

10/8/15

Office of Clark County Councilors
David Madore, Chairman
Tom Mielke
Jeanne Stewart

Dear Councilors,

The Clark County Technical Advisory Committee on Septic Systems (TAC) is a group of industry professionals including Designers, Installers, Operation & Maintenance Providers, as well as members of the Onsite Staff at Clark County Health Department. We meet quarterly to offer guidance and direction regarding local health code policy, and make suggestions as to how to improve the environmental health unit program. **This letter is written in behalf of the private sector portion of the TAC, in response to some inaccuracies in the Draft EIS.**

Specifically, the inaccuracies are around figure 2-3 which depicts nearly the entire county as Very Limited with regard to Soil Limitations for septic systems, as well as several statements implying additional rural lots will reduce the water supply.

The USGS Soil Survey map from 1972 does indeed list at that time, a majority of the county as limited with regard to soil adequacy and slopes. However, this is not accurate at this time for the following reasons:

- Old maps derived from 1970s technology should have no place in planning in the 21st century. These maps have not been updated by USGS.
- The vast majority of soils in Clark County have silt loams and clay loams which under current methods, perform very well with regard to sewage treatment. If the maps in the EIS were derived from the USGS soil survey from 1972, the focus at that time may have been more on "disposal" as opposed to "treatment". Under old methods a very gravelly soil would be preferred because of its ability to discharge rapidly. Science has found this to not be as desirable due to the lack of soil treatment, and the increase in nitrogen loading to the aquifers, etc.
- Currently, there are many options utilizing advanced technology that allow us to place septic systems within areas even with poor soils.
- Washington's codes are far superior to many neighboring states with regard to protecting the groundwater. This includes graduated soil treatment requirements, allowing for simple septic tank / drainfield systems in areas with deep well drained soils, ranging to very advanced treatment systems in areas with poor soils.
- Each individual septic site is carefully evaluated in order to determine the best type of system based on soil type, depth to seasonal water table or other restrictive barriers. All septic systems are individually designed by licensed Engineers or Designers, and reviewed by the county health department.

- All septic systems are designed for either soil treatment, or alternative treatment in order to prevent sewage from surfacing and / or contamination of aquifers and waterways.
- Proper setbacks are established in the code to prevent contamination of waterways.
- Septic systems do a wonderful job of recharging the aquifers.
- All new septic systems are held to a high standard, which, using the soil as a final dispersal and treatment component cleans the sewage to a much higher standard than the effluent limits for sewage treatment plants, which dump their lesser treated waste directly into the area rivers.

There currently are over 30,000 septic systems in the county, of which the majority of these have been installed using prior codes. The more recent systems utilize the newer technologies and are much more reliable as well as have built-in alarms and protections in place to guard against failures and public health issues. The additional lots on septic systems will have to meet these newer standards, and will be also well maintained, resulting in an excellent recharge of the areas groundwater.

Clark County has been a national model with regard to septic maintenance and compliance. Currently the industry has the energy and momentum, as well as the public's confidence to properly maintain the individual systems in place in the county, and is well poised to service any additional systems that may be installed according to the codes in place.

Unfortunately, the current thinking in the Planning Community tends to be discriminatory toward onsite septic: This is a fundamental issue related to misinformation. Properly constructed and maintained septic systems are far better for the environment as a whole than the "big pipe" sewer model, which frequently allows for much higher levels of waste strength to enter the region's rivers while not recharging the area's groundwater.

Septic systems do a great job of recharging the areas groundwater. There is misinformation regarding this in the EIS as well. Rural lots on septic recharge all their used water back into the ground, while waste from homes on the public sewer system enter the river after treatment, even though the CPU wells often draw water out of the same aquifers that the rural lots do.

In summary, this industry group recommends that the county correct the EIS to reflect the bullet points above.

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