

CITY OF MIDDLETOWN  
INLAND WETLANDS AND WATERCOURSES AGENCY

APPLICATION BY THE  
MIDDLETOWN GOLF CLUB TO  
CONSTRUCT A GOLF COURSE IN THE  
MILE LANE-TUTTLE ROAD AREA, MIDDLETOWN

NOTICE OF INTERVENTION AND REQUEST  
FOR NOTICE OF MEETINGS

The Mattabesek Audubon Society, Inc., on behalf of its members, hereby intervenes in the above-captioned proceeding pursuant to Connecticut General Statutes Section 22a-19 and represents that:

1. The Mattabesek Audubon Society, Inc., is a Chapter of the National Audubon Society, a non-profit conservation organization dedicated to the protection, conservation, and enjoyment of the earth's natural resources.

2. In filing this notice, the Mattabesek Audubon Society, Inc., represents its 400-plus members, some of whom are residents, own property, and pay taxes in the city of Middletown, Connecticut.

3. The Environmental Protection Act of 1971 provides, in part, that "any person, partnership, corporation, association, organization 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 to have, the effect of unreasonably polluting, impairing or destroying the public trust in the air, water or other natural resources of the state." C.GoS. 22a-19(a)

4. The Mattabeseck Audubon Society, Inc., asserts that approval of Application 95-43 to construct a golf course is reasonably likely to have the effect of unreasonably polluting, impairing and/or destroying the public trust in "the natural resources and ecosystems of the state, including but not limited to ground and surface water, animal, plant and aquatic life, nutrient exchange, and energy flow." C.G.S. 22a-342.

5. Because of their environmental activities and conservation concerns the Mattabeseck Audubon Society, Inc., and its members may suffer direct and/or indirect damage if Application 95-43 is approved.

60 The above-named intervenor, pursuant to C.G.S. 1-21c, hereby requests that it be given written notice by mail of all hearings and meetings to be held in connection with the investigations and proceedings pertaining to the above-captioned agency application proceeding. Such notices shall be sent to the intervenor at the following address:

Dr. David A. Titus

Mattabeseck Audubon Society  
27 Washington Street  
Middletown, CT 06457

WHEREFORE, the Mattabeseck Audubon Society, Inc., intervenes in this proceeding on the filing of the verified Notice of Intervention and requests notice of meetings.

THE MATTABESECK AUDUBON  
SOCIETY, INC.

By:\_\_\_\_\_

DAVID A. TITUS

Mattabeseck Audubon  
Society, Inc.  
27 Washington St.  
Middletown, CT 06457  
OFFICE (860) 685-2499  
HOME (860) 346-3735

STATE OF CONNECTICUT )  
COUNTY OF MIDDLESEX ) **ss.**

CERTIFICATION

I hereby certify that a copy of the above Notice of Intervention was mailed on postage prepaid, to the applicant, Mr. Mark Quattro, 520 Saybrook Road, Middletown, CT 06457.

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David A. Titus

VERIFICATION OF NOTICE OF INTERVENTION

I, \_\_\_\_\_ being duly sworn, depose and say that I have read the foregoing Notice of Intervention and that the allegations contained therein are true to the best of my knowledge.

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Sworn and Subscribed before me  
this \_\_\_\_\_ day of March, 1996.

\_\_\_\_\_  
Notary Public