



October 10, 2025

Casey Sixkiller
Director, Department of Ecology

Dear Mr. Sixkiller,

I am writing to express serious concern regarding any proposal or interpretation that would prohibit gravel pits and reclamation sites from accepting hydro excavation spoils.

Hydro excavation is a critical, safe method for exposing underground utilities. The resulting material is clean soil—not hazardous waste—and has been responsibly reused at permitted gravel pits for years.

Removing this disposal option would eliminate the only viable path for managing clean hydro excavation material. Treatment facilities are not equipped to handle this volume or type of soil and redirecting it would cause immediate disruption to infrastructure projects across Washington.

This change would impose unnecessary costs, delays, and operational challenges on municipalities, contractors, and utility providers who depend on efficient, lawful disposal methods.

I urge the Department to maintain the current permitting structure that allows gravel pits to accept and manage clean hydro excavation spoils.

Sincerely,

Signed by:

A handwritten signature in black ink that reads "Roy Novosel".

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Roy Novosel

Vice President of Engineering & Construction
Pacific Northwest Region
Comcast