

Brian,

I hope this email find you well. On behalf of Vermonters Against Toxic Sludge I am writing to submit my comments regarding CEDO's "Draft Housing Action Plan". I am encouraged by your office's specific approaches to the housing issue; however, I am struck by the absence of any mention of so-called "performance based codes", particularly as they relate to sanitation and reuse.

Given the large volume of contaminants that the city, residents, and business located within Burlington together contribute to Lake Champlain (in the form of nutrient loading, industrial toxics and fine particulates via CSO's, chemical laden effluent, urban runoff, etc.) isn't it way past time that CEDO began internalizing and promoting more sustainable alternatives to our legacy systems? Moreover, even a cursory examination of the knock-on effects of the status quo when it comes to how we manage human excreta and washwater and how we conserve (or don't conserve) and source water highlights the massive costs to our community that our legacy systems represent. These costs directly and indirectly impact housing affordability, community safety and the long-term sustainability of our city.

Here's a little more about what performance based codes are (by way of a wonderful advocacy project currently underway in Oregon):

<http://www.recodenow.org/portfolio/2013-advocating-for-performance-based-codes/>

And leaving aside the obvious (i.e. the TDML debacle) what follows are two more reasons why Burlington's development office (and code enforcement office and Public Works Department, etc.) all need to care about the serious known deficiencies with sewers, wastewater treatment plants and water delivery systems.

First, based upon a recent late 2013 decision by the Chittenden Solid Waste District (CSWD) all of the sludge removed from Burlington's three wastewater treatment plants (an amount that in 2013 totaled 16.3 million pounds^[1]) is now being exported to upstate New York State where, following exposure to a limited exothermic reaction, it is ending up on farmland with zero restrictions regarding where or in what quantity it can be dumped; this even though the EPA itself is fully aware of its toxic nature:

<http://water.epa.gov/scitech/wastetech/biosolids/tnsss-overview.cfm>

As a result of the above, some might say that we are externalizing the costs of our society on people and ecologies located in another state.

Second, one month ago the EPA's Inspector General issued the following damning report which declares that effluent from WWTPs is highly toxic and woefully unregulated:

<http://www.epa.gov/oig/reports/2014/20140929-14-P-0363.pdf>

And third, the ways in which we in the United States source and deliver drinking water to our communities is in jeopardy:

http://www.johnsonfdn.org/sites/default/files/reports_publications/CNW_NavigatingToNewShoresFullReport.pdf

Could we be doing more? Well, presently other cities (and states for that matter) are eating our lunch when it comes to addressing the need for sustainable sanitation and reuse. For instance, why doesn't Burlington have a page like this on its website?

<https://www.eugene-or.gov/index.aspx?NID=877>

Sadly, a search of Burlington's actual website turns up zero (ZERO!) results for the following search terms: "ecological toilet", "dry toilet", "urine diverting toilet", "waterless urinal", "greywater system" (and "graywater system"). Meanwhile, a search for "composting toilet" turns up a single mention^[ii] - and this only in relation to a Burlington Board of Health agenda item; itself relating to a single isolated zoning request. Likewise, while a search for "rainwater harvesting" produces three distinct hits, two^{[iii],[iv]} occur in the form of public comments and the third^[v], a solitary and incidental mention, appears in a City Council resolution pertaining to a rather mundane amendment to a contract between the City and a firm named "Town Planning and Urban Design Collaborative". And because it may help shed some light on the relative state of awareness of these technologies amongst the public (and, by extension, within government), it should be pointed out that one of the aforementioned public comments refers erroneously to rainwater harvesting as being an, "...ancient technique enjoying a revival in popularity," a qualification that seems to utterly overlook the fact that this practice is popular the world over and has, in some locales, been in use continuously for centuries.

Here's another example of a state that's way ahead of Vermont (and, by extension, Burlington) in normalizing these sustainable technologies [please don't be misled by the title, the following document issued by the State of Washington actually describes various kind of dry toilets and onsite greywater systems suitable for residential sites]:

<http://www.doh.wa.gov/Portals/1/Documents/Pubs/337-016.pdf>

And much closer to home, here's what's on the books in Massachusetts:

<http://www.mass.gov/eea/agencies/massdep/water/wastewater/regulatory-provisions-for-compost-toilets-and-greywater.html>

So, in closing, I urge you and others in your office to spend some time familiarizing yourselves with the alternative technologies that exist and also to brainstorm the various ways in which CEDO can assist in promoting and normalizing same in order to further address the impediments to housing affordability in Burlington.

Thank you for the opportunity to comment and please feel free to contact me to discuss any of the above. Also, our facebook page (follow the link in our name below) provides a wealth of knowledge concerning the problems that Burlington is facing and the low cost and effective solutions that exist to address these problems.

Kai

Kai Mikkel Førli

[*Vermonters Against Toxic Sludge*](#)

[i] <http://www.burlingtonvt.gov/assets/0/122/318/303/720/58f2c01d-d956-4cb8-9814-f09caf57a923.pdf>

[ii] <http://www.burlingtonvt.gov/docs/1576.pdf>

[iii] <http://www.burlingtonvt.gov/assets/0/122/318/302/498/549/577/0d0693c6-b498-4e88-9724-71f2bce85e05.pdf>

[iv] <http://goo.gl/qxls4c>

[v] <http://www.burlingtonvt.gov/assets/0/122/318/360/815/816/1584/2355/e0b03b7c-1553-4126-94cd-021214d83f60.pdf>