

**STATEMENT OF THE ASSOCIATION OF OHIO PEDOLOGISTS
IN OPPOSITION TO AMMENDMENT TO HB 96 PAGE 2561 C -- ‘The director shall not
adopt rules under this chapter requiring a soil evaluator or soil scientist to evaluate
the soil type and slope with respect to a sewage treatment system or a proposed
sewage treatment system’**

BEFORE THE SENATE HEALTH COMMITTEE
Sentor Stephen Huffman, Chair

Chairman Huffman, Vice Chair Johnson, Ranking Member Liston, and member of the Senate Health Committee: Thank you for the opportunity to present opponent testimony on behalf of the Association of Ohio Pedologists.

My name is Matt Deaton. I am here to lend my voice and speak on behalf of the Association of Ohio Pedologists and the soil scientists that are opposed to the HB 96 Amendment submitted by Representative Peterson. I had the opportunity to speak directly with Representative Peterson, and I do appreciate his desire to reduce costs associated with sewage treatment systems. That is my goal as well. However, I am confident that this amendment will have the opposite effect, increasing the cost of systems by thousands of dollars, as opposed to saving the minimal cost of the soil evaluation. It has been suggested by Representative Peterson that the USDA-NRCS Soil Survey Maps is a suitable replacement for soil evaluations.

I have been a soil scientist for 24 years in Ohio working in both government and private practice. Most of my career was in the government where I worked on the USDA cooperative soil survey, mapping soils, and providing data that goes into these surveys. I know exactly how these soil surveys are made. Using the USDA Soil Survey instead of an onsite investigation would go against the exact disclaimers used in the USDA soil survey.

The following is a statement directly from the survey.

The objective of USDA soil mapping is not to delineate pure map unit components; the objective is to separate the landscape into landforms or landform segments that have similar use and management requirements. Each map unit is defined by a unique combination of soil components and/or miscellaneous areas in predictable proportions. Some components may be highly contrasting to the other components of the map unit. The presence of minor components in a map unit in no way diminishes the usefulness or accuracy of the data. The delineation of such landforms and landform segments on the

map provides sufficient information for the development of resource plans. If intensive use of small areas is planned, an onsite investigation is needed to define and locate the soils and miscellaneous areas.

The soil surveys are like a weather forecast. It is a predictive model of what could reasonably be expected based on data collected. It is not an exact identification of what soil is at an exact location.

The USDA soil surveys were mapped at large scales, generally 1: 12000. That would be the equivalent of creating a map from 2.25 miles in the sky looking down at approximately 2,200 acres at one time and delineating the soils on the earth's surface. As a result, any soil map unit that is less than 2.5 acres isn't included as it is too small to show at this scale. Given that some building lots are 1 acre in size, several building lots in an area could be completely precluded from the actual soil data for that site. Can you imagine putting together a plan for your largest investment from 2.25 miles away?

The following is a statement directly from the survey.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

The variation of soil characteristics that are critical to the functionality of a sewage system are offered in large ranges. Specifically, water tables and dense materials are given in 12 to 20 inch ranges. That is the difference between needing a mound system and a leach field. As a result, using the soil surveys will require larger, and more elaborate sewage systems, thereby increasing the cost of the sewage systems.

Additionally, USDA soil surveys don't consider areas that have been disturbed, or compacted, that would result in immediate failure of a sewage system. The only way these disturbances can be identified is through an onsite evaluation.

I personally have worked on and witnessed several sewage systems that were installed without using an onsite soil evaluation. In some of these cases, the systems lasted less than 8 years. Typically, the cause of failure was that the lines were installed in dense materials or installed in the water table. This cost the homeowners 15 to 20 thousand dollars to install a new system, in addition to the original cost to install. Had they taken into consideration the actual soils of the site, this would have been avoided.

Most states require soil evaluations for onsite sewage treatment. Some states, including our neighbors, IN, PA, WV and KY require excavator pits in addition which adds \$500 or more to the soil evaluation. Ohio does not require this. OAC 3701-29-07 was written in a way to reduce the cost burden on the citizens while still providing an essential requirement so that a sewage system can be properly sited and designed based on the conditions on site. This is the most cost-effective way to site a system. The average cost of a soil evaluation is between 1 and 2 percent of the total cost of a sewage system in Ohio. We believe this is a small price to pay to guarantee a system that is sized properly and will function properly.

Conclusion

In conclusion, we see only harm from this amendment and see no benefit to the citizens of Ohio if this amendment passes. The current code has been in place for over 10 years and has worked effectively at reducing the number of system failures by evaluating the soil onsite.

Thank you for the opportunity to appear before you today. I am happy to answer any questions you may have.