

An Analysis of the Special Events Venues

Subcommittee Report: A Rebuttal

January 2019

Summary

The Special Events Venues Subcommittee Report (“the Report”) was released in December 2018 and presented to the Planning and Zoning Committee (“PZC”). The supervisor instructed the PZC to use this report as a reference in developing legislation on Special Event Venues (“SEVs”). The Report, however, contains numerous misrepresentations, and erroneous assumptions and conclusions.

The Report’s most noticeable misrepresentations include the suggestions that data and factual information was presented to and analyzed by Subcommittee members and that the group came to a consensus on a number of issues. The following more accurately represents what happened:

- No data was presented to demonstrate a need for legislation or to manage a supposed “influx” of SEVs in Marbletown.
- No research, statistics or analysis was provided as to how SEVs would positively affect the town.
- No data was provided or analysis performed by the PZC or town officials regarding any of the issues surrounding SEVs that were identified in presentations (noise, public safety or effects on the environment) to the Subcommittee.

In addition, the Report relies upon inaccurate information to justify amending the zoning law to permit SEVs. For example, the Report:

- Misstates New York State law regarding agritourism by claiming that the law recognizes commercial wedding venues as agritourism, when in fact the law explicitly does not define or mention commercial SEVs
- Misinterprets NYS guidelines and recommendations surrounding land use for agricultural districts by disregarding the specifics as outlined and required by farms to qualify for various exemptions

The Report does the same with its analysis regarding SEVs zoning laws in neighboring towns and cites towns *not* included in the Subcommittee information packet of local legislation. In fact, most towns similar to Marbletown do not allow SEVs in residential areas. It also ignores and makes no mention of original research that was done for the Subcommittee regarding the impact of SEVs on property values and the local economy (neither were shared with Subcommittee members nor posted on the Town website as promised).

Moreover, even though Subcommittee members urged a thoughtful analysis of the proposed zoning changes that would allow SEVs in residential zones, preferably starting with areas more conducive to SEVs (i.e., business districts), such analysis did not occur. In addition, the current focus of the SEV Report on allowing venues in farms and business districts was never fully discussed in public or by the Subcommittee. Finally, and perhaps most frustrating, the Report completely disregards the valuable contributions of local professionals and residents who attended the public meetings and attempted to offer thoughtful input.

Overview

What follows is an analysis of seven issues in dispute as presented in the SEV Report.

1. “There is a Demand for Events in Marbletown”: The Reality of Requests

The SEV Report asserts: “Over the past several years there has been an increasing demand for special event permits to allow local citizens to hold recurring for-profit events on their land in Ulster County.” (p. 1)

Initially, it was argued that the Town was receiving many requests to establish SEVs and that there was overwhelming support for wedding venues in Marbletown and neighboring towns. However, the Town was able to identify only one formal request to hold commercial events in a residential district. Several Subcommittee members pressed the Chair and Town officials for more specific information, but neither were able to offer a clear or compelling rationale for changing the zoning code to allow SEVs in residential areas. This discussion was further complicated by the fact that the Town consistently confused family events with the focus of discussion, for-profit weddings. The supervisor has repeatedly stated that such events have been held in Marbletown for “40 years,” yet fails to acknowledge that these were mostly family, not commercial, affairs.

Given that no facts were presented for demand or need for SEV legislation, the question arose: Why change Marbletown zoning laws? The impetus for the proposed zoning changes appears to stem not from positive benefits to the Town or “demand” for SEVs, but from a successful 2017 challenge to an application for a Special Use Permit to operate a commercial wedding venue in a residential area on Mill Dam Road.

The Marbletown Zoning Board of Appeals agreed to review an application for a “limited service eating place” at the property of Thomas Brownlie on Mill Dam Road. That decision was appealed by citizens who hired a lawyer because, a) the applicant was applying to open a large commercial wedding and other event space business (not a limited service eating place) and b) current town zoning code does not allow commercial events in residential zones. On April 25, 2018 Marbletown residents won the appeal and the application was denied. The case effectively nullified the legal basis of commercial wedding operations in residential districts. The Subcommittee was created after this decision. Thus, the proposed law, which is not based on any needs assessment, local zoning trend or concern for balanced economic development, appears to have been intended to compensate for a legal error made by the Town.

2. “Other Towns Have Events”: The Zoning Laws in Neighboring Towns

Subcommittee members were given zoning laws from neighboring towns regarding SEVs, but they were never discussed or analyzed in depth. Yet an independent review of other municipal laws revealed that zoning laws allowing SEVs in residential areas is an exception, NOT the rule.^{i ii}

The Report references zoning laws in the communities of “Hyde Park, Rochester, Union Vale, South Paul” (p.5), even though not all of these municipalities were on the original list presented to Subcommittee members. In addition, the town of South Paul does not appear to exist. The

Report also ignores townships closer to Marbletown in terms of location and history such as Hurley, which does not allow commercial events in residential areas.

3. “Events Will Bring Tourism Dollars”: The Weak Case for Agri-tourism and SEVs

The Town argued that SEVs are a way to tap into New York State’s growing agri-tourism sector. But SEVs are typically not considered agri-tourism and the full impact of SEV on the sector is not fully understood. Some early data suggest that SEVs exacerbate economic disparities, pits locals (both full time and weekend residents) against visitors and create endless nuisances (such as noise and public safety issues), as well as lawsuits.ⁱⁱⁱ Other areas of agri-tourism, not involving SEVs, have been successful and less controversial.

As evidence for the Town’s position, the Report cites a document “Audit of the Marbletown Zoning Law prepared by Katherine Daniels of the NY Planning Federation (which is contained as an appendix of the Federation Plan.)” This document, which was never publicly presented or discussed at Subcommittee meetings, states that the “Definitions for agricultural uses and agricultural lands should be consistent with, and reference New York Agriculture and Markets Law Section Section 301 (11).^{iv}

This state law concerning agri-tourism strictly *limits* weddings:

The Department has concluded that on-farm wedding receptions, parties and special events (e.g., harvest festivals or distillery, brewery, cidery and wine tastings), including charitable events, held at farms which market their crops as wine, beer, cider and distilled spirits, help market the farm operation’s product. These activities are evaluated on a case-by case basis to determine whether they are protected as part of the farm operation. The Department interprets AML §301(11) to include such receptions, parties and special events held on-farm as part of a farm operation under certain conditions. The events, whether public or private, must be: 1) directly related to the sale and promotion of the beverage produced at the farm (from at least 51% on-farm produced grain, hops, grapes/fruit/juice); 2) incidental and subordinate to the retail sale of the beverage on-site; 3) hosted by the farm or customers of the farm (not outside, unrelated parties); and 4) feature the beverage produced at the farm (from at least 51% on-farm produced grain, hops, grapes/fruit/juice).

One relevant excerpt on Marketing Activities (e.g., wedding receptions, parties and special events) from this document concludes:

The Department considers events to be “incidental” only when the gross annual sales from the non-beverage portion of event sales (including any facility rental/vendor fees, admission fees, catering charges, sales of other alcoholic beverages, etc.) does not exceed 30% of total gross sales from the retail sale on-site of the beverage produced at the farm (from at least 51% on-farm produced grain, hops, grapes/fruit/juice) at such events, plus the retail sale of any other crops, livestock or products or beverage-related food products (produced on the farm) that may be sold at such events.⁶ All products must be sold at a cost no higher than the current retail price of such products sold at the farm.

The carve-out for Ag clearly follows NYS Ag rules regarding the sale or service of food to the public with the exception of the following:

On land used in agricultural production, the sale or service of food products composed primarily of ingredients produced on site; or on land used in agricultural production that maintains a winery or farm winery license issued by the New York State Liquor Authority, the sale or service of food items which customarily complement wine tastings and that are ordinarily consumed while standing or walking and without the need for utensils.

It also noted that:

Occasional events on private residential properties hosted by the owner thereof to celebrate family events, holidays, charitable or other not-for-profit fundraisers; however, any use of residential property for profit, such as a venue for weddings or other events, is prohibited.

Thus, existing laws forbid commercial weddings. Daniels suggests including other activities in the definition of *Agri-tourism* such as “u-picks, CSAs, road stands, orchards, maple sugar shacks, cideries/distilleries/wineries/ craft breweries, greenhouse operations, corn mazes, hay rides, pumpkin patches, seasonal events, school programs, weddings and parties, farm markets, bakeries, farm stores and restaurants, bed and breakfasts, and farm stays.” This extensive list of activities was never addressed by the Subcommittee and/or town residents, who numbering 50+ at each meeting and frequently suggested that other, more compatible farm-based initiatives could be promoted. The range and relative value of other more suitable options were never comprehensively explored. Yet many residents, planners and other professionals maintained that other means of tourism could ensure a more equitable form of economic development, with fewer negative economic impacts and without creating a community-wide nuisance.

Additionally, existing research argues that weddings can detract from and even undermine other types of more productive tourism where benefits may be more broadly distributed. In general, there are few details specifically on the economic value of agri-tourism relative to other forms of tourism or its broader impact.

Worse, lawsuits concerning SEV are increasingly common. In fact, the SEV Report overlooks articles submitted to the Subcommittee about recent lawsuits concerning nearby commercial weddings in Hurley, NY, as well as an analysis of over 16 randomly-selected legal cases across the US where towns and neighbors sought legal recourse in response to commercial weddings. Importantly, 13 (81%) of the cases reviewed involved farm-based weddings. In nearly all of the cases the wedding venues were forced to close down, after significant legal expenses to the town.^v

Additionally, the Subcommittee Report states “Reviewing NYS Agricultural Land Use Directives the committee learned that the state supports select SEVs to conserve farm lands with appropriate controls.” (p.6). However, in an email sent to the Town supervisor it was clearly outlined that the Town had sought guidance from the NYS Dept. of Agriculture. NYS officials told the Town that:

“The event must be tied in with the sale of product grown on the farm”

The guidance also directed the town to the following document:

<https://www.agriculture.ny.gov/ap/agsservices/guidancedocuments/305-a-Winery-Distillery-Guideline.pdf>

Clear definitions for eligible farms are critical as elsewhere in New York State, for example, in the town of Cazenovia, NY, residents said they were misled by efforts of one farm that claimed it would be operating as a farm winery, when in fact the owner intended to have an event facility.^{vi} The events venue permit was eventually denied.

[As a way around NYS guidance, in December 2018 the Town introduced Local Law 2, creating a new “celebratory events” category that tried to radically change the activities permitted on farms and parcels in agriculture districts. This wording was inserted and a clear attempt to push the events agenda and subvert transparency. The Ulster County Planning Board unanimously rejected the proposed law.]

Curiously, the referenced document by Daniels and Franz also warns that “Generally smaller rural communities “overzone” for commercial development within their boundaries by zoning land for commercial development far above and beyond what their population can economically sustain, or even desire.”^{vii}

Without a build-out study or analysis of eligible land or an economic impact study, it remains unclear whether the proposed law is economically sustainable or is likely to “overzone” for commercial development. Town residents and a subcommittee member were eager to use existing data to analyze the number of properties eligible for SEVs based on stated requirements, be it 25 acres in residential areas, agricultural districts, or on active farms. Subcommittee member Tracey Dewart submitted information at meetings and offered to run data for any relevant criteria. No requests were made for the data and factual findings that were submitted to the Subcommittee were never posted as promised on the Town website.^{viii}

4. “SEV Generate \$\$\$ and Jobs”: The Reality of SEV Economics

The Town has presented SEVs as a positive economic force for tourism. The chair of the Subcommittee, urged by several committee members, requested a preliminary economic study on July 23rd 2018 that was neither reviewed nor posted on the Town’s website (as promised). The meeting at which the study was to be presented on August 2nd, 2018 was abruptly closed to the public by the chairman, who stated it was a directive from the Town supervisor and board. The preliminary analysis indicated that the financial toll on the town and most taxpayers would be huge relative to the benefits to a handful of businesses.^{ix}

In this last public meeting, the Subcommittee chair also changed the group’s mandate to exclude the economic impact and then suggested “the public present at the meetings strongly believed that Marbletown should first consider the economic benefits of allowing SEVs into the community before the details of the regulations could be developed.” But on July 19, 2018, during the third Subcommittee meeting, the chairman unequivocally stated that the economic impact had to be understood prior to further discussions and it was at his request that a preliminary economic analysis was done by Tracey Dewart. The statement of July 19 as well as

the directive and the statement of the last meeting of the Subcommittee are inconsistent and need to be duly noted.

In terms of economic impact, it is disingenuous for the SEV Report to identify a need to “Determine real facts about the impact SEVs have on property values” when there is extensive information documenting significant depreciation. Financial planner, local resident and public official Doug Adams had completed and presented that specific analysis at the PZC Subcommittee meeting in June 2018. His findings reflect research conducted by professionals in the real estate industry and land planners. Sources such as The Appraisal Institute, RISMedia, a real estate outlet, and other real estate and planning journals, indicate that noise nuisances can depreciate property values by 10-40%.^{x xixixixixiv} Adams also submitted a noise impact report that placed the numbers at around 11-18% yet noted that home adjacent to loud noise are likely “unsellable.” He concluded:

Carried to its logical conclusion, an open air events venue in residential areas poses clear downside financial and political risks to both the Town and the Rondout Valley School District that have not to date been neither anticipated, let alone appreciated. It is neither the role nor the responsibility for citizens’ action committees or kindred groups to draw attention to the glaring lack of a cost-benefit analysis that would normally form the basis of an informed Town decision on the matter of staging outdoor event venues in residential districts that hold the distinct probability of lowering property values of adjacent homeowners. This is the role of responsible government. That role has yet to be demonstrated by our newly elected officials.^{xv}

The Town board and Subcommittee chair agreed to make this report available to the public but to date have not done so. We hope that this will be immediately rectified so that citizens of Marbletown may consider and understand the far reaching and lasting consequences of SEV.

5. “Events Align with Town Plans”: Arriving at False Conclusions

Certain statements in the SEV Report are, in our view, simply false and thereby misrepresent the process that unfolded, which culminated in the following unfounded conclusion:

A detailed review of Marbletown planning documents suggested that embracing some form of SEV legislation could contribute to the following community planning goals:

- *Conserve open space*
- *Preserve our farmland*
- *Encourage small business, services and four- season tourism*
- *Preserve rural character*
- *Prevent commercial sprawl and promote hamlet-centered [commerce]*
- *Increase enthusiasm for local food*
- *Attract home-based occupations and businesses.*

On the contrary, public statements, newspaper articles, and research submitted for the record consistently suggested that such legislation could undermine every one of these goals. The participants who wrote those planning documents, as well as a local professional planner Matt Rudikoff hired to review them, concluded the *exact opposite* and stated so in public forums. Committee members specifically commented that most of these planning documents were

completed with no consideration of commercial weddings, which did not gain in popularity until recently.

To date, many local officials, professional planners and the public maintain that SEVs largely violated the Town's Comprehensive Plan, as well as other plans. Those plans support moderate and, in general, low-impact economic development that strengthens the two hamlets of Stone Ridge and High Falls as focal points for activity in the Town. Meanwhile, the plans warn against the types of businesses (not located in the commercial district) that would impact the rural and undeveloped character of the Town. This includes concerns for the capacity of smaller country roads to handle the speed, volume and weight of traffic. Given traffic, public safety, and the potential noise and air quality impacts, it asserts: "Uses incompatible with the nature and intended use of town roads should be prevented." Proposed zoning changes direct development to areas previously identified by the Marbletown plan 2005 as inappropriate for growth and business development.^{xvi} Several towns that embraced event spaces are now reversing course specifically because the sector has altered the rural and local character of towns and created nuisances too difficult to mitigate.^{xvii}

6. "Events Will Help Our Farmers": The False Narrative of SEVs Protecting Farmland and Stopping Development

The SEV Report indicates a shift in thinking that occurred post Subcommittee meetings: It suggests moving away from SEVs in residential areas to agricultural districts under the guise that SEVs will help farmers and protect farmland that might otherwise be developed. However, the definition of NYS Agricultural Districts in Marbletown often includes residential neighborhoods, so the agriculture option is deceptive unless clarified. The Report refers to agriculture districts, yet in Marbletown there are only residential districts that also happen to be in New York State Agricultural Districts.

Among the Report's many unfounded assertions is the statement that "It has been determined that, if designed, located and operated under appropriate conditions, special events venues can be an effective tool to protect and preserve such resources." (p. 2-3).

It is not clear when or who determined this. If there are reports and or data to support this argument they need to be submitted for public review. But to date, no consensus or evidence supporting this assertion has been presented. The impact of SEVs on agricultural districts and business districts was never addressed during Subcommittee meetings. Instead, the alarm over residential areas prevented discussion and/or progress to be made in other substantive areas. This is of concern given that most SEV lawsuits in the US appear to involve wedding venues on farms. The Town and Subcommittee have not performed a build-out of the number of properties that would be affected. Additionally, the impact of the law on strictly commercial zones was never considered even though it seemed logical to deal with the impact of SEVs on commercial districts first, as this was the one area where there was favorable consensus.

The idea that SEVs protects open space and limits development also has never been demonstrated.

On the contrary, if existing zoning restrictions are not respected it may promote rapid marketing and development of farmland. Parcels from an intact farm could be subdivided and dedicated to

commercial events such as weddings. The rationale that those with interest in housing developments will disappear due to the option of commercial weddings is ridiculous. Not every developer wants to run wedding venues, so development will continue in any case. Yet the new zoning laws may fuel speculation of underdeveloped lands by agritourism entrepreneurs.

These types of zoning laws have been held responsible for the fragmenting and stripping of intact forests. Marbletown's own landscape is notable for its forest cover. According to the Natural Heritage Plan, two-thirds of Marbletown is forested, with much of the forest occurring in contiguous blocks of 100 acres or more. The Plan also emphasizes the need to protect intact forests.^{xviii}

Other towns that include weddings in agri-tourism laws have discovered that undeveloped and wooded land gets purchased and then cleared to become farms associated with wedding venues. Challenges to business operations originally listed as 'wedding venues' cause owners to change the original stated purpose to 'farms' ^{xix} resulting in townships questioning what can be classified as a farm and who is a farmer. These deceptive practices are not always successful at getting farm weddings to be approved, as was demonstrated by the Barn of Chapel Hill at Wild Flora Farm, which has been embroiled in extensive legal and local actions.^{xx}

The strategy is relatively new and to date there are no peer-reviewed academic articles assessing its relative impact. There are strong indications that farm weddings are *not* a successful strategy for preserving farms or rural character. In fact, far more effective strategies exist, as outlined in the Natural Heritage Plan to achieve those goals.

Before commercial events can be presented as a means to preserve land, greater research is needed to analyze whether the changes to zoning laws truly protect land or slow land subdivision and the sale of farms. Until this is done, the notion is conjecture at best and very plausibly a dangerous experiment. So far these zoning changes have not restricted other types of development; rather, they introduce other commercial uses to farm districts. Also in towns such as Warwick NY officials have justified agritourism as a means to prevent farm subdivisions, but the zoning code has not prevented owners from listing farms lands as available for sale and subdivision.^{xxi}

Meanwhile, it should be noted that no farmers with longtime roots in the Marbletown community have come forward to advocate for SEVs. Only a small group of wedding entrepreneurs and businesses with vested interests want this.

7. "The Subcommittee Has a Clear Mandate": The SEV Subcommittee and Its Changing Mandate

The SEV Report misrepresents the composition of the committee as a cross section of the town. It claimed that the Subcommittee members "represented a broad sampling of community opinions on the need for Special Event legislation in Marbletown" (p. 4). Committee members, however, disproportionately represented individuals with business interests related to weddings such as an owner of a commercial event space and caterer. Other committee members possess large land holdings and were positioned to gain if SEVs were permitted in residential areas.

Another false claim of the SEV Report relates to the subcommittee's original mandate. Materials presented at early meetings include: "Determine if the town supports the addition of Special Event Venue regulations in Zoning Code; Provide a detailed review of the draft legislation and generate recommendations to improve the draft to the Town board."^{xxii} Several members, including Tracey Dewart, Nancy Gagliardi, and Daisy Foote, were specifically told that they would be helping to advise whether and if so where such venues were appropriate; their work would involve an assessment of the impact of SEVs in terms of their advantages and disadvantages. Yet the mandate abruptly changed in the final public meeting, stating in the Report that "While the charter allowed time to examine the guidance available that supported the SEV use, the goal of the group was not to determine if the local zoning code should include a SEV use, but to review and improve existing SEV draft legislation. " (p. 4). When this was presented, the three resigned from the Subcommittee. They saw the new mandate for Subcommittee members was limited to fine-tuning a law that was ill-conceived, not supported by many town residents, and not proven to be of benefit to the Town.

From its inception until the resignations, the SEV directive kept changing and provided no clear path forward to reflect the obvious wishes of the citizens of Marbletown. When the data on events (that was not presented to members) was contrary to the original mandate, the chair, as directed by the supervisor, narrowed the mandate. This led to the resignation of Dewart, Gagliardi, and Foote.

Conclusion and Next Steps

Given the extensive misleading statements and unsubstantiated positions reflected in the Report, it is essential that the Town complete a serious needs assessment, a build-out of affected lands, an economic impact study, and survey of the public (as proposed by several committee members throughout the process) before any legislative action is taken. The Town also must complete full SEQR process and analysis reflecting 2019 changes and embrace existing public data and local research to better understand the broader implications of wedding venues in Marbletown.

This SEV Report represents a damaging departure from long-established processes that prioritized community values and participation, and respected residents' desire to protect laws that safeguard rural neighborhoods from nuisances such as noise and traffic. Finally, it seriously undermines public trust in the body that produced it and brings into question its legitimacy and motivations.

Respectfully,

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Daisy Foote
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Former Members SEV Subcommittee

ⁱ Dewart, T. (2018). "Zoning Codes for Towns Near Marbletown NY," prepared June 7th, 2018, and referenced at the second meeting for the Subcommittee of the PZC. All documents submitted August 9th, 2018.

ⁱⁱ Information found at: <https://marbletowninfo.org/proposedlaws/events/othertowns>

ⁱⁱⁱ Bowdin, et al., (2001). "Events Management," Oxford, Butterworth-Heinemann, *The hospitality, leisure and tourism series*; Getz, D. (1997). *Event management and event tourism*. (New York: Cognizant Communications Corporation), p. 386; Fredline, et al. (2003). "The development of a generic scale to measure the social impacts of events." *Event management*, 8(1): 23-37.

^{iv} Daniels, K. & Franz, G. Based on excerpts and recommendations from *Guidelines for Land Use Regulations to Protect Farmland*. New York Planning Federation, Cornell University, p.113. No date was provided for this document.

^v Tracey Dewart's presentation of legal cases against commercial wedding venues, referenced at the Subcommittee of the PZC meeting in July 2018. Final version sent to PZC chair on July 20th, 2018.

^{vi} Cazentre, D. "Can Cazenovia's Oweria Vineyards continue to host weddings? It's looking doubtful." *NYup.com*, updated January 6, 2014.

^{vii} Davis, et al., p. 112.

^{viii} Dewart, T. (2018). "Acreage analysis for special events." Prepared June 12, 2018 and presented at Subcommittee of the PZC meeting in July 2018. Final version sent to PZC chair on July 20th, 2018, August 2, 2018 and August 9, 2018.

^{ix} Dewart, T. "OPINION: At What Cost? Three Ways Commercial Venues Impact A Town And Its Residents." *Shawangunk Journal*, <http://www.shawangunkjournal.com/sjx/180906/6867/at-what-cost--three-ways-commercial-venues-impact-a-town-and-its-residents.html> September 6, 2018

^x Pronin, B. "Does a Neighborhood Nuisance Impact Property Value?" *RIS Media*, <http://newsletter.rismedia.com/news/view/94935/> No date was provided was this article.

^{xi} Lowicki, D. & Piotrowska. (2015). "Corrigendum to Monetary valuation of road noise. Residential property prices as an indicator of the acoustic climate quality" [Ecol. Indic. 52 (2015) 472–479] *Ecological Indicators*, Volume 54, p. 246.

^{xii} Szopińska K. & Krajewska M. (2016). "Methods of Assessing Noise Nuisance of Real Estate Surroundings," *Real Estate Management and Valuation*, Vol. 24, No. 1, pp. 19-30.

^{xiii} Cellmer R. (2011) "Spatial Analysis of the Effect of Noise on the Prices and Value of Residential Real Estates," *Geomatics and Environmental Engineering*, Vol. 5, No. 4, pp. 13-28.

^{xiv} Dubin R.A. (1998) "Predicting House Prices Using Multiple Listings Data." *Journal of Real Estate Finance and Economics*, Vol. 17, No. 1, pp. 35–59.

^{xv} Adams, D. (2018). *Marbletown Noise Assessment*, July 2018, p. 8.

^{xvi} Marbletown New York Town Plan (2005). Compiled by Schuster Associates.

^{xvii} This reference includes Warwick NY, and Cazenovia, NY

^{xviii} Marbletown Natural Heritage Plan 2007. Prepared by Behan Planning Associates.

^{xix} Hudnall, D. "The Party Barn: Are Rustic Weddings Destroying a Way of Life in Rural Orange County?" *Indy Week*, September 14, 2016.

^{xx} <https://www.orangecountync.gov/1722/Current-Interest-Projects>

^{xxi} Information references real estate website Trulia.com
<https://www.trulia.com/property/5039800654-Mission-Land-Road-Pine-Is-Warwick-NY-10990>
December 11, 2018.

^{xxii} Proctor, D. Power Point Presentation, Sub Committee Agenda. June 7, 2018, p.2.