Alicia Dolce  
301 Old Whitfield Street  
Guilford, CT 06437  

5/16/21

Guilford Planning & Zoning Commission

RE: Eunice Demond, 311 Old Whitfield St., Map: 3, Lot: 23, Zone R-3, Special Permit Request per Section 273-16A Table 4, Line 16 to allow non-profit philanthropic wildlife rescue and rehabilitation use for center known as ‘Little Rascal Rescue & Rehabilitation’

Comments in OPPOSITION to this Special Permit Application

Dear P & Z Members,

Please read and enter this into the public record at the hearing on 5/19/2021 for this Special Permit application.

I am the immediate abutting neighbor, residing in the residential R-3 Zone, at 301 Old Whitfield Street, as of January 2019. Prior to my occupancy, 301 Old Whitfield Street was an empty building lot so there was no “next door” neighbor to experience the impact of a wildlife rehab facility because the other abutting neighbor is the Guilford Train Station.

There are multiple reasons why I am NOT IN FAVOR of granting a Special Permit application for a wildlife rehab & rehabilitation facility in a R-3 zone, at 311 Old Whitfield Street.

1. This operation is in violation of town ordinance, adopted 7/15/91 by the Board of Selectman that prohibits sheltering, harboring and feeding wildlife animals, especially raccoons, anywhere in the town of Guilford:

   The Town of Guilford zoning regulations (Article III/Wild Animals, section 131-5 prohibits Feeding or sheltering certain animals: No person shall feed, harbor or shelter raccoons, feral cats, foxes and coyotes within the Town of Guilford, and their removal is encouraged.

2. While Pet Boarding facilities are allowed in Guilford by a Special Permit in the I-2 Zone in accordance with Article X, the special permit application for 311 Old Whitfield fails to meet many of the standards that are stipulated for pet boarding facilities, to minimize impact on the surrounding area/neighbors. Specifically, the standards below for Pet Boarding facilities seem like common sense parameters to minimize impact and they would not be met if the special permit application request is approved for the present location of ‘Lil Rascals’:

   - Minimum parcel size: Located on a lot at least 5 acres in size.

   - No building, run, pen or enclosure designed or intended for occupancy by animals shall be less than 70 feet from a residential property line, residential zone district boundary line or within 150 feet of an existing dwelling.
o Our property line is approx. 20' from the enclosure and our back deck is approximate 45' away.

- All buildings, runs, pens or enclosures designed or intended for occupancy by animals shall be fully enclosed with walls, roof and windows and shall be ventilated by louvered.
  o The current structures do not meet these requirements and many of them are open-air huts with cages.

- All waste from animals shall be enclosed in enclosures designed to prevent escape of odor or access by insect or other pests. Containers shall be emptied regularly or otherwise disposed of, so as to control odor or risks to public health.
  o We have experienced all three of these adverse impacts: animal waste odor, insects or other pests.

3. Within the first year as neighbors, we began to experience negative impacts from Lil Rascals that have persisted when the facility is operational:

  - A very strong offensive odor that precludes being able to sit outside on our back deck, porch or around our fire pit. This foul odor also invades our home through open windows.
  - An infestation of flies on our back porch that we have never experienced living anywhere else, even when we raised backyard chickens at our prior home.
  - Presence of rats in our side and backyard

4. Through outreach to the Guilford Health Department in 2019, we learned from Dennis Johnson, the Director of Health at the time, that the foul odor was coming from animal waste and other sources, as described in this July 9, 2019 Notice of Violation/Blighnt Ordinance issued to Eunice Demond.

   "...A strong animal waste odor was observed emanating from the area around the wildlife "Lil Rascals" rehabilitation shed. An exterior inspection of this facility revealed a box of rotting vegetable trimmings, pile of woodchips and mulch, and the presence of flies. A dirt area on the north side of the shed revealed old boards on the ground with numerous rodent burrows scattered throughout and the presence of a decomposing opossum carcass."

5. Furthermore, this same Notice of Violation/Blighnt Ordinance from the Health Department spells out the operational parameters, which require constant vigilance, in order to ensure there are no negative impacts from odor or on public health, in general.

   "In addition, the area surrounding the animal rehabilitation shed must be cleaned-up, sanitized and made odor and fly free. All animal waste must be cleaned daily, and along with animal food, must be stored in water proof-fly tight containers. Area must be kept free of clutter and not serve as an attachment for rodent harborage."
- Note: The state licensing agency for wildlife handlers, CTDEEP, does not routinely make inspections, unless they are called upon to do so, in conjunction with the Guilford Health Department.

6. As seen in the attached photographs, the scale of Little Rascals has dramatically increased in size since 2017, when we purchased an empty building lot. This is not a small operation that is confined to serving the residents of Guilford. Eunice Demond is one of eight licensed wildlife handlers of vector-species (rabies) animals. As such, she receives deliveries of animals from many other municipal animal control officers as well as the general public, per her listing on CTDEEP’s website (recently removed due to the Cease & Desist Order).

- Photos from 2017 (google earth) compared to present day, show one outbuilding, a single shed, modest in size to what is in place now: a compound with multiple structures, substantially larger in mass and scale.

- An additional photo shows the progression of construction from 2019 through 2020, including an entirely new “back row” of open-air huts and cages built last year.

7. Recent feedback from CTDEEP’s State Biologist, Laurie Fortin, indicates that there is no cap on the number of animals that an authorized wildlife handler can handle at any one time which means that the number of animals that Eunice Demond accepts is discretionary. This does not seem appropriate for a facility of this nature in a high-density R-3 residential zone located in downtown Guilford.

- According to CTDEEP, the agreed-up capacity for Lil Rascals is presently twenty-five animals. However, in a prior site visit conducted by Dennis Johnson, he reported observing over forty animals at one time.

8. In 2019, we were advised by Lorie Fortin (CTDEEP) that she had discussed the possibility of moving the animal cages with Eunice “a few years ago” but Eunice did not have the means to make that happen, at that time.

- Perhaps, given Eunice’s recent success in raising funds to help with this Special Permit application, it may now be possible for her to garner support to move her operation to a location that is permitted and better suited to this use.

Respectfully submitted,

Alicia Dolce
301 Old Whitfield Street
Guilford, CT
View from rear showing single shed and no other structures
No Fencing
April 10, 2019

Completely built-up November 28, 2020 with 4 new structures and fencing
August 2017 – one small shed

May 2021 – note position of the large pine tree
To: Guilford Planning Board and Zoning Commission

RE: Eunice Desmond 311 Old Whitfield St Map:3 Lot 23, Zone r-3 Special Permit request per section 273-16A Table 4 Line 16 to allow non profit philanthropic wildlife rescue and rehabilitation use for center known as “Little Rascal Rescue & Rehabilitation.”

Comments in OPPOSITION to the Special Permit Application

Dear P&Z Members
Please read and enter this into the public record at the hearing on 5/19/21 meeting for this Special Permit application.

My husband and I live 3 houses down from 311 Old Whitfield St, residing in a rapidly expanding R-3 multi family zone. We object to this special permit for multiple reasons.

It is not appropriate to have sick and disease animals in an R-3 rapidly expanding multi-family zone.
311 Old Whitfield St is on approximately one-third of an acre. The center houses a minimum of 25 wildlife animals outside and by special permission additional wildlife in the owner’s home. This is a heavily traveled area both in front of the house on Old Whitfield and behind the house on Whitfield Street. People in large numbers walk from the Green, the fairgrounds and the surrounding areas. Residents and out-of-towners drive, jog, walk skateboard and bike to the harbor, to the rail station and to the beach throughout the day and into the early evening.

This facility houses injured and diseased animals. The center presents an “attractive nuisance” for the large number of people particularly children in the area on bikes and foot. You see them peering down at the cages on Whitefield and watching tow vehicles drop the animals off. In several news-
paper articles about the center the animals are pictured as adorable, cuddly creatures but in truth they are diseased an injured vectors. The ongoing concern is what if one escapes into the neighborhood.

Flies
When we moved into our home on Old Whitfield St. we were welcomed by a monstrous number of flies in the kitchen. They covered our white kitchen fan so that it looked black. Two days later we said farewell to the last fly inside the house, but they were prolific and persistent outside of the house. We have 2 fly traps at all times during spring, summer and fall and change them every 30 days.

Rodents
The Center has been cited for rodents on the property. The Shoreline Times had done an article on the Center nurturing baby rats among the many animals in their care. This does not seem to be an activity for R-3 zoning. Perhaps, in a more rural area with more acreage this would be appropriate.

Odors
We have had intermittent odor coming from the center. If you think of a kitten's litter box, and then multiply it by 25; that is what wafts our way intermittently from this ever expanding outdoor compound.

Finally, when we moved here, we looked down on property as we walked over the rail pass. We observed a few cages and a basic shelter; and wondered what was going on at the property. In the 18 months since we have been here this has expanded into a compound that is inappropriate in scale for R-3 zoning. We are not opposed to wildlife rehabilitation; but an operation of this scope is not appropriate on one-third of an acre. Looking at the number of out of town letters of support and even the out of state letter there is a need for this type of facility on a larger parcel of land, perhaps shared and managed by several towns.

Respectfully submitted,
Michael & Alida Frey
279 Old Whitfield Street
Guilford, CT
Hello, I am writing to address concerns of the growing wildlife rehabilitation center at 311 Old Whitfield and to note our opposition to the approval of Planning and Zoning Application for Special Permit #19320. We moved into the neighborhood in 2013 and couldn’t be happier with our decision to live in town. The neighborhood has some older and newer homes and most residents work diligently to keep their homes up, to make it a nice neighborhood. We were always surprised and displeased with the appearance of the referenced property as it is the gateway to town for anyone visiting by train and an eye sore in general for anyone passing by. We noticed a small shed on the property back when we moved in but there was so much debris on site it was hard to tell what it was used for. As we regularly walk over the train tracks and into town, when doing so we would notice an odor as we passed by and as time went on the shed grew, along with fencing and signage regarding for Lil Rascals. While we are animal lovers, and respect Ms. Desmond’s pursuit to save animals it doesn’t seem like downtown Guilford is the appropriate place for a wildlife refuge and according to article 131-5 it seems like a blatant disregard for town zoning codes. Additionally, it seems that a special permit may be obtained for such activity with a minimum of 5 acres, which their parcel is clearly lacking. Furthermore, its my understanding that racoons are a Rabies Vector Species according to CT DEEP and this breeding environment presents health and safely risks to surrounding residents, walkers who pass by on a daily basis, as well as visitors to the community. Please consider our safety and opinion as neighbors when weighing in on this matter.

Sincerely

Suzanne Kolb
357 Old Whitfield Street
Guilford, CT
Hello Alice and Bill,

It was nice to meet you yesterday. Please be aware of the below correspondence and I hope all goes well at the hearing.

Best,

Bob Mongillo

To Whom It May Concern:

As residents of Guilford and as neighbors to the property in question, we are STRONGLY OPPOSED to the approval of Planning and Zoning Commission Application for Special Permit #19320. We truly appreciate Ms. Demond’s philanthropic pursuit, however her property and the “animal facilities” at the property do not appear to satisfy the requirements of Zoning Code Chapter 273 Town of Guilford 273-22. Section F. The parcel size in question is much too small for such a facility and the animal boarding area does not satisfy the laid out requirements for building design. Furthermore, current use of the property appears to be in direct conflict with the Town of Guilford Ordinances on wild animals. Section 131-5 unequivocally states “No person shall feed, harbor or shelter raccoons...”. We are desperately concerned that granting approval to this permit would encourage the facility to continue to grow and expand and would potentially lead to even greater violation of ordinances. Lastly, we are concerned for the safety of the immediately surrounding residents and those of us who walk in the area on a daily basis. Many of the animals...
...housed in the facility are Rabies Vector Species as recognized by the CT DEEP and this poses a potentially dangerous situation. We sincerely hope that Ms. Desmond will continue to pursue her interests, but we hope that she will choose an appropriate location and operate within town ordinances. I think we can all agree that the operation of such a facility is more appropriate for a larger plot of land with farm or other such zoning. Please strongly consider our opinion as you review this application.

Thank you,

Mr. & Mrs. Robert Mongillo

1 Pages Lane

Guilford CT 06437

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5/18/21

Guilford Planning & Zoning Commission

RE: Eunice Demond, 311 Old Whitfield St., Map: 3, Lot: 23, Zone R-3, Special Permit Request per Section 273-16A Table 4, Line 16 to allow non-profit philanthropic wildlife rescue and rehabilitation use for center known as ‘Little Rascal Rescue & Rehabilitation’

Comments in OPPOSITION to this Special Permit Application

Dear P & Z Members,

I am a resident of downtown Guilford, living only a few blocks from the property in question. There are multiple reasons why I am NOT IN FAVOR of granting a Special Permit application for a wildlife rehab & rehabilitation facility in a R-3 zone, at 311 Old Whitfield Street.

This operation is in violation of town ordinance, adopted 7/15/91 by the Board of Selectmen, that prohibits sheltering, harboring and feeding wildlife animals, especially raccoons, anywhere in the town of Guilford.

My family and I spend many hours walking the neighboring areas to our home. The presence of this rescue operation is offensive and out of character for the neighborhood. It doesn’t belong in its current location, especially as the density and real estate development of that area expands. All of Guilford pays the price in terms of real estate values for this unsightly and poorly maintained property.

I’ve observed how much the facility has expanded, especially since these are rabies vector species (RVS) animals. Additionally, given the town ordinance prohibiting harboring, sheltering and feeding raccoons anywhere in town, it’s puzzling why this rehab and rescue operation has been "allowed" to exist at all.

Furthermore, how can an open-air facility that falls far short of the protocols for pet boarding animals be permitted in an R-3 zone so close to another dwelling? I’ve spent time in the neighbor’s backyard and have experienced first-hand how close the facility is to a residential backyard. Again, as stated earlier, it is an eyesore for the whole community, from many visual angles. Moreover, residents who walk or live nearby have no way of knowing whether these regulatory stipulations to address the public health risk are being met.

This may be a good cause, but it is not in the right location.
Thank you.

Respectfully submitted,
Meg Smith
66 High St., Unit 4
Guilford, CT

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Meg Smith
Guilford, CT
914-844-0402

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