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**ZANGARI COHN  
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Land Use Agencies  
Town of Woodbridge

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August 27, 2025

Via hand delivery

Chairman Robert Klee  
Woodbridge Town Plan & Zoning Commission  
11 Meetinghouse Lane  
Woodbridge, CT 06525

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

Dear Chairman Klee:

This office is legal counsel for Intervenor the Woodbridge Park Association, Inc. ("WPA"). The WPA respectfully requests that the Commission continue the public hearing relating to the referenced matter currently scheduled for September 2, 2025.

By way of background, the WPA was granted intervenor status on May 30, 2025. The WPA presented substantial evidence relating to its petition and at the public hearing conducted on June 2, 2025. Oral and written submissions were offered by Engineer Steven Trinkaus relating to the insufficiency of the Applicant's application, and additional oral and written submissions were offered by Geologist George Logan on behalf of the WPA.

The Applicant has now submitted voluminous written documentation to supplement the Application. That submission was received at 5:00 p.m. on August 19, 2025. Additionally, on August 27, 2025 (today) the Applicant also submitted a substantial revision to his 213 page engineering report. This leaves the Intervenor with less than two weeks to review and respond to the original submission, and only a few days to review the revised submission. This is not adequate nor fair to the Intervenor considering the amount of information, the technical expertise required, and the possible need to prepare for rebuttal. This also must be compared with the 90 days that were afforded to the Applicant to respond to the prior submission from the Intervenors, which the Applicant received on June 2, 2025.

The requested continuance must be granted, as its denial would prejudice the WPA and would create an inequitable process.



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ROBERT KLEE · AUGUST 27, 2025 · PAGE 2 OF 2

Wherefore, the WPA respectfully requests that the public hearing relating to Site Plan and Application for Special Exception be continued until the next following meeting of this Commission.

Very truly yours,

Brenton J. Elliott

Cc: John W. Knuff, Esq.  
The Woodbridge Land Trust  
Jeffrey Hellman, Esq.