

RE: PETITION FOR RECLASSIFICATION :
FROM AN R-40 ZONE TO AN :
R-A ZONE, AND SPECIAL :
EXCEPTION FOR ELEVATOR :
APARTMENTS, :
NE corner of Old Pimlico Road :
and Traymore Road, :
3rd District :
William L. Reynolds, et al, :
Petitioners :
BALTIMORE COUNTY :
No. 66-16-RX

OPINION

This is a petition for reclassification from an R-40 zone to an R-A zone, and a special exception to allow the construction of elevator apartment buildings on a tract of land, approximately thirty-eight (38) acres in size, situated on the east and south sides of Old Pimlico Road in the Third Election District of Baltimore County. Both the reclassification and the special exception were granted by the Zoning Commissioner for Baltimore County, and this appeal was taken by the protestants.

The petitioner alleges both error in placing R-40 zoning on this property by Baltimore County on the Third District map which was adopted January 16, 1957, and a change in the character of the neighborhood since the adoption of the map.

The developer proposes to erect ten - eight story elevator apartment buildings containing 760 apartment units on the subject property with parking space for 980 vehicles. There is also proposed a community recreation building for use by the residents. The developer's plan, which was introduced in evidence as Exhibit #2, proposes that two and three quarter acres of the subject tract be covered by buildings, six acres for parking, and the remaining thirty acres to be left as open space.

The Board conducted six full days of hearings, heard the testimony of twenty witnesses, and received into evidence thirty-three exhibits. It will be impossible in this opinion to review the testimony of each and every witness, however, needless to say, the Board has carefully considered the testimony of each witness and has studied all of the exhibits introduced.

The tract of ground is irregular in shape and has frontage on both the east side and the south side of Old Pimlico Road. Old Pimlico Road from Smith Avenue travels in a north to slightly northeasterly direction, and turns to almost a due easterly direction along the west edge of the subject tract of ground. The zoning and land uses around the property are as follows: Across Old Pimlico Road, in a westerly direction, the zoning is R-10 and is presently undeveloped, the majority of this land is owned by Waitman Zinn, one of the protestants in this case. To the north, across Old Pimlico Road, the land is zoned R-20 and is presently undeveloped. To the south of the property, there is a small

William L. Reynolds, et al - #66-16-RX

strip of ground, some few hundred feet wide, zoned R-40. All of the property south of this strip of R-40 is zoned R-10, from the subject property to the Baltimore City Line. The bulk of the property south of the subject tract is owned by the Bonnie View Country Club and is used by it for golf and country club purposes. Across Pimlico Road, to the southwest, is a large tract of R-6 land which is developed with a cottage house development known as Summit Park. Approximately 520 feet southeast of the eastern edge of the property is a forty acre tract of ground which was reclassified by this Board to an R-A zone in December of 1964 (Case #64-41). This reclassification was subsequently affirmed by the Court of Appeals of Maryland in *Bonnie View Country Club, Inc. vs. Louis J. Glass, 242 Md. 46*.

The petitioner produced voluminous testimony from an architect, an engineer, and a land planner as to the unsuitability of the subject tract for development in its present R-40 classification. The Board will not go into detail as to the testimony of each witness, however, the testimony produced by the petitioner indicates that it would be economically unfeasible to attempt to develop the property in its present classification. The property is a very "rough" piece of ground being extremely hilly and densely wooded. Petitioner's Exhibit #8 shows that the greater portion of the tract fronting on Pimlico Road has grades from twenty-five to thirty percent, the grades on the rear half of the tract reach a maximum of thirty-five percent, and that the entire rear portion of the tract has grades in excess of ten percent. The petitioner contends that this topography, together with the expense of bringing sanitary sewer to the subject tract, makes it entirely unfeasible to develop as R-40. The petitioner further contends that the only reasonable use of the property is for apartments with a special exception for elevator buildings so that the buildings could be placed on the plateaus with a minimum amount of grading required.

There was testimony in great detail by John Hocheder, a professional engineer appearing on behalf of the petitioner, as to the development cost of the tract and he stated that, in his opinion, from an engineering standpoint, the excessive development cost of this tract makes it economically unfeasible to attempt to use the property in its present R-40 classification, but that the higher density apartment zoning could support these costs. Indeed, his contention was, in some respects, supported by a witness for the protestants, Jerome Wolff. Mr. Wolff had prepared a proposed R-20 layout of the property which indicated a prospective layout of sixty R-20 lots. Dividing his estimated development costs by sixty, the development cost would apparently be over \$5,000 per lot. The witness further stated that he felt that a reasonable R-20 lot development cost would be in the \$2,500 to \$3,000 price range, and that \$4,500 per lot would be "very high". He further stated that it was foolish to even suggest R-10 zoning because of the severe grades on the property.

William L. Reynolds, et al - #66-16-RX

of utilities, which were not available in 1957, makes the zoning presently erroneous. We have also referred, earlier in this opinion, to substantial changes that have taken place in the neighborhood since the adoption of the map. On the basis of the testimony heard by the Board and the exhibits filed with the Board, the Board concludes that because of the severe topographical features of the tract it is neither feasible nor practical to attempt to develop this parcel in single family dwelling units. The Board is persuaded, however, that garden apartments within the context of the R-A classification can and should be constructed on this tract in that they would be more in keeping with the surrounding property than the eight story elevator buildings requested and also, on the basis of the engineering testimony in the case, provide for the development of the tract for low density apartment use by placing the buildings on the plateaus removed from the perimeter of the property and at a lesser density than is allowed under the zoning regulations.

ORDER

For the reasons set forth in the foregoing Opinion, it is this 7th day of October, 1966 by the County Board of Appeals, ORDERED that the reclassification petitioned for, and the same is hereby GRANTED, and that the special exception petitioned for, and the same is hereby DENIED.

Any appeal from this decision must be in accordance with Chapter 1100, subtitle B of Maryland Rules of Procedure, 1961 edition.

COUNTY BOARD OF APPEALS OF BALTIMORE COUNTY

William S. Baldwin, Chairman

W. Giles Parker

R. Bruce Alderman

William L. Reynolds, et al - #66-16-RX

The main difference between Mr. Wolff's testimony and that of Mr. Hocheder is that Mr. Wolff felt that the property could feasibly be developed for garden apartments without the special exception for elevator buildings. He did, however, appear to agree with Mr. Hocheder that it would be extremely difficult, due to the topography, to obtain the maximum allowable density under the zoning regulations of sixteen units per acre. The petitioner proposes to erect 760 units on the property, which is the allowable density, utilizing the bonus gained by constructing eight story buildings. The allowable density under R-A zoning without the special exception would be approximately 590 units. However, the testimony of Eugene Delmar, an architect testifying on behalf of the petitioner, indicated that because of the severity of the grades on the tract, the maximum density that would be feasible would be in the neighborhood of 350 to 400 units.

The Board finds, from the evidence produced, that there are public utilities (water and sewer) available to the property in sufficient capacity to serve the proposed apartment project.

Three witnesses gave testimony as to traffic on the roads in the vicinity and the possible effect of apartment construction here on traffic in the vicinity. All of the witnesses were mainly concerned with traffic on Old Pimlico Road. Old Pimlico Road varies greatly in width and alignment from Smith Avenue to the Falls Road; from Smith Avenue to the Summit Club it is reasonably straight and varies in width from 28 to 40 feet. Along the frontage of the Summit Club the road is 40 feet wide with curb and gutter on both sides. North and east of the Summit Club the road narrows to an 18 to 20 foot width, and is curving and hilly. Testimony indicated that the developer would be required, under a public works agreement, to improve and widen Old Pimlico Road on his side along the frontage of the subject tract. The distance from the north entrance to the subject tract to the newly reconstructed Old Pimlico Road, near Falls Road, is approximately 2,200 feet. Baltimore County plans to reconstruct and realign this section of the road, however, there are apparently no funds available at this time to do so. Old Pimlico Road had been scheduled for reconstruction for the year 1966-67 at County expense, however, it was removed from the Capital Program and there are no funds presently available for the improvement. Mr. Gavelis, Director of Planning for Baltimore County, stated that one of the reasons for the withdrawal of the proposed reconstruction project may be that the land on both sides of the road is presently undeveloped.

All of the witnesses who testified regarding traffic agreed that Old Pimlico Road in its present state is something less than desirable. Joseph D. Thompson, a traffic engineer testifying on behalf of the petitioner, described it as a "pleasant country road". Mr. Ewell, for the protestants, described it as "completely dismal", however, both Mr. Ewell and Mr. Thompson agreed that the road is presently operating far below its practical

RE: PETITION FOR RECLASSIFICATION :
From an R-40 Zone to an R-A Zone :
Special Exception for Elevator :
Apartments - NE Cor. Old Pimlico :
and Traymore Roads, 3rd District - :
Wm. L. Reynolds, Virginia B. :
Reynolds, Austin L. Reynolds, :
Doris Hill Reynolds, Samuel C. :
Hottle and Dorothy T. Hottle, :
Petitioners :
BALTIMORE COUNTY :
No. 66-16-RX

Petitioners have requested a reclassification from R-40 Zone to R-A Zone with a Special Exception for elevator apartments on 38 acres of land, more or less, on Old Pimlico Road. Part of the subject property proceeding from Traymore and Old Pimlico Roads is rough and wooded with a fairly flat cleared meadow in the center. Continuing on Old Pimlico Road to Falls Road all the land is hilly.

This section is oriented toward the Jones Falls Expressway and the Falls Road.

The subject property is not so close to the subdivision on Old Pimlico Road or Smith Avenue so as to border, buffer or be a part of a building project near the Bonnie View Golf Club.

Most apartment zoning sites are either large or small spots on a zoning map, but such spots, whether placed on a map by the planners, or as in this case by petition cannot truly be called "spot zoning". This is a rather large complex and should be considered as similar to a small subdivision.

Criteria presently under study by the Office of Planning and Zoning cannot be considered at this time since they have not been presented as yet and may or may not ever be approved by the proper authorities.

Water and sewer requirements may be met without difficulty.

Old Pimlico Road is inadequate from a point near Traymore Road to State improved portion of Old Pimlico Road, extending from Falls Road and under Jones Falls Expressway.

There was sufficient testimony to indicate that enough information was available at the time of the adoption of the present zoning map that should have indicated that the R-40 zone was an improper zone for the subject property, therefore, it is in order to reclassify the property to an R-A zone.

William L. Reynolds, et al - #66-16-RX

capacity, and further agreed that while the construction of the proposed 760 unit apartment project here would bring the traffic volume to near the practical capacity of the road as it presently exists, it would not exceed it. The main disagreement by the experts seemed to be the direction of travel that the apartment residents would take to reach Baltimore City. Mr. Ewell and Mr. Thompson agreed that the majority of the apartment residents would travel northerly and easterly along Old Pimlico Road to Falls Road, while Mr. Clifford, the traffic engineer for Baltimore County, felt that the majority would travel southward toward Smith Avenue. The Board feels that the more logical route of travel would be northerly and easterly toward the Falls Road. The only conclusion that can be reached by the Board, based on the testimony, is that the construction of garden apartments here would not unduly congest the roads in the immediate vicinity.

Bernard Willemain, a recognized expert in the field of land planning, testified that, in his opinion, the present R-40 zoning is erroneous and also that there have been numerous changes in the character of the neighborhood to justify the requested reclassification. He stated that he felt the R-40 was incongruous with the character of the rest of the area, and inconsistent with the zoning on the adjoining tracts of ground. The only development of any size in the immediate neighborhood, known as Summit Park, is located southwest of the subject property and is zoned R-20. He further thought that it was incongruous to place R-40 next to the Summit Club which, in his opinion, is a commercial operation. He also testified that there was a basic error made by Baltimore County in the adoption of the Third District map in that the County had placed on the map little, if any, useable apartment zoning at the time of its adoption, and that now this error must be corrected by individual petitions. He testified to various utility changes in the area since 1957, and referred to the testimony of other witnesses regarding these changes, the major change being that sewer is now available to the property which was not available in 1957. Without going into great detail as to the various utility changes in the area since the adoption of the map, it should be noted that these are the same utility changes referred to in both *Bothell's Congregation of Baltimore City vs. Sidney Blum, et al - 242 Md. 84* and *George G. Finney, et al vs. Milton L. Halle, et al - 241 Md. 224*. The witness also noted numerous road changes including but not limited to the Jones Falls Expressway which was designed in 1961; the Baltimore County Beltway which was opened in July, 1962; the reconstruction of Pimlico Road; and the widening and improving of Green Spring Avenue which is now underway. He also testified to various reclassifications in the immediate vicinity since the adoption of the map, and particularly Case #64-41, the Glass property, which has been referred to earlier in this opinion, which is a forty acre tract reclassified from R-20 and R-10 to R-A; Case #65-92, the Dichiera property, which consists of twenty-two acres on the south side of Smith Avenue which was reclassified from R-6 to

For the above reasons the requested rezoning from R-40 Zone to R-A Zone is granted but no site plan shall be approved or a building permit approved until Old Pimlico Road is relocated and a 24 foot open section is constructed from the existing 42 foot curb and gutter section south of the subject site to the Jones Falls Expressway as set forth in the County Traffic Engineer's report of June 15, 1965, and as further shown on Exhibit "A" attached hereto.

Any use of the subject property for apartment zoning shall be subject to an approved site plan by the Office of Planning and Zoning, approval of all entrances by the County Traffic Engineer and the Bureau of Public Services, and the Bureau of Public Services shall also approve or disapprove the site plan.

The petition for the Special Exception for the elevator apartments satisfies the requirements of Section 502.1 of the Baltimore County Zoning Regulations and is granted, but no site plan shall be approved or a building permit approved until Old Pimlico Road is relocated and a 24 foot open section is constructed from the existing 42 foot curb and gutter section south of the subject site to the Jones Falls Expressway as set forth in the County Traffic Engineer's report of June 15, 1965, and as shown on Exhibit "A" attached hereto.

Any use of the subject property for elevator apartment zoning shall be subject to an approved site plan by the Office of Planning and Zoning, approval of all entrances by the County Traffic Engineer and the Bureau of Public Services, and the Bureau of Public Services shall also approve or disapprove the site plan.

It is this 20th day of July, 1965, by the Zoning Commissioner of Baltimore County, ORDERED that the herein described property or area should be and the same is hereby reclassified; from an R-40 zone to an R-A Zone and a Special Exception for elevator apartments should be and the same is granted from and after the date of this order.

The granting of the petition for reclassification and special exception is subject to compliance with the foregoing provisions set forth in this Order, and, further, subject to the plan for reconstruction of Old Pimlico Road marked Exhibit "A" attached hereto, and Exhibit "A-1".

John J. Gavelis
Zoning Commissioner of
Baltimore County

- 5 -

William L. Reynolds, et al - #66-16-RX

R-A in October, 1964; Case #64-14, the Zinn property, directly across Old Pimlico Road, which was reclassified from R-40 and R-20 to R-10 in January, 1964; and Case #63-38 which was a special exception granted at the northeast corner of the Jones Falls Expressway and Pimlico Road for a research laboratory. He further stated that, in his opinion, the reclassification here would not have any adverse effect on the surrounding properties and that the only property that could possibly be affected by this petition is the Geary property which adjoins the subject property to the north.

The protestants, in the main, objected to the proposed apartment development on the basis of possible traffic congestion and, in their opinion, the invasion of the residential neighborhood by eight story elevator apartment buildings. Based on the testimony heretofore referred to, given by the various traffic experts, the Board does not feel that the protestants' fears as to possible traffic congestion are justified. One of the protestants, Waitman B. Zinn, who testified in opposition to the reclassification, stated that he did not think that apartments were in keeping with the neighborhood, and that he thought the value of his land would be depreciated. However, he admitted that since 1957 he has sold twenty-one acres of his property to Baltimore County for a school site; that in 1963 he had a portion of his property rezoned from R-40 to R-10 (Case #64-14-R); and that in March of 1964 he filed a petition with Baltimore County (Case #64-136-R) to rezone a large portion of his property to R-A, the plan filed by Mr. Zinn with his petition for R-A zoning (Petitioner's Exhibit #15) shows apartment buildings directly in back of his present home (the plan indicates that the nearest apartment building would be approximately 400 feet from his house). Mr. Geary, another protestant, felt the project would "overwhelm" him, however, the Board does not feel this will be true if the development is limited to garden apartments.

George E. Gavelis, Director of Planning for Baltimore County, testified in opposition to the proposed reclassification and special exception, the main thrust of his testimony seemed to the Board to be in opposition to the requested special exception which would allow ten - eight story elevator apartment buildings on the subject tract. He also stated that, in his opinion, the access to the property was substandard. He did state that the topography of the site would make any residential lot development of the tract "difficult". In view of the Board's decision to deny the special exception requested in this case, we feel that the main objections by the Director of Planning are overcome.

From the testimony produced before the Board, the Board is of the opinion that the present R-40 zoning on the property is erroneous. The County authorities apparently placed the R-40 zoning on this property overlooking the fact that the property is surrounded on three sides by different zoning, or in the event the County placed the R-40 classification on the subject property as a "reservoir zone", then the present availability

INTER-OFFICE CORRESPONDENCE
BUREAU OF TRAFFIC ENGINEERING
Baltimore County, Maryland
Towson, Maryland, 21204

#66-16-RX

Date: June 15, 1965

TO: Mr. James S. Dyer
FROM: Eugene J. Clifford
SUBJECT: Item 5 - ZAC - June 8, 1965
Old Pinlico Road

Review of the plat dated May 25, 1965 results in the following comments.

The proposed site of 760 apartment units can be expected to generate 5300 trips per day. If existing zoning remains, the site will generate approximately 300 trips per day.

Old Pinlico Road now exists in a substandard condition as to sight distance and alignment. This road is to be relocated and a 24 foot open section constructed from the existing 42 foot curb and gutter section south of the subject site to the Jones Falls Expressway. This construction is planned for the 1968 - 1969 fiscal year.

In the event the subject zoning is granted, it is requested that the entrances be made subject to the approval of this Bureau.

Eugene J. Clifford
Eugene J. Clifford
County Traffic Engineer

EJC:CRM:ne



RE: PETITION FOR RECLASSIFICATION
From an R-40 Zone to R-A Zone
Special Exception for Elevator
Apartments - NE Cor. Old Pinlico
and Traymore Roads, 3rd District
Mr. L. Reynolds, Virginia D.
Reynolds, Austin L. Reynolds,
Doris Hill Reynolds, Samuel C.
Huttie and Dorothy R. Huttie,
Petitioners.

REPORT
ZONING COMMISSIONER
OF
BALTIMORE COUNTY
No. 66-16-RX

August 27th, 1965

John C. Rose, Esquire
Zoning Commissioner
County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21202

Dear Mr. Rose:

Please enter hereby an Appeal, on behalf of Waitman B. Zinn, an aggrieved property owner opposing the Petition in the above captioned matter, to the Baltimore County Board of Appeals from the Order and Decision of the Zoning Commissioner dated July 30, 1965, granting the Petition for reclassification outlined above.

This Appeal is taken pursuant to the applicable provisions of the Statute, Code and Laws and Regulations pertaining to Appeals to said Board of Appeals from Orders and Decisions of the Zoning Commissioner or Deputy Zoning Commissioner of Baltimore County (in part identified or referred to as Sections 23-25, Title 23, of the Baltimore County Code now in existence and now in effect and force).

A check for \$70.00 is enclosed herewith to cover the cost of this Appeal, in accordance with the established procedures.

Respectfully yours,

Waitman B. Zinn
Waitman B. Zinn
Protestant.
2110 Maryland National Bank Building
Baltimore, Maryland 21202
Attorney for Protestants.

WPMs (Enclosure as noted)
cc: James H. Cook, Esquire
22 West Pennsylvania Avenue
Towson, Maryland 21204

BALTIMORE COUNTY OFFICE OF PLANNING AND ZONING
COUNTY OFFICE BUILDING
TOWSON, MARYLAND 21204

#66-16-RX

June 8, 1965

James H. Cook, Esq.
22 W. Pennsylvania Avenue
Towson, Maryland 21204

SUBJECT: Reclassification from R-40 to R-A, and a Special Exception for Elevator Apartments for William L. Reynolds, et al, located on the Northeast corner of Old Pinlico Road and Traymore Road

Dear Sir:

The Zoning Advisory Committee has reviewed the subject petition and makes the following comments:

BUREAU OF TRAFFIC ENGINEERING: The Bureau of Traffic Engineering will review and comment at a later date. Comments attached.

FIRE BUREAU: See attached comments.

BUREAU OF ENGINEERING:

Utilities: Sewer - Sewer exists in Pinlico Road about 2500 feet east of this site. Water - A 12" water main exists in Old Pinlico Road approximately 500' south of the subject property. However, pressures in this zone of service are not adequate to supply water to the upper floors of these apartments without some kind of onsite pump facilities. Road - Old Pinlico Road to be developed as a minimum 60' curb and gutter road on a 60' right of way.

The above comments are not intended to indicate the appropriateness of the zoning action requested, but to assure that all parties are made aware of plans or problems that may have a bearing on this case. The Director and/or the Deputy Director of the Office of Planning and Zoning will submit recommendations on the appropriateness of the requested zoning ten (10) days before the Zoning Commissioner's hearing.

The following members had no comment to offer:

Office of Planning and Zoning
Board of Education
State Roads Commission
Health Department
Buildings Department
Industrial Development Commission

Yours very truly,

James S. Dyer
James S. Dyer, Chief
Petition and Permit Processing

cc: Mr. R. Moore, Traffic Eng.
Lieut. Norris, Fire Bureau
Mr. Brown, Bureau of Eng.

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

#66-16-RX

June 10, 1965

TO: Mr. James Dyer, Chairman
Zoning Advisory Committee
FROM: Paul H. Robinson, Captain
Plans Review - Fire Prevention Division
SUBJECT: William L. Reynolds
NE Cor Old Pinlico & Traymore Roads
Proposed Zoning: Elevator Apts.

A field inspection conducted on 6/8/65 by Lt. Edward F. Haisel and this writer indicates a serious deficiency of water supply for the fire fighting purposes. Large amounts of water supply through adequate water mains and fire hydrants located properly will be necessary.

The present water supply is received from one direction and is a dead end. The proposed 60' height of the elevator apartment buildings will require a minimum of 65 P.S.I. on the upper floor of the standard pipe system.

Prior to approval of this rezoning it would be beneficial for all concerned to indicate alleviating these deficiencies.

Please contact Paul H. Robinson, Capt. at WA-5-7310 for any additional information or assistance.

PH:jlis

11A PS
#3
5C1.2-C
3-C
NW-8-C
PA
6/28/65

COOK, MUDD & HOWARD

22 WEST PENNSYLVANIA AVE
TOWSON 4 MARYLAND

August 30, 1965

Hon. John G. Rose
Zoning Commissioner of
Baltimore County
County Office Building
Towson, Maryland 21204

Re: Petition for Reclassification
from R-40 to R-A. Special
Exception for Elevator Apts.,
N.E. Cor. - Old Pinlico and
Traymore Roads, 3rd District -
William L. Reynolds, et al.
Petitioners
Case No. 66-16-RX
Our File No. 65-8

Dear Mr. Rose:

On behalf of the Petitioners in the above entitled case, we herewith note an Appeal to the County Board of Appeals from such portion of your order which you entered up on July 30, 1965 in the above case as imposes a restriction on the reclassification granted from R-40 to R-A zone, which conditions the reclassification, as granted, upon the rebuilding of Pinlico Road from Jones Falls Expressway, eastward past the subject property.

Very truly yours,

James H. Cook
James H. Cook

JHC:mac



LEE KLAVANS
Attorney At Law

TELEPHONE 694-2322

August 23, 1965

John G. Rose, Zoning Commissioner
Baltimore County Office of Planning and Zoning
County Office Building
111 W. Chesapeake Avenue
Baltimore, Md. 21204

Re: Petition for Reclassification
from R-40 to R-A Zone - Special
Exception for Elevator Apartments -
NE Cor. Old Pinlico and Traymore
Roads, 3rd District - Wm. L. Reynolds,
et al, Petitioners - No. 66-16-RX

Dear Mr. Rose:

Please enter the Appeal of the Summit Country Club, Inc., Old Pinlico Road, Baltimore County, Maryland, from the Order passed in the above captioned matter on July 30, 1965.

Enclosed please find the necessary \$70 check for costs of the Appeal.

As counsel for the Summit Country Club, Inc., please enter my appearance in this matter and forward any correspondence concerning the case to my office.

Very truly yours,

Lee Klavans
Lee Klavans

LK/gss
Enc.



John C. Rose, Esq.

August 27, 1965

A check in the amount of \$75.00 is enclosed.

Very truly yours,

Harry Goldman, Jr.
Harry Goldman, Jr.

Robert S. Rody
Robert S. Rody

Gerald H. Cooper
Gerald H. Cooper

Attorneys for Appellants

Enc.

cc: Lee Klavans, Esq.
1360 West North Avenue
Baltimore, Maryland 21217
cc: Joseph Harlan, Esq.
717 Title Building
Baltimore, Maryland 21202

John C. Rose, Esq.
Zoning Commissioner
County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21204

Re: Petition for Reclassification on and
Special Exception for Elevator
Apartments - N/E Cor. Old Pinlico
Road and Traymore Road, 3rd Dist.,
Wm. L. Reynolds, et al, Petitioners
No. 66-16-RX

Dear Mr. Rose:

Please enter an appeal on behalf of Charles Jules and Marjorie Jules, his wife, 6800 Pinlico Drive, Paul Kernan and Susan Kernan, his wife, 2404 Hunt Drive, Mrs. Anna Jules, 6700 Pinlico Road, and Peter Isner and Horriet Isner, 2402 Bare Road, individually and jointly to the Baltimore County Board of Appeals from the Order and decision of the Zoning Commissioner dated July 30, 1965, granting the Petition for Reclassification in the above-captioned matter.

Also enter the appearance of Harry Goldman, Jr., 44 Central Savings Bank Building, Robert S. Rody, 711 Equitable Building, and Gerald H. Cooper, 905 Blaustein Building, as attorneys for the appellants.

MAY 30 1965

COOPER AND BECKMAN

SUITE 805
ONE NORTH CHARLES
BALTIMORE, MARYLAND 21201

August 27, 1965

GERALD H. COOPER
A. THOMAS BECKMAN

DIAL 539-0300

WILLIAM L. REYNOLDS,
VIRGINIA B. REYNOLDS,
AUSTIN L. REYNOLDS,
DORIS HILL REYNOLDS,
SAMUEL C. HOTTLE, and
DOROTHY R. HOTTLE

LAW OFFICES
SULLIVAN & PITTLER
140 COURT SQUARE BUILDING
LEIGHTON & CALVERT STREETS
BALTIMORE, MARYLAND 21202
August 24, 1965



Hon. John G. Rose,
Zoning Commissioner of
Baltimore County
County Office Building
Towson, Maryland 21204

Re: Petition for Reclassification
from R-40 to R-A, Special
Exception for Elevator Apts.
N.E./Cor. - Old Pimlico and
Traymore Roads, 3rd Dist., -
William L. Reynolds, et al,
Petitioners
Case No. 6616-RX
Our File No. 7901

Dear Mr. Rose:

This office represents Bonnie View Country Club, Inc.,
owner of substantial property in the immediate area of the sub-
ject property of the above captioned Petition. On behalf of our
client and pursuant to Section 500.10 of the Baltimore County
Zoning Regulations, we herewith note an Appeal to the County
Board of Appeals, from your order dated the 30th day of July,
1965, granting reclassification from R-40 to R-A, with a Special
Exception for "elevator apartments".

We enclose herewith our check, in the amount of \$70.00,
to cover the costs of the within Appeal.

Very truly yours,

Allan J. Malester

AJM:eml
Enclosure
cc: James H. Cook, Esquire
22 W. Pennsylvania Avenue
Towson, Maryland 21204

Klein & Harlan
Attorneys at Law

Donald S. Klein
Joseph Harlan
Donald S. Klein Jr.

717 Title Building
East-Park and Lexington Streets
Baltimore, Maryland 21202
Telephone Area 7-3400
Cable Address "Klema"

August 24, 1965

John C. Rose, Esquire
Zoning Commissioner
County Office Building
111 West Chesapeake Avenue
Towson, Maryland - 21204

Re: Petition for Reclassification and
Special Exception for Elevator
Apartments - W/E cor. Old Pimlico
Road and Traymore Road, 3rd Dist.,
Wm. L. Reynolds, et al, Petitioners
No. 66-16-RX

Dear Mr. Rose:

Please enter hereby an Appeal on behalf of the aggrieved
property owners opposing the Petition in the above captioned matter,
H. Wilmer Heary and Virginia Heary, individually and jointly, to the
Baltimore County Board of Appeals from the Order and Decision of the
Zoning Commissioner dated July 30, 1965, granting the Petition for
reclassification outlined above.

A check for \$80.00 is enclosed herewith to cover the cost
of this Appeal in accordance with the established procedures.

Respectfully yours,

H. Wilmer Heary
Virginia Heary

Protestants

Enclosure as noted

cc: Gerald H. Cooper, Esquire

Joseph Harlan
717 Title Building
Baltimore, Maryland - 21202
Attorney for Protestants.

SUMMIT COUNTRY CLUB, INC.
Old Pimlico Road
Baltimore County, Maryland 21209
Appellant
vs.
COUNTY BOARD OF APPEALS
County Office Building
111 W. Chesapeake Avenue
Towson, Maryland 21204
Appellee

IN THE
CIRCUIT COURT
FOR
BALTIMORE COUNTY

ORDER FOR APPEAL

MR. CLERK:

Please enter an Appeal to the Circuit Court for Baltimore
County on behalf of the Summit Country Club, Inc., by their
attorney, Lee Klavans, from the Order, decision and reclassifi-
cation, granted by the County Board of Appeals on October 7, 1966,
in the matter of Petition for Reclassification from R-40 Zone
to a R-A Zone, at the northeast corner of Old Pimlico Road and
Traymore Road, 3rd District, William L. Reynolds, et al,
Petitioners, Case No. 66-16-RX.

LEE KLAVANS
Attorney for Appellant
North Associates Building
1360 W. North Avenue
Baltimore, Maryland 21217
669-3333

I HEREBY CERTIFY that on this 24th day of November, 1966, a
copy of the foregoing Order for Appeal was served at the
office of the County Board of Appeals, County Office Building,
111 W. Chesapeake Avenue, Towson, Maryland 21204, and was
mailed to James H. Cook, Esq., 22 W. Pennsylvania Avenue,
Towson, Maryland, 21204, counsel for Petitioners.

LEE KLAVANS

LAW OFFICES
LEE KLAVANS
NORTH ASSOCIATES BUILDING
1360 W. NORTH AVENUE
BALTIMORE, MD 21217
Re: 11/14/66
10:10 AM

WILLIAM L. REYNOLDS,
VIRGINIA B. REYNOLDS,
AUSTIN L. REYNOLDS,
DORIS HILL REYNOLDS,
SAMUEL C. HOTTLE, and
DOROTHY R. HOTTLE

vs.

WILLIAM S. BALDWIN,
W. GILES PARKER and
R. BRUCE ALDERMAN,
CONSTITUTING THE COUNTY
BOARD OF APPEALS OF
BALTIMORE COUNTY

ORDER FOR APPEAL

Mr. Clerk:

Please enter an appeal on behalf of William L. Reynolds,
Virginia B. Reynolds, Austin L. Reynolds, Doris Hill Reynolds, Samuel
C. Hottle, and Dorothy R. Hottle from the County Board of Appeals of
Baltimore County to the Circuit Court for Baltimore County in the matter
of a Petition for Reclassification from an R-40 to a R-A zone, with a
special exception for an elevator apartment building, for property located
on the east and south sides of Old Pimlico Road in the Third Election
District of Baltimore County between Smith Avenue and Falls Road. This
appeal is from the decision of Case No. 66-16-RX of the County Board of
Appeals of Baltimore County dated October 7, 1966 which denied the
special exception petitioned for. This appeal is being filed pursuant to the
provisions of Chapter 1100, sub-title B, of the Maryland Rules of Procedure.

James H. Cook
22 W. Pennsylvania Avenue
Towson, Maryland 21204
Attorney for Petitioners

Re: 11-7-66
10:45 AM

I HEREBY CERTIFY that copy of the foregoing Order of Appeal
was mailed this 7th day of November, 1966 to Joseph Harlan, Esquire,
717 Title Building, Baltimore, Maryland 21202, Allan J. Malester,
Esquire, 1410 Court Square Building, Baltimore, Maryland 21202,
Nathaniel Patz, Esquire, 10 Light Street, Baltimore, Maryland 21202,
Lee Klavans, Esquire, 1360 W. North Avenue, Baltimore, Maryland 21217,
Harry Goldman, Jr., Esquire, 44 Central Savings Bank Building, Baltimore,
Maryland 21202, Robert S. Rody, Esquire, 711 Equitable Building,
Baltimore, Maryland 21202, and Gerald H. Cooper, Esquire, 905
Elaustein Building, Baltimore, Maryland 21201, attorneys of record for
Protestants in the above entitled case; and a copy of this appeal has been
delivered on the same date to the office of the County Board of Appeals of
Baltimore County.

James H. Cook

WILLIAM L. REYNOLDS,
VIRGINIA B. REYNOLDS,
AUSTIN L. REYNOLDS,
DORIS HILL REYNOLDS,
SAMUEL C. HOTTLE and
DOROTHY R. HOTTLE

vs.

WILLIAM S. BALDWIN,
W. GILES PARKER and
R. BRUCE ALDERMAN,
CONSTITUTING THE COUNTY
BOARD OF APPEALS OF
BALTIMORE COUNTY

IN THE
CIRCUIT COURT
FOR
BALTIMORE COUNTY
Misc. Docket
8/14/66 3

ORDER OF DISMISSAL

Mr. Clerk:

Will you kindly dismiss the appeal taken on behalf of William L.
Reynolds, Virginia B. Reynolds, Austin L. Reynolds, Doris Hill Reynolds,
Samuel C. Hottle and Dorothy R. Hottle from the Order of the County
Board of Appeals in the above entitled matter.

James H. Cook
Attorney for Appellants

True Copy Test
ORVILLE L. CONNELL, Clerk
Per: [Signature]
Deputy Clerk

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Mr. John G. Rose, Zoning Commissioner Date: June 30, 1965

FROM: George E. Cavellis, Director

SUBJECT: Petition #66-16-RX. "R-40 Zone to R-A Zone. Northeast corner of Old Pinlico and Traymore Roads. Being the property of Wm. L. Reynolds, Virginia B. Reynolds, Austin L. Reynolds, Doris Hill Reynolds, Samuel C. Hottle and Dorothy R. Hottle."

3rd District

HEARING: Wednesday, JULY 14, 1965 (10:00 A.M.)

The planning staff of the Office of Planning and Zoning has reviewed the subject petition and offers the following comments:

- Once again we face the possibility of a major assault upon the integrity of an established comprehensive zoning plan. And, once again, we have a proposal for a reclassification that can be summed up briefly only by the time-worn epithet, "spot zoning". The matter of the subject petition is particularly egregious not only in that land-use potentials that could be fulfilled as of right would be grossly out of character with the use and zoning of surrounding property, but also in that a special exception for not just one but ten elevator apartment buildings is being requested. Adjacent zoning is R-10, R-20, and R-40. Existing uses of adjacent land fall either into the residential or open-land categories.
- From a planning-policy viewpoint, access to the subject property is entirely substandard for the kind of development proposed. Although a realignment and relocation of Old Pinlico Road had been scheduled for fiscal 1968-1969 (as indicated in the County Traffic Engineers comments issued by the Zoning Advisory Committee), the scheduling was never official and was, in fact, removed from the Five Year Capital Program before it was approved by the County Council. Thus, no improvement to Old Pinlico Road is presently in sight, and access will remain substandard for the foreseeable future.
- Aside from access considerations, the subject proposal also fails to meet any of the criteria which are being considered by this office as locational standards for the placement of elevator apartment buildings. The site is not within an urban center, it is not close to any community shopping area of adequate size, and it is not adequately served by public transit facilities.
- Topography on this site could be termed difficult. But only in highly unusual circumstances could topography, in itself be considered a justification for development at a higher density than that to which it should otherwise be limited.
- Taking all things into account, we are of the firm opinion that the subject petition should be denied.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 33412
DATE 9/15/65

TO: Nathan Katz, Esq.,
2110 Matheson Bldg.,
Baltimore, Md. 21202

BILLED BY: Office of Planning & Zoning
119 County Office Bldg.,
Towson, Maryland 21204

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-622		Cost of posting property of W. L. Reynolds, et al No. 66-16-RX	\$5.00	
				5.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 32084
DATE 8/30/65

TO: Messrs. Casper & Redburn,
3405 905, 1 Charleston Center
Baltimore, Maryland 21201

BILLED BY: Office of Planning & Zoning
119 County Office Bldg.,
Towson, Maryland 21204

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-622		Cost of appeal - Wm. L. Reynolds, et al, posting	\$70.00 5.00	\$75.00
				75.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

PETITION FOR ZONING RE-CLASSIFICATION
AND/OR SPECIAL EXCEPTION

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY:
William L. Reynolds, Virginia B. Reynolds, Austin L. Reynolds, Doris Hill Reynolds, Samuel C. Hottle and Dorothy R. Hottle
32 W. Pennsylvania Ave.
Towson, Md. 21204

hereby petition (1) that the zoning status of the herein described property be re-classified, pursuant to the Zoning Law of Baltimore County, from an R-40 zone to R-A zone; for the following reasons:

- There has been a change in the neighborhood, and
- There was an error in the original zoning of the land, and
- For other reasons to be assigned at the time of hearing

3RD DIS.
SEC 2C
NW-8C

See attached description

and (2) for a Special Exception, under the said Zoning Law and Zoning Regulations of Baltimore County, to use the herein described property, for... elevator apartments

Property is to be posted and advertised as prescribed by Zoning Regulations. I, or we, agree to pay expenses of above re-classification and/or Special Exception advertising, posting, etc., upon filing of this petition, and further agree to and are to be bound by the zoning regulations and restrictions of Baltimore County adopted pursuant to the Zoning Law for Baltimore County.

Contract purchaser
Address: 32 W. Pennsylvania Avenue
Towson 4, Maryland

James H. Cook, Petitioner's Attorney
Address: 22 W. Pennsylvania Avenue
Towson 4, Maryland

ORDERED By The Zoning Commissioner of Baltimore County, this... 8th... day of... June... 1965, that the subject matter of this petition be advertised, as required by the Zoning Law of Baltimore County, in two newspapers of general circulation throughout Baltimore County, that property be posted, and that the public hearing be had before the Zoning Commissioner of Baltimore County in Room 106, County Office Building in Towson, Baltimore County, on the... 15th... day of... July... 1965, at 10:00 o'clock.

John G. Rose, Zoning Commissioner of Baltimore County.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 32093
DATE 9/1/65

TO: Allen J. Malenier, Esq.,
1410-1420 Court Square Bldg.,
Baltimore, Maryland 21202

BILLED BY: Office of Planning & Zoning
119 County Office Bldg.,
Towson, Maryland 21204

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-622		Cost of posting property of Wm. L. Reynolds, et al No. 66-16-RX	\$5.00	
				5.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 32086
DATE 8/30/65

TO: Allen J. Malenier, Esq.,
1410-20 Court Square Bldg.,
Baltimore, Maryland 21202

BILLED BY: Office of Planning & Zoning
119 County Office Bldg.,
Towson, Maryland 21204

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-622		Cost of appeal - Wm. L. Reynolds, et al No. 66-16-RX	\$70.00	
				70.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON 4, MARYLAND

No. 30699
DATE 6/22/65

TO: Messrs. Casper & Redburn,
32 W. Pennsylvania Ave.
Towson, Md. 21204

BILLED BY: Zoning Dept. of Balto. Co.

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-622		Cost of appeal for William L. Reynolds, et al No. 66-16-RX	\$70.00	
				70.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 32080
DATE 8/30/65

TO: Lee Klamon, Esq.,
1360 West North Avenue
Baltimore, Maryland 21207

BILLED BY: Office of Planning & Zoning
119 County Office Bldg.,
Towson, Maryland 21204

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-622		Cost of appeal - Wm. L. Reynolds, et al, No. 66-16-RX	\$70.00	
				70.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 32081
DATE 8/30/65

TO: Nathan Katz, Esq.,
2110 Matheson Building
Baltimore, Maryland 21202

BILLED BY: Office of Planning & Zoning
119 County Office Bldg.,
Towson, Maryland 21204

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-622		Cost of appeal - Wm. L. Reynolds, et al No. 66-16-RX	\$70.00	
				70.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 32081
DATE 8/30/65

TO: Nathan Katz, Esq.,
2110 Matheson Building
Baltimore, Maryland 21202

BILLED BY: Office of Planning & Zoning
119 County Office Bldg.,
Towson, Maryland 21204

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-622		Cost of appeal - Wm. L. Reynolds, et al No. 66-16-RX	\$70.00	
				70.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 38973
DATE 11/23/65

TO: Lee Klamon, Esq.,
1360 W. North Avenue
Baltimore, Md. 21207

BILLED BY: County Board of Appeals
(Zoning)

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-712		Cost of certified documents - File No. 66-16-RX William L. Reynolds, et al NE cor. Old Pinlico & Traymore Roads Third District	\$13.00	
				13.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 38972
DATE Nov. 21, 1966

TO: James H. Cook, Esq.,
Loyale Building
Towson, Maryland

BILLED BY: Board of Appeals of Baltimore County
(Zoning)

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-712		Cost of certified documents - File No. 66-16-RX William L. Reynolds, et al NE cor. Old Pinlico & Traymore Roads Third District	\$13.00	
				13.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 32085
DATE 8/30/65

TO: Joe Harlan, Esq.,
717 Title Building
Baltimore, Maryland 21202

BILLED BY: Office of Planning & Zoning
119 County Office Bldg.,
Towson, Maryland 21204

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-622		Cost of appeal - Wm. L. Reynolds, et al, petitioners No. 66-15-RX	\$80.00	
				80.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
COURT HOUSE
TOWSON, MARYLAND 21204

No. 31975
DATE 7/16/65

TO: City Side, Inc.,
2652 Nichols Ave., SE
Washington, D.C.

BILLED BY: Zoning Dept. of Balto. Co.

DEPOSIT TO ACCOUNT NO.	QUANTITY	DETAILS: UPPER SECTION AND RETURN WITH YOUR REMITTANCE	TOTAL AMOUNT	COST
01-622		Advertising and posting of property for William L. Reynolds, et al No. 66-16-RX	\$104.50	
				104.50

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYLAND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

INVOICE
BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE
Division of Collection and Receipts
CO. 45 HOUSE
TOWSON, MARYLAND 21204

No. 32082

DATE 8/30/65

TO: James H. Cook, Esq.,
Lepore Building
Towson, Maryland 21204

REPLY TO: Office of Planning & Zoning
119 County Office Bldg.,
Towson, Maryland 21204

REPORT TO ACCOUNT NO.	04-522	TOTAL AMOUNT \$70.00
QUANTITY	DETAILED UPPER SECTION AND RETURN WITH YOUR REMITTANCE	
Cost of app. and - Mr. L. Reynolds, et al., / No. 66-16-R		370.00
		70.00

IMPORTANT: MAKE CHECKS PAYABLE TO BALTIMORE COUNTY, MARYL. AND
MAIL TO DIVISION OF COLLECTION & RECEIPTS, COURT HOUSE, TOWSON 4, MARYLAND
PLEASE RETURN UPPER SECTION OF THIS BILL WITH YOUR REMITTANCE.

BALTIMORE COUNTY OFFICE OF PLANNING AND ZONING

County Office Building
111 W. Chesapeake Avenue
Towson 4, Maryland

Your petition has been received and accepted for filing this
8 day of June, 1964.

Owner Name: W.H. Reynolds
Reviewed by: James H. Cook

JOHN G. ROSE
Zoning Commissioner

CERTIFICATE OF POSTING
ZONING DEPARTMENT OF BALTIMORE COUNTY
Towson, Maryland

District 3RD
Posted for: App. 66-16-R
Petitioner: William L. Reynolds
Location of property: 111 W. Chesapeake Ave. & Old Pine Road, Towson, Md.
Location of Signs: 111 W. Chesapeake Ave. & Old Pine Road, Towson, Md.
Remarks: 6 Signs
Date of return: 8/23/65

CERTIFICATE OF POSTING
ZONING DEPARTMENT OF BALTIMORE COUNTY
Towson, Maryland

District 3RD
Posted for: App. 66-16-R
Petitioner: William L. Reynolds
Location of property: 111 W. Chesapeake Ave. & Old Pine Road, Towson, Md.
Location of Signs: 111 W. Chesapeake Ave. & Old Pine Road, Towson, Md.
Remarks: 6 Signs
Date of return: 8/23/65

PETITION FOR
RECLASSIFICATION
AND
SPECIAL EXCEPTION

3rd DISTRICT

ZONING: Petition for Re-
classification from R-40
Zone to R-4 Zone
Special Exception for Elevator
apartments
DATE & TIME: WEDNESDAY,
JULY 14, 1965 at 10:00 A.M.
LOCATION: Northeast corner
of Old Pine Road and
Towson, Maryland
PUBLIC HEARING: Room
109, County Office Building,
111 W. Chesapeake Avenue,
Towson, Maryland
The Zoning Commissioner of
Baltimore County, by author-
ity of the Zoning and
Regulations of Baltimore
County, will hold a public
hearing.
Present Zoning R-40
Proposed Zoning R-4
Special Exception for Elevator
Apartments

All that parcel of land in the
Third District of Baltimore
County
Beginning for the same at the
intersection of the east
side of Old Pine Road as
proposed to be widened to 60
feet and the centerline of
Towson Road 25 feet wide,
said point of beginning being
on the north or North 65 de-
grees 35 minutes East 43.0
feet line of that tract of land
described in a deed from
Edna H. Nield to William L.
Reynolds et al., dated June
10, 1953, and recorded among
the Land Records of Bal-
timore County in Liber C.W.B.,
No. 1064, folio 556, at a
point distant 38 feet more or
less from the beginning of
said north line, and running
thence landing on the re-
mainder of said north line,
and all of the north through
the twenty eighth line of
said deed the eight feet fol-
lowing courses and distances
viz: first North 65 degrees
35 minutes East 3.4 feet more
or less, second North 65 de-
grees 36 minutes East
17.46 feet, third North 50
degrees 32 minutes East
97.40 feet, fourth North 54
degrees 32 minutes East
8.0 feet, fifth North 57 de-
grees 24 minutes East 50.37
feet, sixth North 62 degrees
52 minutes East 100.65 feet,
seventh North 62 degrees
25 minutes East 34.07 feet,
eighth North 80 degrees 10
minutes East 399.02 feet,
ninth South 82 degrees 14
minutes East 3.214 feet,
tenth South 37 degrees 07
minutes East 370.2 feet,
eleventh South 85 degrees 45
minutes East 120.25 feet,
twelfth South 1 degrees 07
minutes East 255.3 feet,
thirteenth South 84 degrees
07 minutes East 114.50
feet, fourteenth North 6 de-
grees 16 minutes East 523.50
feet, fifteenth North 74 de-
grees 30 minutes West
600.50 feet, sixteenth
South 77 degrees 19 minutes
West 520.60 feet, and eight-
eenth North 1 degree 07
minutes East 192.0 feet to a
point on or near the center of
Old Pine Road as now located,
thence landing on the first,
second and part of the third
line of said deed the three
following courses and dis-
tances viz: first North 75 de-
grees 29 minutes West 50.00
feet, second North 63 de-
grees 25 minutes West 167.0
feet, and third North 73 de-
grees 01 minutes West 20 feet
more or less to the south
side of Old Pine Road as
proposed to be widened and
adjoined, thence landing on
the south, southeast, and
east sides of Old Pine
Road as proposed to be re-
located, and widened the
three following courses and
distances viz: first North
88 degrees 11 minutes 30
seconds West 130 feet more
or less, second northwesterly
along a curve to the
left with a radius of 785.51
feet, for a distance of 1087.09
feet, said curve being sub-
tended by a chord bearing
South 52 degrees 13 minutes
45 seconds West 1001.41
feet, and third South 12 de-
grees 10 minutes 10 seconds
West 450 feet more or less to
the place of beginning,
Containing 37.0 acres of
land more or less.
Being the property of Wm. L.
Reynolds, Virginia R.
Reynolds, Austin L. Rey-
nolds, Doris Hill Reynolds,
Samuel C. Hottle and Dorothy
H. Hottle.
Hearing Date: Wednesday,
July 14, 1965 at 10:00 a.m.
Public Hearing Room 109,
County Office Building, 111
W. Chesapeake Avenue, Tow-
son, Md.
By Order Of
John G. Rose
Zoning Commissioner Of
Baltimore County

CERTIFICATE OF PUBLICATION

BALTIMORE COUNTY, MD. June 24, 1965.

THIS IS TO CERTIFY, That the annexed advertisement was
published in THE TIMES, a weekly newspaper printed and pub-
lished in Baltimore County, Md. once in each of one
successive weeks before the 14th day of July, 1965, the first publication
appearing on the 7th day of June
1965

THE TIMES

Manager: John G. Martin

Cost of Advertisement, \$100.00
Purchase order 1172
Registration No. 25722

PETITION FOR
RECLASSIFICATION
AND
SPECIAL EXCEPTION

3rd DISTRICT

ZONING: Petition for Re-
classification from R-40
Zone to R-4 Zone
Special Exception for Elevator
apartments
DATE & TIME: WEDNESDAY,
JULY 14, 1965 at 10:00 A.M.
LOCATION: Northeast corner
of Old Pine Road and
Towson, Maryland
PUBLIC HEARING: Room
109, County Office Building,
111 W. Chesapeake Avenue,
Towson, Maryland
The Zoning Commissioner of
Baltimore County, by author-
ity of the Zoning and
Regulations of Baltimore
County, will hold a public
hearing.
Present Zoning R-40
Proposed Zoning R-4
Special Exception for Elevator
Apartments

All that parcel of land in the
Third District of Baltimore
County
Beginning for the same at the
intersection of the east
side of Old Pine Road as
proposed to be widened to 60
feet and the centerline of
Towson Road 25 feet wide,
said point of beginning being
on the north or North 65 de-
grees 35 minutes East 43.0
feet line of that tract of land
described in a deed from
Edna H. Nield to William L.
Reynolds et al., dated June
10, 1953, and recorded among
the Land Records of Bal-
timore County in Liber C.W.B.,
No. 1064, folio 556, at a
point distant 38 feet more or
less from the beginning of
said north line, and running
thence landing on the re-
mainder of said north line,
and all of the north through
the twenty eighth line of
said deed the eight feet fol-
lowing courses and distances
viz: first North 65 degrees
35 minutes East 3.4 feet more
or less, second North 65 de-
grees 36 minutes East
17.46 feet, third North 50
degrees 32 minutes East
97.40 feet, fourth North 54
degrees 32 minutes East
8.0 feet, fifth North 57 de-
grees 24 minutes East 50.37
feet, sixth North 62 degrees
52 minutes East 100.65 feet,
seventh North 62 degrees
25 minutes East 34.07 feet,
eighth North 80 degrees 10
minutes East 399.02 feet,
ninth South 82 degrees 14
minutes East 3.214 feet,
tenth South 37 degrees 07
minutes East 370.2 feet,
eleventh South 85 degrees 45
minutes East 120.25 feet,
twelfth South 1 degrees 07
minutes East 255.3 feet,
thirteenth South 84 degrees
07 minutes East 114.50
feet, fourteenth North 6 de-
grees 16 minutes East 523.50
feet, fifteenth North 74 de-
grees 30 minutes West
600.50 feet, sixteenth
South 77 degrees 19 minutes
West 520.60 feet, and eight-
eenth North 1 degree 07
minutes East 192.0 feet to a
point on or near the center of
Old Pine Road as now located,
thence landing on the first,
second and part of the third
line of said deed the three
following courses and dis-
tances viz: first North 75 de-
grees 29 minutes West 50.00
feet, second North 63 de-
grees 25 minutes West 167.0
feet, and third North 73 de-
grees 01 minutes West 20 feet
more or less to the south
side of Old Pine Road as
proposed to be widened and
adjoined, thence landing on
the south, southeast, and
east sides of Old Pine
Road as proposed to be re-
located, and widened the
three following courses and
distances viz: first North
88 degrees 11 minutes 30
seconds West 130 feet more
or less, second northwesterly
along a curve to the
left with a radius of 785.51
feet, for a distance of 1087.09
feet, said curve being sub-
tended by a chord bearing
South 52 degrees 13 minutes
45 seconds West 1001.41
feet, and third South 12 de-
grees 10 minutes 10 seconds
West 450 feet more or less to
the place of beginning,
Containing 37.0 acres of
land more or less.
Being the property of Wm. L.
Reynolds, Virginia R.
Reynolds, Austin L. Rey-
nolds, Doris Hill Reynolds,
Samuel C. Hottle and Dorothy
H. Hottle.
Hearing Date: Wednesday,
July 14, 1965 at 10:00 a.m.
Public Hearing Room 109,
County Office Building, 111
W. Chesapeake Ave. Tow-
son, Md.
By Order Of
John G. Rose
Zoning Commissioner Of
Baltimore County

CERTIFICATE OF PUBLICATION

BALTIMORE COUNTY, MD. June 24, 1965.

THIS IS TO CERTIFY, That the annexed advertisement was
published in THE TIMES, a weekly newspaper printed and pub-
lished in Baltimore County, Md. once in each of one
successive weeks before the 14th day of July, 1965, the first publication
appearing on the 7th day of June
1965

THE TIMES

Manager: John G. Martin

Cost of Advertisement, \$100.00
Purchase order 1172
Registration No. 25722

CERTIFICATE OF PUBLICATION

TOWSON, MD. June 25, 1965.

THIS IS TO CERTIFY, That the annexed advertisement was
published in THE JEFFERSONIAN, a weekly newspaper printed
and published in Towson, Baltimore County, Md. once in each
of one successive weeks before the 14th day of July, 1965, the first publication
appearing on the 7th day of June
1965

THE JEFFERSONIAN

Manager: John G. Martin

Cost of Advertisement, \$100.00

NO PLAT
IN
THIS FOLDER

MICROFILM