



PUBLIC WORKS – ENGINEERING DIVISION

M E M O R A N D U M

TO: Bloomfield Inland Wetlands and Watercourses Commission

FROM: David Peter Castaldi, Civil Engineer and Wetlands Agent 

DATE: January 9, 2026

RE: **Bloomfield Tennis Club request for a Jurisdictional Ruling for tree removal
51 Douglas Street, Unique ID #851**

Property Owner: 45 Douglas St, LLC

Wetlands File #75-2025-31

This request for a Jurisdictional Ruling was submitted on November 7, 2025, in accordance with Sections 4.4 and 4.5 of the Wetlands Regulations, along with several supporting documents. The November 7, 2025 letter and supporting documentation are made part of this memorandum. The Commission may approve the request for Jurisdictional Ruling or require that the applicant submit an application for a Wetlands Permit.

This 1.852 acre property is located on the west side of Douglas Street, north of Britton Drive, and includes an existing single-family residence. There are no wetlands or watercourses on the property. However, there are off-site wetlands and watercourses and the westerly most part of the property includes the respective 100-foot and 200-foot Upland Review Areas.

The Tennis Club is planning to expand their operations onto this property in the near future and the proposed clearing is the first step in this expansion. The existing residence would also have to be demolished for this development. The Tennis Club opted to submit this request for a Jurisdictional Ruling rather than including the clearing in a Wetlands Permit application for the development of the property.

Section 4.5 of the 2023 Wetlands Regulations states that:

“A jurisdictional ruling is required for timber harvesting and forestry. Any person proposing to carry out timber harvesting, forest management practices or any other use or operation that includes the creation of skidder roads or trails, landing areas, temporary crossings or other disturbance of a wetland, watercourse or upland review shall submit a written request for a Jurisdictional Ruling to the Commission pursuant to Section 4.4 of

these Regulations. Trees, woods, brush, forest or other vegetation may not be removed, cleared, mowed or otherwise disturbed within the wetlands, watercourses or upland review areas without a Jurisdictional Ruling in accordance with Section 4.4 of these Regulations or a valid Wetlands Permit.”

Section 6.6 of the Wetlands Regulations also applies and states that:

6.6 All proposed development or soil disturbance (including removal of trees and vegetative ground cover) of 10,000 square feet of land or more, outside of the Upland Review Areas or Vernal Pool Habitat Areas with overland flow to, or a storm drainage system connection with wetlands or watercourses, shall be submitted for review with a written request for a Jurisdictional Ruling in accordance with Sections 4.4 and 4.6 of these Regulations. The Wetlands Commission or Agent may determine that a Wetlands Permit application is required.

The supporting documentation submitted with this request included the requested tree inventory survey. This inventory indicates many specimen trees within the property proposed to be removed with yellow highlighting. Additional trees on other land owned by 45 Douglas St, LLC, to the north of the subject property are also proposed to be removed. A preliminary plan titled “Site Plan Option 2A” was also submitted.

The Tennis Club submitted a revised and more detailed plan for the proposed tree removal. This plan includes a note indicating that the clearing will not encroach into the Vegetated Buffer Zones 50 feet from wetlands or 75 feet from watercourses. These two limits are essentially the same line and represent about 2400 square feet or 3% of the total lot area in the northwestern corner. The 100-foot Wetlands Upland Review Area occupies about 9700 square feet or 12% of the western part of the property. The 200-foot Wetlands Upland Review Area occupies about 22,600 square feet or about 28% of the total property. The entire lot is not wooded and the estimated area of the proposed clearing is 1.5 acres.

The original request to removal of all of the vegetation would have required a Wetlands Permit application. A Jurisdictional Ruling may be appropriate for the modified plan of tree removal.

The Upland Review Areas, including the Vegetated Buffer Zones, are important parts of the wetland and watercourse resources and limiting their impacts is the best way to protect them. It is recommended that the Commission consider further restrictions on the amount of clearing approved with a Jurisdictional Ruling.

The submitted schematic Site Plan Option 2A indicates no proposed development in the westerly most 0.3 acres of the property and the removal of the trees from this area does not appear to be necessary. Option 2A also shows a retaining wall that is too close to the southerly property line. Another retaining wall may be necessary for the westerly parking lot that has 10-15 feet of elevation change in the existing grades. The Zoning Regulations allow up to 60% impervious coverage and the Option 2A appears to show more than this maximum.

Stormwater detention and quality measures will be necessary for this project and are not indicated on Option 2A. If underground stormwater management is constructed then there will be more opportunity to retain existing vegetation. If a surface stormwater management basin is proposed then more of the existing trees will be lost.

There is also a concern about ground disturbance due to stump removal. This would trigger the need for a Wetlands Permit. It is recommended that the stumps be left in the ground or ground up in place. Regardless of whether the stumps are removed this proposal will require disturbance of the ground and soil erosion and sedimentation controls are required.

Approval for this proposed clearing is also required from the Plan and Zoning Commission. It is recommended that TP&Z approval be obtained before any tree clearing is started.

Recommendations

If the Commission votes to approve this request for a Jurisdictional Ruling then it is recommended that the following conditions be included:

1. The proposed limits of clearing/tree removal shall be modified to retain all existing vegetation within the westerly most 0.3 acres of the property as indicated on Option 2A west of the west parking lot.
2. Tree stumps shall not be removed but can be ground up in place.
3. Soil erosion and sediment control measures shall be installed before any trees are cut.
4. Clearing of trees shall not be started unless also approval by the Town Plan and Zoning Commission.