

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

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 Park Association, Inc. is a 501(c)(3) nonprofit corporation whose purpose is to preserve and maintain open lands in Woodbridge for the public and future generations,

**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**, 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 Park Association, Inc. (WPA), acting by the undersigned, Catherine Wick, its President, duly authorized, hereby intervenes in the above-captioned proceeding 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 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.

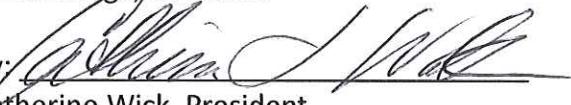
5. The TPZ has jurisdiction of applications for Special Exception/Site Plan review and approval. The facts show that the TPZ should exercise its jurisdiction over the environmental issues presented in this petition and deny the Application.

6. The WPA 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: [president@woodbridgeparks.org](mailto:president@woodbridgeparks.org)

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

**WHEREFORE**, The Woodbridge Park Association, 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 Park Association, Inc.  
P.O. Box 3883  
Woodbridge, CT 06525

By:   
Catherine Wick, President  
Duly authorized

Dated: May 30, 2025

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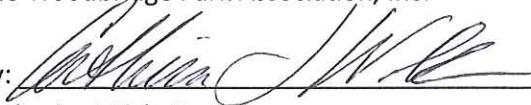
**VERIFICATION OF PETITION FOR INTERVENTION**  
**PURSUANT TO CONN. GEN. STAT. § 22a-19**

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 30<sup>th</sup> day of May, 2025.

INTERVENOR,

The Woodbridge Park Association, Inc.

By: 

Catherine Wick, President

Duly authorized

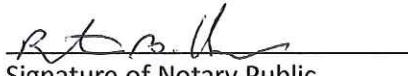
State of Connecticut

County of New Haven

ss: Woodbridge

On this the 30<sup>th</sup> day of MAY, 2025, before me, BRAYTON B. HOOPES, the undersigned officer, personally appeared CATHERINE WICK (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