

APPLICATION FOR SITE PLAN )  
APPROVAL )  
APPLICATION NO. 21-36P )  
APPLICANT: ROBERT URSO; UW VINTAGE )  
LANE II, LLC )  
OWNER: ROBERT URSO; HORSESHOE LANE )  
ASSOCIATES, LLC )

STATE OF CONNECTICUT

BEFORE THE TOWN OF SOUTH  
WINDSOR PLANNING AND  
ZONING COMMISSION

OCTOBER 25, 2021



**VERIFIED PETITION FOR INTERVENTION**  
**PURSUANT TO CONN. GEN. STAT. CH. 439 § 22a-19**

I/We, the undersigned, hereby intervene in the above-captioned proceeding pursuant to the Connecticut Environmental Protection Act of 1971 (CEPA); Conn. Gen. Stat. Ch. 239 § 22a-19(a), which provides in pertinent part that:

“In any administrative, . . . proceeding, and in any judicial review thereof made available by law, . . . any person, . . . corporation . . . 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 South Windsor Planning and Zoning Commission (the “Commission”), as authorized by statute, is the agency authorized to review applications seeking site plan approval in accordance with the Town’s Zoning Regulations.
2. Mr. Robert Urso; Mr. Bradford Wainman; and “UW Vintage Lane II, LLC” (collectively the “Applicant”) has submitted an Application with the Commission for Site Plan Review and Permit approval for the development of real property comprised of GIS Pin #'s 88900005; 88900025; 36900475; and 36900551, constructively known as 25 Talbot Lane, South Windsor, CT (the “Property).

3. A public hearing to consider the Application is scheduled for 26 October 2021, and this Commission 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 effects 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. The Application proposes significant alteration to the topography of the Property leading to the destruction of approximately ~33 acres comprised of mixed forest to include stands of old growth forest, wildlife and their habitat, to include state and federally protected species.
  - B. The Application is incomplete.
  - C. The Applicant has not provided a Wildlife Inventory to evaluate impact to the wildlife on-site and the surrounding habitat area.
  - D. The Applicant's Traffic Study is fatally flawed, and invalid.
  - E. The Application, with its significant increase in intensity of use on the Property, and inadequate proposal for management of storm-water runoff, is reasonably likely to adversely impact the Stoughton Brook, the Podunk River, the Connecticut River, on-site wildlife, and wildlife habitat, as well as the public health and safety.
  - F. 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.
  - G. The proposal for a 360,000 sq. ft. warehouse or manufacturing facility with 118 Tractor-Trailer parking spaces, 54 Loading Docks, and upwards of 300 parking spaces,

is reasonably likely to degrade visual quality through significant alteration of the natural and scenic features of the Property and surrounding area.

- H. There are other feasible and prudent alternatives to the Applicant's proposed site-plan including, but not limited to: (a) significantly decreasing the size of any proposed development area; (b) a series of 34 conforming single family home lots could be placed in the same area and provide greater compatibility with surrounding uses; (c) preserving the land in its natural state or for agricultural use.
5. The Commission has jurisdiction of applications for site plan review and approval. The facts show that the Commission should exercise its jurisdiction over the environmental issues presented in this Petition and deny the Application.
6. I/We request pursuant to Connecticut General Statutes Section 1-227, that I/We 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.
7. I/We reserve the right to supplement this petition and amend these pleadings as the Applicant further amends and/or completes their application, or as new issues may arise.

WHEREFORE, I/We, the undersigned hereby intervene in this proceeding pursuant to § 22a-19 of the General Statutes upon the filing of this verified petition for intervention.

Name:

Email Address:

Signature:

Karen P. VIKLINETZ	Kviklinetz506@cox.net	Karen P. VIKLINETZ
GERALD TEYARAJ	geraldj@gmail.com	J. L. [Signature]



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I/We, the undersigned, being duly sworn, depose and say that I/We have read the foregoing  
Petition for Intervention. I/We verify that the allegations contained therein are true to the best of  
My/Our knowledge and belief.

Dated at Manchester, Connecticut, this 25 day of October, 2021.

INTERVENOR(S),

Name:

Address:

Signature:

Karen P. Viklinetz 88 Edgewood Dr., So. Windsor CT Karen P. Viklinetz  
06074  
GERALD JEYARAT 105 CODY CIR, SOUTH WINDSOR, CT-06074 G. Jeyarat

State of Connecticut

County of Hartford

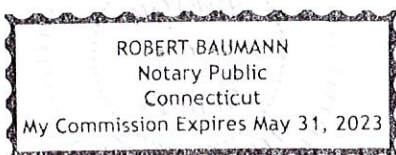
Subscribed and Sworn to before me

on October 25th, 2021 (Date)

By 1

Karen P. Viklinetz

Gerald Jeyarat



Name of Notary Official: Robert Baumann

Notary Public

My Commission Expires: 05/31/2023