

May 14<sup>th</sup>, 2025

The Honorable Stephen Huffman, Chairman  
Senate Health Committee  
1 Capitol Square  
Columbus, Ohio 43215

Thank you for the opportunity to provide written testimony concerning House Bill 96. I am opposed to language on page 2,561 that states the following:

(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.

Not having a soil investigation by a soil scientist or soil evaluator for on-site waste disposal would be similar to forgoing a home inspection when buying a house.

The USDA (United States Department of Agriculture) soil survey can't take the place of an on-site evaluation by a soil scientist. Most soil surveys are 30 years old or older and have had very few updates. A recent example I encountered involved a soil shown as a Coshocton in the soil survey that should have a seasonal high water table from 12 to 24 inches below the surface. Conducting an on-site soil evaluation revealed a seasonal high water table from 1-6 inches below the surface with compaction. The topsoil and much of the subsoil had been previously removed to be used as fill somewhere else on the property. This change was not reflected in the soil survey map. A treatment system designed based on soil survey information would have undoubtedly failed and then need replaced with yet another expensive system.

It's not uncommon at all for soil scientists to find soil conditions much different than what the soil survey shows, the scale of the soil survey was never intended to replace an on-site evaluation, but to provide general information. That is even stated in the soil survey.

Without on-site evaluations, septic system failure rates will certainly increase, impacting water quality, and possibly drinking water as wells and septic systems are typically located in fairly close proximity.

The cost of an on-site evaluation is a very small fraction of the total cost of a septic system but ensures that the septic designer has accurate soil information for treatment calculations.

Important policy changes like this should be undertaken through open discussions with Health and Soil professionals in an open format, and not tucked into an unrelated budget bill.

For these reasons, I am opposed to the policy changes proposed in HB 96 that would inhibit the ability of soil scientists and soil evaluators to evaluate soil type and slope with respect to sewage treatment systems.

Sincerely,

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