

# SHEEHAN PHINNEY

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June 9, 2022

**Via Email (boardassistant@templenh.org)**

Temple Zoning Board of Adjustment  
423 N.H. Rt. 45  
PO Box 191  
Temple, NH 03084

Re: Stepping Stones Event Center Special Exception Application  
Request for Rehearing

Dear Members of the Temple Zoning Board of Adjustment:

Woodcock Farms, LLC (“Woodcock”) is in receipt of the May 23, 2022 Notice of Decision granting Isabella Martin, as Trustee of the Isabella Martin Revocable Trust, a special exception to allow only the barn on Tax Map 9B, Lot 15 to be used as an event center, subject to certain enumerated terms and conditions. Please accept this letter as Woodcock’s request for a rehearing pursuant to RSA 677:22 on the grounds set forth in the June 9, 2022 request for rehearing submitted by Alec MacMartin and Arlene Laurenitis, which are hereby incorporated by reference into this request.

In further support of this request, Woodcock incorporates the points raised in the June 6, 2022 supplement to its request for a rehearing on the Board’s decision to grant the applicant a variance from one of the applicable special exception criteria. For ease of reference, a copy of that letter is enclosed herewith.

Woodcock respectfully asks that the Board consider and grant rehearing at its next regularly scheduled meeting.

Very truly yours,

*/s/ Megan C. Carrier*

Megan C. Carrier

cc: Michael Tierney, Esq. (mtierney@wadleighlaw.com)  
Israel F. Piedra, Esq. (ipiedra@lawyersnh.com)  
Christopher Boldt, Esq. (cboldt@dtclawyers.com)

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June 6, 2022

**Via Email (boardassistant@templenh.org)**

Temple Zoning Board of Adjustment  
423 N.H. Rt. 45  
PO Box 191  
Temple, NH 03084

Re: Stepping Stones Event Center Variance Application  
Request for Rehearing

Dear Members of the Temple Zoning Board of Adjustment:

As the Board is aware, Woodcock Farms, LLC (“Woodcock”) joined in the rehearing request submitted by Alec MacMartin and Arlene Laurenitis in relation to the Board’s decision to grant Isabella Martin, as Trustee of the Isabella Martin Revocable Trust, a variance from Section 13B(1) of the Temple Zoning Ordinance. Woodcock submits this letter as a supplement to that joinder and in further support of the rehearing request.

In support of the variance request and the related special exception request (which the Board found to be intertwined), the Applicant has urged the Board to consider her history with the town, including that she is a “good neighbor and citizen.” While Woodcock agrees that the Applicant is a good neighbor and citizen, Woodcock has responded by repeatedly expressing a concern that the Applicant’s status in town is irrelevant if her ultimate goal was to receive the value-adding variance and special exception and then immediately sell the property to someone else who may or may not be a good neighbor and citizen. Notably, the property (to include both Lot 9B-14 and Lot 9B-15) was listed for sale on May 23, 2022—the same day that the Board issued its notices of decision on the variance and special exception applications. An advertisement for the sale also ran in today’s New York Times. Given the work that goes into the preparation of such a listing and the lead-time associated with the running of a New York Times advertisement, it appears that the Applicant did, in fact, plan to list the properties for sale prior to receiving the requested approvals.

In light of the foregoing, to the extent the Board—in granting the variance—relied upon the Applicant’s representations regarding her history and reputation and assumed the Applicant would be operating the events center herself, a rehearing at which the Board takes into account the likelihood that the property will be owned by someone other than the Applicant in the near future is appropriate.

Very truly yours,

*/s/ Megan C. Carrier*

Megan C. Carrier

cc: Michael Tierney, Esq. (mtierney@wadleighlaw.com)  
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