

# MACKEY BUTTS & WHALEN LLP

ATTORNEYS AT LAW

Ellen L. Baker  
Robert R. Butts  
Robert B. Dietz  
Richard R. DuVall  
Ian S. MacDonald  
Joshua E. Mackey  
Cara A. Whalen

Christina A. Mazzarella  
Alexander D. Salvato  
Elisabeth A. Schiffbauer

Emily Abrahams  
Tyrone Brown  
Richard J. Olson  
R. Keith Salisbury

Hon. Albert M. Rosenblatt

December 9, 2024

Via Email: [landuse@salisburyct.us](mailto:landuse@salisburyct.us)

Dr. Michael Klemens  
Chairman – P&Z Commission  
Town of Salisbury  
PO Box 548  
27 Main Street  
Salisbury, CT 06068

**Re.: Wake Robin Inn – 104-106 Sharon Road, Lakeville CT  
(Special Permit Application #2024-0257)**

Dear Dr. Klemens,

On behalf of the Applicant, we submit the following in response to the document “Additional Commission Member Questions” and other commission members/public comments for the special permit currently under review by the Planning and Zoning Commission. The below responses were coordinated and discussed with the appropriate barred/certified experts including: Mark Arigoni (SLR), Todd Ritchie (SLR), Mathew Sanford (SLR), Marlee Antill (SLR), Dave Sullivan (SLR), Neil Olinski (SLR), Damien Bell (SLR), Nicholas Block (SLR), Vince McDermott (SLR), Tim Armstrong (Bartlett Tree Experts), Tim Widman (EDM Studio) Dave Jones (Dave Jones Realty), and the applicant (Aradev).

## **Chairman Klemens:**

**1. The event barn appears to be the genesis of many (but not all) of the neighbor’s concerns, including traffic, noise, parking, and lighting. Can this project function if the event barn were completely eliminated?**

No, the event facility has always been a core element of the program and site plan. It is important to note that the applicant has voluntarily met with over 30+ neighbors and concerned citizens, as well as continuously considering and assessing questions from both commission members and the public. Based upon those meetings and the concerns raised, the applicant developed and presented several feasible alternative revisions to the layout, eventually receiving *positive direction* from the commission for the alternative that placed the event facility directly adjacent to the main inn.

Reply to:

3208 Franklin Avenue  
Millbrook, NY 12545  
P 845.677.6700  
F 845.677.2202

319 Mill Street  
Poughkeepsie, NY 12601  
P 845.452.4000  
F 845.454.4966

81 Main Street  
P.O. Box 308  
Sharon, CT 06069  
P 860.364.6232  
F 860.364.6429

[www.mbwlawyers.com](http://www.mbwlawyers.com)

On the continuation of the public hearing on October 16, 2024 after seeing the alternative plans discussed above, Dr. Klemens, asked the commission members for verbal responses to the following statement; “from a commission perspective I want to make sure each commission member states whether this plan is superior to what was previous”. All five regular members approved of the conceptual changes. Some members said it was “much better”, that the plan is “tremendous”, and that “this responded to a lot of the concerns from the neighbors”, but that overall “this is great work.”

Additionally, the event space was reduced by 38% in size and capacity, limiting the maximum number of event guests from 200, down to 125. Historically, events have been held at the Wake Robin Inn for over 25 years as outdoor tented events with music and no regulated limitations on the number of guests. In addition, according to current ownership, there have been no complaints or violations due to noise, traffic, etc. The proposed event building will bring the events indoors, to an acoustically designed space, creating a much better condition than has existed historically

**2. Could the event facility be relocated into the existing hotel where there is already an existing banquet facility?**

No, the event facility and hotel each need their own respective back of house, kitchen, and storage spaces.

**3. What is the capacity of the existing banquet facility located within the hotel?**

The current occupancy is 92 people with tables and chairs, 197 people with chairs only, and 459 people with no furniture. The current banquet facility has significantly fewer restrictions on the proposed maximum of seated or standing events of 125 persons in the new event facility. The current banquet facility located in the Wake Robin hotel is in disrepair and is part of the demolition plan for the redevelopment project. The location of the new core for the building to be ADA compliant is located where the existing banquet space is currently located.

**4. If the event barn was eliminated, could some of the parking that adjoins neighboring properties be moved to the interior of the site where the event barn was?**

Creation of parking in this area would be challenging due to the existing topography and most likely require significantly more grading and retaining walls. The current design of the event building is designed to work efficiently with the existing topography, creating a walkout basement condition

**5. Could this project function without the annexation of the Granberry parcel at 53 Wells Hill Road?**

No, the cottages are an important element to the program. It should be noted that several feasible alternatives have been presented for this area; however, due to comments and concerns raised, and the willingness of the applicant to consider revisions, this area was redesigned to relocate the parking, pool, and spa elsewhere on the site, in favor of proposed cottages to better fit within the Wells Hill Road context. Historically, the Granberry parcel

was originally part of the Wake Robin Inn and was subsequently subdivided sometime in the 1900s. Any further reduction in programming would be detrimental to the viability of the project.

**6. Currently there are three structures on the Granbery parcel. Can you provide the square footage footprint of these existing structures?**

The structures on the Granbery parcel are as follows:

House = 1,904 sf  
Cottage = 958 sf  
Garage = 650 sf  
Shed = 124 sf  
**TOTAL = 3,636 sf**

**7. Can you provide the square footage footprint of the proposed cottages on the Granbery parcel? For the purposes of these analyses consider the footprint to be the maximum extent of the built cottage, i.e., as if they were not on pilings but located on the ground. Be sure to include the existing cottage (proposed to be retained) in these calculations. Provide a comparison of the built footprint of the Granbery parcel as it exists now with what is proposed.**

Existing Footprint = 3,636 sf  
Proposed Footprint = 6,745 sf

The proposed footprint includes the existing cottage (958 sf), two Luxe Cabins at 1,161 sf each (2,322 sf), and five Cabins at 693 sf each (3,465 sf total).

**8. What are the total number bedrooms in the existing Granbery structures? How many bedrooms will exist in the cottages proposed plus the existing cottage?**

There are a total of 6 bedrooms in the existing Granbery structures (main house + cottage). Not included in the bedroom count above is a very large room (currently an art studio in the main house) which can be converted/categorized into a bedroom. In addition, the 2-bay garage that exists on the property which functions as a studio/storage area can be converted/categorized as a bedroom as well.

The proposed cottages (including the existing cottage) will have a total of 10 bedrooms.

**9. Historically the campus of the Wake Robin Inn had a motel, swimming pool, and a hotel that contained a banquet facility. Are there any elements in your proposed development that are markedly different from what exists now, other than expansion of those elements?**

No. Over the years, the Wake Robin Inn has had the following amenities and structures: hotel, motel, bar & restaurant (open to public), banquet room, spa, tennis court, paddle court, croquet court, shuffleboard court, badminton court, lawn bowling court, and swimming pool. The Wake Robin continues bookings of events and overnight stays. As mentioned above, all of the elements that the current redevelopment plan proposes are

either present at the current moment or have historically been part of the Wake Robin Inn property. Based upon historical photographs and renderings, the site property also appeared to be much more open lawn with less forested areas.

**10. Are there any elements of your proposed facility that could be considered NOT customary and incidental to upscale hotels within our region?**

No. All of the elements of the proposed redevelopment plan are industry standard for upscale hotels and can be found at comparable properties in the area (Interlaken, Troutbeck, Winvian Farm, Mirbeau Inn & Spa, and Mayflower Inn).

**11. Representations have been made that the Wake Robin Inn is an inactive facility. Please address that with actual data if possible?**

The Wake Robin Inn has been continuously operational under current ownership for the last 25+ years. The current owners have hosted events and bookings for the private schools, Lime Rock, corporate retreats, various group gatherings, weddings, and parties with a majority of its 38 rooms being sold out during peak time. Over the years, the Inn has hosted outdoor tented weddings for up to 200 guests with music ending at 10pm. The Inn is closed every year from November – April, but the rest of the year it is a thriving business which is far from inactive. Please refer to the letter submitted by the current owners for additional information labeled “Wake Robin Inn History & Operations Clarifications.”

I would appreciate written responses from the Intervener as follows. This does not preclude ARADEV from responding to these questions also:

**1. As the ingress and egress to the site will be on Sharon Road (Rte. 41) why is the position of the Intervener that property values on Wells Hill Road will decrease because of traffic?**

We dispute the subjective and unsupported hypothetical offered by Mr. Rawlings on this topic. Regarding the concern over traffic, which has been fully examined and concurred with by professional traffic engineers on our behalf and on behalf of the Town. As understood by the Commission and documented in SLR’s Traffic Impact Study, dated September 13, 2024, the existing driveway access to the Wake Robin Inn and the Granbery property will be gated and used only for emergency access and would result in a significant reduction in traffic onto Wells Hills Road versus existing conditions. Furthermore, there is no other traffic-routed through Wells Hill Road to access the site from Sharon Road.

**2. Salisbury/Lakeville has the one of the most, if not the most, robust real estate market in Litchfield County. A review of the draft 2024 POCD will show this. Given these facts, how can models such as proposed account for valuation decline.**

It is purely speculative that values would be impacted. In general, over time, real estate values increase. This is not due to one input

3. **Isn't it true that properties in Salisbury/Lakeville routinely sell markedly above the appraised values and corresponding assessments?**

Yes, we concur.

4. **Given that Salisbury/Lakeville has one of the lowest (if not lowest depending on the year) mill rate coupled with many other factors, properties are highly sought after and in most cases are sold within days or a few weeks of listing. Given these realities, can you explain why properties on Wells Hill Road that abut an existing hotel facility will be devalued? (See Question 1 concerning traffic volumes on Wells Hill Road).**

As shown in all of the applicant's professional reports and responses, there will be no adverse impacts to the neighborhood or the community as a result of the proposed project. Although all property value discussions are conjecture, a much more predictable outcome would be that a project of this type would expect to result in general increases in property valuations across the board for the neighborhood and the Town.

5. **Concerning Sharon Road properties, what is the percentage increase in traffic volumes on that State Highway proposed to be generated by this project and how can that percentage affect valuations on an already highly trafficked road?**

As stated by the applicants professional traffic engineer, it is important to note that traffic impacts are not related to the increase in traffic, but rather the impact on operations that those increases have. In this regard, 25 percent increase is more a function of the relatively low volume of traffic on Sharon Road, than the amount of site traffic. Our analysis indicates that a Level of Service (LOS) A for vehicles on Sharon Road and an LOS B for vehicles exiting the site are anticipated. These are excellent LOS's and in no way, would suggest any traffic impacts from the proposed project. Any discussions or opinions that would suggest that the 'traffic' from this proposed project would negatively impact property valuations are purely suggestive, and opinion based only. A second opinion is that a project of this type would expect to result in general increases in property valuations across the board for the neighborhood and the Town.

6. **There has been testimony as to the fact that the proposed facility will generate impaired (drunk) drivers. What is unique about this facility that will generate significantly more impaired drivers than any of the restaurants in Lakeville that front on Route 41 or abut Route 41? This has not been an issue with other facilities recently permitted such as Fern and the expansion of The Boathouse.**

There is nothing unique to this facility to suggest that there will be an increase in impaired driving than any other restaurant, hotel or event venue in Salisbury or Lakeville. The applicant has discussed many levels of their commitment to the safety and security of hotel guests and the community at large. The applicant acknowledges its responsibility to be good neighbors and intends to be exceptional community partners. The applicant has agreed to require its staff that is serving alcohol to be certified in SERV Safe Alcohol training (<https://www.servsafe.com/ServSafe-Alcohol>) to promote safe alcohol consumption. In addition, the applicant has agreed to require law enforcement to be present for event barn functions that exceed 50 guests where alcohol is being served.

- 7. As part of the cell tower application (Docket 501) of the Connecticut Siting Council, a significant portion of the site was environmentally assessed by the CT-DEEP, USFWS, and the CT-CEQ. As this occurred recently in 2021, why is ARADEV to be held to a higher standard than the State of Connecticut held New Cingular Wireless?**

As it has been shown throughout the Special Permit application process, Aradev is committed to working with the Town land use commissions, the neighbors, and the public to build a project that is truly special, environmentally sensitive, and uniquely designed to fit into the landscape. The project meets or exceeds all regulatory requirements and guidelines and significantly improves water quality, invasive species management, and the safety of vehicles entering and existing the property along Sharon Road.

- 8. Under interrogatory/response 13 of Docket 501 the question of core forest was discussed. It was asked/responded to that this site was not core forest as defined by the CT-DEEP. Do you agree with that finding?**

According to the CT DEEP Core Forest GIS Mapping, a very small section of GIS based small core forest is mapped along a section of the southern fringe of the subject parcel. The sliver of core forest mapped into the edge of the property is at the northern edge limits of the small core forest.

- 9. In the Intervener's testimony it was represented that the site was part of a 300-acre habitat block. What are the constituent components of this block (forests, fields, development) and how does that differ (i.e., how is it markedly unique) from most of the contiguous habitat blocks in RR1 and RR3 zoned parcels in Salisbury? As far as habitat blocks go within Salisbury, wouldn't you agree that this parcel is at the lower end of the acreage within habitat blocks in the RR1 and RR3 zones?**

We agree that this parcel is at the lower end of the acreage within habitat blocks in the RR1 and RR3 zones.

- 10. Would you characterize "old growth type forest" more accurately as mature second growth forest?**

Yes, we would say that portions of the site have mature second growth forest.

- 11. Interrogatory/response 41 of Docket 501 concluded upon consultation with the USFWS that there were no long eared bat hibernacula within 0.25 mi. of the site and no maternity roosts within 150 feet of the project area (including access road). Do you agree with this statement?**

During the various SLR site inspections, they did not specifically look for maternity roost trees for this project.

- 12. Can the protection of maternity roosts of long-eared bats be managed by seasonal clearing restrictions?**

Yes, completing clearing between Nov 1 through April 14 protects the NLEB. The long-eared bats are not using maternity roost trees during this hibernation period.

- 13. Can the protection of maternity roosts of long-eared bats be augmented by retaining certain tree species that provide optimal maternity habitat? Please describe those trees by species and identify where these trees occur on the site. How many of these trees are being preserved in the current development plan and how many are being lost?**

We did not conduct tree surveys for documenting potential maternity roost trees, however it can be assumed that with a large number of mature trees to be retained on site, that there would be suitable habitat.

### **Allen Cockerline**

- 1. The first big question for me is how is this not an expansion given that it is adding the Granberry property? The exclusion of the Granberry property would add a buffer while reducing the development impact. Another approach could be simply a further reduction of development activity on the Granberry parcel.**

The proposed Wake Robin Inn redevelopment project is an expansion of the property which includes 53 Wells Hill Rd (Granberry). Historically, the Granberry parcel was part of the Wake Robin Inn property and was used as the residence for the owners.

- 2. Next question related to that is the idea of incorporating the event space into the main building. If it were buried in the core of the larger building it seems logical that sound containment would be more easily achieved. This also puts the burden of sound containment front and center in hotel guests enjoyment of their stay. I would support an increased footprint to accommodate this.**

The Event Barn location has been revised based upon comments and desires received from commissioners, neighbors and the public to be closer and more in line with the hotel/inn structure and functions, thus having the same burden of sound as the hotel and restaurant guests. The programming and space requirements for the Event Barn to efficiently operate will not fit within the existing hotel or within the expanded extension. The Event Barn must be a standalone structure as presented.

- 3. What effect would a solid fence within the planted area surrounding the north parking lot have on sound traveling to adjoining areas? Are there other areas that could benefit from similar treatment? Auto noise and the behavior of guests are a concern.**

The applicant is not opposed to proposing a solid panel, decorative fence, (6' height), in combination with the vegetative buffer already proposed around the sides of the parking lot closest to abutting neighbor properties.

- 4. I'm not sure that the drainage into the CT DOT easement will be increased or decreased. There will be an improvement in the roadside conditions but it seems that the same square footage of the drainage area may not increase and may in fact decrease. Most of the DOT drainage is less than ideal so any reduction in runoff from**

**both the applicants property and the DOT ROW would be positive. Is there any chance of infiltration within the DOT easement prior to the catch basin?**

The proposed drainage plan does in fact reduce runoff and improve water quality through a variety of recommended BMPs, including infiltration, from the site to the CT DOT drainage system. CT DOT will review and approve the final work, including site lights and drainage improvements within its right-of-way.

- 5. My last concern is in regard to the Rawlings report. To me this demonstrates a reduction in value from the town appraisal. No quantitative value was established though and I think it's fair to say that everyone knows these values are far from what properties in Salisbury sell for which is often many times the tax assessment values. I'm not sure it meets the "unreasonable adverse effect" cited in 803.3. What are the actual variables in lot values used by the assessor's office?**

Any discussions or opinions that would suggest that this proposed project would negatively impact property valuations are purely suggestive, and opinion based only. A second opinion is that a project of this type would expect to result in general increases in property valuations across the board for the neighborhood and the Town.

### Cathy Shyer

- 1. Are you in discussions with the owners of the property on the right of the existing WR driveway on Sharon Rd (up on the hill, new balconies, currently unoccupied) to purchase this property?**

The applicant has had numerous conversations with the current owners of 110 Sharon Road and they have expressed their support for the redevelopment project. The applicant has not discussed the potential purchase of the home and does not intend to in the future.

- 2. If you were to purchase any additional abutting properties, would you commit to only using them for staff housing**

Any expansion via abutting properties would be brought before the Planning and Zoning Commission for its consideration, review, and approval/denial in compliance with the town zoning regulations.

- 3. Would you agree NOT to promote or advertise the Salisbury Town Beach aka the Grove to your guests?**

As mentioned via previous comment response letters, the applicant has not had conversations with the Town regarding guest access to The Grove, but is open to suggestions of limiting guest passes in an effort to make sure that town residents have priority over hotel guests. Once appropriate, Aradev will discuss logistics and access with town officials.

- 4. Would you ask your guests NOT to walk or run on Wells Hill Road or south bound on Sharon Rd?**



Hotel staff will be advised to encourage hotel guests to utilize town sidewalks. Once guests are off the property and on public roadways, hotel staff cannot legally control where people are walking/running and the same goes for the Salisbury Planning & Zoning Commission.

**5. How would you mitigate the noise from cleanup of the restaurant or event spaces ie bottles, garbage haulage.**

The placement of the refuse and receiving areas were strategically relocated further into the property whereby all trucks, vans, and delivery vehicles will have to drive by the hotel right next to guestrooms. This was purposely done to align on times that would be best for both guests and residents. The applicant will coordinate with the refuse providers to make best efforts to have refuse picked up during regular business hours.

**6. You were asked by Mrs Cruger in one of the earlier hearings to please identify other hospitality properties that you have developed or operated. Was this question ever answered and would you please share that information i.e. names and addresses with us.**

As mentioned in numerous correspondences prior, this is the first project under the Aradev company. Its founders (Jonathan and Steven) have over 30 years of experience in developing, constructing, managing, and operating hospitality and residential properties. As Dr. Klemens advised on numerous occasions, the planning & zoning commission is to review the use, not the user. There is no requirement in zoning that a like kind project must have previously been developed. Zoning is a matter of law and regulations.

**7. Can you please address the issue raised by the interceder that the development of a spa and event space is not allowed in RR1.**

According to the Zoning Regulations, a hotel is permitted via a special permit in the RR1 zone. A hotel is defined in the regulations as “A facility offering transient lodging accommodations, that may include additional facilities and services, such as restaurants, banquet facilities, meeting rooms and event spaces, personal services, gift shop and convenience store, and recreational facilities.” Therefore, a spa or event space is a permitted “additional facility or service”

**8. If the entire project was permitted how long would you expect demolition to take? How long would you expect construction of the new facility to take?**

From the time of a building permit, 4 to 6 months for demolition and then 14-18 months for the renovation and new construction. This is all dependent on weather and any other agencies' requirements

**9. How and where would promote such a resort?**

There will be two key hires related to marketing - a Director of Sales and Marketing and a Director of Events. These hires will build out their own departments within the operations team. The sales team will seek to partner with an upscale reservation system.

**10. Do you see a market for mid-winter and shoulder season business**

Yes, we believe the site is well-programmed for corporate retreats and destination travel. Coming to the property will be an experience where you can stay, relax in nature, workout, eat, and enjoy the spa year-round.

**11. Question for tree experts both interceder and applicant's Mr Townsend (?) about the role of mature trees in absorbing noise.**

The usual higher canopy (branches and leaves) of mature trees tend to make them less effective at absorbing noise created at lower heights. Evergreen and deciduous plantings, such as those proposed in the projects buffer areas, will be more successful absorption of any sound. However, it is important to note that although buffer plantings and fences do assist in removing the visual component of the sources of sound and will have minimal sound attenuation benefits, the applicant has committed to mitigating any potential noise by addressing the potential sources of sound. For example, the pool amenity has been moved interior to the site, away from Wells Hill Road, with the bar/food building removed. The event barn has been moved adjacent to the Inn, as requested, event capacity capped at 125 guests, and will be designed and constructed with sound mitigation as a primary element. The loading and service area has been relocated with the event barn to areas in the rear of the property, adjacent to the cell tower (currently under construction by others). The spa has also been relocated from the Wells Hill Road side of the property to an area behind the Inn and Inn expansion.

**Dr. Danella Schiffer**

**1. Who is the clientele for the event barn? What will be the criteria for selecting groups?**

The clientele for the event barn is in line with the clientele for the hotel, upscale luxury travels and weekenders. Therefore, the event barn will be an exclusive use to those wishing to host an upscale event or meeting. The use of the event barn shall be restricted to purposes, which offer community benefits and family events. Community events shall include banquets, arts & crafts shows, antique shows, product demonstrations, business meetings, training classes, seminars and others deemed appropriate. Family events shall include wedding receptions, bar & bat mitzvah celebrations, birthday celebrations, anniversary celebrations, wedding & baby showers, family reunions, class reunions and others deemed appropriate.

**Public Comment Questions:**

**1. Why is the proposed 2,815 sf event space so much larger than needed?**

The current sizing of the event barn accounts for the reception space, bathrooms, storage, back of house (office / breakrooms). A diagrammatic floor plan has been added to the public record which illustrates a "sample room layout" for a typical function with a maximum of 125 people seated.

**2. Why is the event barn building (about 8,000 sq. ft.) so much larger than the event space? Does Aradev plan to expand the event space in the future?**

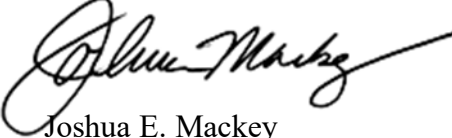
The event barn “reception space” is about 2,800 sf, which is the appropriate size for a 125 person event which includes tables, chairs, dance floor, band/DJ stage, bar, cake table, etc. without the room being too crowded for service flow. Our operations team has extensive experience in upscale weddings, and it is industry standard to account for 20 – 25 sf per person when planning an upscale wedding. In addition, a future expansion can only occur with a new special permit application.

**3. Why is the event barn building needed at all given the 2,800 sq. ft. banquet hall / bar / restaurant space that already exists in the Inn building?**

The current Inn has a 1,400 sf banquet hall that is in severe disrepair. The current restaurant and bar will be renovated and expanded into the new restaurant/bar. The new event barn will allow for much better sound attenuation due to the new construction methods in place.

Sincerely,

**MACKEY BUTTS & WHALEN, LLP**



Joshua E. Mackey

cc: ARADEV LLC

# **EXHIBIT A**



Steven Cohen &lt;scohen087@gmail.com&gt;

## Wake Robin History & Operations Clarifications

1 message

**shaffin wakerobinn.com** <shaffin@wakerobinn.com>

Thu, Dec 5, 2024 at 11:36 AM

To: Steven Cohen &lt;scohen087@gmail.com&gt;, Jonathan Marrale &lt;jonathanmarrale@gmail.com&gt;, Joshua Mackey &lt;jmackey@mbwlawyers.com&gt;

Cc: "michael wakerobinn.com" &lt;michael@wakerobinn.com&gt;

Dear Steven, Jonathan and John,

Misleading comments made during Planning and Zoning Hearings these past few months are lacking important context about the Wake Robin. As property owners, we are pleased to forward the following history and operational summary, germane to the Aradev application:

Far from being "inactive," the Wake Robin has a robust groups strategy for almost 25 years under current ownership that focuses on private Schools, Lime Rock corporate partners, retreats, other group gatherings, and weddings as well as wedding lodging, and parties.

In 2024, the Inn hosted 3,000 guest lodging nights during its current peak-season strategy, with almost all guests arriving from outside the area. This represented a 10% occupancy increase from 2023, when the property hosted 2,700. Each year, the property has seen steady increase in lodging, with guests utilizing up to 38 private rooms in two separate buildings (not 26, as claimed by intervenor testimony) .

The Wake Robin has operated with this evolving, group-focussed strategy with no lodged noise or other complaints from neighbors, including when the Inn has:

- Hosted outdoor, tented weddings for up to 200 guests. Music has ended at 10 p.m., per guidelines, and after-event celebrations move indoors – just as they do at other properties such as the Interlaken and the White Hart. Commission members are invited to view the following video compilations of various weddings, including those booked and enjoyed by local families for their sons and daughters: <https://link.zixcentral.com/u/c8f5a79d/yta1rDWy7xGaqob0W9GfSw?u=https%3A%2F%2Fwww.dropbox.com%2Fsl%2Ffo%2Fpit1w36tl1c1qj8ifhh8c%2FAN56vSbr2FkHDh-oEL9c1Zs%3Frkey%3Dxwoqxytphartz0fex4moc4w%26dl%3D0>
- Also hosted multiple functions serving 150+ guests total with cars, including local guests for a popular Irish pub until 2007 that operated concurrently during multiple groups celebrations, without neighbor complaint.
- Managed to meet building inspector and fire marshal oversight for such onsite events, set-ups and guest capacity.
- Utilized full parking almost every weekend during every peak seasons since 2002 (except during Covid) – including a second parking lot that abuts Wells Hill Road.
- Experienced traffic volume increases during peak seasons since 2002, as guest cars, shuttles and buses enter and exit Sharon Road, including past 1 a.m. on weekends.

\*\*\*

Michael Loftus  
Shaffin Shariff  
Managers, Wake Robin LLC

With best regards,

Shaffin  
Wake Robin  
Office | (860) 435-2000  
Mobile | (860) 938-7724