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Land Use Agencies
Town of Woodbridge

August 27, 2025

Via hand delivery

Town of Woodbridge Plan & Zoning
Attention: Kristine Sullivan, Land Use Analyst
11 Meetinghouse Lane
Woodbridge, CT 06525
ksullivan@woodbridgect.gov

Re: 804 Fountain Street
Site Plan Application and Application for Special Exception
Applicant: Angelo Melisi
Intervenors: Woodbridge Land Trust
Woodbridge Park Association, Inc.

Dear Kris:

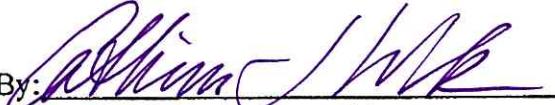
Please be advised that the Woodbridge Park Association, Inc. ("WPA") is represented by legal counsel at Zangari Cohn Cuthbertson Duhl & Grello P.C., which is hereby authorized to act on the WPA's behalf with respect to this matter. Please direct all correspondence and other materials relating to this matter through our legal counsel, via the following:

Brenton J. Elliott
Zangari Cohn Cuthbertson Duhl & Grello
59 Elm Street, Suite 400
New Haven, CT 06510
belliott@zcclawfirm.com

Thank you in advance, and please do not hesitate to contact us if you have any questions or need additional information.

Very truly yours,

The Woodbridge Park Association, Inc.

By: 
Catherine Wick, Its President

APPLICATION FOR SPECIAL PERMIT APPROVAL)	STATE OF CONNECTICUT
TO EXCAVATION, REMOVAL, FILLING, GRADING,)	
AND PROCESSING OF EARTH PRODUCTS)	BEFORE THE TOWN OF
804 FOUNTAIN STREET)	WOODBRIDGE TOWN
)	PLAN AND ZONING
)	COMMISSION
)	
<u>APPLICANT: ANGELO MELISI</u>)	AUGUST 27, 2027

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

The Woodbridge Park Association, Inc. (“WPA”), acting by and through the undersigned, its duly authorized legal counsel, hereby intervenes in the above-captioned proceeding pursuant to Conn. Gen. Stat. § 22a-19(a)(1), the Connecticut Environmental Protection Act of 1971 (“CEPA”), which provides in relevant 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.”

In furtherance of this Petition, WPA states the following:

1. WPA is a Connecticut non-stock corporation organized under Section 501(c)(3) of the Internal Revenue Code whose purpose is to preserve and maintain open lands in the Town of Woodbridge for the benefit of the public and future generations;
2. The property located at 804 Fountain Street is the subject of an application for special permit approval to the Town of Woodbridge Plan and Zoning Commission (the “Application”); and
3. The Application 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 of Connecticut.

4. 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 of Woodbridge’s Zoning Regulations.
 - a) Angelo Melisi (the “Applicant”) has applied to the TPZ for a special permit to excavate, remove, fill, grade, and process earth products (the “Application”) in conjunction with his Special Exception and Site Plan application to develop a 4-story, 96-unit apartment building at 804 Fountain Street, Woodbridge, CT (the “Property”).
5. The WPA has intervened in the Special Exception and Site Plan Application proceeding.
 - a) The TPZ convened a special meeting on August 4, 2025, where it held a “work session” to discuss the Application.
 - b) The Applicant has requested that the TPZ consider the Application during its September 2, 2025, meeting.
6. 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 including, without limitation:
 - 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 Application's 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.

7. The TPZ has jurisdiction over applications for Special Permit 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.
8. 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 via: president@woodbridgeparks.org and to counsel at Zangari Cohn Cuthbertson Duhl & Grello, Attn: Brenton J. Elliott: Belliott@zcclawfirm.com.
9. The WPA reserves the right to supplement this Petition and amend any associated pleadings, filings, reports, and/or any other evidence or submissions 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.

By: 

Brenton J. Elliott
Zangari Cohn Cuthbertson
Duhl & Grello P.C.
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New Haven, CT 06510
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Juris #: 011012
belliott@zcclawfirm.com

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APPLICANT: ANGELO MELISI) AUGUST 27, 2027

VERIFICATION OF PETITION FOR INTERVENTION

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, this 27^h day of August, 2025.

INTERVENOR,

The Woodbridge Park Association, Inc.

By: *Catherine Wick*
Catherine Wick, President
Duly authorized

On this the 27 day of August, 2025, personally appeared, Cathy Wick, signer and sealer of the foregoing instrument and acknowledged the same to be her free act and deed before me.

Commissioner of the Superior Court
Notary Public

or
Commissioner of the Superior Court

BROOKE ELIZABETH HOPKINS
NOTARY PUBLIC
MY COMMISSION EXPIRES JUNE 30, 2029

