

From: alyssaroyse@gmail.com <alyssaroyse@gmail.com>
Sent: Sunday, June 16, 2024 7:45 AM
To: Thompson, Tami (DOH) <tami.thompson@doh.wa.gov>
Subject: Petition for Rule Change

External Email

Hi Tami –

I've been engaged in marginally productive conversations with the Jefferson County Board of Health, trying to address illegal dumping of septic waste, for months now.

As a part time resident of Brinnon Washington, and a member of our HOA board for the Olympic Canal Tracts, I've talked to hundreds of people about the difficulty they have dealing with septic waste. Part of the problem – well, most of the problem – is that there is no good way to do it. There is, as you probably know, no sewage system in these beautiful rural areas. Most of them can't have septic systems because they are either too small, or too close to environmentally sensitive areas. Pumping small RV tanks weekly is cost-prohibitive. Sanicans are not a reasonable option because they are hard to keep clean and comfortable, especially if you're dealing with the weather that makes our area so beautiful. Not to mention that sanicans are hard to secure, and many of us don't feel safe having an open sanican on our property. As such, it's easier to simply dump waste on the ground, and that's what's happening. You can look at bacterial loads in local waterways for all the evidence you need that this is happening.

Nearly everyone I have talked to in Brinnon has said that the option to have an approved 200-500 external storage tank would be life-changing. (And I would personally work tirelessly to create a fund for subsidized pumping for those living in poverty, they deserve dignity and sanitation too!) There are many of those that simply slide under an RV, for safe storage, and would enable people to use their RVs – whether full time or as vacation getaways – in a way that is safe for both people and planet.

The Jefferson County BOH insists that state regulations do not allow this. Though I know many counties in Washington do, so I am not sure where the problem is.

In any event, they suggested that filing a petition for a rule change will require the state to address this within 60 days, so I'm hoping that – after months of only marginally productive conversation with JeffCo BOH – is true. This is such a serious issue, and there is such a simple solution that is already readily available. Even if it's only temporary, while we work to figure out how to serve rural communities indefinitely.

Please help!

I'm attaching the form that JeffCo BOH sent me. On the form it says to send to the appropriate state rules committee, and they offered me no guidance as to who that is. I'm hoping it's you, but if it's not, that you'll help me get to the right place.

I'm desperate to help both the people in my community and protect the natural beauty of it that I love so much. Thank you.

Alyssa Royse

(She / Her. Not into hugs.)

* [Rocket Community Fitness](#)

* [Rocket on Instagram](#)

* [Speaking and Consulting](#)



PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE

Print Form

In accordance with [RCW 34.05.330](#), the Office of Financial Management (OFM) created this form for individuals or groups who wish to petition a state agency or institution of higher education to adopt, amend, or repeal an administrative rule. You may use this form to submit your request. You also may contact agencies using other formats, such as a letter or email.

The agency or institution will give full consideration to your petition and will respond to you within 60 days of receiving your petition. For more information on the rule petition process, see Chapter 82-05 of the Washington Administrative Code (WAC) at <http://apps.leg.wa.gov/wac/default.aspx?cite=82-05>.

CONTACT INFORMATION *(please type or print)*

Petitioner's Name Alyssa Royse

Name of Organization Part time Resident of the Olympic Canal Tracts in Brinnon WA

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City Seattle State WA Zip Code 98118

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COMPLETING AND SENDING PETITION FORM

- Check all of the boxes that apply.
- Provide relevant examples.
- Include suggested language for a rule, if possible.
- Attach additional pages, if needed.
- Send your petition to the agency with authority to adopt or administer the rule. Here is a list of agencies and their rules coordinators: <http://www.leg.wa.gov/CodeReviser/Documents/RClst.htm>.

INFORMATION ON RULE PETITION

Agency responsible for adopting or administering the rule: WA State / Jefferson County Board of Health

1. NEW RULE - I am requesting the agency to adopt a new rule.

Allow secure external storage of septic waste that can be pumped by certified pumping companies.

The subject (or purpose) of this rule is: _____

Currently, it is difficult and cost prohibitive for people without septic systems to manage their waste. This results in dumping directly on the ground. This is impacting both ground water and local waterways.

The rule is needed because: _____

This would be life changing for people who live in RVs and off-grid, as well as for people who have stationary RVs on vacation property that they use recreationally.

The new rule would affect the following people or groups: _____

2. AMEND RULE - I am requesting the agency to change an existing rule.

List rule number (WAC), if known: I don't know, but Jefferson County BOH said it's a state issue, so I'm trying.

Allow for external (above or in ground) storage of septic waste in APPROVED containers of at least 200 gallons, with a valid pumping contract. This is legal with sanicans, but those involve going outdoors, are unsafe and inconvenient.

I am requesting the following change: _____

Too many people simply dump septic waste on the ground because safe and sanitary solutions aren't allowed, and they don't want sanicans.

This change is needed because: _____

A HUGE reduction in people dumping septic waste directly on the ground.

The effect of this rule change will be: _____

The rule is inconsistent. Mason county allows external storage, Jefferson does not. We need this in order to reduce illegal dumping, and allow more people to use their property in a safe and sanitary way.

The rule is not clearly or simply stated: _____

In the Olympic Canal Tracts the lots are FAR too small for septic, and sanicans are inconvenient. So people dump. Allowing large storage, under RVs, and such, would be life-changing. People want this.

3. REPEAL RULE - I am requesting the agency to eliminate an existing rule.

List rule number (WAC), if known: _____
(Check one or more boxes)

Allowing for external storage of septic waste, in approved containers, would reduce the amount of septic waste that is dumped directly on the ground. For people who use RVs either as permanent residents due to poverty, or recreationally on their own land, the small storage isn't enough. But frequent pumping is cost prohibitive.

It does not do what it was intended to do.

Sanicans are an option for some people. But for many, they aren't. Sanicans are harder to keep clean and secure, not to mention they often involve going out in the weather. They can also be tipped over by vandals, which makes everything worse.

It is no longer needed because:

It imposes unreasonable costs:

Meanwhile, frequent pumping of small RV tanks is expensive.

The agency has no authority to make this rule: encourage safe septic practices. It would be safer, simpler, more convenient and feasible for many people.

It is applied differently to public and private parties: If Sanicans are allowed, there is no good reason for even safer external storage not to also be allowed.

It conflicts with another federal, state, or local law or rule. List conflicting law or rule, if known: Whether it was the plan or not, more people are moving to remote areas permanently, or spending more time there because remote work is possible. Given that full sewage systems are not feasible, and in many cases septic is not possible, this is truly the only responsible way to

It duplicates another federal, state or local law or rule. List duplicate law or rule, if known: protect both people and the environment. This would eliminate the primary reason that people dump their septic waste illegally.

Other (please explain): _____
PLEASE help us protect our beloved environment by allowing the safe, affordable, simple storage of septic waste that can be pumped and managed by companies equipped to do so.

I WOULD LOVE TO TALK TO ANYONE WHO CAN HELP WITH THIS! I've been working with my neighbors and it matters so much to us. I am putting a lot of time into trying to solve this problem, but I need help!