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To:
Monroe Planning and Zoning
7 Fan Hill Road
Monroe, CT 06468

Re: Concerns Regarding Proposed Subdivision and Use of Independent Wells (Stevenson / Cottage Street Area)

Dear Members of the Commission,

I am submitting this comment regarding the proposed subdivision in the Stevenson area, which includes the installation of eight (8) independent private wells and associated septic systems across clustered residential parcels. The configuration presents a series of cumulative environmental and public-health risks that merit careful technical review under both state and local standards.

The proposed reliance on individual wells creates overlapping cones of depression within a shared bedrock aquifer, increasing the potential for long-term drawdown, interference, and diminished yield for existing residential wells. Coupled with eight on-site septic systems, this pattern significantly heightens the likelihood of groundwater contamination in an area already characterized by shallow soils, high water tables, and limited percolation capacity. The Connecticut Department of Public Health (Section 19-13-B102) and CT DEEP Guidance for Subsurface Sewage Disposal in Aquifer Protection Areas both require that cumulative impacts to groundwater quantity and quality be fully evaluated for clustered developments.

In addition, the proposal for a single deep well drilled to a depth of approximately 200–300 feet through bedrock warrants particular scrutiny. Under the Connecticut Well Drilling Code (Conn. Gen. Stat. § 25-128 et seq.) and DPH Circular Letter #2019-33, wells penetrating bedrock must demonstrate sufficient sanitary seal depth, casing grouting, and isolation from upper fractured zones that may contain contaminants or surface infiltration. When located within 75 feet of wetlands or drainageways, as is the case on portions of the subject site, the well must also comply with the minimum separation distances and isolation requirements outlined in DPH Technical Standard #19. Improper sealing or cross-connection between shallow and deep fractures can permit vertical migration of nitrates or bacteria, compromising both the proposed supply and adjacent domestic wells. Furthermore, deep bedrock wells in low-yield formations can create significant localized drawdown, potentially altering groundwater gradients that sustain nearby wetlands and vernal pools. For these reasons, any approval should be conditioned upon submission of a

licensed hydrogeologist's report detailing borehole geology, yield testing results, static water levels, and well construction specifications in accordance with DPH and DEEP standards.

Further, Section 7.4.3 of Monroe's Inland Wetlands and Watercourses Regulations requires the Commission to consider "the cumulative impact of reasonably related activities" on wetlands and watercourses. Multiple uncoordinated withdrawals can alter the hydrologic balance supporting nearby vernal pools, wetlands, and recharge areas. Without a centralized water system, there will be no mechanism for coordinated monitoring, data reporting, or mitigation if drawdown or contamination occurs.

For these reasons, I respectfully urge the Commission to require a hydrogeologic impact assessment and nitrate loading analysis prior to any approval, and to consider whether a community water supply or alternative design is warranted to protect both public health and the area's sensitive wetland ecosystem.

Thank you for your attention to this important matter.

Sincerely,

Bryant Abbott