

APPLICATION TO CONSTRUCT AN APARTMENT)	STATE OF CONNECTICUT
BUILDING ON SITE)	
27 BEECHER ROAD)	
)	BEFORE THE TOWN OF
)	WOODBIDGE TOWN
)	INLAND WETLANDS AGENCY
)	
<u>APPLICANT: DARIUS ISWASZKIEWICZ</u>)	

RECEIVED

January 20, 2026

JAN 21 2026

Land Use Agencies
Town of Woodbridge

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

Whereas, Peter Morgan is a resident of Woodbridge and an abutter to 27 Beecher Road;
and

Whereas, the property located at 27 Beecher Road is the subject of an Application before the Town of Inland Wetlands Agency seeking a permit to conduct regulated activity in connection with the construction of an apartment building; and

Whereas, the application to construct an apartment building at the site 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, Peter Morgan 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 Inland Wetlands Agency (“IWA”), as authorized by statute, is the agency with jurisdiction to review applications to conduct regulated activity and

seeking inland wetland approval in accordance with CGS section 22a-37 et seq. and the Inland Wetlands and Watercourses Regulations of the Town of Woodbridge.

2. Darius Iswaszkiewicz (the "Applicant") has submitted an Application to the IWA to construct a 100 unit apartment building (the "Project") at 27 Beecher Road, Woodbridge, CT (the "Property").
3. A public hearing to consider the Application is scheduled for January 21, 2026 and the IWA 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. According to Steven D. Trinkaus, P.E., Trinkaus Engineering, LLC, the stormwater management system is not designed in accordance with the CT DEEP 2024 Storm Water Quality Manual, as amended. This will result in the discharge of increased runoff volumes which will adversely impact the downgradient inland wetlands. Increased runoff volumes are documented in professional literature to cause erosion of wetlands and watercourses.
 - b. Non-point source pollutant loads which will be generated from the proposed development will be discharged to the downgradient wetlands. Over time, the increased pollutant loads will adversely impact water quality in the delineated inland wetland system.
 - c. 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.
 - d. 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, onsite wildlife, and wildlife habitat, as well as the public health and safety.
 - e. 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.
 - f. According to George T. Logan, MS, PWS, CSE, REMA Ecological Services, LLC, due to the extensive area of impervious surfaces proposed at the Property, the Project will result in a substantial alteration of pre-development hydrology, including increased stormwater runoff volumes, increased peak discharge rates, reduced groundwater recharge, and shortened runoff concentration times. These changes will occur at a local watershed scale, and will adversely alter both surface and subsurface hydrologic regimes. As a result, wetlands and watercourses located downgradient of the site will experience increased flooding

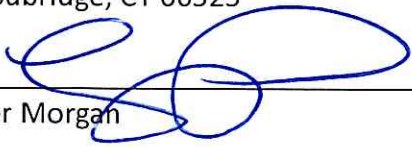
- frequency and duration, altered hydroperiods, erosive flows, and reduced baseflow contributions, leading to the impairment of wetland functions and values, including flood storage, groundwater recharge, and habitat support.
- g. The proposed stormwater management system fails to comply with applicable State of Connecticut stormwater and water quality guidelines, including requirements for adequate treatment, pollutant removal, and protection of receiving resources. The project relies on the discharge of inadequately treated stormwater toward downgradient wetlands and watercourses, resulting in the introduction of excess sediments, nutrients, hydrocarbons, metals, and thermal impacts. These discharges will degrade water quality, disrupt wetland soil chemistry, impair vegetative communities, and reduce ecological integrity, thereby diminishing the wetlands' ability to perform essential functions such as nutrient transformation, sediment retention, wildlife habitat, and water quality buffering. Such impacts constitute a likely unreasonable impairment of wetlands and watercourses protected under Connecticut law.
 - h. The application is materially deficient, containing numerous errors, omissions, and unsupported conclusions, and fails to provide the level of analysis necessary for informed decision-making by the Commission. Critically, wetland delineations located downgradient of the proposed development envelope are substantially incorrect, resulting in an underestimation of the extent, connectivity, and functional importance of regulated resources potentially affected by the project. Because accurate wetland identification is foundational to impact assessment, alternatives analysis, and mitigation planning, these deficiencies render the application incomplete and unreliable. Approval based on such flawed information would risk authorizing activities that may cause unreasonable pollution, impairment, or destruction of wetlands and watercourses, contrary to the intent and requirements of Connecticut environmental statutes.
5. The IWA has jurisdiction over Applications to conduct regulated activity within the Town of Woodbridge. The provided facts show that the IWA should exercise its jurisdiction over the environmental issues presented in this Petition and deny the Application.
6. Peter Morgan requests pursuant to Connecticut General Statutes Section 1-227, that he 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: woodbridge.neighbors2025@gmail.com
7. Peter Morgan reserves the right to supplement this Petition and amend these pleadings as the Applicant further amends and completes his Application.

WHEREFORE, Peter Morgan hereby intervenes in this proceeding pursuant to § 22a-19 of the General Statutes upon the filing of this verified petition for intervention.

Intervenor,
Peter Morgan
52 Rimmon Road
Woodbridge, CT 06525

By: _____

Peter Morgan

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke, written over a horizontal line.

Dated: January 20, 2026

APPLICATION TO CONSTRUCT AN APARTMENT
BUILDING ON SITE)
27 BEECHER ROAD

STATE OF CONNECTICUT

BEFORE THE TOWN OF
WOODBIDGE INLAND
WETLANDS AGENCY

APPLICANT: Darius Iswaszkiewicz

January 20, 2026

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 20th day of January, 2026.

INTERVENOR,

Peter Morgan

By: _____

Peter Morgan

State of Connecticut
County of New Haven

ss: Woodbridge

On this the 20 day of January, 2026, before me, Douglas Hennigan, the undersigned officer, personally appeared Peter Morgan, known to me (or satisfactorily proven) to be the person(s) whose name is subscribed to the within instrument and acknowledged that he, executed the same for the purposes therein contained.

In witness whereof I hereunto set my hand.

Douglas B. Hennigan

Signature of Notary Public

Notary Public

Title of Officer

Date Commission Expires: 11/29/27

(Seal)

or

Commissioner of the Superior Court
