

**From:** Andres, Charles R.  
**Sent:** Tuesday, June 9, 2026 5:36 PM  
**To:** Abby Conroy  
**Subject:** RE: 3rd Party Review - LRP Reg Amendment [IMAN-ACTIVE.FID2821443]

Abby:

I have reviewed the proposed text amendment to the Zoning Regulations regarding “A Track for Racing Motor Vehicles”, Section 221.1 of the Zoning Regulations. I assume that the operative version of the proposed amendments is the version submitted by Attorney Timothy Hollister in his letter to the Commission dated May 27, 2026.

I note that my comments are limited to a legal review of the proposed text amendments and am not addressing the policy or merits of the proposed changes, which I understand have been agreed to by the current owner/operator of the Lime Rock Race Track and the Lime Rock Citizens Council. I understand that the Lime Rock Citizens Council has been substituted as the plaintiff in the private nuisance action where an injunction had been established governing the operation of the Lime Rock Race Track (Ann Adams, et al. v. B. Franklin Vaill, et al., CV No. LLI-CV-6-58-0015439-S, Judicial District of Litchfield at Torrington), and the proposal is to substitute the terms of the revised stipulation for the terms set forth in Section 221.1 of the Zoning Regulations, which were derived from an earlier version of a stipulated judgment in this action.

My comments are as follows:

- The proposal appears to lift the entire text of the Revised Stipulated Judgement agreed to by Lime Rock Park and the Citizens Council, and insert that text into the regulations. However, unlike the previous stipulation agreed to by the parties in the private nuisance action, the current stipulation contains specific notice obligations from Lime Rock Park to the Citizens Council as well as obligations for filing the Stipulated Judgment on the Land Records. While those contractual obligations are certainly appropriate for a Stipulated Judgement in a nuisance action (and are binding on the parties to that action), such private obligations should not be part of the regulations addressing the underlying land use, i.e., a Track for Racing Motor Vehicles, and I recommend they be deleted from the amendment if the Commission should choose the amendment.
- Several sections of the regulations specifically mention obligations of Lime Rock Park (or LRP). The regulations, however, govern the use, not a specific entity that may be conducting that use, and I have recommended that reference to Lime Rock Park or LRP be deleted and that the owner and/or operator of the use be substituted therefor.
- The proposal recommends that a copy of the court-approved stipulation be filed as an appendix to the regulations. I think that this would be an unnecessary addition to the regulations, but do recommend that the footnote provide that volume and page of the Salisbury Land Records where the Stipulation has been filed.
- There were a couple of areas where the amendment refers to other sections of the Stipulation, and refers to the sections by how they are numbered in the Stipulation, instead of where they have been numbered in the Regulations. I recommend those sections be revised to reflect the sections in the regulations vs. the sections in the Stipulation.

I have attached a red-lined and clean version of the proposed amendments that reflects these proposed changes.

Please let me know if I can provide any additional information to the Commission about this matter.

Chuck Andres

**Charles R. Andres**

Pronouns: he/him/his  
Partner



555 Long Wharf Drive • Sixth Floor • New Haven, CT 06511  
D: (203) 672- • F: (203) 654- E: CAndres@barclaydamon.com  
• 2657                      3256

[www.barclaydamon.com](http://www.barclaydamon.com) • [vCard](#) • [Profile](#)

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## Proposed Substitute for Existing Sections 221.1

### 221.1 Track for Racing Motor Vehicles

A track for racing motor vehicles, excluding motorcycles, as well as for automotive education and research in safety and for performance testing of a scientific nature, private auto and motorcycle club events, car shows, and certain other events identified in Section 221.2 are permitted subject to the issuance of a special permit in compliance with the procedures and standards of these regulations and also subject to the following:

- a. No motor vehicle races shall be conducted on any such track except in accordance with the following parameters.<sup>1</sup>
  - (1) All activity of mufflered or unmufflered racing cars upon the asphalt track or in the paddock areas shall be prohibited on Sundays.
  - (2) Activity with mufflered racing car engines shall be permitted as follows:
    - A. On any day Monday through including Saturday between 9:00 a.m. and 6:00 p.m.; and
    - B. Permissible mufflers are those which meet the standards set forth in Section 14-80(c) of the General Statutes of Connecticut, Revision of 1959, or as the same may be amended from time to time.
  - (3) Activity with unmufflered racing car engines shall be permitted as follows:
    - A. On Tuesday afternoon, not more than twenty-three (23) days in a calendar year, between 12:00 noon and 6:00 p.m.
    - B. On Saturdays, not more than ten (10) days in each calendar year, between the hours of 9:00 a.m. and 6:00 p.m.
    - C. On the ten (10) Fridays which precede the said ten (10) Saturdays between the hours of 9:00 a.m. and 6:00 p.m.
    - D. On three (3) Thursdays per year, as part of scheduled unmufflered weekend racing, between 9:00 a.m. and 6:00 p.m.

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<sup>1</sup> 1 The parameters set forth herein are ~~based on identical to~~ those stated in the Amended Stipulated Judgment approved by the Superior Court, the Hon. Ann Lynch, J., on May 12, 2026, in the civil action, Ann Adams, et al. v. B. Franklin Vaill, et al., CV No. LLI-CV-58-0015439-S (Judicial District of Litchfield at Torrington). The Court also approved substitution of the original parties: Lime Rock Citizens Council, LLC for plaintiffs Ann Adams et al., and Lime Rock Park II, LLC for defendant, Franklin Vaill, et al. A copy of the court-approved Motion is recorded at volume \_\_\_ page \_\_\_ of the Salisbury Land Records. Appendix \_\_\_ to these Regulations.

- E. There will be no unmuffled racing on the Monday and Tuesday preceding the three weeks in which Thursday to Saturday racing is scheduled.
- F. In such event the scheduled racing for any of the said ten (10) Saturdays must be rescheduled for a "rain date," then the said "rain date" and the Friday preceding it shall not be considered as one of the ten (10) days referred to in Paragraphs (b) and (c) above.
- G. On Memorial Day, Fourth of July and Labor Day between the hours of 9:00 a.m. and 6:00 p.m.:
  - (i) In the event of said holidays falls on a Tuesday, Thursday, or a Friday, there may be unmuffled activity on the day preceding the holiday between the hours of 12:00 noon and 6:00 p.m., but in such event the permissible unmuffled racing activity on the next Tuesday preceding any of the said holidays, as allowed by ~~§ III a), subsection (3) A.~~ shall be forfeited.
  - (ii) In the event any of said holidays fall on a Sunday, the next day (Monday) will be considered the holiday of these purposes.
- (4) Prohibited activity upon the track property shall include the revving or testing of muffled or unmuffled car engines on Saturdays and holidays referenced in ~~§ III g), subsection (3) G.~~ prior to 9:00 a.m. and after 6:00 p.m., excepting the transportation of said vehicles to and from the paddock areas on or off their respective trailers, which transporting, unloading or loading shall not commence before 7:30 a.m. or extend beyond 7:30 p.m.
- (5) The use of the track loudspeakers before 8:00 a.m. and after 7:00 p.m. is prohibited. Prior to 9:00 a.m. or after 6:00 p.m., including on all Sundays, the loudspeakers will be used in the inward-facing paddock facing areas only, and if needed, for emergency announcements.
- (6) A "racing car" is defined as any car entered in an event on an asphalt track.
- (7) Racing of motorcycles is prohibited. Nevertheless, specifically permitted are non-racing motorcycle activities including but not limited to demonstrations, instruction, timing, testing, practice and photography.
- (8) Stand-alone "Drifting" events are prohibited. Under the following conditions, drifting demonstrations are permitted: such demonstrations will be held only on scheduled unmuffled days and no more than once per year on two consecutive days; there will be no more than three demonstration sessions on each day of not more than 15 minutes each; at

no time will there be more than 10 cars on track participating in the demonstration. ~~The owner and/or operator of the Race Track (“Owner/Operator”) Lime Rock Park~~ will not permit or conduct any activities on its property that will generate excessive amounts of smoke. Excessive smoke is defined as any smoke cloud produced by tire spin or engine exhaust that remains suspended in the air for more than 15 seconds, or that is visible above the tree line.

- (9) ~~The Owner/OperatorLRP~~ will install, maintain and monitor decibel meters at the property line at Lime Rock Road and at White Hollow Road. Readings of muffled track activity will be monitored in real time by ~~Owner/Operator Lime Rock Park~~ staff and ~~Owner/OperatorLRP~~ will adjust the activities on the track to reduce readings should they exceed 78 decibels in accordance with State of Connecticut regulations § 14-80a. ~~LRP will make meter reading data available to LRCC or its designated agent upon request. LRP will provide decibel meter data to an LRCC designated representative on a monthly basis.~~
- (10) “Major Racing Events” are any muffled or unmuffled racing activity with an expected attendance of 500 or more spectators in a single day of the event. Major Racing Events shall be limited to no more than 6 (six) in a calendar year and no more than one per month. ~~LRP will provide notice of the 6 (six) Major Racing Events to a designated LRCC representative by March 1 of the calendar year.~~
- (11) “Major Sunday Events” are defined as (a) any for profit vendor-sponsored non-racing event directly related to motorsports with an attendance of more than 100 attendees and (b) any not for profit organization-sponsored fundraising event with an anticipated attendance of more than 100 attendees.
- A. Major Sunday Events are permitted only between the hours of 9:30 and 1:30 and shall be limited to 5 (five) per year and no more than one per month.
- B. Major Sunday Fundraising Events are permitted only between the hours of 9:00 and 5:00 and shall be limited to 6 (six) per year and no more than one per month.
- (12) For all Major Sunday Events ~~Owner/OperatorLRP~~ will provide the following control measures:
- A. A uniformed police officer on White Hollow Road and Route 112 from at least two hours before and two hours after the event’s scheduled run-time.

- B. Two manned ~~Owner/Operator~~ LRP track vehicles with strobe lights, one in the ~~LRP~~ track entrance office driveway on route 112 and one at the intersection of White Hollow Road and Route 112 and personnel with yellow flags to help control traffic and noise.
  - C. Orange cones placed on the median of White Hollow Road to slow ingress and egress of traffic
  - D. Sandwich board signage including large quiet zone and speed restriction signage will be clearly visible on White Hollow Road and Rte. 112. Sandwich Board signage to be mutually agreed prior to installation.
- (13) ~~Lime Rock Park II, LLC will provide to LRCC, by email to members of the LRCC steering committee and US mail to LRCC, P.O. Box 525 Lakeville, CT 06039, its intended schedule of racing and events for the following calendar year no later than March 1 of each year. In addition, Lime Rock Park LLC will provide to the LRCC by email 14 days notice prior to filing or submission of any application to the Salisbury Planning and Zoning Commission for a Permit relating to any Major Racing Event or Major Sunday Event.~~
- (14) ~~This Amended Stipulation will be recorded in the Town of Salisbury Land records as a Notice filed in accordance with Connecticut General Statutes § 47-12, in addition to Superior Court files and Town of Salisbury Zoning Regulations.~~
- (15) ~~This Amended Stipulation shall govern Lime Rock Park beginning with racing activity and events occurring in 2026.~~

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  - (1) All activity of muffled or unmuffled racing cars upon the asphalt track or in the paddock areas shall be prohibited on Sundays.
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    - A. On any day Monday through including Saturday between 9:00 a.m. and 6:00 p.m.; and
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- (4) Prohibited activity upon the track property shall include the revving or testing of muffled or unmuffled car engines on Saturdays and holidays referenced in subsection (3) G, prior to 9:00 a.m. and after 6:00 p.m., excepting the transportation of said vehicles to and from the paddock areas on or off their respective trailers, which transporting, unloading or loading shall not commence before 7:30 a.m. or extend beyond 7:30 p.m.
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