

APPLICATION FOR SPECIAL EXCEPTION/)	STATE OF CONNECTICUT
SITE PLAN APPROVAL)	
804 FOUNTAIN STREET)	
)	BEFORE THE TOWN OF
)	WOODBRIDGE TOWN PLAN
)	AND ZONING COMMISSION
<u>APPLICANT: ANGELO MELISI</u>)	

May 30, 2025

RECEIVED

VERIFIED PETITION FOR INTERVENTION
PURSUANT TO CONN. GEN. STAT. § 22a-19

MAY 30 2025

Land Use Agencies
Town of Woodbridge

Whereas, The Woodbridge Land Trust, Inc. is a 501(c)(3) nonprofit corporation whose purpose is to conserve and preserve the natural resources of the Town of Woodbridge, including wooded and open land and all other water and mineral and rights and interests therein, and scenic and historic buildings, sites and locations therein for the benefit of the general public and posterity, and to promote and encourage the education and interest of the public generally in all of the purposes of the Corporation; to extend such conservation and preservation to all plant and animal life and to further the recreational use by the public of the outdoors with due regard to conservation of natural resources, and

Whereas, The Woodbridge Land Trust, Inc. owns property located at 816 Fountain Street, Woodbridge, CT, and

Whereas, said property is bounded to the west of the property known as 804 Fountain Street, and

Whereas, the property located at 804 Fountain Street is the subject of an application for special exception and site plan approval to the Town of Woodbridge Plan and Zoning Commission, and

Whereas, if approved, the application for special exception and site plan is reasonably likely to cause harm to the interests of The Woodbridge Land Trust, Inc. as an abutting property owner, and

Whereas, the application for special exception and site plan is reasonably likely to have the effect of unreasonably polluting, impairing or destroying the public trust in the air, water or other natural resources of the state.

Now therefore, The Woodbridge Land Trust, Inc. (WLT), acting by the undersigned, Bryan H. Pines, its President, duly authorized, hereby intervenes in the above-captioned proceeding as an

abutting property owner and pursuant to the Connecticut Environmental Protection Act of 1971 (CEPA); Conn. Gen. Stat. § 22a-19(a)(1), which provides in part:

“In any administrative, licensing or other proceeding, and in any judicial review thereof made available by law, the Attorney General, any political subdivision of the state, any instrumentality or agency of the state or of a political subdivision thereof, any person, partnership, corporation, association, organization or other legal entity may intervene as a party on the filing of a verified pleading asserting that the proceeding or action for judicial review involves conduct which has, or which is reasonably likely to have, the effect of unreasonably polluting, impairing or destroying the public trust in the air, water or other natural resources of the state.”

1. The Town of Woodbridge Town Plan and Zoning Commission (“TPZ”), as authorized by statute, is the agency authorized to review applications seeking special exception and site plan approval in accordance with the Town’s Zoning Regulations.
2. Angelo Melisi (the “Applicant”) has submitted an Application to the TPZ for Special Exception/Site Plan Approval for the development of a 4 story, 96-unit apartment building at 804 Fountain Street, Woodbridge, CT (the “Property”).
3. A public hearing to consider the Application is scheduled for June 2, 2025, and the TPZ has been asked by the Applicant to approve its Application to permit the proposed development of the Property.
4. The Application involves conduct which is reasonably likely to have the effect of unreasonably polluting, impairing, or destroying the public trust in the air, water or other natural resources of the State for the following reasons:
 - a. The Application proposes significant alteration to the topography of the Property leading to the destruction of second growth forest, including many large healthy trees, and wildlife and their habitat.
 - b. The Application’s stormwater management system will not adequately reduce non-point source pollutant loads which will result in increased pollutant loads being discharged to downgradient regulated wetlands and watercourses, and associated ecosystems.
 - c. The Application, with its significant increase in intensity of use of the Property, and inadequate proposal for management of stormwater runoff, is reasonably likely to adversely impact groundwater in the area, including nearby wetlands, the West River, the Yale Nature Preserve, onsite wildlife, and wildlife habitat, as well as the public health and safety.
 - d. The Application, with its increase in intensity of use on the property, significant noise, light, and air pollution, increased traffic and congestion is reasonably likely to adversely impact wildlife, wildlife habitat, as well as the public health and safety.

- e. The Application removes a densely forested rocky hillside that serves as a broad buffer protecting the ridge crest and Bishop's Pond, owned by the Woodbridge Land Trust, from invasive species. The hillside forest also filters air pollutants and muffles noise pollution associated with a major transportation corridor.
- f. The Property contains a pristine ridge crest with multiple exposed bedrock outcrops that is geologically, mineralogically, and botanically interesting and diverse, with high potential scientific and educational value and outstanding aesthetic value.
- g. The Application calls for the removal of a large amount of this bedrock. Blasting needed to accomplish this task will adversely affect amphibians and reptiles residing in and around Bishop's Pond. Blasting of this type of rock is also likely to impact underground flow pattern that could have negative hydrologic effects on wetlands, the pond, and on drinking water wells in the neighborhood.
- h. The proposal for a 4 story, 96-unit apartment building with 145 parking spaces is reasonably likely to degrade visual quality through significant alteration of the natural and scenic features of the property.
- i. There are other feasible and prudent alternatives to the Applicant's proposed site plan including, but not limited to, (i) limiting the height to 2.5 stories, so that the building does not loom over the existing single family neighborhood and mar the aesthetics of the ridge; (ii) reducing the number of units, so that the building does not overwhelm the existing single family neighborhood creating an undue concentration of population, and the large number of new residents does not overwhelm the town's infrastructure, and the traffic does not overwhelm Fountain Street; (iii) preserving the land in its natural state or for agricultural use, as was its use in the past.

5. The TPZ has jurisdiction of applications for Special Exception/Site Plan review and approval. The facts show that the TPZ should exercise its jurisdiction over the environmental issues presented in this petition and deny the Application.

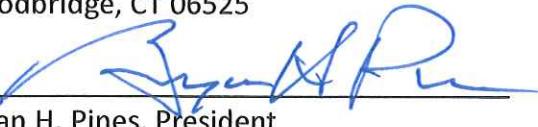
6. The WLT requests pursuant to Connecticut General Statutes Section 1-227, that it be given written notice by electronic mail of all hearings and/or meetings, including meetings between the Applicant and Town staff in connection with the proceedings pertaining to the above-captioned matter.
Email address: Woodbridgelandtrust@gmail.com

7. The WLT reserves the right to supplement this petition and amend these pleadings as the Applicant further amends and completes his application.

WHEREFORE, The Woodbridge Land Trust, Inc. hereby intervenes in this proceeding pursuant to § 22a-19 of the General Statutes upon the filing of this verified petition for intervention.

Intervenor,
The Woodbridge Land Trust, Inc.

P.O. Box 3699
Woodbridge, CT 06525

By: 

Bryan H. Pines, President
Duly authorized

Dated: May 30, 2025

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SITE PLAN APPROVAL
804 FOUNTAIN STREET

STATE OF CONNECTICUT

BEFORE THE TOWN OF
WOODBRIDGE TOWN PLAN
AND ZONING COMMISSION

APPLICANT: ANGELO MELISI

May 30, 2025

VERIFICATION OF PETITION FOR INTERVENTION
PURSUANT TO CONN. GEN. STAT. § 22a-19

I, the undersigned, being duly sworn, depose and say that I have read the foregoing Petition for Intervention. I verify that all the allegations contained therein are true to the best of my knowledge and belief.

Dated at Woodbridge, Connecticut, the 30th day of May, 2025.

INTERVENOR,

The Woodbridge Land Trust, Inc.

By: 

Bryan H. Pines, President

Duly authorized

State of Connecticut

ss: Woodbridge

County of New Haven

On this the 30th day of MAY, 2025, before me, BRAYTON B. HOOPES, the undersigned officer, personally appeared BRYAN H. PINES (name of individual or individuals), known to me (or satisfactorily proven) to be the person(s) whose name(s) (is or are) subscribed to the within instrument and acknowledged that (he, she or they) executed the same for the purposes therein contained.

In witness whereof I hereunto set my hand.



Signature of Notary Public

NOTARY PUBLIC

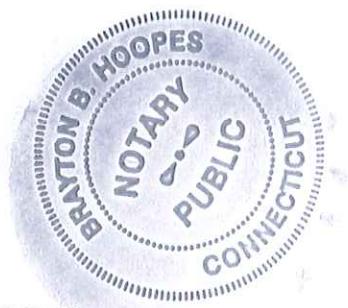
Title of Officer

Date Commission Expires: 01/31/2030

or

Commissioner of the Superior Court

(Seal)



BRAYTON B. HOOPES
NOTARY PUBLIC
MY COMMISSION EXPIRES JAN. 31, 2030