



Woodbridge Board of Selectmen  
11 Meetinghouse Lane  
Woodbridge, CT 06525  
Via Email: [avalsamis@woodbridgect.org](mailto:avalsamis@woodbridgect.org)

September 8, 2025

Re: Feedback and recommendations for the Draft 2025 POCD

Dear First Selectman Cardozo and Members of the Board of Selectmen:

The Woodbridge Conservation Commission reviewed the draft 2025 Plan of Conservation and Development (POCD). We find that the draft does not reflect the values, priorities, or responsibilities of the Town of Woodbridge. In addition, it conflicts with key goals outlined in the State's 2025 Conservation and Development Policies Plan. We believe the issues are substantial enough that they cannot be adequately addressed through written feedback. Addressing the deficiencies in the document will require a collaborative discussion by a wider set of stakeholders and a refocusing and rethinking of many parts of the plan. We urge the Board to use all available means to pause the adoption process and suggest that TPZ initiate a comprehensive, integrated revision.

*1. The draft ignores what makes Woodbridge unique*

The POCD should begin by emphasizing what makes the town unique and its defining assets: our extensive open space, vital water resources, and proximity to cultural and economic opportunities in New Haven. These aspects of the town's character, in addition to the community priorities outlined below, should provide the necessary background, context, and motivation for the vision and goals presented in the remainder of the document. The draft plan currently either de-emphasizes these critical aspects of the town's character or excludes them entirely.

*2. The draft disregards community priorities*

Survey results show that residents value open space and schools most highly (Fig. 1). Yet the draft centers on regional housing issues instead. For example, although the amount of open space is a unique aspect of the town and residents ranked it as the most special aspect of Woodbridge, the first chapter of the plan focuses on housing. In contrast, natural resources and sustainability are addressed last. The State Plan emphasizes the importance of meaningful stakeholder engagement and the need for plans to strike a balance between visions when priorities conflict. The draft plan itself also states that it should have "broad public consensus" (p. 4), yet appears to ignore its own advice in the remainder of the document. By failing to highlight resident priorities, the draft undermines local trust and confidence.

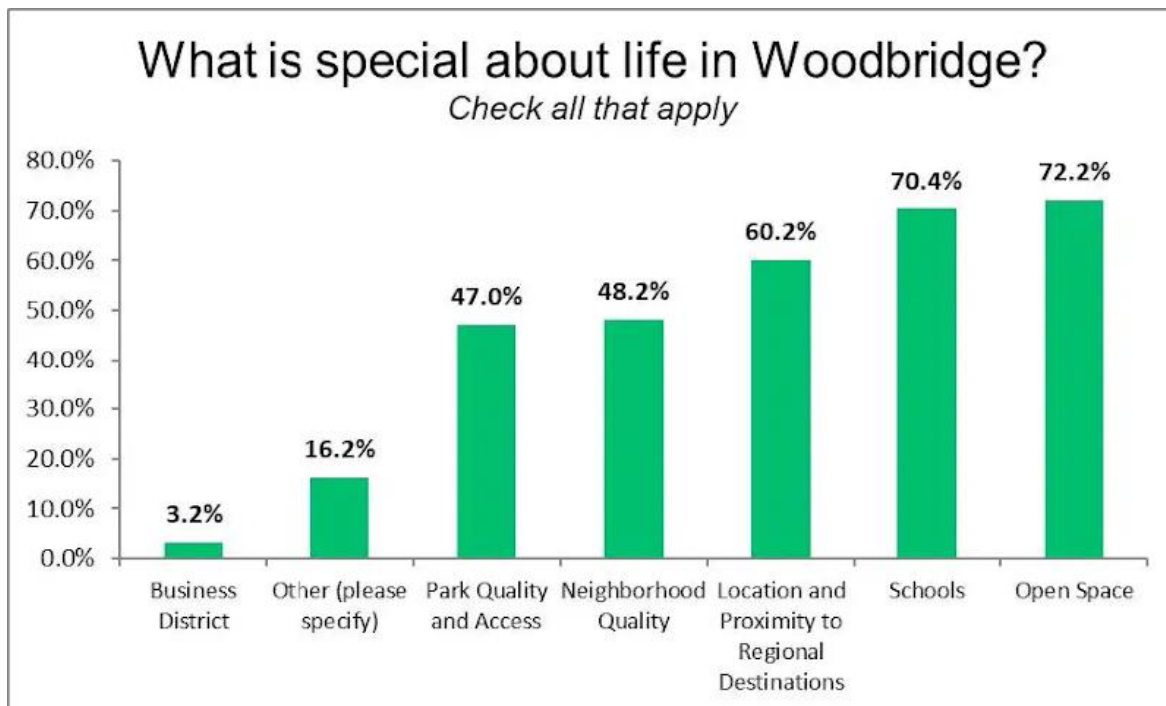


Figure 1. Reproduced from Community Survey Results, Plan of Conservation & Development Update, Figure 2.

*3. The plan misses an opportunity to promote our natural resources*

The forests, open spaces, and hiking trails of Woodbridge are not only beneficial to the town but also important to nearby towns and the wider region. For example, the town's forest cleans New Haven's water, sequesters its carbon emissions, and provides its residents with hiking and biking trails. The State Plan's Stewardship of Resources requires towns to conserve drinking water supplies, protect biodiversity, and invest in open space to meet climate resilience goals. Some towns, like Woodbridge, must assume a larger share of these responsibilities to compensate for cities that have depleted their natural resources. The plan should highlight and emphasize the importance of Woodbridge's natural resources to the surrounding region.

*4. The focus on regional housing is misaligned*

We recognize the importance of addressing the shortage of affordable housing. However, the State Plan acknowledges the need to balance housing development with conservation of core forests, farmland, and watersheds. Rather than focusing on new development, which will likely be 90% market-rate units, our housing policies should emphasize repurposing existing structures, low-density housing, accessory dwelling units, infill within already developed areas, and context-appropriate growth that protects ecological services.

*5. The draft fails to integrate themes*

The draft is overburdened with conflicting goals. It advances new housing without addressing impacts on water, biodiversity, or climate. The State Plan warns that such conflicts must be resolved through holistic, cross-sector planning. Housing, economic, and community development goals should flow from Woodbridge's natural resources and community priorities discussed above. For example:

Housing goals should be met while protecting watershed health and core forests. Economic development could leverage eco-tourism and recreation. Welcoming Community goals could improve accessibility to trails and cultural resources, helping members of our community, as well as others, feel at home.

*6. The process excluded conservation voices while emphasizing housing*

In nearly all meetings where TPZ developed the draft POCD, the head of the housing committee was present, actively participated in discussions, and provided both verbal and written feedback to the consultants. In contrast, no other commission was afforded this opportunity, including the conservation commission. The conservation commission was not allowed to meet with TPZ or even speak to its members. The State Plan emphasizes the importance of equitable and inclusive stakeholder engagement across all sectors. The exclusion of conservation perspectives explains why the draft fails to integrate development with appropriate stewardship of the town's natural resources and open space, and instead highlights housing.

*7. Risks of adopting the draft as written*

If adopted, the draft could authorize high-density housing throughout the town, as its goals promote such developments wherever water and sewer services are available, while also expanding these services. Such actions would quickly destroy natural resources and undermine regional ecological services. This outcome would contradict both resident priorities and the State Plan's clear direction to avoid development in prime farmland soils, core forests, and drinking water watersheds.

*8. Recommendations*

We believe that the flaws in this draft are too significant for TPZ to rectify by simply providing written suggestions. Therefore, we recommend that BOS suggest that TPZ collaborate with additional stakeholders, particularly those involved in conservation. These additional voices can help create a more balanced plan that accurately reflects the importance of protecting the town's environmental assets and the wishes of the townspeople. Here are two suggested options:

- Form a steering committee with diverse representation, including members of TPZ, Conservation, and other stakeholders. Branford took this approach to developing their POCD.
- Request that TPZ collaborate with Conservation to jointly prepare a new draft.

*Conclusion*

Woodbridge's residents overwhelmingly support preserving open space, strengthening schools, and promoting sustainable economic growth. Our natural assets benefit the entire region. The State's 2025 Plan of Conservation and Development reinforces these priorities and requires us to balance development with conservation. We ask the Board to reject the current draft and initiate a serious rewrite that aligns with both community input and state policy.

Sincerely,

The Woodbridge Conservation Commission

Sharon de Kadt (co-chair)  
Diana McCarthy-Bercury (co-chair)  
Ben Carlson  
Barbara Hagan-Smith  
Rachel Guerra  
Valerie King

Attachment: Selected detailed feedback to the current draft of the 2025 Woodbridge POCD.

## **Selected detailed feedback to the current draft of the 2025 Woodbridge POCD**

The notes below are a selection of responses to the current draft of the 2025 Woodbridge POCD. In particular, the actions in the sections shown below are so pro-development as to essentially nullify the conservation elements of the POCD and put an unfair burden on those protecting the open spaces and the rural character of Woodbridge.

In the selections below, we have italicized all text that is copied directly from the POCD. Much of this text is, in our view, self-evident in nullifying conservation elements of the POCD. Non-italic text is our commentary in response to the text taken from the POCD.

*Page 20*

*Woodbridge should utilize Town-owned properties with public water, public sewer, and/or access to transportation for high-density housing development that will meet the needs of our current and future population while preserving desirable open space.*

This does not adequately consider environmental considerations. High-density housing anywhere where public water and sewer conflicts with almost every goal in the conservation section, and the overarching goals of maintaining a small-town feel. Furthermore, the next bullet point suggests expanding sewer and water, which will only exacerbate these issues.

*Page 28*

Why are these properties called “vacant?” More accurate would be “unprotected.”

*Page 38*

The POCD should not show sewer lines going to the Country Club. The lines are currently not functional. It will cost millions of dollars to put in new lines. And, would this be paid for by taxpayers?

*Page 54*

NDDDB can be applied to any site, so the statement “several NDDDB sites have been identified” does not make sense.

DEEP just performed a survey of bats. The country club houses six out of the nine species of bats. All six are on the CT or DEEP conservation lists. Furthermore, local birders have identified nine bird species that used the site over the breeding season that are on these conservation lists.

*Page 56*

This map of natural resources is too empty. Additionally, the area of the country club is not indicated as having natural resources, while it has been identified as having animals on the critical animals list. Look at the DEEP natural resources maps.

*Page 69*

*Strategy 1.1.1*

- A. Continue to review development applications for consistency with the Town's zoning regulations and POCD's goals and Future Land Use Plan.*
- B. Continue to ensure that future Town growth aligns with Town services and infrastructure capabilities and complies with environmental regulations.*
- C. Ensure the Town's zoning regulations support desired land use patterns within the Town.*
- D. Review for consistency and amend as needed the Town's zoning regulations to be consistent with the POCD and the Connecticut General Statutes.*
- E. Review and amend the Town's zoning regulations to simplify and modernize the existing regulations, including development standards and uses to remove regulatory barriers.*

For Goal 1.1, There is nothing "sustainable" described in the goals on this page. Is sustainable defined anywhere in the document? It should be, if the term is to be used, given its ambiguity.

For Goal 1.2, economic development could also focus on ecotourism, hiking trails, open space and how to use those to generate revenue. Also, it should mention something about the West River, to protect and enhance it. It could even be an attractive natural feature to get people interested in the area.

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*Goal 1.3 Housing options*

Woodbridge should avoid developing in ecologically sensitive areas, and avoid fragmentation of ecosystems.

*Strategy 1.3.2*

*C. Promote housing where there is existing infrastructure for public water and sewer or potential for future connections*

*Strategy 1.3.3*

*D. Identify potential Town-owned properties or properties to be acquired that could be used to provide affordable housing options for households looking for smaller housing options.*

*E. Explore other ideas to encourage housing in Town such as reducing minimum lot sizes in designated areas, updating the Opportunity Housing zoning regulations, and pursuing a targeted number of new housing units over the next 20 years.*

The proposed actions above specifically jeopardize the rural nature and amount of open space in the town of Woodbridge when considered in conjunction with the proposed zoning regulations.

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*Strategy 1.4.1*

*B. Support RWA's efforts to maintain and expand the public water system within the Town.*

*Strategy 1.4.2*

*B. Support GNHWPCA's efforts to maintain the public sewer system and use the existing system to leverage future development projects.*

*C. Support the Town's efforts to study the feasibility of expanding the existing sewer system within the Town.*

The question is, is it really in the town's interest to increase the water and sewer system, or will that be the beginning of a significant change in the town's atmosphere when combined with the new, dramatic proposed changes in the zoning regulations, thus altering or destroying its rural nature in the years to come? Additionally, there has not been much public interest or demand for an expansion of public water and sewer, while there has been a clear expression of interest in the rural environment and the protection of open spaces in Woodbridge.

*Page 88*

*Goal 3: Embrace and Preserve Natural Spaces*

This passage highlights the importance of embracing and preserving natural spaces. What needs to be added to the POCD document is an interest in acquiring more natural space that is ideally preserved as Open Space.

*Page 93*

*Low-Density Housing Residential*

This portion of the POCD undermines the concept and preservation of low-density housing, where it says:

*Higher-density multifamily structures are permitted under some circumstances (when not located within a public water supply watershed and when served by public sewer/water). There are some undeveloped parcels within this land use category, which may or may not be suitable for future development. The future of these parcels should consider the presence of any sensitive natural resources and their contribution to the Town's open spaces. Environmental concerns should be balanced with economic and social issues or goals, especially housing and affordable housing, which are of equal importance as the social and financial need of the Town and region.*

The paragraph above raises several significant concerns:

1. That any area with sewer and water access can change significantly from rural to high-density housing.
2. That the environment might only be considered vital if it contains sensitive natural resources. The word "sensitive" is open to a broad interpretation, and a developer might have a different standard than an environmentalist. In such cases, the environmental organization or town body would have to expend considerable effort and energy in defending what should have already been protected without question.
3. There are no limitations or guidance on how much of the low-density housing can be changed to medium or high-density housing; thus, over time, the rural nature and the health of the local environment could be degraded beyond repair, and the Town of Woodbridge would have a feeling more like West Haven without the benefit of being on the Long Island Sound.
4. Other portions of this POCD strongly promote increasing the amount of municipal water and sewer infrastructure, allowing more of the low-density areas to be under this same threat of a significant increase in construction and thus degradation of the natural environment.

*Page 94*

*Open Space-Protected*

*The Open Space -Protected future land use category consists of land zoned Park or Rural (T1 and T2). These tracts may be protected as open space (publicly and privately) or natural areas (forests, grasslands, etc.), and include land owned by the Town, State, and RWA.*

The word "may" is problematic. There needs to be two separate categories identified on all maps to distinguish if the land is actually protected open space or default open space that can be developed if the interest arises by town government or the land owners. Too often there is unclear distinction between protected "Open Space" with capital letters to signify an easement of conservation and/or owned by the Woodbridge Land Trust vs. open space that does not have any protection.

The POCD wording "*These areas do often have sensitive natural resources*" places the weight of protecting the land on an ecological survey or other investigation, which then shifts the burden on the Conservation Commission or other ecologically minded groups, rather than the developer. Additionally, the POCD wording refers specifically to "sensitive natural resources." However, the value of open space cannot only be determined by something defined as "sensitive." Open space is valuable simply by being open space, where animals reside, carbon is sequestered, water runoff is managed, and all the usual reasons why we value open space, even if it's not a "sensitive natural resource."

*Page 99*

*Under Principle #3: Concentrate development around transportation nodes and along major transportation corridors to support the viability of transportation options.*

There is a misleading statement in this paragraph. The line that says “with some discussion of the former Woodbridge County Club property near Route 15.” There is no exit that makes Route 15 accessible to the Woodbridge County Club. The relevant exit is the one by the business district, which is over a mile away, and there is no direct road to the Woodbridge Country Club property. It is like saying when you are flying from New York to Los Angeles that you could have stopped by Saint Louis, it was only a few thousand feet below the plane.

*Page 100*

*Principle: Promote integrated planning across all levels of government to address issues on a Statewide, regional, and local basis.*

This is overly weighted, mainly discussing housing, and only has one reference to land protection, vaguely referring to coordination with land trusts. Another aspect of coordination with the state and other towns would be to coordinate the protection of open space, promoting a larger swath of land for animal habitats, water quality improvement, and recreational spaces for more extensive outdoor use.

*Page 102*

*Vision 3: Stewardship of Resources*

The section refers to many aspects of thoughtful development and little to natural land use preservation. Especially important to change the only reference to preserving habitat to “preserving critical habitat.” That word critical is not needed. What is vital is that open space is so open to man's interpretation and undermines the value of all open spaces that contribute to the town's character and healthy habitat.

*Page 103*

*Human Environment*

This section is heavily weighted towards housing and affordability issues and needs to focus on the human need for healthy open space to interact with.

*Overall*

Upon reflecting on the POCD overall, no section in the document sets a limit on the amount of development to be carried out. We suggest that wording to this effect be included, with the intention of regularly evaluating the level of development and assessing whether a thoughtful balance with conservation has been maintained. This wording should ensure that people making decisions about that balance are both involved in conservation and housing.

There should be a section at the beginning of the POCD that summarizes how Woodbridge perceives itself. This is missing entirely. We take pride in our natural resources. These provide numerous benefits to the residents and nearby towns.

Reorder the sections in the POCD. Lead with what is unique about Woodbridge, which is not housing. Our uniqueness comes from our natural resources and open space. The POCD should make a strong case that Woodbridge provides essential services to the region and should not simply be viewed as open land to develop. In the current draft of the POCD, open space, natural resources, and sustainability are the last sections, implying that they are of lower priority.

The initial focus of the POCD should be on what the people of Woodbridge want and need, rather than on solving the region's housing needs. Woodbridge can't solve the crisis—we are too small.

There is no mention in the POCD of climate crises or biodiversity crises. The greatest current threat to biodiversity is land cover change, fragmentation, etc. We need migratory corridors for climate resilience, forests to absorb carbon, and other important elements that mitigate climate crisis and biodiversity loss, elements that Woodbridge can and does contribute.

Finally, we have two specific goals that should be added to the POCD.

- 1) To avoid similar issues in the future, the next POCD should establish a steering committee comprising diverse voices to develop the plan, rather than having the plan be solely owned and produced by TPZ. The steering committee should include sufficient voices from conservation so that the plan is truly a Plan of Conservation and Development.
- 2) Conservation and TPZ should produce a map recommending where we can build with the least environmental impact. This map should incorporate conservation and ecological principles to maximize carbon sequestration, climate resilience, habitat connectivity, and other factors critical to effective conservation and open space networks. This map can help guide TPZ as they incorporate environmental considerations into their decision-making process when reviewing development applications.

We are confident that adopting the recommendations in this document will result in a POCD that reflects the concerns of town residents, promotes conservation and open space, and better balances housing with environmental concerns.