

² <https://apps.ecology.wa.gov/publications/documents/2509054.pdf>

³ <https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/site-register-lists-and-data#SiteRegister>

Response to Comments

Commenter 1 – Glen DeWillie: Camas Earth Day Society

Comment 1.1

Tab SI (Socioeconomic Indicators). The EJ Screen launch macro function takes the user to a site that is no longer available on the EPA's website. If this data is no longer available or provided by the EPA, the tool should cite a contemporary source like the Washington Environmental Health Disparities map to gain insight into vulnerable and potentially exposed populations.

Response 1.1

Thank you for raising this point. We are working on a suitable demographic information replacement from the [Washington Environmental Health Disparities Map](https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map)⁴. After we update our environmental justice criteria, we will update the SHARP Tool.

Comment 1.2

SL_Ex1 The “yes” and “maybe” categories do not mention documented releases and use analytical data to be a trigger for a yes or maybe. It is possible that a release occurred and was partially remediated (say to a 6-foot depth) and there is no visible sign of contamination at surface. A maybe selection should include some kind of documented release which allows future possibility of contamination.

Response 1.2

We appreciate your engagement on this topic. We designed SHARP to assess current site hazards.

The second “maybe” bullet under question SL_Ex1 should cover the situation you describe. The bullet states, “Testing information isn’t available or adequate enough to rule out an impact.” This definition applies when a release has been documented, but the available information is insufficient to confirm an impact, including where a partial cleanup was completed.

Comment 1.3

SL_Ex2 Selecting “no” (no evidence in surface soil or no surface release documented) raises the exposure level to “B”. Why would a positive outcome (absence of contamination) raise the exposure level? This seems counterintuitive.

⁴ <https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map>

Response 1.3

Question SL_Ex2 assesses whether people can currently be exposed through direct contact with soil. A “no” response means no complete human exposure pathway, so the exposure score should be less than “A”. Later questions address potential exposure for plants and animals at deeper soil depths, which can still result in an A or B score even if SL_Ex2 is answered “no”.

Comment 1.4

SL_Ex3 There is no apparent change in scoring (low criterion sensitivity) if one selects any of the three categories provided. Without point totals shown in each of the media tabs, it is difficult to assess the effect of an outcome on score (see also para 4 in the document, “Other comments”).

Response 1.4

Thank you for the comment. Question SL_Ex3 may appear to influence the score less than other questions because it focuses solely on exposure risks to plants or animals. The other soil exposure questions assess risks to both humans and ecological receptors, so they may carry more weight in some scenarios.

The scoring logic is complex. Question SL_Ex3 does not have standalone points.

Comment 1.5

General comment on exposure questions. There is nothing to assess either contaminant concentrations or chemical properties (ie; solubility, volatility, sorption) that would drive fate or transport of the contaminant which affects exposure risk to soil contaminants. While we recognize the thousands of chemicals this tool may assess/address, perhaps a table could be built like the chemical toxicity table and group chemicals by “high,” “medium,” or “low” designations for solubility especially when drinking water supplies are nearby. The chemical toxicity element and related questions should be retained as presented in the tool and the scoring preserved as is. Additionally, there is not a means of evaluating surface drainage features, manmade ditchlines (or abandoned/buried abandoned ditches) that could pose a risk either within the soil, groundwater or surface water/sediment domains. Some additional thought should be applied to this land feature as it poses multi-media risks. It is often possible to do forensic aerial photographic work in a Preliminary Assessment, and the tool could ask for that (historic photos/aerial photos) as a condition of evaluating this pathway.

Response 1.5

Thank you for the suggestion. Adding questions to assess contaminant concentrations and chemical properties is outside the scope of the current SHARP updates, but we may consider them for future updates.

SHARP can evaluate information on surface drainage features, if available to the SHARP assessor. The assessor considers the conceptual site model (contaminant location and estimated transport pathways) to support soil, groundwater, surface water, or sediment scoring.

Comment 1.6

SL_Sv6. The maybe category should be modified to be either/or but not both criteria. Soil contamination is usually measured at a specific point and the concentration may be higher or lower than a specified threshold. Given the uncertainty of a single sample or specificity at depth of sample and depth to groundwater, we urge Ecology to consider the uncertainty should be properly accounted for by making an “or” condition rather than the current “and.”

Response 1.6

We appreciate this recommendation. If one of the bullets under the maybe category is not true, and sufficient information is available, “yes” or “no” would be selected. We left the depth between soil contamination and groundwater general by design because of the unique situations at each site.

Comment 1.7

GW_Ex2. The 500 feet requirement stated in the “maybe” category seems arbitrary. Given the fate and transport of water soluble contaminants and withdrawal rates of well/pump systems found on the site or on neighboring sites, there must be an alternative screening value similar to what is provided in the yes category (ie 10 year Time of Travel Zone - TTz).

Response 1.7

A calculated Time of Travel zone does not exist for numerous groundwater wells across the state, including private wells. In these instances, using an arbitrary fixed radius around the wellhead is a commonly used method to assess potential impacts to a well. Our hydrogeologists recognize that a 500-foot radius is a commonly accepted value used for this type of assessment and determined it is appropriate for the SHARP Tool.

Comment 1.8

General comments. The tool does not account for any geological or hydrogeological conditions on site. This minimizes the exposure and severity risks associated with groundwater and the overall potential for soluble contaminant mobility, especially when contaminated sites are within reasonable distance to drinking water supplies and potentially “sharing” unconfined, or high transmissivity groundwater supplies. The importance of this site information for

groundwater – even if preliminary - cannot be overlooked as it can be a direct and high level adverse impact to human health.

Response 1.8

Geologic and hydrogeologic conditions are factored into the assessment through the groundwater and soil-to-groundwater questions, even without a standalone question.

Comment 1.9

When a municipal groundwater supply is within prescribed TTz, the finding of a B level exposure must be weighted high enough to influence a higher priority site scoring as it may pose a DIRECT threat to HUMAN health.

Response 1.9

This is an important clarification. Ecology takes drinking water and human health risks seriously and addresses groundwater exposure concerns quickly. Sites with potential municipal groundwater impacts are tracked separately from the overall score so they can be addressed properly.

Comment 1.10

Other Comments. The lack of tallying points either by media tab or in a summary tab makes it difficult to assess borderline/judgment calls the reviewer is making after the tool is filled out. While SHARP should be used as a “blind” scoring tool to reduce bias, it would be a more publicly transparent tool if points within individual media as well as total site scoring could be toggled on or off as the user prefers.

Response 1.10

Thank you for your viewpoint. Displaying cumulative scoring was eliminated early in SHARP development over concerns of introducing potential bias. Therefore, overall site ratings are calculated automatically only after all media tab questions have been answered. No overrides or adjustments are made to the overall points for a completed SHARP assessment.

However, we will be adding overall points and rating guide to the SHARP report for calculation transparency.

Comment 1.11

It would be useful to see the overall ranking of sites in a publicly available document or webpage (*much like EPA does in publicizing its Hazard Ranking System scores for National Priority Listed sites). This would help communicate the realities of limited funding available for

investigation and cleanup and better show the public the apportionment of funds toward sites that pose the greatest threat to human and environmental health truly have priority (and funds). We recognize the complexity of adding the funding piece in the same document/page, but we believe just releasing the ranking of these sites gives the public awareness of how something in their backyard is viewed in terms of potential risk (small or large). This would then allow the public a chance to speak to regulatory personnel about the “why” behind a site’s ranking and what kind of potential risk it poses to humans or the environment.

Response 1.11

Since the comment period closed, we created a publicly available [dashboard](#)⁵ for tracking Ecology’s progress toward completing SHARP assessments for all existing and newly reported contaminated sites.

The dashboard shows the current number of SHARP-assessed sites, overall SHARP scores, and the number of sites near vulnerable populations and overburdened communities. Dashboard data are updated daily.

Commenter 2 – Director: Downtown Camas Association

Comment 2.1

I'm a lay person who is not familiar with technical cleanup rating procedures so please forgive me if this is obvious--is the "Updates to the Site Hazard Assessment and Ranking Process (SHARP)" doc supposed to be for the lay person like me? If so, clearer descriptions for the process and what's included in the ratings (in the Points Calculation--see below) would be beneficial. Neither of the versions really tell me the process I'm commenting on so I don't know the extent of the impacts the changes would make.

There are asterisks between the media points below which typically means multiplying but at the end it says the points are summed? That could be more clear.

“Current Points Calculation

Currently, we calculate points for each media with the following formulas based on exposure score:

- For A’s: media points= $\text{ExpPts} * \text{SvPts} * \text{NonDSum} * \text{ExpPriority}$

⁵ <https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-process/assessing-contaminated-sites/sharp-dashboard>

- For B's, C's and D's: media points = $\text{ExpPts} * \text{SvPts} * \text{NonDSum}$
- The variables for the formulas are:
- ExpPts= convert exposure alpha scores "A-B-C-D" to "4-3-2-1", respectively
- SvPts = convert severity scores "4-3-2-1" to "0-1-3-5", respectively
- NonDSum = total number of non-D scores for all media
- ExpPriority = numeric order of exposure risk priority (9, 8, 7, 6, 5) (Indoor air (9), Groundwater (8), Soil (7), Surface water (6), Sediment (5))

The media points are then summed to get the overall site points."

Also--Is the length of time an industrial site has been operating included in the evaluation? Sites that were started before a certain date may have more risk due to lesser environmental requirements so should be rated differently.

Under the "Surface Water Ecological Risk" section, if this is meant to be for a lay person to understand, would need far less technical jargon.

Overall, this doc was hard for me to give good feedback on since it was hard for me to fully understand. If it's meant to be for all users, it should include more lay person language and descriptions. Perhaps it's really just meant for those in the know already.

Response 2.1

We appreciate feedback that helps us improve SHARP's transparency and clarity. We will add more information on our website about how SHARP ratings and points work and make SHARP reports easier to understand. Our goal is to reduce any confusion about the SHARP Tool.

Each media score is calculated by multiplying the converted exposure and severity scores, the non-D score total, and the media's exposure-risk priority. Scores from all media are then summed for the overall total.

Site age is not included so the scoring reflects current risk; site history is reviewed during the SHARP assessment, but only current conditions support the scoring.

We aim for accessible language but must retain some technical terms to maintain accuracy.

Commenter 3 - Caroline Mercury: Downtown Camas Association

Comment 3.1

I concur with the comments above. One would have to dig pretty deep to understand how overall points are determined. (I don't see overall points on the current Georgia Pacific Consumer Products and GPCBC document posted?) As for the current question being asked, the additional consideration given to surface water impacts is a good thing.

A better explanation of how SHARP is related to sites where activities are already in progress, such as this one with an AO, is needed.

Response 3.1

Thanks for your comment. Assuming "current question being asked" refers to the proposed addition of a surface water exposure risk question, thank you for your support.

For sites already under a legal agreement with Ecology for cleanup, like the GPCBC site, the first SHARP for the site will be completed midway through the cleanup process. Most sites under a legal agreement should have at least one SHARP available in the site file at this point. There are multiple ways we can use these SHARP results to continue to inform decisions and communicate current site status with the public. One is to use SHARP to reflect threats to people, plants, and animals in scoring criteria for our cleanup grants, for those sites that qualify for grant funding. Another is to use additional SHARPs for a site at designated points in the cleanup process to show site progress. For example, a SHARP completed at the end of the Remedial Investigation, when we have a full understanding of type and extent of contamination, is likely to resolve any B (possible) exposure scores from a SHARP completed earlier in the site's history. A SHARP completed after an interim or final remedial action, where contamination has been removed from the site, should reflect this in changes to exposure and/or severity scores. We commit to completing a site cleanup when we put a site under a legal agreement, and actions completed that lower a SHARP rating do not affect that commitment.

Commenter 4 – Alexandra Johnson: Duwamish River Community Coalition

Comment 4.1

SHARP prioritizes sites based on exposure pathways and toxicological risk, but does not fully account for cumulative harm, structural inequity, or Tribal sovereignty. As a result, it risks reinforcing historic patterns where Indigenous communities and overburdened communities wait longer for cleanup, even when harm is ongoing.

Expand the Definition of “Risk”

A. What SHARP does well

1. Evaluates exposure through standard pathways (soil, groundwater, surface water, air)
2. Uses conservative assumptions in some exposure scenarios
3. Prioritizes sites with clear human health risks

B. Where it falls short

1. Risk is largely defined as individual exposure, not community-level or cumulative harm
2. Does not systematically incorporate:
 - a. Multiple nearby contaminated sites
 - b. Co-location with air pollution, noise, heat, or industrial land use
 - c. Socioeconomic vulnerability (housing insecurity, language access, health disparities)
3. SHARP should not treat each site as an isolated problem. The result, while unintended, could rank sites located in EJ communities as a lower priority than they are in reality.
 - a. Sites like the Duwamish Valley, Lower Yakima Valley, Tacoma Tideflats, etc.

Include a Cumulative Impact Assessment

A. SHARP does not fully integrate:

1. Cumulative exposure across media
2. Multiple contaminants with similar health endpoints
3. Long-term stressors that amplify toxic effects (poverty, displacement, lack of healthcare)

- B. This is a major gap given WA’s statutory commitments to environmental justice through the CCA, HEAL Act, and other laws

Response 4.1

We do not include socio-economic factors in our overall scoring and rating system to ensure we do not minimize their importance. We use the socio-economic factors to prioritize our work and make decisions about cleanup. We are currently updating our policy on how we use SHARP, the presence of overburdened communities and vulnerable populations, and other factors to prioritize our resources. We anticipate this policy will be out for public comment before the end of 2026, and we hope you will also provide comments on that policy. We will consider future additions to SHARP to better flag sites in areas with multiple nearby contaminated sites.

Comment 4.2

Integrate SHARP with EJ Mapping Tools

- A. Washington Environmental Health Disparities (EHD) Map
- B. EJ indicators used in CCA and HEAL Act contexts
 - 1. SHARP as written does not formally weight these indicators in site scoring - uses them inconsistently or downstream, if at all

Response 4.2

To ensure we are meeting the statutory commitments Ecology we are working on updating the environmental justice criteria that are included in SHARP. Environmental justice indicators were intentionally kept separate from the SHARP ratings. This was done to prevent environmental justice concerns from being obscured by the technical characteristics of a site that are included in scoring.

Comment 4.3

Western Exposure Assumptions Undervalue Indigenous Lifestyles - Incorporate an Indigenous Lens into the Framework, Partner with Indigenous Nations

- A. SHARP currently heavily relies on standard EPA residential/recreational exposure assumptions, generic consumption rates for fish, shellfish, and plants.
- B. Missing subsistence fishing, hunting, and gathering practices; seasonal and ceremonial use of land and water; intergenerational exposure tied to cultural continuity.

1. This is especially problematic to be absent in sites containing aquatic ecosystems, sediment contamination, or floodplains and tidelands

C. Incorporate Indigenous consumption rates as the default, where applicable

Where Applicable, Embed Treaty Rights as a Core Priority Metric

- A. Explicitly elevate treaty-protected resources as a prioritization factor
- B. Automatically treat damage to usual and accustomed fishing areas as high-risk
- C. Score cultural harm alongside toxicological harm
- D. Treat Tribal impacts as partnered concerns, not legal or sovereign obligations

Consultation vs. Co-Governance

- A. Reflect a co-development or co-governance model, not a consultation model.
- B. Engages with Tribes before technical frameworks are set.
- C. Increase Tribal authority to shape exposure assumptions or scoring thresholds, and embed Indigenous knowledge in hazard ranking.

Response 4.3

In the last year, the Toxics Cleanup Program has worked to engage Tribes in a more effective and meaningful way. This includes providing Tribes with opportunities to become involved in site cleanup earlier in the process, allowing them more time for input during public comments, and meeting with Tribal technical staff on a regular basis to provide Tribes with information and offer an accessible platform to express concerns and communicate Tribal needs. In these meetings Tribal staff are encouraged to provide technical assistance for Indigenous resources such as consumption rates for fish, shellfish, and plants which can then be included in the assessment of the site (although they may not be explicitly visible within the SHARP itself – these would be used in the development of site cleanup levels). Fishing, hunting, and gathering information is currently used as often as possible for cleanup site timelines, and this improved engagement will allow Tribes to provide more detailed input of those cultural activities and impacts the cleanup process may have on them.

Comment 4.4

Prioritize Community Agency

- A. Create a formal mechanism for community-identified priorities to inform rankings that is more accessible than a public comment period
 - 1. Avoid placing the burden of proof on the impacted communities to demonstrate harm.
- B. Data gaps and limited sampling should become a reason for precaution, not necessarily delay.

Response 4.4

We will continue to evaluate how best to communicate with communities about SHARP and community-identified priorities moving forward. We agree that data gaps are a reason for precautions not necessarily delay.

Comment 4.5

Surface Water Ecological Risk

- A. “No: Surface water has been adequately characterized, and contamination was not found above cleanup or screening levels.”
- B. Clarify if this is only for onsite surface water or if it also includes receiving waters. Include both groundwater and saturated soils, and require consideration of pathways from soils to plants to herbivores.
- C. Clarify whether surface waters means: onsite or receiving; natural or built; and if runoff and outfalls are included.
- D. Prioritize presence of sensitive habitats and species, critical habitat, state and federal designated species, etc. (EPA also has a list https://rais.ornl.gov/documents/st1_4.pdf)

Response 4.5

The cleanup site is defined as everywhere contamination has come to be located following a release, which may include both surface water located on the same property as the release as well as receiving waters. To determine if receiving waters may be impacted, we consider multiple possible transport pathways, including migration of contaminated groundwater, direct runoff of contaminated waters, and erosion of contaminated soil. Built surface water and outfalls may not be included as part of surface water for all sites, but this determination is made on a site-specific basis.

Comment 4.6

Science is shaped by assumptions, and assumptions too often reflect dominant land-use norms. It goes without saying that these norms historically exclude Indigenous and frontline communities. Neutrality thus functions as structural bias, and we highly encourage you to develop a more equitable and community-integrated focus. We request not just a response to our update requests but also a period for revising the SHARP framework.

Response 4.6

We appreciate your feedback and will continue to seek input on SHARP as we make changes in the future.