

## GREGORY AND ADAMS, P.C.

ATTORNEYS AT LAW  
190 OLD RIDGEFIELD ROAD  
WILTON, CT 06897

ESTABLISHED 1964

PAUL H. BURNHAM  
SUSAN L. GOLDMAN  
J. VANCE HANCOCK  
J. CASEY HEALY  
DERREL M. MASON\*  
MATTHEW C. MASON\*  
JAMES D'ALTON MURPHY\*⊕  
RALPH E. SLATER  
ROGER R. VALKENBURGH \*

\* ALSO ADMITTED IN NEW YORK  
⊕ ALSO ADMITTED IN VERMONT

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JULIAN A. GREGORY  
(1912 - 2002)

THOMAS T. ADAMS  
(1929 - 2015)

PLEASE REPLY TO SENDER:  
JAMES D'ALTON MURPHY  
DIRECT DIAL: 203-571-6309  
jmurphy@gregoryandadams.com

May 21, 2021

### **By E-mail and Hand Delivery**

Architectural Review Board  
Town Hall Annex  
238 Danbury Road  
Wilton, CT 06897

Attn: Mr. Michael E. Wrinn – Director of Planning and Land Use Management

Re: Four Seasons Racquet Club, LLC and Northeast Volleyball Club, LLC –  
Application for Architectural Review Board Informal Review and Comment  
Premises: 589 Danbury Road, Wilton, Connecticut

Dear Mr. Chairman and Members of the Board:

This firm represents Four Seasons Racquet Club, LLC (Four Seasons) and also Northeast Volleyball Club, LLC (NEVBC), two athletic clubs which jointly make use of the property at 589 Danbury Road (the Property). Four Seasons is owned and operated by Greg Moran. NEVBC is owned and operated by Cat Dailey Minyard and Garrett Minyard.

The Property is currently 6.1 acres, and it houses 73,000 ft.<sup>2</sup> of indoor tennis courts (9 courts) as well as 12 outdoor courts, a swimming pool, a spectator building, a parking lot, and other site improvements. Four Seasons currently leases two of its indoor tennis courts to NEVBC; two tennis courts allow the placement of three volleyball courts.

NEVBC is pursuing the design, approval and construction of a new six-court volleyball building on the northern portion of the site where there are currently a number of outdoor tennis courts.

Both tennis and volleyball are played year-round and therefore indoor courts are needed. In addition, both sports require very large quantities of square footage/footprint and also very large quantities of cubic footage to achieve high ceiling heights without interior columns as structural supports.

Indoor tennis and indoor volleyball buildings are very large by necessity. A volleyball court with surrounding player space outside the lines consumes 4000 ft.<sup>2</sup>; a tennis court similarly consumes 7000 ft.<sup>2</sup>. With six players on each volleyball team 4000 ft.<sup>2</sup> of court space is required to accommodate 12 players. Stated differently, for each volleyball player 333 ft.<sup>2</sup> of court space is required which is equivalent to a room 12' x 27.7' per player. The per player square footage consumption of tennis is even greater; a tennis court with player space outside the lines requires 7000 ft.<sup>2</sup>; a doubles game involving only four people nonetheless requires 1750 ft.<sup>2</sup> of building per player (equivalent to 6 one-car garages).

It is the combination of the significant commitment of footprint square footage and cubic square footage which drives the design and large size of the existing tennis buildings and proposed volleyball building. Due to the need for large amounts of very valuable land to accommodate large buildings, both the tennis and volleyball organizations must achieve a minimum critical mass to be viable. Four Seasons and NEVBC have analyzed this question carefully and determined that a mix of 9 indoor and 6 outdoor tennis courts along with 6 indoor volleyball courts will be an appropriate mix to allow the two organizations to continue to offer year-round tennis and volleyball to the Wilton and regional communities.

At the upcoming public hearing the applicants will give testimony and provide evidence as to the significant benefit which will accrue to Wilton and neighboring communities from the full operation of the Northeast Volleyball Club in a new six-court building. A few of those benefits are:

- Provides K through 12 year-round athletics for hundreds of children and teens.
- NEVBC complements the Wilton schools' athletic programs; hours and seasons do not coincide.
- Creates a center of wellness and activity for student athletes from Wilton and surrounding towns.
- Enhances a strong tradition of Wilton athletics.
- Creates a place to study and do homework or just be with friends before or after practices and games.
- Teaches time management.
- Instills self-confidence, self-esteem and therefore happiness.
- Maintains basic fitness and builds strength and endurance.
- Enhances the college application prospects for dozens of young people each year.

With this background, and in support of the application for an informal review and comment by the Architectural Review Board, we submit the following:

1. Improvement Location Survey prepared by Ryan and Faulds, LLC Land Surveyors dated January 29, 2008;
2. Draft Site Plan (ZSP-1) prepared by Redniss & Mead dated May 21, 2021;
3. Renderings - Design B prepared by Claris Construction, Inc. ("**Claris**") dated May 7, 2021;
4. Floor Plan prepared by Claris dated May 7, 2021;



5. Authorization letter signed by Four Seasons as applicant and owner authorizing Gregory and Adams, P.C. to act as its agent in this matter;
6. Authorization letter signed by NEVBC as applicant authorizing Gregory and Adams, P.C. to act as its agent in this matter; and
7. List of Project Professionals.

If you have any questions, please contact me.

Respectfully submitted,  
Gregory and Adams, P.C.

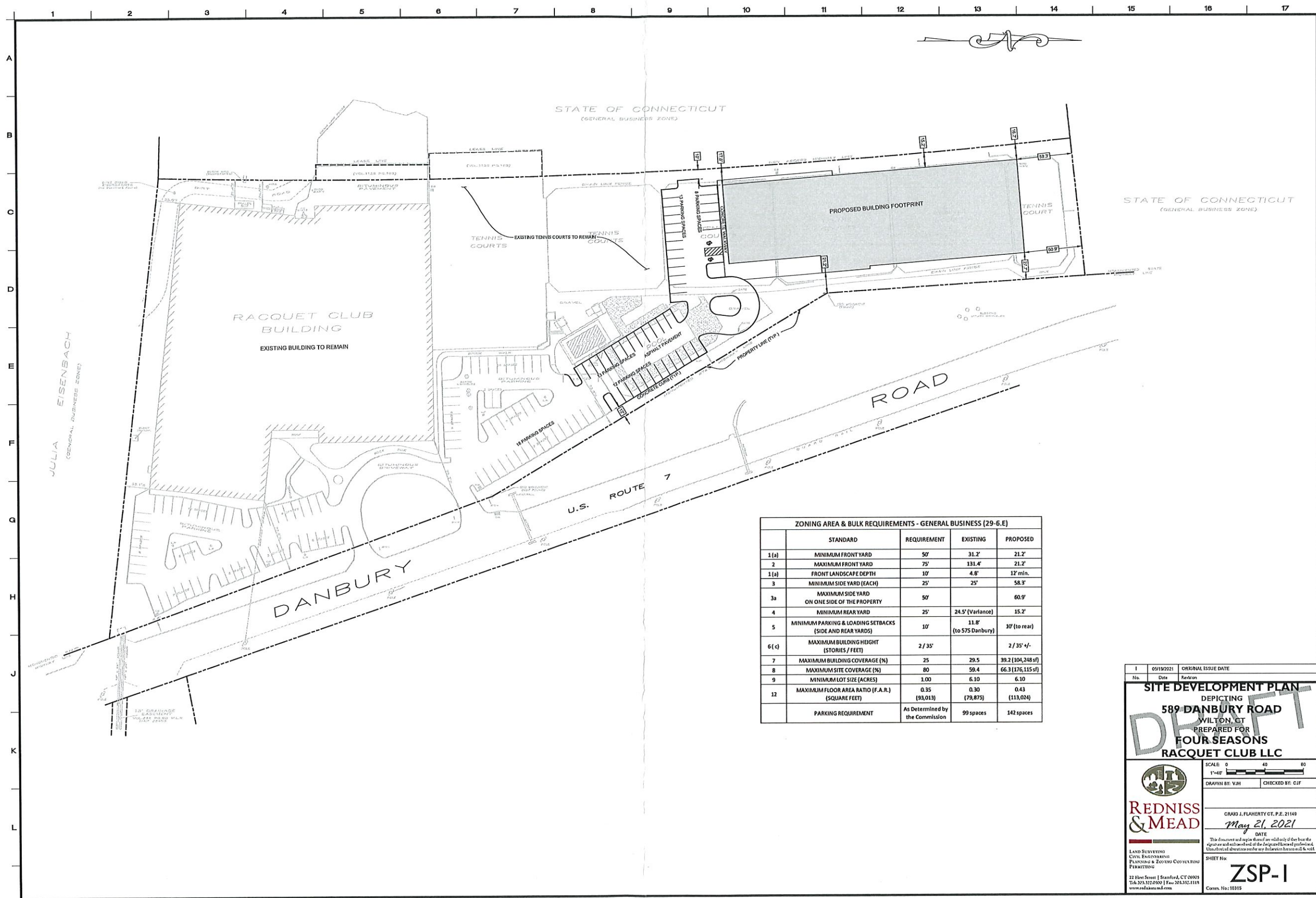
By: /s/ James D'Alton Murphy  
James D'Alton Murphy

JD'AM/ko  
Enclosures

cc: Mr. Greg Moran – Four Seasons Racquet Club, LLC  
Ms. Cat Dailey and Mr. Garrett Minyard – Northeast Volleyball Club, LLC  
Mr. Richard Casner  
Messrs. Craig Flaherty and Vincent Hynes– Redniss & Mead  
Mr. Mike Kozlowski – Claris Construction, Inc.











CLARIS  
DESIGN • BUILD





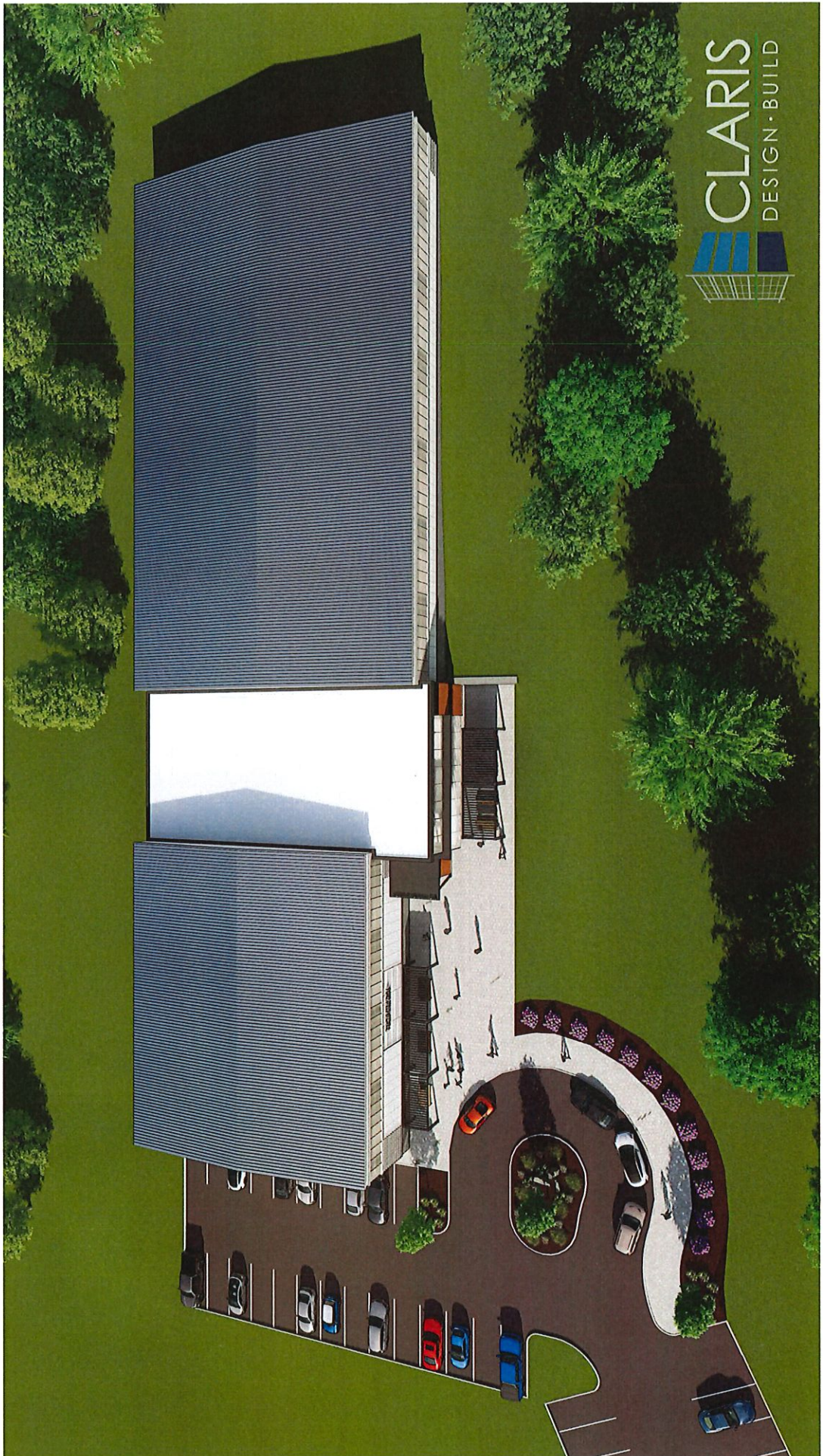






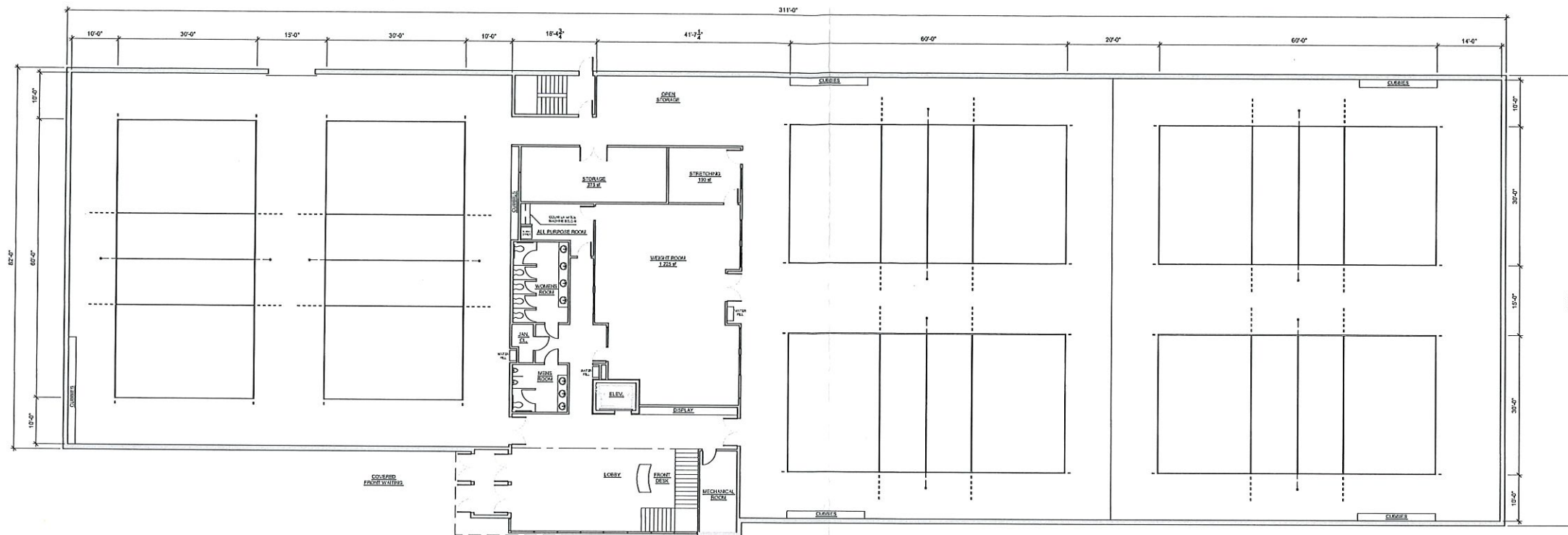




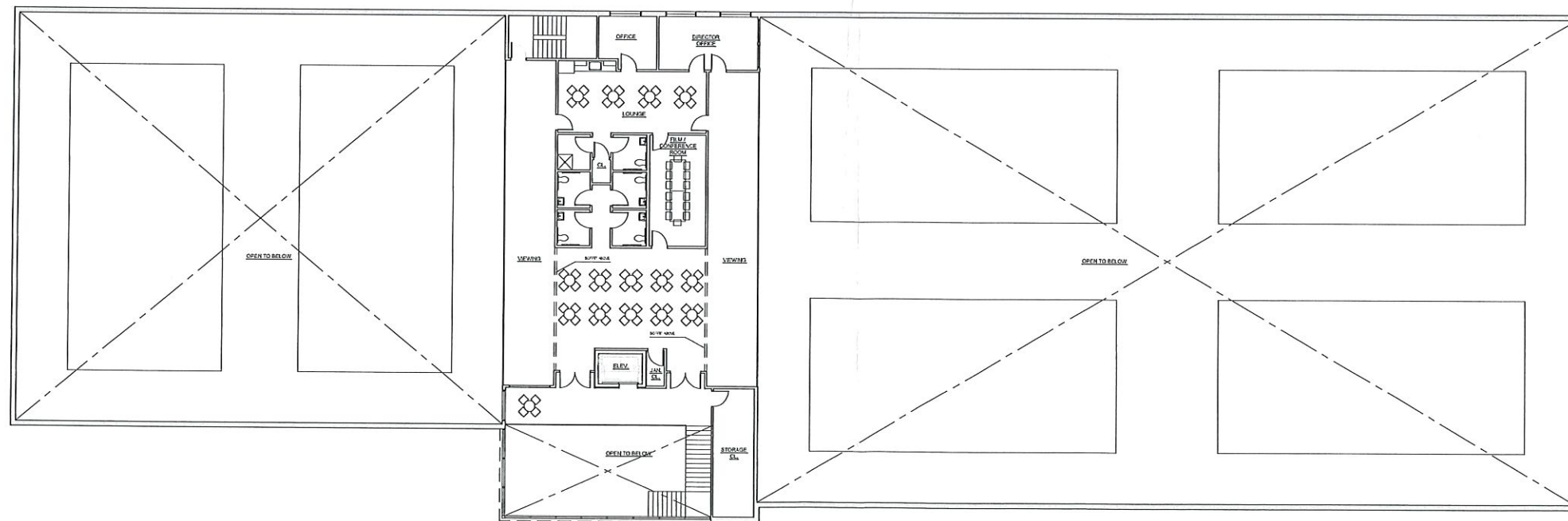


CLARIS  
DESIGN • BUILD





1 FIRST FLOOR PLAN  
A101 SCALE: 3/32"=1'-0"



2 SECOND FLOOR PLAN  
A101 SCALE: 3/32"=1'-0"



THIS DRAWING IS THE PROPERTY OF CLARIS CONSTRUCTION HAS BEEN PREPARED SPECIFICALLY FOR THE OWNER FOR THIS PROJECT AT THIS SITE, AND IS NOT TO BE USED FOR ANY OTHER PURPOSE, LOCATION, OR OWNER WITHOUT WRITTEN CONSENT OF CLARIS.

NORTHEAST VOLLEYBALL CLUB  
MAIN STREET  
WILTON, CT

No.	Description	Date

FLOOR PLAN

ATHLETIC

Project Number  
Date 5/7/21  
Drawn By MRK  
Checked By  
Scale As Noted

A-101



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May 13, 2021

**By E-Mail Only**

Mr. Greg Moran  
Four Seasons Racquet Club, LLC  
589 Danbury Road  
Wilton, CT 06897

Re: Four Seasons Racquet Club, LLC and Northeast Volleyball Club L.L.C. -  
Applications to Wilton Land Use Agencies  
Premises: 589 Danbury Road, Wilton, Connecticut

Dear Greg:

The Town of Wilton, State of Connecticut and other government agencies, if applicable, require written authorization from Four Seasons Racquet Club, LLC as an applicant and owner of the property located at 589 Danbury Road, Wilton, Connecticut authorizing Gregory and Adams, P.C. to act as its agent in connection with any and all land use matters involving the subject property. Please sign a copy of this letter and return it to me by email or fax @ 203-834-1628.

Very truly yours,

*/s/ James D'Alton Murphy*  
James D'Alton Murphy

JD'AM/ko

The undersigned hereby authorizes Gregory and Adams, P.C. to act as its agent in connection with the above-referenced applications.

Four Seasons Racquet Club, LLC

By: *Greg Moran*  
Greg Moran  
Its: Managing Member  
Duly Authorized



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May 13, 2021

**By E-Mail Only**

Mr. Garrett Minyard  
Ms. Cat Dailey  
Northeast Volleyball Club LLC  
589 Danbury Road  
Wilton, CT 06897

Re: Four Seasons Racquet Club, LLC and Northeast Volleyball Club LLC  
Applications to Wilton Land Use Agencies  
Premises: 589 Danbury Road, Wilton, Connecticut

Dear Garrett and Cat:

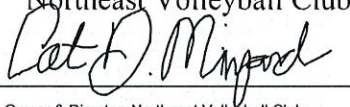
The Town of Wilton, State of Connecticut and other government agencies, if applicable, require written authorization from Northeast Volleyball Club LLC as an applicant authorizing Gregory and Adams, P.C. to act as its agent in connection with any and all land use matters involving the subject property. Would one of you please sign a copy of this letter and return it to me by email or fax at 203-834-1628?

Very truly yours,

**/s/ James D'Alton Murphy**  
James D'Alton Murphy

JD'AM/ko

The undersigned hereby authorizes Gregory and Adams, P.C. to act as its agent in connection with the above-referenced applications.

Northeast Volleyball Club LLC  
By:   
Owner & Director, Northeast Volleyball Club  
Duly Authorized



**Four Seasons Racquet Club, LLC and Northeast Volleyball Club, LLC**

**Applications to Architectural Review Board and Planning and Zoning Commission  
Premises: 589 Danbury Road, Wilton, CT**

**List of Project Professionals**

- |                        |  |
|------------------------|--|
| 1. Applicants          | Four Seasons Racquet Club, LLC and<br>Northeast Volleyball Club, LLC<br>c/o Gregory and Adams, P.C.<br>190 Old Ridgefield Road<br>Wilton, CT 06897<br>(203) 571-6309 |
| 2. Owner               | Four Seasons Racquet Club, LLC<br>c/o Gregory and Adams, P.C.<br>190 Old Ridgefield Road<br>Wilton, CT 06897<br>(203) 571-6309                                       |
| 3. Surveyor            | Mr. Doug Faulds<br>Ryan & Faulds, Land Surveyors<br>c/o Redniss & Mead<br>22 First Street<br>Stamford, CT 06905<br>(203) 327-0500                                    |
| 4. Civil Engineer      | Mr. Craig Flaherty<br>Redniss & Mead<br>22 First Street<br>Stamford, CT 06906<br>(203) 327-0500  |
| 5. Architect           | Mr. Michael Kozlowski<br>Claris Construction, Inc.<br>53 Church Hill Road<br>Newtown, CT 06470<br>(203) 364-9460   |
| 6. Land Use Consultant | Mr. Richard D. Casner<br>10 Corbin Drive<br>Darien, CT 06820<br>(617) 314-5480   |
| 7. Attorney            | James D'Alton Murphy, Esq.<br>Gregory and Adams, P.C.<br>190 Old Ridgefield Road<br>Wilton, CT 06897<br>(203) 571-6309   |