



July 2, 2026

Washington State Department of Ecology
Attn: Nathan Woods
Southwest Region Office
Olympia, Washington

RE: Clark County Public Health Review of Burnt Bridge Creek Advance Restoration Plan

Dear Mr. Woods,

Clark County Public Health (CCPH) appreciates the opportunity to submit comments regarding our role in the Burnt Bridge Creek Advance Restoration Plan (ARP). Our detailed feedback is recorded directly within the document via tracked changes, and we have also attached a table of specific review comments.

Additionally, we have identified several overarching themes that we would like to highlight and clarify for mutual understanding:

- **Human Wastewater as Non-Point Bacteria Sources:** While On-Site Sewage Systems (OSS) are identified as a source of human-based bacterial pollution or nutrient loading, they are not the sole sewage infrastructure source in the Burnt Bridge Creek watershed. Reframing this section to encompass all sewage infrastructure—including private sewage laterals, municipal sewer lines, connection points between private and municipal lines, and OSS—would provide a more accurate representation of potential non-point bacteria sources.
- **Sewer Connection Promotion:** The ARP currently identifies CCPH as a partner in promoting public sewer connections. Please note that CCPH does not actively promote or incentivize property owners to convert from OSS to public utilities. Instead, our agency provides technical assistance and financial aid information so property owners can make informed, independent decisions.
- **Sewer Connection Requirements:** The draft indicates that CCPH will require the replacement of septic systems with sewer connections. While CCPH is the primary local agency that determines when an OSS must be repaired, replaced, or

abandoned and connected to public sewer, our authority is strictly limited by specific criteria under the Clark County Code. A watershed-based mandate to connect to the sewer system is not supported by current local ordinances.

We value the opportunity to review and comment on the ARP, and we look forward to collaborating on a final plan that accurately reflects our agency's scope and regulatory framework. If you have any questions, please contact Sean Hawes at Sean.Hawes@clark.wa.gov.

Yours in partnership,

/s/Nikki Guillot

Nikki Guillot, CPH
Program Manager
Clark County Public Health