



**Westport Weston  
Health District**

August 10, 2010

Laurence Bradley, Director  
Westport Planning & Zoning Department  
Westport Town Hall  
110 Myrtle Avenue  
Westport CT 06880

**RE: Text Amendment #621/P&Z Appl. #10-037, Modifications to 5-2, 6-2.2, 11-6, 12-6, 13.6, 14-6, 16-6, 45-35.3 and Appendix D regarding coverage.**

Dear Mr. Bradley,

Responsive to the Planning and Zoning Transmittal dated August 10, 2010, The Westport Weston Health District has the following comments:

**The Health District has no objection to the passage of the proposed amendments.**

- Please note that for properties not serviced by the public waste water collection and treatment system, but rely on individual on-site subsurface wastewater disposal systems (septic systems) in areas outside the "blue line" where public sewer extensions are not planned, additional attention to the need for an area to install/expand/repair septic systems may be warranted.

Where public sewers are not available, Connecticut Public Health Code Section 19-13-B100a regulates building conversions, changes in use, building additions, swimming pools, garages, and other accessory buildings. Generally speaking, this code requires that prior to any such work, the local director of health must determine that a code-complying area exist on the lot for installation of a subsurface sewage disposal system. Other Public Health Code regulations establish separation distances and setback requirements from septic system components, wells, waterlines, buildings, etc.

Areas in a town where the cost of extending public sewers may be deemed undesirable due to cost of construction, limited flow, or other factors, the emphasis becomes making sure that on-site subsurface waste disposal systems remain a viable long term environmentally sensitive means of waste water disposal. Since on-site, subsurface basically involves the land surface and the soil below it, perhaps this area should also be considered as part of the overall coverage requirements, or at least some percentage of it.

In accordance with the Zoning Regulations, decks, driveways, patios, pools, tennis courts, and terraces are all recognized as having potential to impact local water quality. In un-sewered areas, septic systems clearly have a potential significant impact for the positive (ground water recharge) and negative (sewage contamination of surface waters).

There has been a trend for ever increasing house size with a multitude of external amenities such as swimming pool, tennis courts and the like. Similarly, larger houses have been found to have increased water usage which has resulted in the need to increase the primary and reserve septic areas. It is increasingly becoming difficult to meet the desires and/or needs of homeowners who purchase large homes and want all the amenities, particularly on lots less than one (1) <sup>acre</sup> in size. When one subtracts wetlands, steep slopes, and areas with ledge rock from that which is considered usable land, sometimes there is not a lot of acceptable area left.

The reserve septic area is greatly unappreciated (until it is needed) and keeps getting "squeezed " in between all the outdoor amenities. Yet, it is one of the most critical components of an effective on-site subsurface wastewater management plan. Even though the septic area is underground and cannot be seen, it consists of several structures (septic tank and leaching structures, either plastic or concrete) that take up space, and cannot be used for other purposes

In considering property coverage regulations and the need to protect local water quality, avoid the extension of public sewers, or expansion of the Town's wastewater treatment facility, please consider on-site subsurface wastewater disposal systems, or at least a percentage of the area needed for their installation, in your calculations.

Should you have additional questions or would like to discuss this matter in more detail, please feel free to contact me directly.



Mark A.R. Cooper, Director of Health  
Westport Weston Health District

c: Board of Health

# Building and Total Coverage Comparison to Other Towns

	FAIRFIELD	DARIEN	NEW CANAAN	WESTON	WILTON	WESTPORT EXISTING	WESTPORT PROPOSED
<b>Building Coverage</b>	None	20% in All Zones	Sliding Scale by Lot Size up to 1 acre 8% for Lots over 1 Acre	None	10% in 1 Acre Zones 7% in 2 Acre Zones	15% in A & B Zones None in AA & AAA Zones	15% in All Zones
<b>Total Coverage</b>	10% in 1 & 2 Acre Zones 15% in 1/2 Acre Zones	None	None	15% in All Zones	15% in 1 Acre Zones 12% in 2 Acre Zones	25% in AAA, AA & A Zones 35% in B Zones	25% in AAA, AA & A Zones 35% in B Zones

Westport Zones by Size  
 AAA = 2 Acre  
 AA = 1 Acre  
 A = 1/2 Acre  
 B = 6,000 SF