No. 6
2017 Management Plan
GRACE FARMS FOUNDATION, INC.

2017 MANAGEMENT PLAN

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A. Master Plan

A-I. The Foundation’s Mission for the Property. Grace Farms Foundation (“the Foundation”) sees its 80-acre site at 365 Luke’s Wood Road in New Canaan (“the Property”), under its Core Initiatives of Nature, Arts, Justice, Community and Faith, as a place of “grace and peace,” a vibrant community to advance good in the world. The Foundation is intent on a purposeful low intensity use of the Property, in a manner that preserves its natural beauty as a place for spiritual growth and reflection. The Property offers to the New Canaan community a refuge from — and a contrast to — the busy pace of modern society.

Statistical data from the first year of Foundation operations shows that the average attendance of the majority of its own programs and of the space grants awarded to non-profits was less than 25 persons. The combined use of the Property for public visitation, Grace Community Church (“the Church”) activities, and Foundation activities, with the maximum on-site, paved parking availability of 226 spaces, has not once caused a traffic or safety complaint for the neighbors.

The Foundation thus has self-imposed limits on the intensity of its operations, given its commitment to preserve the site’s natural beauty and to create a space for peace and reflection. This “philosophical” limit on growth-borne-of-success, has worked in tandem with the very practical limits of 226 available parking spaces to ensure that activities and events do not change the character of the residential zone, or impede the enjoyment and value of the residential properties surrounding the Property. The Foundation has demonstrated effective site management of Grace Farms in its first 18 months, and has refined its approach in this Management Plan.

An important part of the Foundation’s philanthropic mission is exercised through its “space grants,” meaning an invitation to select non-profits to use the Grace Farms facility and the expertise of the Foundation staff for a specific event or program. The intention of the Space Grant program is not to attract crowds but to meet identified need, and to facilitate creative operations and good works by community service non-profit organizations. Space grants are typically small in attendance, and have proven to be a seedbed for creative thinking and solutions. The space grant program provides a nexus for non-profits to meet identified needs and an opportunity to collaborate with Foundation staff and other non-profits, often from other sectors.

A. Screening for Grace Farms’ Neighbors. The Foundation understands that an effective screen/buffer of its special permit activities from the residential neighbors on its borders is essential to their enjoyment and use of their properties. Since 2015 the Foundation has voluntarily planted 135 mature trees, ranging in height from 8’ to 16’, beyond the number required in the 2013 Amended Special Permit landscape plan, to better buffer the neighbors’ properties. In addition, in 2017 the Foundation re-evaluated the efficacy of this screening in consultation with its neighbors, with the Town Planner, and with its own landscape architects, and has committed to supplement the buffers between it and its neighbors, as shown on the attached Tab A, “Neighbor Screening & Buffering Plan,” dated March 24, 2017 by OLIN Partnership, Ltd, and to maintain this screen/buffer for its neighbors in the years to come. Tab A shows an additional 74 new mature trees (meaning a total of 209 trees beyond the approved

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1 The 5 sheets behind the Plan are sections showing the screening / buffering / fencing along the boundary with each neighbor.
2013 landscape plan), sized and placed in a way that, over time, they will grow and spread, thereby improving the buffer substantially each year.

For its neighbors on Smith Ridge Road, for whom topography does not make a full opaque screen/buffer feasible, the Foundation has undertaken adjustments to its lighting plans, described below, to make the impact of evening activities on the Property as minimal as possible. In addition, the trail east of the River Building has been retracted, after consultation with the Smith Ridge neighbors, to provide a buffer in respect of their privacy. Tab B is the “Walking Trail and Tour Landscape Plan” showing the reduced trail/tour routes and trail signs and that will be posted on the Property. This re-direction of the paths makes the entire 8 +/- acre wetland meadow area east of the stream on the Property an open space buffer. Additional fencing in the areas near the neighbors, as shown on Tab A, and the trail signs shown in Tab B shall be permanent features that will keep visitors on the trail and away from the boundary fence.

B. Regular Consultation with Neighbors. The Foundation has established a Neighbor Assistance Protocol, described in Section B-IX, below, with a dedicated telephone line for the exclusive use of its contiguous neighbors. This telephone number will be answered by Foundation safety personnel 24 hours a day. The matters reported will be responded to as quickly as possible and shared with the Town Zoning Official.

As part of this Neighbor Assistance Protocol the Foundation will also communicate regularly with its neighbors who wish to receive information about its key activities.

A-II. Strategic Vision for the Property. The Foundation anticipates that its Special Permit will need to be modified in certain ways as its programs and activities develop and as it gains experience in the maintenance and upkeep of the Property. The following are areas in which change is anticipated:

A. Extension of the Special Permit to All Foundation Parcels. The 2013 Amended Special Permit applies only to Lot 77, the 47.98 acre parcel. The Foundation has asked the Commission to modify the Special Permit to include two other parcels --- Lot 76, the 26.80 acre parcel, and 82 Puddin Hill Road, the 4.61 acre parcel --- owned by the Foundation. See, Tab C, “Zoning Location Survey,” dated March 21, 2017 by Rocco V. D’Andrea, Inc., Surveyor. With this added acreage, the Foundation’s entire contiguous real property holdings at the site are subject to the terms of the Special Permit, providing uniformity of regulation for the Town and neighbors.

B. Use of 82 Puddin Hill Road. The Foundation purchased the 82 Puddin Hill Road parcel in 2015 because it extends deeply south and between Parcels 76 and 77. This 4.61 acre parcel is improved with a residence and detached shed that are in need of significant structural repair and that have not yet been put to any use by the Foundation.

The Foundation’s plan is to apply in the future for municipal approvals to relocate part of the Foundation’s maintenance and staff parking and offices, presently located at the West Barn and shed at the south end of the Property, to the 82 Puddin Hill parcel and the first floor of the structure. Given its location within the larger tracts around it, and the mature vegetation buffering already in place, relocated parking and office uses on this 4.61 acre parcel will be
even less noticeable to neighbors. The second floor of the residence could be renovated to house a scholar- or artist-in-residence opportunity at the Foundation.

C. Additional Parking for the Church. The 226 parking spaces authorized under the 2013 Amended Special Permit have proven adequate for Foundation and the Church activities during the week and for special events. However, it is not adequate for the Church Sunday service, and has necessitated shuttle service to off-site parking in Vista, NY.

The Foundation is studying this overflow parking situation, and is considering a zoning application in the near future to add additional parking to relieve this overflow Sunday need. The location of such parking is of critical importance, and would be vetted carefully with neighbors and Town staff before being presented in a formal application.

One design under consideration utilizes “green” construction techniques for unmarked temporary spaces that are lawn when not used, but would be available for supervised parking on Sunday and possibly occasional special events.

D. Outdoor Activities. The Foundation is committed to enhancing and maintaining the natural beauty of the Property, of which less than 3 acres have been developed and which has been augmented to nearly 80 acres in total by extending the Special Permit to all three parcels owned by the Foundation.

Trails have been mowed through the meadow to the north and east of the River Building, and to the Cattail Pond, to facilitate passive recreation. In 2017 the trails were reconfigured, as per Tab B, "Walking Trail and Tour Landscape Plan," away from the eastern wetlands, in order to provide a privacy buffer to the Smith Ridge neighbors.

Future plans of the Foundation, especially under the Community and Nature initiatives, may include applications to expand activities for enjoyment of the natural setting, including seasonal activity such as use of the wetlands trail east of the brook in the summer, when the deciduous foliage screens the area from the neighbors. Any such plans would not include removal of the privacy barrier fence that is shown in Tab A, "Neighbor Screening & Buffering Plan.”

E. Future Growth. The Foundation, as the owner of the Property, has sole responsibility and control of the future and growth of the activities and structures on site. It has no plans of its own to increase the pace of its activities. Nor are there any plans to develop the Property or to expand the present structures, except, as noted above, to put the 82 Puddin Hill Road residence to use, and to evaluate an overflow parking solution. Two factors inform this view of the Foundation’s future: First, the River Building, which has won international architectural acclaim, was designed expressly as part of the larger natural beauty of the Property, and is dependent, practically, on the Property in its natural state for its attraction and value. Second, as stated above, the mission of the Foundation, committed to the simplicity and pace of the natural setting it has restored, is such that growth out of success, or growth for growth’s sake, is anathema to that mission.

The Church, as licensee on the Property, cannot elect to grow uncontrolled. It has no legal right to expand the physical size of the Sanctuary. More importantly, it is already well-situated with the seating capacity approved in earlier proceedings. If its congregation increases in size, it has the option to hold additional services on Sunday, which will not increase the intensity of use, because other uses on that day will simply be curtailed.
B. Operations Plan

B-I. General Hours of Operation.

A. General Public Visitation. Public visitation to the Property may occur as follows:

1. Mondays: Closed
2. Tuesday through Saturday: 10 AM to 7 PM
3. Sundays: 12 Noon to 6 PM

B. Church and Foundation Use. The Property is open from 7:00 am to 11:00 pm for the scheduled activities of the Church and Foundation, other than those described in Section B-III, below.

On Sundays, the Church has exclusive use of the Property for worship services and other activities, until 12:00 noon, when general public visitation begins. If the Church needs to schedule additional worship services on Sunday, the hours the Property will be open to the public may be reduced.

C. Tours. The Foundation conducts organized tours during the Public Visitation hours, as follows and as shown on Tab B, “Walking Trail and Tour Landscape Plan.”

1. Tours occur in groups of 25 persons, led by a Foundation employee. The paths of the tours and trails available for passive recreation are shown on Tab B, “Walking Trail and Tour Landscape Plan.”

2. A special art offering is provided between 11 AM and 3 PM from April 2nd to November 29th at the Cattail Pond shown on Tab B, for the purpose of exhibiting the site specific art installation by Susan Philipsz, entitled “New Canaan.” This work, which is the artist reciting a poem inspired by the sheltered pond site, is approximately two minutes long and would play on the half hour during the times offered.

\[2\] Susan Philipsz was born in 1965 in Glasgow. She completed a BA in Fine Art at Duncan of Jordanstone College of Art, Dundee (1989–93) and an MA in Fine Art at The University of Ulster, Belfast (1993-94). In 2010, she won the Turner Prize and in 2014 she was awarded an OBE.

\[3\] Selected from an anthology of 19th-century songs—“Parting Friends” is the voice of the artist herself that travels across the pond. The melancholic song, the lyrics of which convey the singer’s desire to meet her loved one in Canaan, finds its way into the listener’s heart. It is a simple song, which anyone can sing, and yet it is a powerful symbol of human encounters and separation.

Parting Friends

Farewell, my friends, I’m bound for Canaan,
I’m traving through the wilderness;
Your company has been delightful,
You, who doth leave my mind distressed.
I go away, behind to leave you,
Perhaps never to meet again,
But if we never have the pleasure,
The Foundation in 2017 engaged AKRF, Inc., a NYC engineering firm with expertise in acoustics, to evaluate the site and to advise about the appropriate volume for the display, to ensure it is not audible to any contiguous neighbor. AKRF's summary, entitled "Acoustical Survey and Recommendations Report," dated March 16, 2017, is attached as Tab D.

3. The Foundation offers a "Grace Farms Pass" free of charge that is intended to facilitate use by frequent visitors. This permits quicker access to the Property. It can also be used to borrow books from the Foundation's select library of literature about the Foundation's five Core Initiatives.

B-II. Parking Protocols. The Foundation safety staff monitors the number of vehicles on site, from the entrance gate, based on ongoing visitor counts and knowledge of scheduling between the Foundation and Church. In this way the Foundation is aware at all times when an event has been scheduled and the associated parking demand. If the combined Foundation / Church parking demand ever begins to approach the maximum parking available, the Director of Safety or his designee is authorized to exclude general public visitors and to invoke the same shuttle service to off-site parking that the Church employs on Sunday mornings.

On Sunday mornings the Property is closed to the public, to give the Church complete use of available parking for its worship service and related activities. Foundation safety staff and Church volunteers work together to direct congregants to parking spaces in the North and South Lots, and to ensure that access by emergency vehicles is always available. The Sunday shuttle service for overflow parking, approximately one mile away in Vista, NY, has worked well.

B-III. Event/Program Attendance and Policies.

A. Intensity of Use. The Foundation coordinates all activities on the Property in advance with the Church and its internal records of public visitation in a manner that ensures against any negative impact on the residential neighbors. With this planning, Foundation safety staff each day can monitor the number of expected visitors and general public visitors against the maximum 226 parking spaces. In this way, the intensity of use is effectively managed to avoid an overburden situation.

B. Principal Use Events and Activities

1. Religious Use Activities. The Church, or its successor, as the Foundation may provide, conducts worship services and other church-related outreach activities under and accessory to the Religious Institution Use on the Property.

2. Foundation Use Activities. The Foundation conducts activities under the Philanthropic Use and Club/Organization Use and recognized accessory uses. Specifically, Foundation Use activities" include (a) programs and events related to one or more of the five "Core Initiatives;" and (b) "space grants," as described below.

I hope we'll meet on Canaan's land.
Foundation activities are conducted in a way to be consistent with the Special Permit Criteria set forth in Section 8.2.4(a) to -(g) of the Zoning Regulations and with the 2014 Town Plan of Conservation & Development.

C. Types of Events.

1. **Large Events.** No more than twelve (12) “Large Events” per calendar year (including the Foundation’s annual October weekend celebration) may be held at the Property, defined as one at which more than 700 participants are anticipated to be present at one time. Large Events do not include Sunday or Holy Day Church services, memorial or wedding services.

   If held inside the Sanctuary, a Large Event requires advance written notice to the Town Zoning Officer. If held outdoors, it requires advance review and authorization by the Commission.

2. **Regular Events.** No more than twenty-four (24) “Regular Events” per calendar year, (not including Sunday or Holy Day services, memorial or wedding services) may be held at the Property, defined as one at which more than 300 but less than 700 persons will be present at one time. Of these Regular Events, a maximum of eight (8) can be held outdoors. Regular Events require advance written notice to the Town Zoning Officer.

3. Large Events and Regular Events require advance coordination between the Foundation and the Church for scheduling of other programs/events to ensure the Property will not be overburdened. If more than 500 persons are expected to attend an event at one time, the Property will be closed to the general public.

4. Events at which less than 300 persons will be present at one time are managed by the Foundation and its safety staff, consistent with the safety and parking protocols discussed above.

D. **Annual Report to the Commission.** The Foundation will make an annual report to the Commission by March 1st of its prior year’s activities, providing statistical data of its activities and attendance.

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**B-IV. Foundation Program: Space Grants.** The Foundation conducts its charitable mission for the community and non-profit service groups through “space grants,” which allow a selected non-profit to use a designated area, structure, or room for a specific program or purpose that falls under one or more of the Foundation’s Core Initiatives. The space grant program is highly selective, on a rolling basis, with less than half of the applicants receiving approval. There is typically no charge, or only a nominal charge, for space grants.

The Space Grant Committee is overseen by the Director of the Community Initiative at the Foundation. It is comprised of the Foundation Core Initiative and Operations directors, events team, and other relevant staff. It looks at a number of factors, chief among which are the applicant’s need, if the intensity of use is appropriate for the Property, the allocation of space grants to date among the Foundation’s five Core Initiatives, and if the program/event fits the Foundation and Church calendars. The Foundation website calendars only the few non-profit space grant activities that are open to the public. A sample of the Space Grant Application and a Summary of 2016 Space Grant Awards are attached a Tab E and Tab F, respectively.
B-V. **Foundation Program: Sustainability Funding Opportunity Events.**

A. Subject to prior advance written notification to the Town Zoning Officer, and as a customary accessory use by cultural/artistical sites, the Foundation may hold no more than 24 “Sustainability Events” per year, meaning activities and events on a strictly limited basis, for commercial organizations or entities attended by between 25 and 300 persons. Sustainability Events include, but are not limited to, company board meetings, team retreats, and commercial photo shoots or videography, in exchange for a substantial monetary donation to the long-term financial sustainability of the Property.

B. Sustainability Events shall not include use of the Property as a commercial concert or commercial performing arts venue.

C. If a Sustainability Event involves an attendance at one time equal to that of either a Large Event or Regular Event, as described in Section VII, above, it is counted against the number of such Large Events or Regular Events allowed per calendar year.

B-VI. **Accessory Food Service on the Property.**

A. **Accessory to the Foundation and Religious Uses.** The Foundation provides a limited food service as an accessory use to the Foundation's Philanthropic Use and charitable activities, to the passive recreation use to which the Foundation has dedicated the Property, and to the Religious Institution Use by the Church, and “Pavilion” Volumes of the River Building, and for other programs and activities, as described above.

B. **Hours of Operation for the Public.** Lunch service is available for general public visitors, is self-serve and not for “carry out,” from 11 AM to 3 PM Tuesday-Saturday, and 12 Noon to 3 PM Sundays. Beverages and snacks are sold from 10 AM to 6 PM. A sample of the Commons lunch menu is attached as Tab G. Dinner is not available to the general public except at the single Friday night per month “Community Dinners.”

C. **Annual Report.** The Foundation, as part of its Annual Report to the Commission, will report on its food service revenues and costs to demonstrate that revenues were less than the total cost of supplies, labor and maintenance costs for the kitchen and Commons. Any expansion of the limited food service operation shall be subject to approval by the Commission of a modified Special Permit.

B-VIII. **Lighting.** The lighting approved and installed under the 2013 Special Permit was designed and has worked to eliminate light trespass onto any neighbor's property. The Foundation has made every effort to minimize the visibility of evening activities on the Property to its contiguous neighbors. During summer months the deciduous tree foliage provides an effective shield. The Foundation in 2016-2017 tested a seasonal lighting plan described below for the winter months, that proved effective and will be maintained as part of this Management Plan.
A. River Building. When not in use, the River Building lights, except the Court (discussed below, in B.), will be manually turned off by 8 PM, following building cleaning. This is in addition to the electronic timers installed as required in the 2013 Special Permit.

For events in the Commons after 8 PM from January 1st to April 15th, the Foundation will dim the interior lights to “Low,” to reduce significantly their visibility to the east. The photographs attached as Tab H, taken during a Foundation event in the Commons on March 3, 2017, show the contrast between “High” and “Low”, and the efficacy of this change.

The Sanctuary has opaque curtains installed for use in evening events (50’ behind the stage) that will be drawn after 8 PM from January 1st to April 15th to minimize its visibility. Similarly, the Library will dim its interior lights to “Low,” and use the east facing curtains in the conference room during evening meetings.

B. The Court and Pavilion Volume. The Court and adjacent Pavilion are the structures of the River Building lowest in elevation. These structures are used by the Church for community outreach activities almost every evening until 9:30 PM, and will generally be closed with all lights off after cleaning by 10 PM.

C. Security and Landscape Lighting After-Hours. The 2013 Special Permit allows outdoor security lighting as shown on the approved Site Lighting Plans E-101 and E-102. The Foundation has determined that the lighting in the south parking lot and River Building can be reduced substantially, to make the Property even less visible after dark.

The Foundation reserves the right to adjust this voluntary modification, after consultation with the Town Zoning Officer, if safety experience or insurance-related issues require more lighting.

B-IX. Security. The Foundation has engaged a Director of Safety with considerable law enforcement and security experience and has implemented the safety regime described below to address issues of security, privacy, and preservation of property values that are important to any residential neighborhood. This regime provides a level of security that is greater than what a religious institution operating by itself could provide.

A. Security Monitoring. The Foundation, as investor/steward/owner of the international award-winning River Building, the art works on site by internationally renowned contemporary artists, and the 80-acre Property itself, maintains security cameras at the front entrance, in every structure, and at strategic points across the Property for insurance and safety purposes. These cameras are monitored in real time 24 hours a day by safety staff in the Operations Center, for rapid response to any problem.

B. Director of Safety / Safety Staff. The Director of Safety is an experienced professional in security measures, liaison with government and law enforcement agencies, and management of a safety team. The safety staff is comprised of former New Canaan Police

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4 East facing curtains are a possible but not ideal option for the Commons, because of design/architectural reasons. More importantly, the dimming regimen to which the Foundation is committed, is as effective, if not more than, use of east facing curtains.

5 The present Director of Safety who designed the Foundation site safety protocols is the former federal Resident Agent in Charge of the Department of Homeland Security, New Haven Division, with over 20 years law enforcement experience. He is a
Department personnel or persons with law enforcement experience. All safety personnel are first aid- / CPR- / AER-certified, and certified traffic control flaggers. Foundation safety personnel are required to participate in the Securitas On-Line Academy, which provides Advanced Certification Training (ACT 1-2-3) for ongoing topical training in law enforcement and security issues.

C. **Staffing Events.** The number of safety staff on duty is in accord with national recommended safety guidelines of American Society for Industrial Security, and is determined on a case-by-case basis, in the judgment and experience of the Director of Safety. The decision process anticipates that the number of safety personnel on duty will depend on the nature and size of any event.

It is not prudent to publish specific parameters and guidelines regarding security practices or staffing. However, at a minimum, Foundation safety personnel duties and schedules ensure that safety personnel are visible, and are in ready communication with and accessible to the Operations Center and hospitality staff via radio and cell phone. Call "buttons" installed in several locations on the Property can summon help immediately. Safety staff regularly circulate the Property, the outdoor trails, and structures. Nighttime and after-hours security involves monitoring of remote sensors and cameras, and the availability of rapid response.

D. **Operations Center / Duty Hours.** The Operations Center in housed is the entry house at the entrance to the Property. It is equipped with monitoring equipment and electronic links to security cameras in each structure and at key locations across the site. Safety staff are on duty at the Operations Center and around the Property 24 hours a day, 7 days a week, and in communication with one another and the Operations Center via radio and cell phone.

E. **Neighbor Assistance Protocol.** The Neighbor Assistance Protocol includes regular contact with the contiguous neighbors regarding key activities on site. It also requires the Safety Operations Center to maintain a current list of the names and, if provided, email and telephone contact information, of all contiguous property owners, for immediate contact, if ever necessary.

The Protocol also includes a dedicated telephone line provided only to contiguous neighbors for their convenience in contacting the Foundation. This telephone line is answered by safety personnel on duty at the Operations Center 24 hours a day. All calls received on this line are recorded and logged into an electronic system for tracking, reporting, and response. If the matter related in any call can be handled by safety personnel then on duty, it will be handled immediately. If the matter is urgent or characterized as an emergency, the Director of Safety for the Foundation will be immediately notified. Otherwise, the matter will be investigated and responded to the next business day, with a reply to the neighbor who initiated the contact.

Within 72 business hours of receipt of any complaint from a neighbor, the Foundation’s General Counsel or designee will notify the Town Planner about the complaint and how it was handled.

F. **Coordination with NC Police Department and Fire Department.** Foundation safety personnel have established a close coordination with the Town of New Canaan Police

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member of the American Society for Industrial Security (ASIS), which since 1955 has been dedicated to increasing the effectiveness and productivity of security professionals through educational programs and materials presented at annual seminars and specific topical security interests.
Department and Fire Department and the Town of Lewisboro Police Department. Several safety personnel are former NCPD officers, who are familiar with local procedures and known to current NCPD personnel, which facilitates communications on all levels.

In addition, the Foundation has installed a dry hydrant on the Property on Puddin Hill Road that provides the NCFD ready roadside access to the water of the large pond on the Property for firefighting efforts in the area, which is not otherwise served by Town water and hydrants.

G. Perimeter Fence. The Foundation maintains a 5’ chain link security fence around the entire perimeter of the Property at or just inside the boundary line. Safety staff inspect it daily. There are no gates driveways into the Property through this perimeter fence, or other access to the Property except through the Front Entrance.

For the privacy of contiguous neighbors, the Foundation has installed signage on the walking trails and secondary fencing between the walking trails and the Perimeter Fence, to ensure that visitors stay on the trail and to prevent approach to the boundary between the Property and its neighbors. See, Tab A, “Neighbor Screening & Buffering Plan,” and Tab B, “Walking Trail and Tour Landscape Plan”.

H. Front Entrance Driveway and Gate. The Property can be accessed only through the driveway off Luke’s Wood Road, where safety gates and safety staff greet entering vehicles. There are security cameras located in the area of the entry and exit lanes. Unless registered from previous visits under a “Grace Farms Pass,” every vehicle or pedestrian entering the site must stop at the gate, and must produce driver identification, and is then directed to the appropriate parking area. In this way an accurate count is always known of the number of visitors and vehicles present on the Property.

I. Closing Procedures. At closing each day, safety staff inspect all structures to ensure that all visitors have left the Property. This inspection is confirmed with safety staff that monitor the main entrance, to ensure the Property is empty and can be secured. Further, after the daily cleaning has been concluded, safety staff again inspect to ensure that each structure is empty, lights off, and locked. Safety staff use a detailed checklist to enhance accountability and to ascertain that the closing procedures are strictly followed.

In anticipation of specific events for which the Property is required to be closed to the general public, visitors to the Property are notified approximately 30 minutes before closing, so that they can leave. The Property and structures are then inspected to ensure that all visitors have left so that the specific event may begin.

J. Results of 2017 Security Peer Review. The Foundation has engaged an outside security consultant, Blueline Security Consulting Group LLC (“Blueline”) to review the safety protocols and physical security of the Property, in response to concerns expressed by neighbors. Blueline’s founder, Patrick Chagnon, is a 22-year Connecticut State Police veteran whose last six years of active duty were spent in the Office of Counter Terrorism and Statewide Anti-Terrorism Task Force, and who has consulted with private institutions in Connecticut and abroad since 2008. Blueline brings to its review and advice the safety/security best practices and experience of several recognized professional associations, including the Intelligence and National Security Alliance (INSA), the American Society of Industrial Safety and Security (ASIS), the International Association for Counterterrorism & Security Professionals (IASCSP), and the Connecticut Association of Licensed Private Investigators (CALPI).
Blueline's findings, entitled "Security Report Analysis and Review," dated March 16, 2017, is attached as Tab I. Blueline found the safety protocols for the Property and the safety staff to be in accordance with all applicable standards and best practices.

-------- END OF 2017 MANAGEMENT PLAN -------
VIA ELECTRONIC MAIL and U.S. MAIL
Steve.Palmer@newcanaanct.gov
Lola.Sweeney@newcanaanct.gov

June 23, 2017

Mr. Steve Palmer
Town Planner
New Canaan Town Hall
77 Main Street
New Canaan, CT 06840

Re: Grace Farms Foundation, Inc. ("Foundation")
365 Lukes Wood Road, New Canaan, Connecticut

Dear Mr. Palmer:

As you know, this firm represents the Foundation in its Renewed Application, the formal presentation of which was made in a public hearing on May 30, 2017, which remains open with a second session scheduled for June 26, 2017.

At the close of the Foundation’s presentation on May 30th, Glenn Chalder, AICP addressed the Commission regarding Planimetrics' May 23, 2017 “Report-Grace Farms,” (“Report”) but the Foundation was not able to respond before the public hearing was continued. Since then, the Town Planner has forwarded to the undersigned Planimetrics’ subsequent “Regulatory Change Summary” and “Possible Issues Framework” (“Framework”) referenced above, which we understand supplement the Report.

Mindful of the interest of others to speak at the next session, this letter is written to provide the Commission and the Record with the Foundation’s views on the issues addressed by Planimetrics in these documents, and to report on the status of the Foundation’s application to the Inland Wetlands Commission for approval of the buffer fencing and wetlands planting proposed as part of the Renewed Application in response to neighbors’ concerns, which they expressed either directly to the Foundation or through discussions with the Town Planner.
Comments on the Report, Regulatory Change Summary, and Framework.

In terms of the Background section of the Report, and Issues 1 through 9 (pp. 1-2) of the Framework, it should be noted that what the Foundation seeks is the “more restrictive approach” listed, with the following clarification: Especially as the new permit will supersede and replace the 2013 Special Permit, it should be made clear that the applicant and title owner of the Property in 2012 was Grace Property Holdings, LLP, an entity owned and controlled by the Foundation, and that Grace Property Holdings, LLP in 2014 transferred title to the Property, including all rights and obligations under the 2013 Special Permit, to the Foundation. Further, any new special permit should continue to reflect what the 2013 Special Permit stated in “Whereas” Paragraph 4 (p. 2): “...that Grace Farms Foundation is a not-for-profit charitable foundation established in 2009 in New Canaan, Connecticut, to support initiatives in the areas of faith, the arts, social justice and community.” (italics provided).

With respect to Section 1 and 2 of the Report (p. 2), regarding the Foundation’s Application for Regulation Amendments (“Text Change”), and Mr. Chalder’s comments on the Record on May 30th, the Foundation agrees that the proposed changes will make more clear what the Zoning Regulations already allow and what the Commission historically has done: To approve more than one (1) of the “Permitted Principal Uses” listed in Section 3.2 for a single parcel of land, consistent with the special permit “Criteria” in the Zoning Regulations and the facts of a specific application/situation. (Indeed, Mr. Chalder explained that this text change will make once again “explicit,” what the 2002 revised Regulation his company drafted to be “implicit,” thinking the point was that clear.). And, as you are aware, the Commission has done this for years, as evidenced by the many entities in New Canaan that today operate under a special permit approved for more than two principal uses.

As stated in the public hearing, however, for purposes of the Foundation’s Renewed Application, whether the Commission chooses to rely on its existing Regulations and historic practices for this position, as the Foundation believes is sufficient, or instead chooses to adopt a clarifying text change, as recommended by its counsel, is a matter that you and the Commission should discuss with counsel.

Furthermore, the Foundation respectfully does not agree that the specific language proposed by Planimetrics, either in the “Report” or in the “Regulatory Change Summary” for Section 3.2.C is better than what the Foundation has proposed in its April 28, 2017 Regulation Amendment Application. Again, Commission counsel should weigh in on this issue. Our concern is that Planimetrics’ proposed language, and in particular the words “additional,” “secondary,” or “subsequent,” whether offered in or out of parentheses, will lead to more uncertainty and textual
gamesmanship. As you know, eliminating uncertainty and gamesmanship is what the text changes here were recommended and offered to avoid; they do not change the substance of the Zoning Regulations or the Commission’s prerogatives. Indeed, one could argue that the language recommended by Planimetrics contemplates a hierarchy of uses that is clearly not the intent or practice of the Commission, but worse, supports the very argument advanced by the opponents which the text change is intended to defuse.

With respect to Section 3 (p. 3) of the Report and the Framework regarding the Special Permit modifications the Foundation is proposing, the following comments are offered:

Mr. Chalder seems not to appreciate that the Foundation purposely seeks two additional principal uses ("Club" and "Elemycenary Institution") only because of the peculiar manner in which they are defined in the Regulations, relics of earlier text changes. He seems not to understand that the Foundation’s purpose is to operate as an independent principal use(s), not an accessory use (as he suggests) to the religious institution use. The need for this change is to facilitate the Foundation’s Justice Initiative --- to combat human trafficking and gender violence --- to work with government and law enforcement agencies without the legal impediments of separation-of-church-and-state that have arisen under the religious institution use.

This application has nothing to do with the church uses or size of the sanctuary, or any of the matters listed in paragraphs 1, 3, and 4 of the Report and the “Background” descriptions for Issues 7 and 8 (p. 2) of the Framework. It is not intended to increase any aspect of the Foundation’s operations or its impact on the site or, especially, on its neighbors. Indeed, the Justice Initiative, while vitally important and very effective to date, is likely the least visible of all the Foundation’s work from a zoning or neighborhood perspective.

Further, the Foundation has defined in its 2017 Management Plan a strategic vision for the Property; its intention to subject all three parcels to the special permit, and to preserve the natural setting of the undeveloped 70+ acres on site. It has stated therein that it has no plans to develop further the site, except for the 82 Puddin Hill Road site, which has two structures that are not used at present. It has also stated therein that any new parking proposed would be solely for the purpose of relieving the religious use parking problems, for which an off-site shuttle has been used since the Property was opened for use. This strategic view is logical given the significant investment by the Foundation in, and the enhanced value and international recognition achieved to date by, the iconic and creative architecture of the River Building.

From a zoning perspective, such an articulation of purpose and voluntary expansion of the scope of the special permit by the Foundation provides the Commission with a means of enforcement,
substantively and procedurally, that works to the benefit of the neighbors as well as the community overall. It makes clear that the uses sought will not increase the intensity of the Foundation’s use of its property or change at all its impact on its neighbors. It also makes clear that any further development of the entire site will require amendment of the special permit, with all the application detail, notice, public input, and deliberative process that are involved.

As discussed with the Commission at the public hearing, the Foundation believes that Planimetrics’ concern for a clear statement of use can be easily accomplished in the language of the amended special permit, explicitly stating that it applies to the entire expanded Foundation Property as presently developed and configured as of the date of approval. Such language will require any change thereto, as already stated, to be the subject of a formal application to amend the special permit.

Planimetrics’ comments on Paragraph 5 (p. 4) of the Report appear to reverse its earlier position and advice to the Foundation in January. Planimetrics itself suggested that a Management Plan be prepared as a means for management of the site, and it was acknowledged that the number and size of events are essentially new territory, since the 2013 Special Permit (and Record) addressed Foundation activities in only three paragraphs, and with very little specificity. The actual attendance figures the Foundation has provided for the Record ---- pp. 76-81 in the Foundation PowerPoint ---- demonstrate that, except for Sunday mornings (a busy phenomenon experienced by nearly every church in Town), the parking management regimen implemented by the Foundation in fact works. And the Foundation has proactively addressed the busy Sunday church service parking by (1) voluntarily closing the site to the public and (2) engaging a private shuttle service to and from a commercial parking lot off-site. Neither of these measures is required under the 2013 Special Permit, and should be seen as evidence of the Foundation responsibly handling its Property and activities.

The Foundation understands, and has stated to the Town Planner and at the public hearing, that the number of events requested and in the categories described has been “dialed up” in order to provide flexibility. Indeed, the numbers set forth were discussed with Planimetrics as justifiable on a “per month” basis, and Mr. Chalder encouraged the Foundation’s position. A draft of the Foundation’s application was provided to him for comment in advance of the application, but he did not respond until his formal report was submitted. With this background in mind, the following additional comments are provided for the Report and the Framework:

The 2013 Special Permit did not prescribe operating hours beyond requiring that exterior lights be extinguished by 11 PM and that construction work not commence before 7 AM. Thus, the hours proposed by the Foundation are in fact more limited and should be seen as the

Planimetrics mistakes the nature of “space grants” in Issues 14 and 15 of the Framework (p. 3), in two significant ways: First, the Foundation does not hold “Sustainability Events” at present, but has requested permission for this new type of event in the Renewed Application, with limits in the mandatory consultation with the Town Planner and the tax laws applying to tax exempt entities. Second, the Foundation does not “host third parties” in making space grants, but carefully selects those non-profits whose interests fall under one of the Foundation’s Core Initiatives, and can be furthered by collaboration with the Foundation’s skilled staff.

Issue 16 (p. 4) of the Framework is not accurate and should be disregarded. The Foundation seeks nothing in this Renewed Application related to the Sanctuary size or capacity. Similarly, Issue 17 mischaracterizes the strategic vision articulated in the Management Plan. Any increase in parking sought will be the subject of a separate application and will be constructed and permitted so that it does not increase the daily capacity of the site, but will relate only to relief for parking demand by the church on Sundays and for religious services.

Issues 20-33 (pp. 5-7) properly characterize the Foundation’s position as “Alternative Approach,” which we take as balancing interests to protect all involved. With regard to Issue 30, “Interior Lighting,” (p. 7) and the use of curtains, the photographs provided by my letter of June 21, 2017 show that only during the winter months, and not during daylight savings time, as Planimetrics suggests, is this even remotely an issue. Further, the efficacy of turning down the lights is clearly shown in the PowerPoint (Slides 60-61). We respectfully ask that these alternative approaches be approved, since the openness and airiness of the River Building is defeated by the use of curtains. And, as the Commission knows, nothing in its Zoning Regulations or in the private property rights of the neighbors requires that the Property be void of light at all times after dark.

As for the type and number of events described in the Report, and the “Activity Matrix” (p. 10) of the Framework, Planimetrics’ expansion of types of events into “High”, “Very High,” and “Extreme” seems to complicate the process unnecessarily, given that the same proven approach for managing the events through monitoring parking and limiting access by the public will apply. The following additional specific comments are offered:

A. The Foundation regularly has at least four large events, including the Annual Benefit Weekend in October (2 days), Earth Day (April 22), and a Holiday Concert. The Foundation would propose capping attendance of these at 1,200 attendees, as referenced in the
parking studies, and would limit the total number per year to ten (10), representing the four at present, with the potential for six additional justice and arts events.

Contrary to Planimetrics’ comment regarding “Extreme Attendance,” the sanctuary capacity is not limited to 700, and the capacity is but one element to be considered. Some of these events do not even involve the Sanctuary alone, or even at all. It is also important that events be defined by attendance at one time, as distinct from attendance over the course of a full day. This is because, first, the Foundation’s system of monitoring intensity of use by counting persons and cars entering the site has been proven to work, as Planimetrics recognizes in concept in the Report (p. 3, para. 3), and as you and the Town have seen from the absence of any complaints of a parking or traffic or noise problem since the site was granted a certificate of occupancy in October 2015. Second, as demonstrated by the measure of most intense attendance in any two hour period over nearly the last year (PowerPoint Slides 79-81), the parking use on site has never been overwhelmed, even if you use a “one attendee/one car” ratio for the attendance counts in these peak periods.

B. The Regular Events include “Space Grants” to worthy non-profit organizations and other events under its Core Initiatives that the Foundation believes are of interest to the public. The Winter Outing, Memorial Day celebration, and the Voices of September 11 commemorations are some examples. The Practicing Art series (2 events to date) is another, which provides free art performances --- the last being 6 New York City Ballet performing artists --- to the community. The number of attendees encountered to date and anticipated is less than 700, but, again, the idea is to provide flexibility against the possibility that such an event would be topical and well-attended. The Foundation proposes to limit the number of Regular Events to twenty (20).

As stated in the Application, the Foundation will close the site to the public whenever the attendance at any event is expected to be greater than 500, so as to ensure the available parking is not taxed.

Further, any such Large Events or Regular Events, with the exception of the Holiday Concert and Winter Outing, would likely be scheduled during months of warm weather, when the deciduous foliage is in bloom and provides additional buffering and screening of all activities on site from neighbors. The photographs submitted to the Record showing full summer foliage views and winter views of contiguous neighbors’ properties demonstrate the distance and unobtrusive nature of the Grace Farms structures from each neighbor. This is so even in the winter months, as shown, but, especially, in the spring through autumn months, when the neighbors’ homes and Grace Farms’ structures literally cannot be seen by the other at all.
C. The Small Events, by their nature, do not challenge the parking limits or have any impact on neighbors, and, respectfully, should not be limited. To date, the Foundation and Grace Church have worked in close collaboration on their respective calendars for almost two years without once allowing a combination of events that has challenged the parking limit or impacted the neighborhood traffic or quiet.

Further, limiting space grants to certain days per quarter, as suggested, will only increase the potential for impact, by defeating the flexibility that this 80-acre site with 226 parking spaces provides across a wider calendar, and by ignoring the good record achieved in nearly two years of no incident involving traffic or noise.

The remaining issues listed in Mr. Chalder’s Report have been addressed in the Renewed Application and other materials provided for the Record.

Let me repeat the Foundation’s intention to define and describe its activities in such a way that the uncertainty is resolved and the Commission, its neighbors, and the community can fully understand both what activity is taking place on site and also that it poses no threat to the greater neighborhood in which it is locate. Thank you for this opportunity to reply to the Planimetrics Report in more detail.

Status of Inland Wetlands Application

At the public hearing on June 19, 2017 on the companion application the Foundation filed with the Inland Wetlands Commission, the three Smith Ridge neighbors appeared individually or through counsel to oppose the buffer fence aspect of the application, to request that an “independent monitor” be appointed to oversee the work proposed (stating that the independent monitor in 2012 had not adequately done his job), and to request that the walking trail be relocated to the west of the stream. This opposition was not announced to the undersigned in advance and came as quite a surprise and disappointment: Previously, the neighbors had commented that they wanted different forms of screening/buffers, or that they did not “like” what was proposed. They never said that, from a wetlands agency’s jurisdiction standpoint, they would oppose the concept.

The Foundation’s response was that the Foundation, at considerable expense, has sought these measures because it believed that the Town and the neighbors desired them, after discussions with the Town Planner and individual neighbors prior to filing the Renewed Application; further, that there is no need, based on the minimal disturbance and nature of the work proposed --- planting by hand --- for any independent monitor and that accusations against the earlier
decisions and 2012 independent monitor’s work were unfair and unwarranted; and, finally, that the Foundation’s application did not contemplate relocating the trail, already 400 yards at the closest point from the neighbors.

The Wetlands Commission closed the public hearing, and deferred its deliberations and decision to its July 17th meeting, which will necessitate this Commission keeping the public hearing open to receive the Wetlands Commission’s decision.

Thank you also for the courtesies of allowing the Foundation to respond to these issues. If you have any questions, please do not hesitate to contact me.

Very truly yours,

Edward V. O’Hanlan

EVO’H/jh
Renewed Application for Second Amended Special Permit

Closing Thoughts

July 25, 2017
Seeks 2 Uses For Foundation: Philanthropic / Eleeomyocenary Institution and Club.

- Separates Foundation Principal Use From Church Use.
  - Needed For Justice Initiative to Work With Governmental Agencies.
  - Peculiarity Of Zoning Regulation Definition is Why Both are Needed.

- No Expansion Or Alteration of Structures At Grace Farms.
- No Increase In Pace of Activity Or Intensity of Use.
John and Keisha: I just got off a scheduled conference call with Ted O’Hanlan and Krishna Patel. Grace is going to file an appeal of the permit approval, challenging some of the conditions, but they are characterizing this as a “friendly” appeal to preserve their rights to clarify some of the conditions. Some folks will react negatively to this appeal, but that was their decision to preserve the option to negotiate some changes... On the Curt-Bissonnette appeals, I continue to believe, and Ted agrees, that we should have a “do-over.” In other words, file both applications again, as we discussed, and just correct the technical errors. We could also use this to modify/clarify some of the conditions Ted is objecting to, if the Commission so desires. I understand you have an executive session on October 31. I would suggest we set up an executive session that night with the Commission to discuss the pending litigation and this “do-over” option. Can I ask that it be set up before the regular meeting (at 6:30 or so)? Ira
Changes Proposed by Grace Farms Foundation, Inc.

January 2018

Below is a verbatim word document prepared from the Special Permit approved by the Town of New Canaan Planning and Zoning Commission on September 26, 2017 and recorded on the land records on October 6, 2017, with track changes proposed by Grace Farms Foundation, Inc. and discussed with the Town Planner and Town Counsel.
Hearing: May 30, June 26 (Special Meeting), and July 25, 2017
Decision: September 26, 2017

Town of New Canaan
Planning and Zoning Commission

Application

Upon application of Edward V. O'Hanlan, Robinson & Cole, LLP, Authorized Agent for Grace Farms Foundation, Inc., owner, for a Special Permit of Section(s) 3.2.C.14, 3.2.C.16 and 3.2.C.17 and 8.2.B, to amend its existing Special Permit granted in 2013 to authorize additional principal uses for Grace Farms Foundation Inc. for a "Club and Organization" and a "Philanthropic or Eleemosynary Institution" in addition to the previously approved "Religious Institution" use, and associated modifications to the 2013 Special Permit, and to merge 82 Puddin Hill Road (Map 41, Block 38, Lot 26) with 365 Lukes Wood Road (Grace Farms) and a vacant parcel on Lukes Wood Road (Map 41, Block 38, Lot 76) into a single 79.31 acre parcel to be encumbered by the amended Special Permit, on property in the Four Acre Zone at 365 Lukes Wood Road (Map 41 Block 38 Lot 77).

Resolution

WHEREAS, the Planning and Zoning Commission (PZC) originally approved a Special Permit with conditions on December 6, 2007, approved amendments with conditions on May 20, 2008, and March 26, 2013; to permit the use of a portion of the property as a religious institution and to authorize construction of building(s) and other improvements on the site.

WHEREAS, the Zoning Board of Appeals, on May 15, 2016, denied the appeal of a decision of the Town Planner/Senior Enforcement Officer to issue a Certificate of Occupancy for the Sanctuary at Grace Farms.

WHEREAS, Steve Kleppin, Town Planner/Senior Enforcement Official issued a letter dated June 24, 2016, regarding compliance with the 2013 Special Permit Conditions, where he stated it was his opinion at the time that "Some of the Uses occurring at the site have indeed exceeded some of the special permit conditions granted in March 2013."

WHEREAS, the Planning and Zoning Commission approved amendments to the Zoning Regulations on July 25, 2017; to Section 2.2 Definition - Use, Principal, and Section 3.2.0 Permitted by Special Permit.

WHEREAS, the Inland Wetlands Commission, on July 17, 2017, denied an application to perform activities including the installation of plantings and fencing in a regulated wetland.

FINDINGS:

i) The PZC has determined that this Special Permit shall supersede and replace prior Special Permits regarding this property so that there is a comprehensive and coordinated set of conditions for managing the nature and intensity of uses and activities at the site.
and to avoid any situation where prior Special Permits might result in conflicting or ambiguous stipulations or outcomes.

2) In reviewing the Special Permit application, the PZC has determined that the activities authorized by this Special Permit would be in general accordance with the Special Permit criteria contained in Section 8.2.B of the Zoning Regulations if they are conducted in accordance with the conditions and stipulations herein.

3) The applicant, Grace Farms Foundation, has requested as a Special Permit approval of three (3) principal uses at the site:
   1) "Religious institution"
   2) "Philanthropic and Eleemosynary Institutions"
   3) "Clubs and Organizations"

4) The PZC finds that Grace Community Church's principal use is a "Religious Institution" as permitted under Section 3.2.C.14 of the Zoning Regulations. The Commission finds that the religious use of the property consists of numerous ancillary uses/activities including, but not limited to, religious ministries, parishioner counseling, religious study, parish day care activities which are sponsored and led by Grace Community Church.

5) The PZC finds that Grace Farms Foundation is an organization that has principal uses consisting of "Philanthropic and Eleemosynary Institutions" and "Clubs and Organizations" as permitted in Sections 3.2.C.16 and 3.2.C.17 of the Zoning Regulations.

6) The PZC finds that the use categories requested by Grace Farms Foundation: "Philanthropic and Eleemosynary Institutions," "Clubs and Organizations," and "Religious Institutions" are intended to align Grace Farms Foundation's activities with the use categories in the zoning regulations as conditioned and limited herein.

7) The PZC finds that the uses and activities requested on the property can be effectively managed by the findings and stipulations in this Special Permit.

8) The Grace Farms Foundation requested that any Special Permit be granted for three properties:
   1) Lot 77 (47.98 acres)
   2) Lot 76 (26.80 acres)
   3) 82 Puddin Hill Road (4.61 acres)

9) The PZC finds that requiring a merger of all parcels into one parcel of land and management under one Special Permit will allow the PZC more control and oversight over all uses and activities on the site.

10) The PZC finds that the use of the facilities for "Space Grants" for governmental agencies, quasi-governmental organizations, and not-for-profit organizations with proof of 501(c)(3) status is consistent with philanthropic use of the property provided such activities continue in accordance with conditions outlined herein.

11) The PZC finds that "Sustainability Events," the use of physical space within Foundation
facilities by commercial, for-profit entities to generate revenue, are not appropriate for this property and are not permitted. The PZC's finding remains unchanged from its 2013 Special Permit approval, Condition #7, which specified that there "shall be no renting or use of any portion of the property, including any building or athletic field, to outside commercial or for-profit organizations."

12) The record of the 2013 application indicates that the parking capacity might one day be increased beyond the 226 spaces on the site. Parking is a key factor in managing the level of activity at the site. As part of the 2013 application, the Grace Farms Foundation pledged to maintain off-site parking (in Vista, NY) and operate a shuttle bus service for overflow activity. The PZC finds that this off-site parking arrangement continues to be necessary to manage traffic and the level of activity at the site.

13) Grace Farms Foundation is requesting permission to use the former dwelling located at the main entrance on Lukes Wood Road as an Operations Center for security and other Administrative Operations. This building was approved for the referenced use in 2013 to be temporary during construction. No future use was defined in that Special Permit. The PZC finds the use of the building as an Operations Center for security and other administrative operations is appropriate and consistent with the overall uses of the site.

14) The "Commons" space contains a kitchen and a food service operation which is used by employees and visitors and for special events. The PZC finds that this type of activity is in keeping with the nature of the facility and is not uncommon for churches or institutional facilities (coffee service, soup kitchen, snack bar, etc.) similar to Grace Farms. The PZC further finds that this level of activity can be considered customary, subordinate, and incidental provided the facility is not rented out separately for such events.

15) The "River Building" space contains a small "Tea Room" space used by employees and visitors. The PZC finds that this type of activity is in keeping with the nature of the facility and can be considered customary, subordinate, and incidental provided the facility is not rented out separately.

16) The "Commons" space contains a lecture hall on a lower level which is occasionally used for Foundation-related programs (movies, discussions, etc.). The PZC finds that this type of activity is in keeping with the nature of the facility and is not uncommon for churches or institutional facilities similar to Grace Farms. The PZC finds that this level of activity can be considered customary, subordinate, and incidental provided the facility is not rented out separately for such events.

17) Three (3) small areas within the buildings have been used to display some items available for sale to visitors and employees. The PZC finds that this limited activity is accessory to the uses of the facility provided that the areas remain extremely limited (less than 300 SF in all three (3) areas combined) and the only items offered for sale are small items (such as souvenirs or books and other items related to the Foundation and its mission) in limited quantities offered for sale only in these three (3) locations:
   a. Library — books (less than 100 SF)
b. Library — limited merchandise (such as souvenirs or books and other items related to the Foundation and its mission) less than 100 SF
   a. West Barn — limited merchandise (such as souvenirs or books and other items related to the Foundation and its mission) less than 100 SF

The PZC further finds that this minor level of activity is in keeping with the nature of the facility and is not uncommon for churches or institutional facilities similar to Grace Farms. The PZC further finds that this level of activity is customary, subordinate, and incidental to the activities of the Foundation at its current level.

18) The Foundation has represented that it maintains a five (5) foot chain link security fence around the entire perimeter of the Property. The PZC finds that the fence is necessary and requires that it be maintained for the benefit of abutting property owners.

19) The PZC agrees with findings from Fredrick P. Clark Associates in reports dated September 22, 2016 — (Annual Traffic and On-Site Parking Study) and November 10, 2016 — (Supplemental Report) stating that "Grace Farms is operating below our estimates for site traffic generation found in the original 2007 Traffic Study," that "all Study Area intersections are operating at Level Service "C" or better and acceptable delay," and that "during the weekday evening condition, there are ample available parking spaces to meet demand."

20) The PZC finds that there are the following access points into the Property through the perimeter fence:
   b. Front main entrance gate
   c. Service gate at 82 Puddin Hill Road
   d. Access gate to pond area on Puddin Hill Road

21) Grace Farms Foundation has proposed to install additional landscaping and fencing to address some of the visibility and privacy concerns expressed by neighbors. The PZC finds that the "Neighbor Screening and Buffering Plan," prepared by OLIN, dated March 24, 2017, and a letter dated July 24, 2017, proposing additional plantings and strategic fencing, coupled with conditions outlined herein, will adequately address screening.

22) The PZC finds that Grace Farms Foundation's proposed changes to curtail interior lighting intensity and reduce the need for lighting in general are necessary and appropriate in considering the level of activity on the property.

23) The PZC finds that the general security operations protocol maintained by the Foundation (and required to be maintained as part of this Special Permit) are adequate to address abutter concerns.

24) Based on the significant public comments in the record, the PZC finds that Grace Farms Foundation provides substantial economic, social, and cultural benefits to the community through its activities and in making the property accessible to the public.
25) The PZC finds that the following conditions are reasonable and necessary to protect and promote:
   a. the public health, safety and welfare,
   b. the environment,
   c. sound planning and zoning principles,
   d. improved land use,
   e. site planning and development, and
   f. better overall neighborhood compatibility.

Upon a motion by Ms. Jean N. Grzelecki, Secretary seconded by Mr. John (Jack) Flinn the Planning and Zoning Commission hereby resolves to APPROVE the special permit request of Edward V. O’Hanlan, Robinson & Cole, LLP, Authorized Agent for Grace Farms Foundation, Inc., owner, for a Special Permit pursuant to Section(s) 3.2.C.14, 3.2.C.16 and 3.2.C.17 and 8.2.B; to authorize additional principal uses for Grace Farms Foundation Inc. as a "Club and Organization" and a "Religious Institution" use, to authorize accessory uses, and to merge 82 Puddin Hill Road (Map 41, Block 38, Lot 26) with 365 Lukes Wood Road (Grace Farms) and a vacant parcel on Lukes Wood Road (Map 41, Block 38, Lot 76) into a single 79.31 acre parcel to be encumbered by this Special Permit, on property in the Four Acre Zone at 365 Lukes Wood Road (Map 41 Block 38 Lot 77), subject to the findings and conditions herein:

GENERAL CONDITIONS:

1. This Special Permit it is granted to Grace Farms Foundation as the entity responsible for managing the property in accordance with the Special Permit stipulations.

2. In order to have a comprehensive and coordinated set of conditions for managing the nature and intensity of uses and activities at the site and to avoid any situation where prior Special Permits might result in conflicting or ambiguous stipulations or outcomes, this Special Permit shall supersede and replace any prior Special Permits regarding any of these properties.

3. Each of the conditions herein is integral to the PZC approval and to each other condition herein and cannot be severed or treated individually without the approval of the PZC.

4. Any violation of any condition or modification of approved activities of the Special Permit herein, may be considered sufficient justification and cause for the PZC to rescind this Special Permit or modify the findings and/or conditions herein.

5. The property shall be improved, operated, and managed in accordance with this resolution and with reference to the plans submitted to the PZC as may be modified by this Resolution.

Plans dated March 24, 2017:
- Neighbor Screening and Buffering Plan,
- Neighbor Screening and Buffering — Miller and Kekedjian
- Neighbor Screening Buffering — Ostling
- Neighbor Screening and Buffering — Curt Bissonnette
• Neighbor Screening and Buffering — Buczkiewicz
• Neighbor Screening and Buffering - Markatos

6. There shall be no material change of the approved use or intensification of any use unless specifically authorized herein.

7. The entire 79.39 acre site (Parcels 1 and 2, and the 4.61-acre property commonly known as 82 Puddin Hill Road that abuts Parcel 2) shall be operated under the terms and conditions of this Special Permit.

8. All three (3) parcels shall be merged into one (1) development parcel for purposes of this Special Permit as shown on a survey entitled "Zoning Location Survey, Showing Consolidation of Properties at Puddin Hill Road, Smith Ridge Road & Lukes Wood Road in New Canaan, CT". Prepared for Grace Farms Foundation, Inc., by Anthony L. D’Andrea, PE, L.S., dated March 22, 2017.

9. Evidence of such merger in the form of a recorded map and deed shall be provided to the Planning and Zoning Department prior to the issuance of a zoning permit.

10. No accessory use of the property beyond what is specifically approved hereunder is allowed.

ACTIVITY LEVEL

11. The property may be used for Grace Community Church’s religious activities on any day of the week between the hours of 7:00 a.m. and 11:00 p.m.

12. Scheduled activities of Grace Farms Foundation as authorized herein shall start no earlier than 7:00 a.m. and end no later than 10:00 p.m.

13. Grace Farms Foundation activities may only be open to the general public as follows:
   - Monday: Closed
   - Tuesday - Saturday: 10:00 a.m. to 7:00 p.m.
   - Sunday: Noon to 6:00 p.m.

14. Should Grace Community Church conduct multiple services in one day, it shall provide appropriate time between services in order for parishioners from the first service to depart prior to parishioners arriving for the second service.

15. During Sunday church services or major religious or holiday worship services, no other Grace Farms Foundation activities shall occur at the same time.

16. The following "Foundation Event Activity Chart" shall establish the permitted activity levels for Grace Farms Foundation for events that do not include general public use, staffing or Grace Community Church use.

Comment [DEN1]: Correction.
Reason: No changes were sought in the application or discussed by the Commission for Church activities also to avoid impact on religious activities.

Comment [DEN2]: Clarification.
Reason: These changes (including those to the chart below) clarify that this chart applies to identified planned events, as intended, and not to semi-daily usage by church or Foundation staff, or general public visits, which are monitored by the availability of parking on site.

If you base the count on the total people on site, we would exhaust all Type C limits in the first three months of the year just by having daily visitors and Grace Community Church activity, without any planned events.

As the Commission has noted in Paragraph 19 of its Findings, above, the Traffic Study demonstrates that the permitted activity levels set forth in the Chart below are well within the traffic generation capacity and impact on and off-site.
### Event/Activity Chart

All events shall start no earlier than 7:00 a.m. and end no later than 10:00 p.m.

<table>
<thead>
<tr>
<th>Activity Level</th>
<th>Number of People</th>
<th>Number of Days</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Maximum Cap</td>
<td>At no time will there be more than 1200 people on site at any time. No single event or combination of events shall exceed 1200 people on site at.</td>
<td>• No more than 6 days per calendar year &lt;br&gt; • No more than 2 days in any one calendar month</td>
</tr>
<tr>
<td>2. Type-A Activity Level Attendance</td>
<td>More than 500 guests people total on-site at any time for any and all activities for an event</td>
<td>• No more than 4 days in any one calendar month &lt;br&gt; • No more than 18 days per calendar year</td>
</tr>
<tr>
<td>3. Type-B Attendance</td>
<td>300 to 500 people guests total on-site at any time for any and all activities for an event</td>
<td>• No more than 24 days per calendar year &lt;br&gt; • No more than 6 days in any one calendar month &lt;br&gt; • No more than 2 days in any one calendar week</td>
</tr>
<tr>
<td>4. Type-C Attendance</td>
<td>200 to 300 people guests total on-site at any time for any and all activities for an event</td>
<td>• Not limited</td>
</tr>
<tr>
<td>5. Casual Attendance</td>
<td>Up to 200 people total on site at any time for any and all activities</td>
<td>At least 52 days per year (Mondays) and &lt;br&gt; See, Condition 24, below</td>
</tr>
<tr>
<td>6. Closed to the public</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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17. "Space Grants" for governmental agencies, quasi-governmental organizations, and for not-for-profit organizations with proof of 501(c)(3) status other than the Church or Foundation are permitted subject to the overall limitations on event size and frequency outlined in the Activity Chart.
18. Approved space grantees may utilize the facility for lectures, meetings, fundraising, classes, and seminars subject to the overall limitations on event size and frequency outlined in the Foundation Event Activity Chart.

19. "Sustainability Events," where the facility is rented or otherwise made available to commercial, "for-profit" organizations, are prohibited.

20. Due to the types of activities requested as part of this application, the sanctuary is limited to 71564 seats.

**PARKING & TRAFFIC**

21. The on-site parking capacity is limited to 226 parking spaces as shown on the approved plans.

22. Any parking or related changes, including but not limited to the following, shall require an amendment to the Site Plan and Special Permit:
   a. Increase in the number of parking spaces.
   b. Expansion of paved surfaces.
   c. Change in parking lot configuration from what is shown on the Overall Site Development Plan.

23. Parking on the site shall be confined to and located within approved parking areas.

24. The property shall be closed to visitation by the general public whenever:
   - Any planned event(s) on the property, whether by the Foundation or by the Church or a combination of both, is expected to use all available parking spaces, or
   - The actual parking occupancy on the site reaches the maximum available parking spaces (226).

25. Grace Farms Foundation shall maintain remote (off-site) parking for church services and other scheduled events and provide shuttle bus service to and from such remote (off-site) parking whenever on-site parking occupancy is expected to exceed 200 vehicles. Such remote parking and shuttle service shall be made available at least 2 hours in advance of services or events. In the event that such remote parking and shuttle service are not made available in advance of scheduled services or events and actual parking occupancy on the site reaches 200 vehicles, such shuttle bus service shall be made available within 30 minutes.

26. Grace Farms Foundation shall provide traffic control at Grace Farms Foundation's driveway/Lukes Wood Road intersection, and the intersection of Route 123/Puddin Hill Road as follows:
   a. Police officers during all events where more than 600 attendees are reasonably expected,
   b. Trained traffic officers during all church events where more than 400 attendees are reasonably expected.
   c. Trained traffic officers during all non-church events where more than 200 attendees are reasonably expected.
27. No tour buses are allowed on the property, except for:
   a. buses used specifically by the Glass House organization as an extension or a part of their tour schedule;
   b. buses used for public or private school field trips or;
   c. buses used to transport invited guests to and from a scheduled event are permitted.

28. The PZC reserves the right to retain the assistance of its own traffic consultant to conduct an independent review of the annual traffic report, at Grace Farms Foundation’s expense, in accordance with Section 8.1.E.2 of the Regulations for a period of five (5) years from the date of this approval.

29. Should the subsequent traffic reports indicate that levels of service at the studied intersections have deteriorated since the initiation of activities at Grace Farms, the PZC reserves the right to require mitigation remedies, including, but not limited to, the placement of additional police officers in the vicinity, and/or intersection or other improvements that will, at a minimum, maintain the same level of service.

ACCESSORY USES

30. a. The former dwelling located at the main entrance and referred to in Paragraph 13 of the Findings, above, is hereby approved as the Operations Center for the Grace Farms site, for security and other administrative operations for the Property.
   b. The former dwelling on the site located at the main entrance is hereby approved to house the Operations Center for security and other administrative operations for the property.
   c. The residence and other structures formerly located at 82 Puddin Hill are approved for administrative offices and maintenance activities and for an accessory residential apartment for an employee or "guest-in-residence" of the Foundation.
   d. The building shall not otherwise be used for dwelling or commercial purposes.

30-31. The "Commons" kitchen and food service operation is hereby authorized as an accessory use as currently configured and may be utilized as follows:
   a. The "Commons" shall be operated only as an incidental amenity for programmatic events conducted by the Church or Grace Farms Foundation and for the convenience of the general public who may be visiting the site.
   b. The "Commons" cannot be rented to the general public or any other entity and other events (including but not limited to classes or banquets) are prohibited without the express approval of the PZC.
   c. There shall be no stand-alone advertising, marketing or promotion of the Commons kitchen facilities or food service operation as being a separate attraction or use at the property open to the general public.
   d. Alcohol beverages may only be served in the "Commons" at designated special events and with the proper permitting as required by the State of Connecticut and local law.
   e. Maximum Hours of Operation: Lunch
      * Sunday: Noon to 3:00 p.m.
      * Monday: Closed to public

Comment [DEN7]: Correction.
Reason: To correct the confusion in the original text of the Operations Center and the residence at 82 Puddin Hill Road and to accurately identify the approved uses and functions of the Operations Center and structures at the residential lot formerly known as 82 Puddin Hill Road.

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Comment [DEN8]: Correction.
Reason: See new Paragraph 34, below, for site-wide alcoholic beverage policy.
32. The "Tea Room" operation in the Pavilion is hereby authorized as an accessory use as currently configured and may be utilized as follows:

a. The "Tea Room" shall be operated only as an incidental amenity for programmatic events conducted by the Church or Grace Farms Foundation and for the convenience of the general public who may be visiting the site.

b. The "Tea Room" cannot be rented to the general public or any other entity and other events are prohibited without the express approval of the PZC.

c. There shall be no advertising, marketing or promotion of the "Tea Room" as a separate attraction or use at the property open to the general public.

d. Service of alcoholic beverages in the "Tea Room" is prohibited.

33. The "Lecture Hall" operation is hereby authorized as an accessory use as currently configured and may be utilized as follows:

a. It is limited to Church and Foundation Activities.

b. It shall be operated only as an incidental amenity for programmatic events conducted by the Church or Grace Farms Foundation.

c. It cannot be rented to the general public or any other entity, and other events are prohibited without the express approval of the PZC.

34. Alcoholic beverages may be served only at private Foundation events and with proper permitting as required by the State of Connecticut and local laws.

35. Limited retail activities including, but not limited to, the sale of souvenirs shall be permitted on site to the extent they exist today in the West Barn and Library and Commons.

36. No temporary or permanent accessory structures (including special event tents) other than what currently exists on the property are permitted by this Special Permit.
36. The “Court” gymnasium may be used for Church and Foundation sponsored activities, or for other athletic organizations. Other athletic activities for Court use are subject to PZC approval.

37. The existing outdoor athletic field located in the southeast portion of the property may be used by the Church or the Foundation for activities related to their key initiatives as follows:
   a. The athletic field may be used for Church or Foundation-sponsored activities such as recreational, non-organized sports.
   b. The athletic field shall not be rented or used by outside organizations.
   c. There shall be no lighting of the athletic field.
   d. There shall be only one athletic field permitted on the property.

38. Except as expressly permitted by these conditions, the use of the property for private, non-Church or Foundation activities or for any commercial, for-profit purposes is prohibited.

39. No keeping of animals is approved by the PZC except that the keeping of a domestic pet within any residential unit by the occupant(s) of any residential unit approved by the PZC is not subject to this limitation.

40. Grace Farms Foundation shall not use the property for a school as defined in the Regulations.

41. While 82 Pudding Hill Road (lot and buildings) has been incorporated into the Special Permit, it exists as a single-family dwelling and no other use is approved at this time.

TRAILS & OUTDOOR ACTIVITIES

41. Grace Farms Foundation shall abandon / relocate trails as indicated on the "Neighborhood Screening and Buffering Plan" prepared by OLIN and included at Tab 5 of the Application Binder entitled "Renewed Application for Second Amended Special Permit", dated March 27, 2017.

42. Grace Farms Foundation shall implement the trail and signage plan as indicated on plans in Tab B of the Application Binder entitled "Renewed Application for Second Amended Special Permit", dated March 27, 2017 entitled “Trails and Trail Signage” (2 pp), as revised January 2018 with the following specific modifications:
   - The "landscape map" (2 signs) shall only be installed at the locations shown and the design shall be subject to approval by the Town Planner before fabrication / installation to ensure that it reflects the trail configuration approved by the PZC.
   - The "stay on marked trail" signs (3 signs) shall only be installed at the locations shown and the most northeasterly such sign shall be relocated to the inside of the curve of the trail leading back to the Sanctuary.
   - The "guided nature tour route" signs (4 signs) shall be rephrased to read "guided nature trail route ONLY" and such signs shall only be installed where shown.
• No additional or alternative trail signs shall be installed without the approval of
the Town Planner and/or the PZC.

43. Grace Farms Foundation shall remove any benches, signs, or other pedestrian amenities
along the abandoned trails and relocate them to the west side of the brook.

44. Following the filing of the Special Permit on the land records, Grace Farms Foundation
shall place and maintain "Closed to Public" or similar signs within the property where
trails have been abandoned.

45. Following the filing of the Special Permit on the land records, Grace Farms Foundation
shall not conduct or authorize maintenance of any abandoned trails (including mowing)
unless needed in the opinion of the Town Planner for security or emergency response
purposes.

46. Walking paths shall remain natural and shall not be paved.

47. The renting of snowshoes or cross country ski equipment is not permitted.

48. The use of All Terrain Vehicles (ATV's) or ski mobiles for recreational use is prohibited.

49. Grace Farms Foundation may offer tours of the building and grounds when the facility is
open to the general public in accordance with the following:
   a. There shall be no more than one (1) tour per hour.
   b. Tours shall be escorted by a staff person or organization volunteer.
   c. Tours shall stay within 2500 feet of the "River" building (to include the Community
      Garden) and within 100 feet of the "Barn" buildings.

50. Grace Farms Foundation may offer nature tours of the site to the general public when the
facility is open to the general public in accordance with the following:
   a. Tours shall contain no more than fifteen (15) people, unless otherwise approved by
      the PZC.
   b. There shall be no more than three (3) tours per day.
   c. Tours shall be escorted by at least one (1) staff person or volunteer.
   d. Tours shall stay on the marked paths.

51. Grace Farms Foundation may conduct outdoor nature and wildlife oriented educational
activities within 2500 feet of the "River Building" (to include Community Garden) and
within 100 feet of the "Barn" buildings.

52. Organized outdoor activities are prohibited unless specified herein.

53. No outdoor catered events are permitted by this Special Permit.

54. Campfires, pyrotechnic displays or the use of incendiary devices of any kind is
prohibited.
55. Use of outdoor power generation equipment at Grace Farms shall be limited to emergency use and normal maintenance of power generation equipment unless specifically approved by the PZC.

56. Overnight camping is prohibited. Travel trailers, camper trailers and caravans are prohibited.

57. Grace Farms Foundation shall maintain the existing five (5) foot fence around the perimeter of the property to delineate Grace Farms Foundation's property from that of its abutting neighbors.

58. All vehicular traffic entering and leaving Grace Farms shall only use the front gated main entrance gate unless such entry or exit is needed for emergency response or other purpose acceptable to the Town Planner or New Canaan Emergency Services.

59. The driveway to 82 Puddin Hill shall only be used by Grace Farms' maintenance personnel and maintenance contractors.

LANDSCAPING & FENCING

60. By May 31, 2018, unless modified herein, Grace Farms Foundation shall install all proposed landscaping (planting) and fencing that is outside the jurisdiction of the Inland Wetlands Commission as shown on, in accordance with the "Neighbor Screening and Buffering Plan", prepared by OLIN, dated March 24, 2017, and in accordance with the OLIN letter of July 24, 2017.

61. Prior to the issuance of a zoning permit the applicant shall submit evidence to the Town Planner that the Inland Wetlands Director has reviewed and approved the "Neighbor Screening and Buffering Plan."

62. By May 31, 2018, Grace Farms Foundation shall conduct a review of landscaping and replace any trees and/or planting shown on the 2013 Plan or planted in the interim period that, in the opinion of the Town Planner, are dead or are failing to thrive. In May 2019, Grace Farms Foundation shall again conduct a review of landscaping and replace any trees shown on the 2013 Plan, the 2017 Plan, or planted in the interim period that, in the opinion of the Town Planner, are dead or are failing to thrive. In May 2020, Grace Farms Foundation shall again conduct a review of landscaping and replace any trees shown on the 2013 Plan, the 2017 Plan, or planted in the interim period that, in the opinion of the Town Planner, are dead or are failing to thrive.

63. All evergreen trees to be planted on site shall be in accordance with the "Neighbor Screening and Buffering Plan", shall be ten to twelve feet (10'-12') in height.

64. Grace Farms Foundation shall install supplemental fencing as follows:
   a. Six (6) foot high stockade fencing on shared property line with 1196 Smith Ridge Road.
b. Four (4) foot high "paddock-type" fencing or post and rail fencing where shown on the drawings submitted by Grace Farms Foundation outside of the jurisdiction of the Inland Wetland Commission.

c. Such installation may be modified in height, type, and/or replaced by vegetative screening if mutually agreeable to the owners at 1196 Smith Ridge Road and Grace Farms Foundation.

65. Grace Farms Foundation shall install four (4) ft. high intermediate fencing (stockade fencing, "paddock-type" fencing, or post and rail fencing) in proximity to the shared property line with 1218 Smith Ridge Road where shown on the drawings submitted by Grace Farms Foundation outside the jurisdiction of the Inland Wetland Commission. Such installation may be increased in height and/or relocated if mutually agreeable to the owners at 1218 Smith Ridge Road and Grace Farms Foundation.

66. Grace Farms Foundation shall install four (4) ft. high intermediate fencing (stockade fencing, "paddock-type" fencing, or post and rail fencing) in proximity to property located at 1258 Smith Ridge Road where shown on the drawings submitted by Grace Farms Foundation outside the jurisdiction of the Inland Wetland Commission. Such installation may be increased in height and/or relocated if mutually agreeable to the owners at 1258 Smith Ridge Road and Grace Farms Foundation.

LIGHTING & SOUND

67. Except as modified herein, all lighting shall be operated in accordance with Section B-VII of the "Grace Farms, Inc., 2017 Management Plan," contained in Tab 6 of the Application Binder "Renewed Application for Second Amended Special Permit".

68. All lights shall be off by 8:00 p.m. except for scheduled events and those necessary for safety and security.

69. Grace Farms Foundation shall maintain already installed curtains to mitigate light in the sanctuary and the conference room in the library.

70. All interior pendant lighting in the "Commons" shall, at Grace Farms Foundation's choice, be either:
   a. Converted to a cut-off fixture to block horizontal projection of direct light,
   b. Modified with a temporary shade from October 15 to May 15 to block horizontal projection of direct light during the winter months, or
   c. Shielded with floor to ceiling curtains similar to those that exist in the Sanctuary from dusk to dawn from October 15 to May 15 to block horizontal projection of direct light during the winter months.

71. All interior lighting in the "River Building" shall include motion sensors that shut off interior lighting due to inactivity.

72. Interior spaces and outdoor walkways at the "Barn Buildings" may continue to be illuminated as they are currently.
73. Exterior lighting including parking lot lighting, with the exception of indoor security lighting, and the minimum outdoor security lighting and parking lot security lighting needed, shall be turned off at the designated closing time of the facility.

74. All exterior lighting shall comply with Sections 6.11.B.1, 6.11.B.2, 6.11.B.3, 6.11.B.7 and 6.11.B.8 of the Zoning Regulations or as otherwise approved or referenced in this Special Permit.

75. Shielding shall be added to all exterior light fixtures, if not already specified.

76. All site lighting shall comply with the Memorandum prepared by Buro Happold dated January 29, 2013.

77. Exterior sound amplification (including but not limited to bullhorns, loudspeakers, or other noise amplifying devices) is prohibited unless for emergency or public safety purposes.

78. The "sound sculpture" and all devices associated with it shall be removed from the exterior portions of the property. It may be relocated to a fully enclosed location within an existing structure on the property.

SECURITY

79. Grace Farms Foundation shall provide and maintain security staff of at least two (2) individuals on the premises 24 hours a day.

80. The number of safety personnel on duty at any time shall be determined on a case-by-case basis, in the judgment and experience of the Director of Safety, considering all relevant factors (size of scheduled events, nature of events, actual site occupancy, standards and guidelines of ASIS International, etc.).

81. In the event there should be an issue or question in the future related to security operations, the PZC reserves the right to:
   a. Request staffing information for different types of events, and/or
   b. Dictate actual staffing levels for different types of events if issues have arisen in the past.

82. Grace Farms Foundation shall maintain and staff the security booth / security gate during all hours the facility is open.

83. Every vehicle or pedestrian entering the site when the site is open to the general public or for Grace Farms Foundation events shall stop at the security booth / security gate and be logged in for vehicle count and people count.

84. So that an accurate count can be made of the number of general public visitors and vehicles on the site at any time when the site is open to the general public, each vehicle
or pedestrian entering the site shall produce identification (such as a driver’s license) unless such person is:

- a. Grace Farms Foundation or Grace Community Church Grace Farms staff person;
- b. a passenger in a vehicle where the driver has produced identification;
- c. a passenger on a Grace Farms bus or other authorized bus-type vehicle;
- d. a person logged in from previous visits under a "Grace Farms Pass."

85. Grace Farms Foundation shall maintain a contemporaneous log of the number of all vehicles and people entering and exiting the site in real time.

86. Such contemporaneous log of vehicles and people on the property at any one time shall be kept at the security booth or Operations Center and shall be subject to immediate inspection by the PZC and/or its designated agent(s), including photo-copying, photographic reproduction, or other reporting method.

87. As represented by Grace Farms Foundation during the application process, Grace Farms Foundation will maintain security cameras that operate 24 hours a day:

- a. at the front entrance,
- b. in every structure and
- c. at strategic points across the Property.

88. Grace Farms Foundation shall coordinate the location of security cameras with the Town Planner in order to protect neighbor’s privacy and provide reasonable coverage of sensitive areas. This may result in an increase, decrease, relocation, or reorientation of these cameras.

89. Grace Farms Foundation shall retain video footage from all video cameras on the property for 45 days. In the event an incident occurs or a complaint is made about activity on site, pertinent footage from video cameras shall be identified and copied in order to be preserved for future use as needed. 90 days so that the Town can, if desired, inspect the security footage of any incident reported.

90. Grace Farms Foundation shall maintain the Neighbor Assistance Protocol as described in the application materials, and the following protocols shall apply:

- a. Maintain contact information for all property owners contiguous to the Property (to the extent provided by such property owners) for immediate contact, if ever necessary. Any correspondence or communication requesting such information from contiguous property owners and any responses thereto shall be shared with the Town Planner.
- b. Maintain a dedicated telephone number for the benefit of the contiguous neighbors to report safety or security concerns with such phone number to be answered by on-site safety personnel 24 hours a day.
- c. Record and log all calls received on this line into an electronic system for tracking, reporting, and response.
- d. Address any such report from a neighbor as soon as appropriate (immediate, if urgent; next business day, if general or routine).
- e. Formally respond to the person who initiated the report as soon as appropriate.
f. Notify the Town Planner by email within 72 hours about any such report from a neighbor and any action taken in response.

g. Summarize any such report from a neighbor and any action taken in response in the monthly reports to the PZC.

COMPLIANCE / ENFORCEMENT / REPORTING

91. Grace Farms Foundation shall notify the Town Planner Zoning Inspector in writing within five (5) business days of the receipt of any complaint related to any activity (whether on-site or with regard to an off-site activity such as a shuttle bus) and outline the response/corrective measures taken to address that complaint. The Grace Farms Foundation shall maintain a log of any such events that is readily available for review by the Town Planner.

92. By the 25th of each month, Grace Farms Foundation shall submit a report to the PZC specifying:
   a. The scheduled events and size of events for the next month (i.e., the month in advance)
   b. The number of people and number of vehicles on site per day and per 2 hours for the past month (i.e., the month in arrears), including a summary of site activity relative to the Activity Chart approved by the PZC for the month and for the calendar year to date.
   c. A summary of any security events on the site in the prior month and corrective actions taken (including any update(s) to the emergency action plan and/or security site assessment report).
   d. A summary of any complaints logged with regard to operations on the site for the prior calendar month, the source of such complaint, and any corrective actions taken.

   e. At the discretion of the PZC, this requirement may be modified, suspended or terminated re-instated by the Town Planner.

93. An event may be scheduled for the current month provided the Town Planner is notified at least 5 days in advance. For a memorial service, the Town Planner shall be notified at least 48 hours in advance.

94. By February 1 of each calendar year, Grace Farms Foundation shall submit an annual report to the PZC containing the following:
   a. A summary of attendance for all dates and by events scheduled for the prior calendar year, including a summary of site activity relative to the Activity Chart approved by the PZC for the calendar year.
   b. A summary of any security events on the site for the prior calendar year and corrective actions taken (including any update(s) to the emergency action plan and/or security site assessment report).
   c. A summary of any complaints logged with regard to operations on the site for the prior calendar year, the source of such complaint, and any corrective actions taken.
   d. A report on the condition of landscaping and fencing and the schedule for replacement of any dead and dying plants or fencing in disrepair.
e. At the discretion of the PZC, this requirement may be modified or terminated.

95. The PZC reserves the right to conduct periodic reviews of activity at the site and the tabulation of people and vehicles and these may occur unannounced.

96. The PZC reserves the right to retain a "third-party" monitor to inspect the property at the expense of Grace Farms Foundation should conditions so warrant.

97. The PZC reserves the right to amend or revoke any approval, upon written notice, should violation of the conditions and terms so warrant.

98. The PZC reserves the right to have the Town Planner-Zoning Official, or a third party paid for by Grace Farms Foundation, conduct a review and/or inspection of the operations at the property at any time and for any reason. The property owner consents to such inspections as a condition of the Special Permit.

99. The PZC reserves the right to amend or revoke the Special Permit approval, including, without limitation, suspending specific privileges granted to Grace Farms Foundation under this Special Permit (for example, the ability to hold programming events at Grace Farms) for failing to comply with one or more of the terms and conditions of this approval.

100. Grace Farms Foundation shall be responsible for any costs and reasonable attorney's fees incurred by the Town associated with enforcing the terms and conditions of this approval.