



**PETITION TO INTERVENE
INLAND-WETLANDS AGENCY / CONSERVATION COMMISSION
TOWN OF SOUTH WINDSOR CONNECTICUT
IN ALL MATTERS CONCERNING APPLICANTS "UW VINTAGE LANE II LLC";
MR. JOHN URSO; MR. BRADFORD WAINMAN; AND THE SITE
CONSTRUCTIVELY KNOWN AS
25 TALBOT LANE**

"These proceedings involve 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." Conn. Gen. Stat. Ch. 439 § 22a-19(a)(1). Specifically, the application submitted by "UW Vintage Lane II LLC"; "Mr. Robert Urso"; "Mr. Bradford Wainman" (Applicants) for the area comprised of GIS Pin #'s: 88900005, 88900025, 36900475, & 36900551, constructively known as 25 Talbot Lane. Applicants have submitted a Site Development Plan, which will impact approximately ~33 acres comprised of inland wetlands, old-growth forest, and various wildlife to include federally and state-protected species.

I/We, the undersigned, assert the right to intervene pursuant to the Connecticut Environmental Protection Act of 1971, Conn. Gen. Stat. Ch. 439 § 22a-19, and make the following factual allegations:

- (1) The Applicants' proposed activities will directly introduce pollution into the wetlands through the use of mechanized equipment and leakage of various fuels, oils, lubricants, and other human-made waste products on the proposed site.
- (2) The alteration of the topography on the site proposed by the Applicants will cause direct alteration of the hydrology on-site.
- (3) The alteration of the topography on the site proposed by the Applicants will directly impact certain species of vegetation, mammals, birds, reptiles, amphibians, and insects, which may be protected by State and Federal law.
- (4) Industrial use and increased runoff from construction activities will increase impervious surface area and decrease the vegetation which may directly alter the water temperature of the wetlands.

(5) There are other feasible alternatives to the Applicants' proposed activities, which would be less detrimental to the wetlands and watercourses present on-site.

Name:	Address:	Signature:
1. RAGHURAJ SINGH CHANDRA	74, Edgewood Dr, South Windsor, CT-06074	<i>Raghu</i>
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10.		

State of Connecticut
County of Hartford
Signed and sworn to (or affirmed) before me
on 09 September 1 2021 (Date)
by Raghu Raj Chandra

Name of Notary Official:

Notary Public

My Commission Expires:

