



April 11th, 2018

House Natural Resources Committee  
Lansing, MI

**Re: HB 5752, 5753**

Committee Members:

Michigan Environmental Council, a coalition of 65+ member groups statewide, has long advocated for a statewide septic code to address ongoing water quality issues in Michigan. In 2015, MSU researcher Joan Rose conducted a study that found human e. coli in 64 of 64 rivers she tested in Michigan. This is an issue that is long overdue in being addressed, and we support the concept of these bills. We also have some questions over how this new program would be implemented in its current form.

Our greatest concern is around the distinction between an evaluation and an assessment. This seems to be an unnecessary distinction and would only hinder consumer confidence in the program and limit the environmental benefits. We would support removing the assessment and instead have a 10 year evaluation unless the circumstances set forth in the current evaluation language are met.

The current assessment language does not account for a full inspection and can be done by septic haulers licensed under part 117, who would not have the same training set forth for inspectors and health departments in the bill. This means that a consumer may not get the full benefit of a septic evaluation, as an assessment focuses on a tank not a drain field. Additionally, the lessened language of the assessment means that a site that never triggers an evaluation may never see a full and robust inspection of the drain field and continue to cause environmental concerns.

We look forward to continuing work with the sponsors, the DEQ and the committee to craft a septic code that truly protects our public health and waters.

Sincerely,

Sean Hammond  
Deputy Policy Director  
Michigan Environmental Council