## PETITION OR ZONING RE-CLA SFICATION AND SPECIAL EXCEPTION

I, or we. SOUT DICERUS. DC. ...... legal owner... of the property situate in Baltimor County and which is described in the description and plat attached hereto and made a part hereof, 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 D.R. 5.5

D.R. 16....zone; for the following reasons

The 1976 noning mags for this area erroreously domeshifted the subject property from a D.R. 16 to a D.R. 5.5 residential zone, despite the fact that this property has long enjoyed and continues to enjoy endustry the boaleward, and it is located directly of the former residential series of colonial pict which has displaced the enjority of the former residential area of Colonial

Park.

That it was error for the 1976 maps to fail to recognize the continuing charging nature of the Security Rouleward corridor in this area which has been charging nature of the Security Rouleward corridor in this area which has been residential areas on the south side of Security Rouleward, directly opposed to residential areas on the south side of Security Rouleward, directly opposed to embject property. The 1976 maps corroscond your enclosed our right inhardral zoning area, which changes would justify else and resident the south of the form of the first firs

County, to use the herein described property, for offices and office buildings

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 Baltimor

Charles A. Knott, Pres. Legal Owner Contract purchases Address Knott Industries, Inc. 1726 Whitehead Road Baltimore, Maryland 21207 James D. Molon

James D. Nolan Petitioner's Attorney
Molan, Plumboff & Williams
Address 204 W. Pennsylvania Avenue
Towson, Maryland 21204 (823-7800)

A .... M 90 31 77 50 -7

oner of Baltimore County, this. 31st ORDERED By The Zoning Commiss

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 8th day of March 1978 41200 o'clock

1. .... Zoning Commissioner of Baltimore County

October 31, 1977

Exception for a high-rise elevator apartment building was granted in the then existing R.A. zoning classification.

As indicated through conversation with the Bureau of Engineering, the majority of the proposed development falls within the flood plain for Dead Run. Since this is the case, the limits of the flood plain must be plotted on the submitted site plan in order to determine how the proposed development will be affected.

Since this Special Exception is in a residential consistency of the state of the This has been brough to your attention in order that you may proceed accordingly and resolve this matter prior to the scheduled hearing date.

prior to the scheduled hearing date.

This petition for Nuclassification is accepted for filing on the date of the enclosed filing certificate. However, any revisions or corrections to petitions, descriptions, or plats, as may have been requested by this Committee, shall be submitted to this office prior to November 28, 1977 in order to this office prior to November 28, 1977 in order to this office prior to November 28, 1977 in order to this office prior to November 28, 1977 in order to this office prior to November 28, 1977 in order to this office prior to November 28, 1977 in order to this office prior to November 28, 1977 in order to this office prior to November 28, 1977 in order to

(continued from previous page) at the very least, and overshelmingly justify the retention of the established D.R. 16 zoning at the very

James D. Nolan Esquire

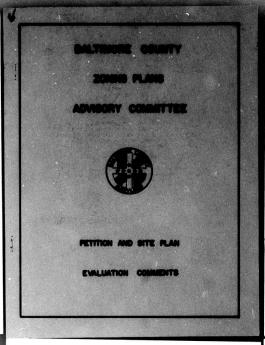
cc: Evans, Hagan & Holdefer, Inc. Surveyors and Civil Engineers 8013 Belair Road Baltimore, Maryland 21236

Very truly yours,

1. 1. h. . smooden

NICHOLAS B. COMMODARI Chairman Zoning Plans Advisory Committee

3. That the subject property and the character of the neighborhood in which 3. That the suspect preserve and the character of the neudatorhood in which it is set have undersome and are undersoint numerous furtherestic characters all of which character reserved and increased in the character of the property, and the Petitioner reserves the right or correct for the property, and the Petitioner reserves the right to raise the issue of character in the character of the neidatorhood when such around for reclassification shall be available by statute or otherwise.



TOWSON MARYLAND 21204

THORNTON M. MOURING, P.E. DIRECTOR

October 25, 1977

Mr. S. Eric DiNenna

Re: Item #12 (Cycle 11) October 1977 - April 1978 Property Owner: Knott Industries, Inc. N/S Security Blvd. 2345.30 W. Colonial Rd. Existing Zoning: D.R. 5.5 Proposed Zoning: D.R. 16 with a Special Exception for offices. Acres: 28.1 District; 1st

The following comments are furnished in regard to the plat submitted to this office for review by the Zoning Advisory Committee in connection with the subject item.

Security Boulevard is a County road, improved as a divided or dual highway with closed section roadways on a 150-foot right-of-way.

Doppood Soad, an existing public road, is proposed to be improved in the future as a 40-foot closed section roadway on a 60-foot right-of-way. Bighway right-of-way widening, including any necessary revertible calements for alops will be required in connection with any grading or building permit applications.

Lafayette and Colonial Roads are existing public roads. No further improvements are proposed at this time.

The entrance locations are subject to approval by the Department of Traffic Engineering, and shall be constructed in accordance with Baltimore County Standards. The construction of reconstruction of concrete sidewalks, curbs and gutters, entrances, aprons, etc. will be the full responsibility of the Petitioner.

Development of this property through stripping, grading and stabilization could result in a sediment pollution problem, damaging private and public holdings downstream of the property. A grading parmit is, therefore, necessary for all grading, including the stripping of top soil.



COUNTY OFFICE BLDG. 111 W. Chesapeake Av. . Tueson, Maryland 2120

Bureau of Engineering

Department of Traffic Engineering

State Boads Commiss. Sureau of

Bealth Department

Project Planning

Board of Education

Soning Administratio Industrial

James D. Nolan, Esquire Nolan, Plumhoff & Williams 204 W. Pennsylvania Avenue Towson, Maryland 21204

Picholas S. Commuda

RE: Reclassification and Special Exception Petition Item Number 12 - Cycle II Petitioner - Knott Industries, Inc.

Dear Mr. Nolanı

The Zoning Plans Advisory Committee has reviewed the plans submitted with the above referenced petition and has made an on site field inspection of the property. The following comments are a result of this review and inspection.

October 31, 1977

These comments are not intended to indicate the appropriateness of the zoning action requested, but o assure that il parties are made earer of plant of the state of the state

This currently vecant wooded site, somed D.R. 5.5 is located on the north side of Security Boulevard, east and west of Kernan Drive in the lat Election District. Single Fasily Meellings exist to the north site, while mostly wooded unimproved land exists to the south across Security Boulevard.

Prior to the adoption of the recent countywide Prior to the adoption of the recent countwise coning maps. the adjoity of this property was roun special Exception is now being requested in order to restore the original sonding and construct an office complex. This property was the subject of a previous soning bearing (Case 867-55 86-4) in which a Special

October 25, 1977

Storm Drains

Provisions for accommodating storm water or drainage have not been indicated

The greater portion of this overall tract of land les within the Dead Run year design storm flood plain, within which grading or structures is undesirable, may not be permitted.

In accordance with the drainage policy, the Developer is responsible for the otal actual cost of drainage facilities required to carry the storm water run-off grouph the property to be developed to a suitable outfall.

There are existing drainage and utility easements through this property. Additional drainage and utility easements or reservations will be required

Open stream drainage requires a drainage reservation or easement of sufficient with to cover the flood plain of a 100-year design storm. However, a minimum widt of 50 feet is required.

The Petitioner must provide necessary drainage facilities (temporary or permanent) to prevent creating any nuisances or damages to adjacent properties, \*specially by the concentration of surface waters. Correction of any problem which may result, due to improper grading or improper installation of drainage facilities, would be the full responsibility of the Petitioner.

There are public water mains (16 and 24-inch) in Security Boulevard, 8-inch in Colonial Road, and 12-inch in Dogwood Road (Park Place to Kernan Drive).

Additional fire hydrant protection may be required in conjunction with development

There are public sanitary sewers (27 and 30-inch) in Dogwood Road, 8-inch in Colonial Road and in Security Boulev rd, easterly thereof, and the 12-inch Colonial Park Manor Interceptor Sewer exists within a 10-foot right-of-way at the westerly edge of this tract (Drawing #57-0410, File 1).

This property is tributary to the Dead Run - Gwynns Falls Sanitary Sewer System, subject to State Health Department regulations.

Very truly yours,

Clburach Power/com w ELLSWORTH N. DIVER, P.E.

PND-PAM-PMR-SS

L-SE Key Sheet 3, 4, 5 & 6 NM 19 - 5 & 6 NM 20 - 6 NM 21 Pos. Sheets MM 1 & 2 E & F Topo 95 Tax Map



October 14, 1977

Mr. Eric S. DiNenna, Zoning Commissioner ZoningAdvisory Committee
Office of Planning Only
Baltimore County Office Building Towson, Maryland 21204

Comments on Item #12, Zoning Cycle II, October, 1977, are as follows:

Property Owner: Knott Industries, Inc., Location: N/S Security Bivd 2345,30' W. Colonial Road Existing Oning: D.R.5.5 Proposed Zoning: D.R.16 with Special Exception for offices Acres: 28.1

This office has reviewed the subject petition and offers the following comments. These comments are not intended to indicate the appropriateness of the zoning in question, but are to assure that all parties are made aware of plans or problems with regard to development plans that may have a

If the petition is granted, the developer must comply with the Subdivision Regulations; additional screening, landscaping and storm water management must be clearly indicated on the site plan.

The height of the buildings must be indicated on the site plan.

John Lev why

John L. Wimbley Planner III



STEPHEN E. COLLINS

October 24, 1977

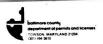
Zoning Commissioner 2nd Floor, Courthouse

Item 12 - 366 - October 13, 1977
Property Owner: Knott Industries, Inc.
Location: M/S Security Blwd. 2345,30° w. Colonial Road
Estating Zoniag: D. B. 3. 36
Estating Zoniag: D. B. 3. 16 with a Special Exception for offices
District: 184

The subject petition is requesting a change from D. R. 5.5 to D. R. 16 of 28.1 acres. This should change the trip density from 1400 to 3400 for D. R. 16. The special exception for offices will create a trip generation of 5300 vehicles per day.

At present, the intersections of Security Boulevard at Woodlawn Drive and Ingleside Avenue are both operating at a Level of

CRM/bza



October 10, 1977

Mr. S. Eric Dimenna, Zoning Commissi Office of Planning and Boning County Office Building Towson, Maryland 21204

Comments on Item # 12 Zoning Advisory Committee Meeting, Cycle II

Property Owner:

Knott Industries, Inc N/S Security Blvd. - 2315.30 W. Colonial Road D.R. 5.5 D.R. 16 with A special Exception for offices Frott Industries. Inc

The items checked below are applicable:

- Structure shall conform to Baltimore County Building Code (B.O.C.A.) 1970 Edition and the 1971 Supplement and other applicable codes.
- (X) B. A building permit shall be required before construction can begin.
- C. Three sets of construction drawings will be required to file an application for a building permit.
- Three sets of construction drawings with a registered Maryland Architect or Engineer's original seal will be required to file an application for a building permit.
- E. Wood frame walls are not permitted within 3'0" of a property line. Contact Building Department if distance is between 3'0" and 6'0" of property line.
- G. Requested setback variance conflicts with the Baltimore County Building Code. See Section \_\_\_\_\_\_\_.

There & Sumbon

Charles E. Burnham 2 20 Plans Review Chief CEB:rrj

### BOARD OF EDUCATION OF BALTIMORE COUNTY

TOWSON, MARYLAND - 21204

Date: October 17, 1977

Mr. S. Eric DiNenna Zoning Commissioner Baltimore County Office Building Towson, Maryland 21204

Z.A.C. Meeting of: Cycle II

RE: Item No: 12
Property Owner: Knott Industries, Inc.
Location: N/S Security blvd. 2345.30' W Colonial Rd.
Present Zoning: D.R. 5.5
Proposed Zoning: D.R. 1.6 with a Special Exception for offices

District: 1st

Dear Mr. DiNenna:

No bearing on student population.

Very truly yours, W. Tit tetrout W. Nick Petrovich

MNP/bp

MRS. LORRAINE F. CHIRCUS ROGER B. HAYDEN -----

MRS. MILTON R. SMITH. JR. RICHARD W. TRACEY, D.V.M.



October 13, 1977

Mr. S. Bric DiBenna, Zoning Commissioner Office of Flanning and Zoning County Office Building Towson, Maryland 21204

Comments on Item #12, Zoning Advisory Committee Meeting for Cycle II, October 5, 1977, are as follows:

Enott Industries, Inc. N/S Security Elvd. 2345.30' W Colonial Rd. D.R. 5.5 D.R. 16 with a Special Exception for offices Existing Zonings Proposed Zonings Districts

Metropolitan water and sewer are available, therefore no health are anticipated.

Very truly yours,

There 11. Kener Thomas H. Devlin, Director

THD/KS/fth6

Plenning Coup Special Imspection Division RE: PETITION FOR RECLASSIFICATION REFORE PETITION FOR RECLASSIFICATION from D.R. 5.5 to D.R. 16 and SPECIAL EXCEPTION for Offices N/S Security Boulevard 2345.30' W. of Colonial Road COUNTY BOARD OF APPEALS OF let District BALTIMORE COUNTY Knott Industries, Inc.,

No. 78-186-RX

### ORDER OF DISMISSAL

Petition of Knott Industries, Inc. for reclassification from D.R. 5.5 to D.R. 16 and special exception for offices, on property located on the north side of Security Boulevard 2345,30 feet west of Colonial Road, in the First Election District of

WHEREAS, the Board of Appeals is in receipt of a letter of withdrawal of petition filed December 21, 1979 (a copy of which letter is attached hereto and made a par' hereof) from the attorney representing the Petitioner in the above entitled asse.

WHEREAS, the said attorney for the said Petitioner requests that the petition filed on behalf of said Petitioner be "Dismissed Without Prejudice" as of December 21.

IT IS HEREBY ORDERED this 6th day of January , 1982, that said petition be DISMISSED WITHOUT PREJUDICE.

> COUNTY BOARD OF APPEALS OF BALTIMORE COUNTY



October 26, 1977

Office of Planning and Zoming Baltimore County Office Building Towson, Maryland 21204

Attention: N. Commodari, Chairman Zoning Advisory Committee

Re: Property Omer: Knott Industries, Inc.

Location: N/S Security Blvd. 2345.30' W Colonial Rd.

Item No. 12 Zoning Agenda Cycle II

Pursuant to your request, the referenced property has been surveyed by this Bureau and the comments below marked with an "a" are applicable and required to be corrected or incorporated into the final plans for the property.

(ox) 1. Fire hydrants for the referenced property are grequired and shall be located at intervals of 300 feet along an approved road in accordance with Battlaner County Standards as published by the Department of Public Works.

( ) 2. A second means of vehicle access is required for the site.

( ) 3. The wehicle dead-end condition shown at\_\_\_\_

RCE-DS the maximum allowed by the Fire Department.

haurum ton saxious allowed by the Fire Department.

1 a. The site shall be nead to comply with a spitcable parts of the Fire Provention Code prior to occupancy or beginning of operations.

(DE) 5. The buildings and structures cutaffing or proposed on the site shall comply with all applicable regions of the Estimated Fire Protection Association General Warmons of the Estimated Fire Pro-Ritton prior to occupancy.

( ) 6. Site plans are approved as drawn.

( ) 7. The Pire Provention Bureau has no comments, at this time.

Hotod and Levige M Wegandt Piro Provention Burn

RE: PETITION FOR RECLASSIFICATION:

AND SPECIAL EXCEPTION FOR : ZONING COMMISSIONER

KNOTT INDUSTRIES, INC. : FOR

Case No. 78-186-RX Item No. 12 : BALTIMORE COUNTY

REQUEST FOR DISMISSAL WITHOUT PREJUDICE

MR. COMMISSIONER:

On behalf of the property owner, Knott Industries, Inc., in the above entitled matter, please dismiss this Petition for Reclassification and for Special Exception for Offices "Without Prejudice", at the request of the Petitioner and property owner.

James D. Nolan

Nolan, Plumboff Williams Nolan, Plumboff Williams 204 W. Pennsylvania Avenue Towson, Maryland 21204 823-7800 Attorneys for the Petitioner, Knott Industries, Inc.

I HEREBY CERTIFY that on this 5th day of April, 1979, a copy of the aforegoing REQUEST FOR DISMISSAL WITHOUT PREJUDICE was mailed, postage prepaid, to JOHN HESSIAN, III, PEOPLE'S COUNSEL and PETER MAX ZIMMERMAN, DEPUTY PEOPLE'S COUNSEL, both at the Baltimore County Office Building, Towson, Maryland 21204

James D. Nolan

# OF REQUEST FOR RESTORATION OF WRONGFULLY DOWNSHIFTED D.R. 16 ZONING ON THE KNOTT INDUSTRIES PROPERTY ON THE NORTH SIDE OF SECURITY BOULEVARD OPPOSITE THE EXPANDING SOCIAL SECURITY COMPLEX

The Petitioner and landowner, Knott Industries, Inc., a body corporate of the State of Maryland, states that the 1976 zoning maps which arbitrarily, erroneously and improperly downshifted the former D.R. 16 zoning which this property formerly enjoyed was and is an erroneous, arbitrary and improper downshift of established zoning, for at least the following reasons:

- It was and is error to downshift the property from its former D.R. 16 zoning, in view of the fact that D.R. 16 zoning is the least intensive zoning which this property deserves, and indeed it deserves and is appropriate for either light industrial or light commercial zoning and usage.
- 2. That it was and is error to deprive the property of its former D.R. 16 zoning, and this wrongful downshift of established zoning amounts to a confiscation, as a practical matter, of the use of the property in view of the topography, location, road exposure and other characteristics, and indeed D.R. 5.5 zoning is unusable.
- 3. That it was and is erroneous to downshift the established D.R. 16 zoning on the subject property in view of the fact that the entire character of the Security Boulevard corridor in this area has been changed, and is being further changed by the establishment, expansion and ut.lization of the property on the opposite side of Security Boulevard, that is, on the south side, for an expanded and enlarged Social Security Complex.

# OF REQUEST FOR RESTORATION OF MRONGFULLY DOWNSHIFTED D.R. 16 ZORING ON THE RESTORATION OF WRONGFULLY DOWNSHIFTED ON THE NORTH SIDE OF SECURITY BOULEVARD OPPOSITE THE EXPANDING SOCIAL SECURITY COMPLEX

The Petitioner and landowner, Knott Industries, Inc., a body corporate of the State of Maryland, states that the 1976 soning maps which arbitrarily, erroneously and improperly downshifted the former D.R. 16 soning which this property formerly enjoyed was and is an erroneous, arbitrary and improper downshift of established soning, for at least the following reasons:

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- That it was and is error to deprive the property
  of its former D.R. 16 soning, and this wrongful downshift of
  established soning amounts to a confiscation, as a practical
  matter, of the use of the property in view of the topography,
  location, road exposure and other characteristics, and indeed
  D.R. 5.5 soning is unusable.
- 3. That it was and is erroneous to downshift the established C.R. If soning on the subject property in view of the fact that the entire character of the Security Boulevard corridor in this area has been changed, and is being further changed by the establishment, expansion and utilization of the property on the opposite side of Security Boulevard, that is, on the south side, for an expanded and enlarged Social Security Complex.

- 4. That the wrongful and erroneous downshift from D.R. 16 zoning runs completely contrary to the developing and unfolding character of the area, which suits the property for either office use as proposed and/or for light industrial and light commercial usages as well.
- 5. That the wrongful and erroneous downshift completely ignored the excellent office site characteristics of the subject property and completely ignored the fact that very large and extensive office areas are to be established and are being established on the Social Security Complex opposite the subject property.
- 6. That the erroneous downshift of the established D.R. 16 zoning of the subject property completely ignores the excellent access and exposure along the north side of Security Boulevard which this property enjoys, which renders it an excellent site for office, light industrial or light commercial usages; which exposure to heavily travelled Security Boulevard renders the property inappropriate for any type of D.R. 5.5 residential use, whether it be individual homes, clustered homes, townhouses, or apartments, due to the relatively shallow nature of the property and the exposure of the property to traffic noise, traffic hazards, and continual traffic, all of which completely deprives the property of residential suitability.
- 7. The wrongful and erroneous downshift of the established D.R. 16 zoning completely ignores the fact that the Security Industrial Park is largely filled; and the erroneous downshift is compounded by the fact that due to the numerous industrial, commercial and governmental operations in the area, coupled with the excellent access to Baltimore City and to Baltimore County and other points via the Baltimore
- 4. That the wrongful and erroneous downshift from D.R. 16 zoning runs completely contrary to the developing and unfolding character of the area, which suits the property for either office use as proposed and/or for light industrial and light commercial usages as well.
- 5. That the wrongful and erroneous downshift completely ignored the excellent office site characteristics of the subject property and completely ignored the fact that very large and extensive office areas are to be established and are being established on the Social Security Complex opposite the subject property.
- 6. That the erroneous downshift of the established D.R. 16 soning of the subject property completely ignores the excellent access and exposure along the north side of Security Bouleward which this property enjoys, which renders it an excellent site for office, light industrial or light commorcial usages; which exposure to heavily travelled Security Bouleward renders the property inappropriate for any type of D.R. 5.5 residential use, whether it be individual homes, clustered homes, townhouses, or apartments, due to the relatively shallow nature of the property and the exposure of the property to traffic noise, traffic hazards, and continual traffic, all of which completely deprives the property of residential suitability.
- 7. The wrongful and erroneous downshift of the established D.R. 16 moning completely ignores the fact that the security Industrial Park is largely filled; and the erroneous downshift is compounded by the fact that due to the numerous industrial, commercial and governmental operations in the area, coupled with the excellent access to Baltimore City and to Baltimore County and other points via the Baltimore

County Beltway, all tend to create an additional need for offices and office space, and indeed a need for further light industrial and light commercial zoning.

- 8. The wrongful and erroneous downshift of the established D.R. 16 soning also erroneously ignores the fact that office uses installed pursuant to a special exception in a D.R. 16 sone insure a high quality type of use and a high quality type of construction and site development with continuing control assured to Baltimore County by means of the various conditions which can be imposed as a part of a special exception under the Baltimore County Zoning Regulations.
- 9. And for such other and further errors as may be disclosed by a closer analysis of this property and this area, as this zoning petition case continues, many of which errors shall be brought out at the time of the hearing berson.
- 10. And for such other and further changes as have occurred, are occurring and will occur in this changing Social Security corridor as this petition case continues; which changes the Petitioner specifically reserves the right to raise at such time as such changes in the character of the neighborhood shall be available as a ground for reclassification, either by statute or otherwise.

Respectfully submitted,
MCLAN, PLUMHOFF & WILLIAMS
Arms D. Nolan

By James D. Nolan

County Beltway, all tend to create an additional need for offices and office space, and indeed a need for further light industrial and light commercial zoning.

- 8. The wrongful and erroneous downshift of the established D.R. 16 soning also erroneously ignores the fact that office uses installed pursuant to a special exception in a D.R. 16 sone insure a high quality type of use and a high quality type of construction and site development with continuing control assured to Baltimore County by means of the various conditions which can be imposed as a part of a special exception under the Baltimore County Soning Regulations.
- 9. And for such other and further errors as may be disclosed by a closer analysis of this property and this area, as this zoning petition case continues, many of which errors shall be brought out at the time of the hearing hereon.
- 10. And for such other and further changes as have occurred, are occurring and will occur in this changing Social Security corridor as this petition case continues; which changes the Petitioner specifically reserves the right to raise at such time as such changes in the character of the neighborhood shall be available as a ground for reclassification, either by statute or otherwise.

Respectfully submitted

James D. Nolan

RE: PETITION FOR RECLASSIFICATION PETITION FOR SPECIAL EXCEPTION N/S of Security Blvd, 2345, 30' W of Colonial Bd., 1st District

: BEFORE THE ZONING COMMISSIONER

KNOTT INDUSTRIES, INC., Petitioners : Case No. 78-186-RX

.....

### ORDER TO ENTER APPEARANCE

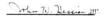
Mr. Commissioner:

Pursuant to the authority contained in Section 524.1 of the Baltimore County
Charter, I hareby enter my appearance in this proceeding. You are requested to notify
me of any hearing date or dates which may be now or hereafter designated therefore,
and of the passage of any pretilinancy or final Order in connection therewith.

Charles S. Kounty, Jr.
Charles E. Kountz, Jr.
Deputy People's Counsel

John W. Hessian, III
Pacple's Coursel
County Office Building
Towson, Maryland 21204

I HERBY CERTIFY that on this 21st day of Fabruary, 1978, a copy of the aforegoing Order was mailed to James D. Nolan, Esquire, Nolan, Plumboff & Williams, 204 W. Pennsylvania Ave., Towson, Maryland 21204, Attorney for Patitioners.







TELEPHONE 023-7800

Rund D. NOLAN
J. SANE D. NOLAN
J. SANE B. RAUMOFF
MICHAEL M. HERSON, A.
THOMAS J. REPORT

LAW OFFICES OF
NOLAN, PLUMHOFF & WILLIAMS
204 WEST PENESTVANIA AVENUE
TOWSON, MARYLAND 21204

January 10, 1978

The Honorable S. Eric DiNenna Zoning Commissioner Baltimore County Office Building Towson, Maryland 21204

Re: Second Cycle Case Involving Knott Industries, Inc. Property on the North Side of Security Boulevard, I.D.C.A. Application No. 77-51-X.

Dear Commissioner DiNenna:

Recently Zoning Advisory Committee Chairman Mr. Nicholas Commodari made an inquiry regarding our plans for the above entitled case.

First of all, the Interim Development Control Application has been temporarily denied on the basis of incomplete traffic information, rather than being completely denied based upon firm traffic information. At the present time, the Deputy Traffic Engineer Hr. Moors indicates that he is not certain what effect the new Social case that he is not certain what effect the new Social Security Professional Relations of Indicate Avenue to Social Security William Social Security Boulevard.

As we have told Mr. Commodari, we definitely want to proceed with the reclassification aspects of this case, and we hope that by March we may be able to rectify the special exception portion of the case and that it can be heard as well.

We will continue to keep you and your Staff informed, and we appreciate the attention of you and your Staff to this important zoning case. With best regards of the New Year, I am

Sincerely,

James D. Nolan

JDN/hl See next page for cc's Page two

cc: Nicholas Commodari, Chairman Zoning Advisory Committee Mr. Charles Knott, President Knott Industries, Inc.

Mr. Al Evans Evans, Hagan & Holdefer

Robert L. Morris, P.E. Robert L. Morris, Inc.

December 8. 1977

Mr. S. Eric Dillenna, Zoning Commi Office of Flamming and Boning County Office Building Townon, Maryland 21204

CYCLE II REVISED Comments on Item # 12 Zoning Advisory Committee Meeting, November 15, 1977

Acres: District:

The items checked below are applicable:

A. Structure shall conform to Baltimore County Building Code (B.O.C.A.) 1970 Edition and the 1971 Supplement and other applicable codes, Maryland State Code - Handicapped and aged.

B. A building permit shall be required before construction can begin.

C. Three sets of construction drawings will be required to file an application for a building permit.

(X) D. Three sets of construction drawings with a registered Maryland Architect or Engineer's original seal will be required to file an application for a building permit.

E. Wood frace walls are not permitted within 3'0" of a property line. Contact Billding Department if distance is between 3'0" and 6'0" of property line.

G. Requested setback variance conflicts with the Baltimore County Building Code. See Section \_\_\_\_\_\_.

Very truly yours.

Charles & Sumban

Charles E. Burnham

December 8, 1977

Mr. S. Eric DiMenna, Zoning Commissioner Office of Planning and Boning County Office Building Towson, Maryland 21204

CYCLE II REVISED

Comments on Item # 12 Zoning Advisory Committee Meeting, November 15, 1977

Property Owner:
Location:
Righting Zoning:
Proposed Zoning:
D.R. 16 with A special Exception for offices

The items checked below are applicable:

(X) A. Structure shall conform to Baltimore County Building Code (B.O.C.A.) 1970 Edition and the 1971 Supplement and other applicable codes, Maryland State Code - Handicapped and aged.

(X) B. A building permit shall be required before construction can begin.

C. Three sets of construction drawings will be required to file an application for a building permit. (X) D. Three sets of construction drawings with a registered Maryland Architect or Engineer's original seal will be required to file an application for a building permit.

E. Wood frame walls are not permitted within 3'0" of a property line. Contact hilding Department if distance is between 3'0" and 6'0" of property line.

G. Requested setback variance conflicts with the Baltimore County Building Code. See Section \_\_\_\_\_\_

Very truly yours.

Charles & Sumla

DCA 1077-51 X

IOCA NO.......

Charles E. Burnham Plans Review Chief CEB:rrl

494-3180

- Bearl of Austri January 6, 1982

Newton A. Williams, Esq. 204 W. Pennsylvania Ave. Towson, Md. 21204

Re: Case No. 78-186-RX Knott Industries, Inc.

Dear Mr. Williams:

Enclosed herewith is a copy of the Order of Dismissal passed today by the County Board of Appeals in the above entitled case.

Very truly yours,

Edith T. Eisenhart, Adm. Secretary

EL 5 400

Encl.

cc: Knott Industries, Inc. John W. Hessian, III, Esq. Mr. W. E. Hammond Mr. J. E. Dyer Mr. J. G. Hoswell Board of Education Larry T. Stewart Charles C. Kreis Mary E. Peckworth Mrs. George H. Dent Mrs. Edwin Appel

189 7 '82 AM

IDCA APPLICATION FOR SPECIAL EXCEPTION AND OR SPECIAL PERMIT exception \_\_\_\_ wa D.R. 16 zene to use the sense seconds recommy use offices and office buildings THE PROPERTY IS EXPECTED TO BE IMPROVED AS FOLLOWS: GROSS SITE AREA 32.1 ACTES +/- DEED REF. NJR 3887/405; OTG 4998/079 31.5 % OF OVERALL STE WILL REQUIRE GRADING. mass room \_100\_ x \_100 \_ amss10,000 x 7 bldgs=70,000 square feet NAMES OF PLOOPS \_\_6 \_\_\_\_ TOTAL NEWSTT\_\_\_60 feet RECEIVED FLOOR AREA RATIO = TOTAL FLOOR AREA DIVIDED BY SITE AREA = \_\_\_\_Q\_3Q\_\_\_\_ enouse russ Offices Offices OFFICE OF ------PLANNING & ZUNING ### 150,000 divided 934 | 150,000 divided 93 ments: Doublet | Donners, tree or pressur \_\_\_\_\_\_

BAITIMES COUNTY PASSAGE OF THE PASSA NOV 23 1917 CIFFICE OF LONNING DATE: November 22, 1977 Chief, Bureau of Engineering IDCA PLAN PROJECT NAME: Knott Industries, Inc. PRETTYTNARY PLAN PROJECT NUMBER: IDCA NO. 77-51x TENTATIVE PLAN IOCATION: Security Blvd. DEVELOPMENT PLAN 101 FIMAL PLAT This application for special exception (No. 77-512) was received by the Developers

Design and Approval Section on October 11, 1977 and we comment as follows

Water; (Western Third Zone) Urban Area

There are public water mains (16 and 24-inch) in Security Boulevard, 8-inch in There are public water manus (16 and Ar-Inch) relace to postury Bourwara, orman and Colonial hose, and 12-inch in looped Boad (Farly Relace to Rerma brive). There are no problems with water service reported in the area, that is property is within the Uniter-Brail Demonstration (Line and in an eras desapted "Existing Service" on Battimore County state Plans 4-27a and 22-8, as assended. The requested change in use 411 not advanced, which refer they struct project may be approved.

Sanitary Sewer: [Dead Run - Gwynns Falls Interceptors - Back River Waste Water Treatment Plant]

There are public sanitary sewers (27 and 30-inch) in Dogwood Road, 6-inch in Coloniol Road and in security Boulevard, easterly thereof, and the 12-inch Colonial Park Manor Interceptor Sewer at the westerly edge of this tract of land. No dry weather flow problems are reported in the area. This property is within the Urban-Baral weather flow problems are reported in the area. This property is within the Urban-Markal Demarcation Line and in an area designated "Existing Service" on Baltimore County Sewerage Plans 5-22A and 22-3, as amended. The requested change in use will not advarcaly affect the system; therefore, this project may be approved. Estimated average daily flow: .042 mgd\*.

Storm Drains: (Dead Run - Gwynns Palls - Patapsco River)

The greater portion of this overall tract of land lies within the Dead Run 100-year gn storm flood plain, within which grading or structures is undesirable, and may not

Drainege from this property is tributary to beed Run and Coynes Falls, along which areas are subject to severe flooding, Flooding and damage of homes and commercial properties have been experienced. The onatic improvious areas is indicated to be an experience of the control o

Ellowith N. Divir /de mes ELLSWORTH N. DIVER, P.E. Chief, Bureau of Engineer

DEPARTMENT OF TRAFFIC ENGINEERING

IDCA NO. 77-5/x LOCATION: SECURITY POUR

1) Nearest Arterial Intersection Security Bus + Incresion And

a) a) Level of Service F 4/21/17

2) Trip Generation from Site 420,000 "x 15 TRIPY at = 6300 TRIPS/pdy

a) Proposed Level of Service

Proposed Roads Improvements Programmed for Construction Within Next Two Years.

None

OCT 28 1977 OFFICE OF

PLANNING & ZONING

RECEIVED

RESOLUTION OF THE BALTIMORE COUNTY PLANNING BOARD December 15, 1977

Pursuant to Section 22-15.1 of the Baltimore County Code 1968 as amended by Bill No. 12-77, known as the Interim Development Control Act, there has been submitted to the Baltimore County Planning Board an application, IDCA No. 77-51-X for a special exception to allow office use on property located between Dogwood Road and Security Boulevard south of Circle Drive, owned by Knott Industries, Inc. and

The Department of Traffic Engineering has determined that the service level of the nearest arterial intersection serving that property, the intersection of Security Boulevard and Ingleside Avenue, is rated as "F": and

Subsection 22-15.1(e) of the County Code requires that such an application be denied, and Subsection 22-15.1(f) requires that the Planning Board render a decision in the matter, based upon and consistent with the recommendations of appropriate County

Further, under Subsection 22-15(f) of the County Code, if the Planning Board decides that an application submitted under the Interim Development Control Act fails to conform to the requirements of that act, the application must be denied; now, therefore, be it

That the Baltimore County Planning Board hereby decides that the development proposed under IDCA Application No. 77-51-X fails to conform to the requirements of the Interim Development Control Act; and be it further

That pursuant to Paragraph 22-15.1(e)(2)B of the County Code. BE SOL VED

a copy of this resolution shall be forwarded to the Zoning Commissioner thereby advising him of the Planning Roard's findings and decision regarding IDCA Application No. 77-51-X.

I HEREBY CERTIFY that this resolution was duly adopted by the Baltimore County Planning Board at its meeting in Towson, Maryland on December 15, 1977.

DATE: December 15, 1977

Leslie H. Graef, Director of Planning Secretary to the Board

HOLAH, PLUMBOFF & WILLIAMS TOWSON, MARYLAND 21204

December 21, 1979

DFC 1 8 '79 4M

7:

C. ....

PART SAMETERS, SAL

The Hon. Walter A. Reiter, Jr. Chairman, County Board of Appeals Court House, Room 219 Towson, Maryland 21204

Re: Requested Dismissal of Pending Reclassi-fication Case Involving Knott Property on the North Side of Security Boulevard; Case No. 78-186-RX.

Dear Chairman Reiter:

Recently we wrote to Zoning Commissioner Hammond recarding the proposed dismissal without prejudice of the above entitled matter. A copy of our letter of December 17, 1979 is enclosed.

As we told Commissioner Hammond in our letter, this reclassification case involving a special exception as well was delayed by the passage of the Interim Development Control Act.

No hearing was ever held on this Petition, and we are advised by our client, Mr. Charles A. Knott, Chairman of the Board of Knott Industries, Inc., that he does not wish to pursue this matter at this time and that it may be dismissed without prejudice.

commissioner Namend is of the opinion that the vest-ing of reclassification powers in the plant of Appels has deprived his office of jurisdiction in his had capend that the dismissal must come from the Board. Accordingly, it will be greatly appreciated if you will enter the above entitled case "Dismissed Without Prejudice".

Thanking the Board and its Staff as well as Commissioner Hammond and his Staff for your aid in resolving this

Page two - Chairman Reiter - December 21, 1979

dismissal, I am, with best regards of the Season to all,

Sincerely, lames Q. Nolan Zames D. Nolan

4 \*\*\*\*

JDM/hl
Enclosure Milliam E. Hammond
cor The Hon Milliam E. Hammond
County Office Building
Towson, Md. 21204

Jack W. Hessian, III People's Counsel County Office Building

Mr. James Hoswell Office of Planning Courts Building Towson, Md. 21204 Knott Industries, Inc 6665 Security Boulevard Baltimore, Md. 21207

Mr. L. Alen Evans Evans, Hagan & Holdefer 8013 Belair Road Baltimore, Md. 21236



404-3180

WHEREAS,

WHEREAS.

WHEREAS

RESOLVED.

ndg Bourk of Appeal Room 219, Court House Transport, Maryland 21204 January 6, 1982

Newton A. Williams, Esq. 204 W. Pennsylvania Ave. Towson, Md. 21204

Re: Case No. 78-186-RX Knott Industries, Inc.

Enclosed herewith is a copy of the Order of Dismissal possed today by the County Board of Appeals in the above entitled case.

Very truly yours,

Edith T. Eisenhort, Adm. Secretory

cc: Knott Industries, Inc. John W. Hessian, III, Esq. Mr. W. E. Hammond Mr. J. E. Dyer Mr. J. G. Hoswell Board of Education Larry T. Stewart Charles C. Kreis Mary E. Peckwortl Mrs. George H. De Mrs. Edwin Appel

Re: Case No. 78-186-RX Knott Industries, Inc.

May I call to your attention a prior communicate dated December 4, 1979, addressed to yourself from this Board concer the above applicated case. As of this date, this Board has no recontible case. It is not on our doctor nor do we have any file or other

Specifically referring to paragraph four of your letter of Deamber 21, 1979 concerning this metter, the Boord has no quarrel with henceing the request for distincted by the Petitiones, but finds the bask difficult when it has no case to disease. I can cause you that if you on provide a with a case, we will promptly denies in

LAW OFFICES OF NOLAN, PLUMHOFF & WILLIAMS TOWSON, MARYLAND 21204

JAMES D. NOLAN
J. EARLE PLUMHOFF
NEWTON A. WILLIAMS
WILLIAM M. HESSON.
THOMAS J. REANER
HENNETH H. MASTERS
STEPHEN J. NOLAN
WILLIAM P. ENGLEPIAM

December 17, 1979

The Hon. William E. Hammond Zoning Commissioner for Baltimore County County Office Building Towson, Maryland 21204

Re: Requested Dismissal of Pending Reclassifi-cation and Special Exception Case for Knott Industries, Inc., Case No. 78-186-Rx.

Dear Commissioner Hammond:

As records will reveal, this case was filed, but due to the subsequent passage of the Interim Development Con-trol Act which affected the special exception portion of the case, your predecessor Commissioner DiNenna deferred hearing the matter.

We have been officially advised in writing by our client Mr. Charles A. Knott, Chairman of the Board of Knott Industries, Inc., that Knott Industries doer not wish to proceed with this case at this time.

and your staff will consider this letter as a formal Requester or limits and of this iong outstanding reclassification and special exception case, gaf count. Miland Despetion to the second outstanding rought.

Thanking you and your staff for your kind attention to this requested dismissal I am, with best wishes for the Rollady Sesson to all.

Sincerely, James D. Nolan

JDN/hl cc: Jack W. Hessian, III People's Counsel

James G. Hoswell

Charles A. Knott, Chairman of the Board Knott Industries, Inc.

Al Evans Evans, Hagan & Holdefer

PETITION FOR RECLASSIFICATION AND SPECIAL EXCEPTION

1st DISTRICT

ZONTING:

LOCATION

From D.R. 5,5 to D.R. 16 Zone. Petition for Special Exception for Offices and Office Building.

North side of Security Boulevard 2345.30 feet West of .Colonial Road.

PUBLIC REARING:

WEDNESDAY, MARCH 8, 1978 at 10:00 A.M. Room 106, County Office Building, 111 W. Chesapeak Avenue, Towson, Karyland.

The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County, will hold a public hearing:

Present Zoning: D.R. 5.5 Proposed Zoning: D.R. 16 Petition for Special Exception for Offices and

Office Building.
All that percel of land in the First District of Baltimore County

Being the property of Knott Industries, Inc., as shown on plat plan filed with

Hearing Date: Wednesday, March 8, 1978 at 10:00 A.M.
Public Mearing: Room 106, County Office Building, 111 V. Chesapeake Avenue,
Toward, Maryland

BY ORDER OF S. EPIC DIMENIA ZONING COMMISSIONER OF



LAW OFFICES OF NOLAN, PLUMBOFF & WILLIAMS

April 5, 1979



RHATT IF A INC.

The Mon. S. Eric DiNenna Zoning Commissioner Baltimore County Office Building Towson, Maryland 21204

Dismissal Without Prejudice of the Knott Zoning Reclassification Case. Case No. 78-186-2X.

Dear Commissioner DiNenna

It is our understanding from your Staff, that you either wish to set the above entitled case for a hearing, or in the alternative that your Office will dismiss it.

As you will recall and as your records will reveal, for a time there was a problem with the Interim Developmen Control Act, due to the nearby intersection between Securi Boulevaré and Ingleside Avenue.

W. C. Richard Moore, the Assistant Traffic Indiaser, a restudent was not considered to the constant traffic Indiaser. A restudent was not operating at level of service "0", and that this improvement was attributable in part to the opening of a parallel drive giving access to the Social Security

Although this IDCA barrier has now been removed inso-far as the special exception is concerned, the property owne has been notified by the Bureau of Land Acquisition that the great majority of the property is presently being appraised for use as a stream valley park.

Assordingly due to this appounced intention on the Accordingly, due to this announced intention on the part of Baltimore County to acquire this property, the property owner, %nott Infustries, Inc., does not wish to pursue the reclassification case at this time. We are enclosing herewith an Order of Dismissal Without Prejudice in the above mutiled matter, and the attention of you and your Page two - Commissioner DiNenna - April 5, 1979

Staff to this Order Of Dismissal Without Prejudice is greatly appreciated.

Thanking you and your Staff, I am

Respectfully James O. Wolan James D. Molan

cc: Charles Knott, President
Knott Industries, Inc.
6665 Security Boulevard
Baltimore, Md. 21207

Frank J. McGuinness, Executive Vice President Knott Industries, Inc.

Mr. L. Alan Evans Evans, Hagan & Holdefer 8013 Belair Road Baltimore, Md. 21236

SURVEYORS AND CIVIL ENGINEERS

6913 BELAIR ROAD / BALTIMORE AND PLOTE COST AND THE

Sept. 26. 1977 DESCRIPTION TO ACCOMPANY PETITION FOR ZOWING PECLASSIFICATION FROM DR 5.5 TO DR 16 WITH A SPECIAL EXCEPTION FOR OFFICE MITLIFFICE IN A DE 16 ZONE

RECIMING FOR THE FIRST thereof on the North side of Security Rivd., 120 feet wide at a point distant 2345,30 feet, more or less, measured Westerly on said North side of Security Blvd. from its intersection with the centerline of Colonial Road, 50 feet wide, leaving said place of beginning and said Morth side of Security Blvd. and running the 3 following courses and distances vis: (1) North 0 degrees 38 minutes 44 sec West 275.00 feet, thence (2) North 72 degrees 31 minutes 12 seconds West 71.91 feet, thence (3) North 41 degrees 38 minutes 27 seconds East 287.90 feet to DogwoodRoad, thenc running and binding thereon the 4 following courses and distances, viz: (4) South 56 degrees 41 minutes 00 seconds East 82,16 feet, thence (5) South 69 degrees 03 minutes 00 seconds East 87.00 feet thence (6) South 87 degrees 57 minutes 00 seconds East 78.16 feet, thence (7) North 85 degrees 00 minutes 00 seconds East 15.03 feet, to the centerline of Lafayette Road, 40 feet wide, thence running and binding thereon (8) South 10 degrees 03 minutes 30 seconds West 330.00 feet to the centerline of Mt. Vernon Drive, thence running and binding thereon (9) North 78 degrees 44 minutes 30 seconds East 236.16 feet, thence leaving the centerline of Mt. Vernon Drive, (10) South 10 degrees 03 minutes 30 seconds West 126.68 feet to intersect the aforesaid North side of Security Blvd., thence running and binding thereon the 6 following courses and distances, viz: (11) South 86 degrees 07 minutes 51 seconds West 361.27 feet to a point of curve, thence (12) Southwesterly by a line curving to the right with a radius of 2740.00 feet for a distance of 80.23 feet (the arc of said curve being subtended by a chord bearing South 86 degrees 58 minutes 15 seconds West 80,23 feet) thence (13) North 02 degrees 11 minutes 29 seconds West 20.00 feet, thence \$4) Southwesterly by a line curving to the right with a radius of 2720,00 feet for a distance of 48,57 feet (the arc of said curve being subtended by a chord bearing South 88 degrees 19 minutes 29 seconds West 48,57 feet) thence (15) South 01 degrees 10 minutes 06 seconds East 20,00 feet and thence (16) Southwesterly by a line curving to the right with a radius of 2740.00 feet for a distance of 25.00 feet (the arc of said curve being subtended by a chord bearing South 89 degrees 06 minutes 22 second



PAGE-II

West 25,00 feet) to the place of beginning

Containing A.S. Acres of land, more or lans.

This description has been prepared for soning surposes only, and is not intended to be used for conveyance.

MEGINETISG FOR THE second thereof on the North side of Security Blvd., 120 feet wide, at a point distant 1457.06 feet, more or less, measured Westerly on said North side of Security Blvd, from its intersection with the centerline of Colonial Road, 50 feet wide, thence leaving said place of beginning and said North side of Security Blvd. and running the 3 following courses and distances, vis: (1) North 03 degrees 52 minutes 09 seconds West 150,00 feet, thence (2) South 86 degrees 07 minutes 51 seconds West 179,86 feet and thence (3) South 10 degrees 02 winutes 13 seconds West 27.85 feet, more or less to the centerline of Mr. Vernon Brive thence running and binding thereon. (4) South 86 degrees 08 minus 08 seconds West 155,78 feet, more or less, thence leaving the centerline of Mt. Vernon Drive and running the 17 following courses and distances, viz: (5) North 10 degrees 03 de East 66,25 feet, more or less, thence (6) North 79 degrees 01 minute 42 seconds East 148,10 feet, more or less, thence (7) North 85 degrees 57 minutes 02 seconds East 549.10 feet, thence (8) North 73 degrees 43 minutes 42 seconds East 607.76 fact, thence (9) North 81 decrees 36 minutes 33 seconds East 78.60 feet, thence (10) South 76 degrees AS minutes 00 seconds. East 65.30 feet, thence (11) South 59 degrees 27 minutes 57 seconds East 69.97 feet, thence (12) South 41 degrees 48 minutes 08 seconds East 58.06 feet, thence (13) South 14 degrees 36 minutes 47 seconds East 44.08 feet, thence (14) South 07 degrees 06 minutes 34 seconds West 90.74 feet, thence (15) South 22 degrees 27 minutes 20 seconds East 64.09 feet, thence (16) South 49 degrees 02 minutes 44 seconds East 86,86 feet, thence (17) Northeasterly by a line curving to the right with a radius of 759.00 feet for a distance of 25.92 feet (the arc of said curve being subtended by a chard bearing North 27 degrees 29 minutes 03 seconds East 25.91 feet), thence (18) South 53 degrees 39 minutes 22 seconds East 413.87 feet, thence (19) North 27 degrees 13 minutes 54 seconds East 49.98 feet, thence (20) North 32 degrees 58 minutes 52 seconds East 49.99 feet, and thence (21) North 36 degrees 20 minutes 16 seconds East 59.86 feet to the South side of Dogwood Road, thence across the bed of Dogwood Road, (22) North 36 degrees 23 minutes 30 seconds East 45.00 feet to the centerline of Dogwood Road, themce running and binding thereon, (23) South 53 degrees 36 minutes 30 seconds East 60,00 feet, thence leaving the centerline of Dogwood Road and running across the bad @hereof, (24)

PAGE III

South 36 degrees 20 minutes 38 seconds West 12.48 feet, thence running and binding on said Dogwood Road the 8 following courses and distances, viz: (25) South 53 degrees 24 minutes 20 seconds East 69.77 feet, thence (26) South 37 degrees 53 minutes 20 seconds East 420.67 feet, thence (27) South 30 degrees 40 minutes 20 seconds East 65.33 feet, thence (28) South 14 degrees 36 minutes 20 seconds East 84,00 feet, thence (29) South 8 degrees 36 minutes 20 seconds East 416,84 feet, thence (30) South 22 degrees 27 minutes 20 seconds East 98,00 feet, thence (31) South 35 degrees 52 minutes 20 seconds East 98.75 feet and thence (32) South 41 degrees 04 minutes 20 seconds East 128.25 feet, thence leaving said Dogwood Road and running the 5 following courses and distances, viz: (33) South 60 degrees 25 minutes 40 seconds West 165.00 feet, thence (34) South 17 degree 18 minutes 20 seconds East 184,84 feet, thence (35) South 82 degrees 44 minutes 20 seconds East 239.67 feet, thence (36) South 02 degrees 36 minutes 40 seconds East 55.00 feet, and thence (37) South 84 degrees 09 minutes 20 seconds East 76.99 feet to the aforesaid Dogwood Road and thence running and binding thereon (38) South 14 degrees 45 minutes 20 seconds East 776.00 feet to the Southernmost outline of the whole tract thence leaving said Dogwood Road and running and binding on said southernmost outline the 9 following courses and distances viz: (39) South 73 degrees 40 minutes 50 seconds West 74.63 fect, thence, (40) North 89 degrees 57 minutes 40 seconds West 33.00 feet, thence (41) North 81 degrees 27 minutes 00 seconds West 42.64 feet, thence (42) North 37 degrees 24 minutes 90 seconds West 58.55 feet, thence (43) North 20 degrees 13 minutes 40 seconds West 47.03 feet, thence (44) North 48 degrees 21 minutes 30 seconds West 50.59 feet, thence (45) North 58 degrees 16 minutes 50 seconds West 51.93 feet, thence (46) North 70 degrees 46 minutes 30 seconds West 40.54 feet and thence (47) North 64 degrees 00 minutes 00 seconds West 86.89 feet to intersect the Northeast side of Security Blvd. thence running and binding thereon the 4 following courses and distances, viz: (48) North 15 degrees 41 minutes 39 seconds West 14.23 feet to a point of curve thence (49) Northwesterly by a line curving to the left with a radius of 3060,00 feet for a distance of 472,01 feet (the arc of said curve being subtended by a chord bearing North 20 degrees 06 minutes 47.5 seconds West 471.49 feet) to the end of said curve, thence (50) North 24 degrees 31 minutes 56 seconds West 1197.00 feet to a point of curve thence (51) Northwesterly by a line curving to the left with a radius of 860.00 feet for a distance of 444.29 feet (the arc of said curve being subtended by a chord bearing North 39 degrees 23 minutes 58 seconds West 439.34 feet to the East side of Colonial Road, 50 feet wide, thence running and binding on said East side of Colonial Road the 2 following courses and distances, viz: (52) North 19 degrees 28 minutes 25 seconds West 28,43 feet and thence (53) North 15 degrees 10 minutes 02 seconds East 22,26 feet thence leaving the East side of Colonial Road and running across the bed thereof (54) North 55 degrees 24 minutes 26 seconds West 53.02 feet to the

PAGE IV

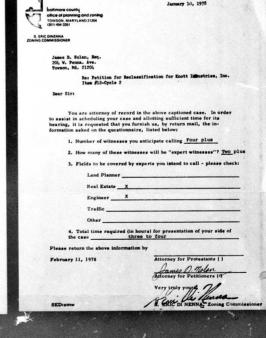
West side of Colonial Road, thence running and binding theron the 2 following courses and distances, viz: (55) South 15 degrees 10 minutes 02 seconds West 8,74 feet and thence (56) South 67 degrees Computer 16 seconds West 39 38 feet to the aforesaid Northeast side of Security Blvd., thence running and binding thereon. (57) Northwesterly by a line curving to the left with a radius of 860 feet for a distance of 209,32 feet (the arc of said curve being subtended by a chord bearing North 67 degrees 54 minutes 37 seconds West 208,80 feet ) thence leaving said Northeast side of Security Blvd, and running the 3 follow ing courses and distances, viz: (58) North 36 degrees 59 minutes 22 seconds West 112.75 feet thence (59) North 46 degrees 19 minutes 00 seconds West 144,25 feet and thence (60) South 59 degrees 58 minutes 36 seconds West 144,66 feet to the North side of Security Blvd. thence running and binding thereon the 2 following courses and distances wis: (61) Northwesterly by a line curving to the left with a radius of 3460.00 for a distance of 944.94 feet (the arc of said curve being subtended by a chord bearing North 86 degrees 02 minutes 43 seconds West 942.01 feet) to the end of said curve and thence (62) South 86 degrees 07 minutes 51 seconds West 41.75 feet to the place of beginning.

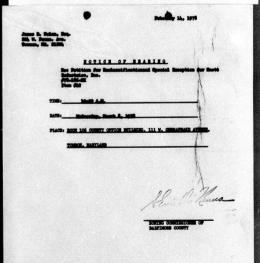
Containing 28.1 acres of land, more or less.

This description has been prepared for zoning purposes only, and is not intended to



f Man Evan







- 15, 1977 Was

TELEPHONE 823-7800

ock payable to Baltimore County, Md. and remit to Mrs.

Been 113 County Office Building, before the hearing.

Yours very truly. Lines

S. ERIC PINEINA

NOLAN, PLUMMOFF & WILLIAM TOWSON, MARYLAND 21204

November 21, 1977

NOV 21 '77-000 30

V.

ZONING DEMOCRACIT

C. Richard Moore, Assistant Traffic Engin Bureau of Planning & Design Department of Traffic Engineering Courts Building, Fourth Floor Towson, Maryland 21204

Re: Knott Reclassification and Special Exception Case on the North Side of Security Boulevard Second Cycle (Item No. 12), IDCA No.77-51-X.

While we are aware that there may be some difficul-ties presently being experienced at the intersection of Security Boulevard and Ingleside Avenue, we are also aware that the State, the County and the Social Security Admini-stration are taking steps to alleviate the situation.

More specifically, at the present time there is under construction an alternate route paralleling Route 70N, leading from the rear of the Social Security Complex to Ingleside Avenue and to Interstate 70N, just to the southeast of Interstate 70N's present overpass over Ingleside Avenue.

It is our understanding that this major access road for the Social Security Complex is being constructed by the A. V. Williams Construction Company and that it is scheduled to open in June of 1978.

There can be little doubt that this new road, which we understand is to be a County road, will do a great deal of the county road of the county of the count

Section 22-15.1(d)D. provides in part for "road or road intersection improvements to relieve traffic congestion," either in the 5-year State Highway Administration Improvement Program or the Baltimore County budget or program for construction within 2 years. Of course, this new

Page two

access road is actually under construction and is in part physically present on the ground and observable at the present time.

respectfully ask that the Traffic Engineering Department comment be changed to A to indicate approval, in view of the facts brought out in this letter. Thanking your beartment, the Planning Board, and the Soning Commission Confice and the Planning Staff for your stantion to this point, I am

Sincerely yours, James D. Nolan James D. Nolan

JDN/hl
cc: Arnold Fleischmann, Esq.
Chairman, Planning Board
Baltimore County
Courts Building 21204

Mr. Leslie Graef Director of Planning Courts Building 21204

Norman E. Gerber, Deputy Director, Office of Planning & Zoning County Office Building

Mr. Ray Potter Southwest Area Planner and IDCA Special Exception Planner, Office of Planning & Zoning County Office Building

The Hon. S. Eric DiNenna Zoning Commissioner County Office Building

The Hon. George J. Martinak Deputy Zoning Commissioner County Office Building

Nicholas Commodari, Chairman Zoning Advisory Committee County Office Building Mr. Charles Knott Knott Industries, Inc. 1726 Whitehead Road Baltimore, Md. 21207

L. Alan Evans, P.E., Pres. Evans, Hagan & Holdefer 8013 Belair Road Balto., Md. 21236

LAW OFFICES OF NOLAN, PLUMHOFF & WILLIAMS 204 WEST PENNSYLVANIA AVENUE

January 27, 1978

Mrs. Beatrice Anderson Zoning Commissioner's Office County Office Building Towson, Maryland 21204

Second Cycle Cases: Ellis A. Rawls (Colden Ring Savings & Loan, Contract Purchaser), Item No. 3 - Cycle 2; Knott Industries, Inc., Item No. 12 - Cycle 2; Mario Manarelli, Item No. 13 - Cycle 2.

Dear Mrs. Anderson:

Please find enclosed herewith the completed case information sheets in the above three matters.

will start with the eastern end of the County and work toward the western end, and, of course, with only ld cases involved, in all probability you may well finish by March 17 or so.

It would be our expectation that the Golden Ring Case (Rawls, Item 3) will take one-half day or less, perhaps two to three hours.

haps two to three hours.

As for Knott Industries, it will take at least one-half day and we may be presenting additional expert testimony.

Pinally, as for the Manarelli Case, it would be or spectation that the case would take two to three hours at

In scheduling these cases, it will be appreciated if the afternoon of Wednesday, March 15 could be left available for a Board of Directors meeting which I am extend to attend. Similarly, my partner Newton the control will be a scheduled to appear in a soning matter in another County on

Page two

JDN/hl

Wednesday, March 22, and it will be appreciated if this date can be avoided and hopefully all of the cases will have already been finished during the first three weeks of March in any case.

Thanking you and the Commissioner and Deputy Commissioner for your consideration in these matters, I am, with best regards to you all,

Sincerely, James D. Nolan

Gwynn Oale IMPROVEMENT ASSOCIATION, INC.

52,4 Pembroke Avenue Baltimore, Maryland - 21207 March 8, 1978

Re: Rezoning Security Blvd. Dogwood Road - Colonial Rd. Item 12

Mr. S. Eric DiNemna Zoning Commissioner County Office Building Towson, Maryland - 2120k

Dear Mr. Dillennat

I cannot see how the Bureaucracy can on one hand condern and on the other permit. This site (Iten 12) Being considered for resoning lays completely in or surrounds the flood plains which for permit corested problems. No amount of reconstruction could correct enough to warrant any decision but connecting this property.

No trust you will rule in favor of the residents sentiments and stop this overcreding conditions which has existed ever since Social Security eved into our melaphorhoods and is still esting at us both in expansion and sided traffic, pollution etc.

Sincerely yours,

Thus Thangaret & San Mrss Margaret R. Sas Past President and Board of Director

Western Alliance W of Concerned Communities

Item No. 12
Property Owner: Knott Industries, Inc.
Location: N/S and E/S of Security Boulevard;
both sides of Colonial Road

The extensive building persisted by a R. 16 soning would necessitate the desiruction of a goodly stand of trees, and undergrowth, which now is an extresely important natural control factor. To replace this large root of the standard standard control factor. To replace this large root only be a tragic of the standard standard

Across the Blvd., S.S.A. is plundering about 100 acres of prise woodland, putting in access roads, parking lots, and enormous roof surfaces. In the impact study it was admitted that the planned retention pont would not take care of all the run-off from that source.

Without a doubt, the County Council took into consideration the multiple 5.5.4. buildings, the sparing region amburger and the sparing sparing

We implore a consideration of the ecology, four heritage, as well as the people living in the boundaries of this Alliance.

Cacherine agel

Becretary

2-8-78



Mr. James D. Molan Molan, Plumboff & Williams 204 West Pennsylvania Avenue Towson, Maryland 21204

SUBJECT: Knott Reclassification and Special Exception Case on the North side of Security Boulevard Second Cycle (Item No. 12), IDCA No. 77-51-X.

In reference to your letter of Kovember 21, 1977 concerning the subject IDCA petition, we offer the following information:

Baltimore County is aware of the access road now being constructed by the State Highway Administration and the Social Security Administration is a difficult, however, to determine what evidence in the state of the state state state of the state state of the state state of the state state state of the state state state of the state of the

It is anticipated that this access road will improve the traffic somewhat at the intersection of Security Boolevard and Ingleside Avenue. However, the degree of improvement cannot be determined without a detailed origin and destinated the security of the

If we can provide you with further information, it will be available at the December 15th Planning Board meeting or at your convenience.

Chila Man C. Richard Moore Assistant Traffic Engineer

TTEN 0 12

RE COUNTY OFFICE OF PLANNING & ZONING

County Office Building 111 W. Chesapeake Ave. Towson, Maryland 21204

CERTIFICATE OF POSTING

Date of Posting FeB . 18, 1978 Posted for PETITIONS FOR O RECLASSIFICATION @ SPECIAL EXCEPTION Petitioner KNOTT INDUSTRIES, INC. Location of property: MS OF Security Blub. 2345.30' W OF CELONIAL Rd.

2-5161

Torono, Marriand

Location of Signa M/S OF Security Blue, 950 to - WOF Colonial Pd

Posted by Llouis F. Roland Date of return FCB, 24,1978

78-186-RX

cc - Arnold Fleischmann, Eaq. Chairman, Planning Board Baltimore County Courts Building 21204 Mr. Leslie Graef

Director of Planning Courts Building, 21204

Morman E. Gerber, Deputy Director Office of Planning & Zoning Courts Building, 21204

Mr. Ray Potter Southwest Area Planner and IDCA Special Exception Planner Office of Planning & Zoning County Office Building

The Hon. S. Eric DiNenna

The Hon. George J. Martinak Deputy Zoning Commissioner County Office Building

Micholas Commodari, Chairma Zoning Advisory Committee County Office Building

Mr. Charles Knott Knott Industries, Inc. 1726 Whitehead Road Baltimore, Maryland 21207

L. Alan Evans, P. E., Pres. Evans, Hagan & Holdefer 8013 Belair Road Baltimore, Maryland 21236

NOLAN, PLUMBOPP & WILLIAM 204 WEST PE

Mr. Nicholas Commodari, Chairman Zoning Advisory Committee County Office Building Towson, Maryland 21204

Re: Reclassification and Special Exception Petition Item Number 12 - Cycle II Petitioner: Knott Industries, Inc.

Dear Mr. Commodari:

Pursuant to your Zoning Advisory Committee Comments dated October 31, 1977, we are herewith submitting 10 revised plats dated November 18, 1977.

We believe that Mr. Evans or a member of his Staff has already conferred with you regarding the requested changes and your attention is also directed to our letter of November list directed to Mr. Moore in Traffic Engin-cial conference of the traffic passing through the do a great deal road improvements in the area which will do a great deal road improvements and the area which will intersection at Inglesids and Security Doulevard.

Thanking you and your Staff for your attention to these revised plats, I am

Sincerely, James D. Nolan

/hl Mr. Charles Knott Knott Industries, Inc. 1726 Whitehead Road Baltimore, Md. 21207

L. Alan Evans, P.E., Pres. Evans, Hagan & Holdefer 8013 Belair Road Baltimore, Md. 21236

BALTIMORE COUNTY OFFICE OF PLANNING AND ZONING

County Office Building 111 W. Chesapeake Avenue Towson, Maryland 21204 Your Petition has been received \* this 30

197 ? Filing Fee \$ 5 \_. Received \_Check

Petitioner 1. # July 7 Submitted by U. 4 141 Petitioner's Attorney 1/2 Reviewed by Misc

This is not to be interpreted as acceptance of the Petition for assignment of a hearing date.

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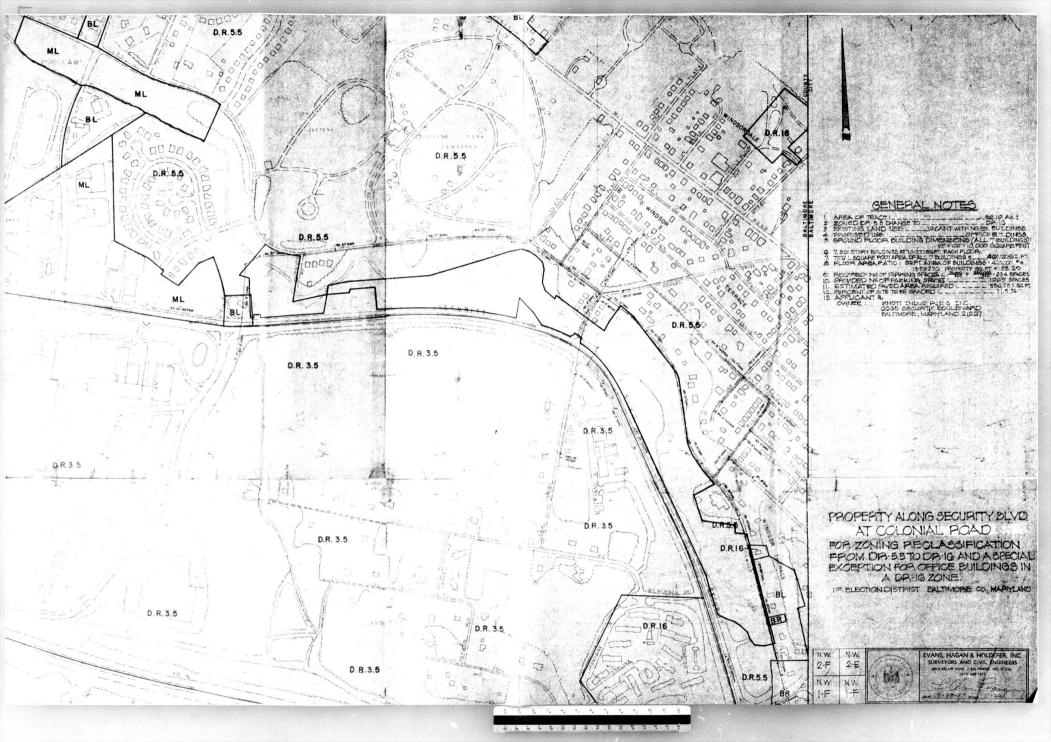
Catonsville Times
Dundalk Times
Essex Times
Suburban Times East THIS IS TO CERTIFY, that the annexed advertisement of Petition For Reclassification & Social Exception was inserted in the following Knoffer of Street Social Exception Towson Times
Arbutus Times
Community Times
Suburban Times West

successive weeks before the 19.78, that is to say, the same feeb, 16, 1978.

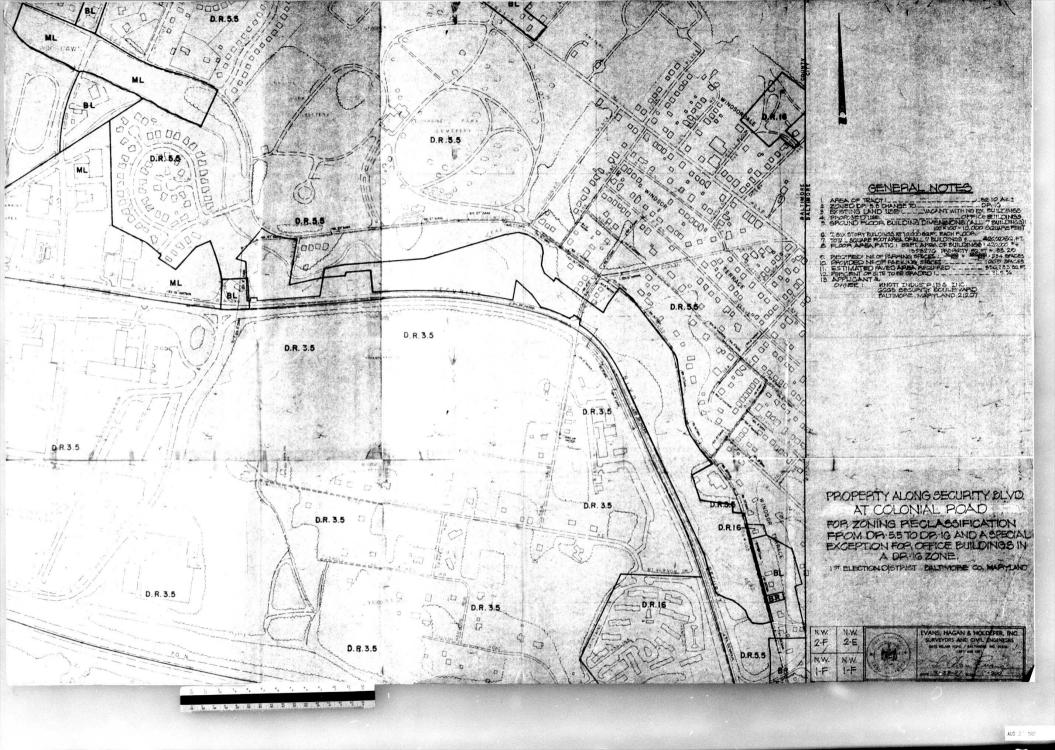
STROMBERG PUBLICATIONS, INC

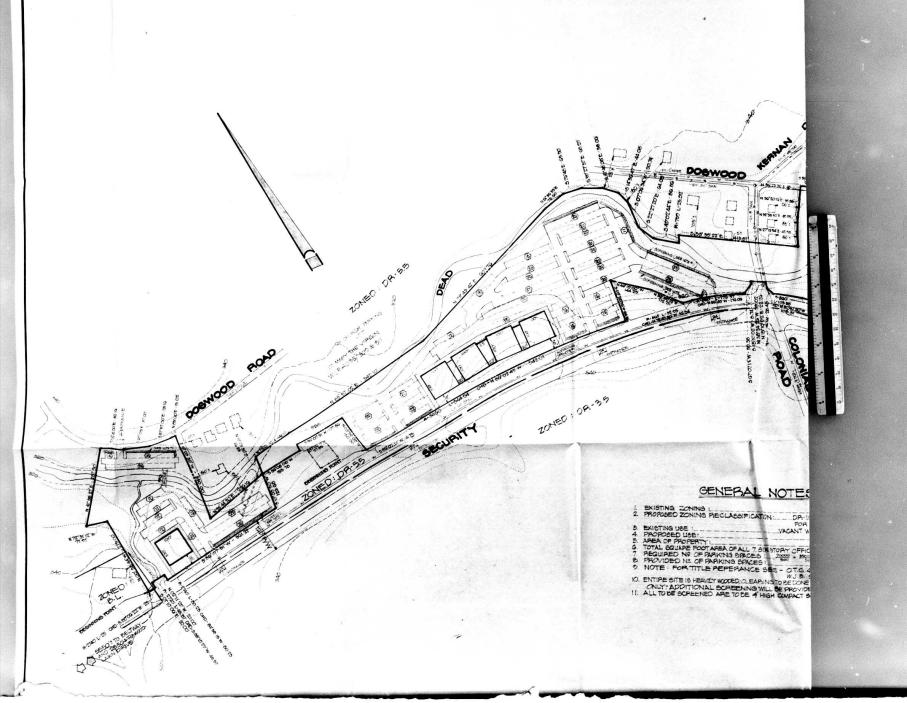
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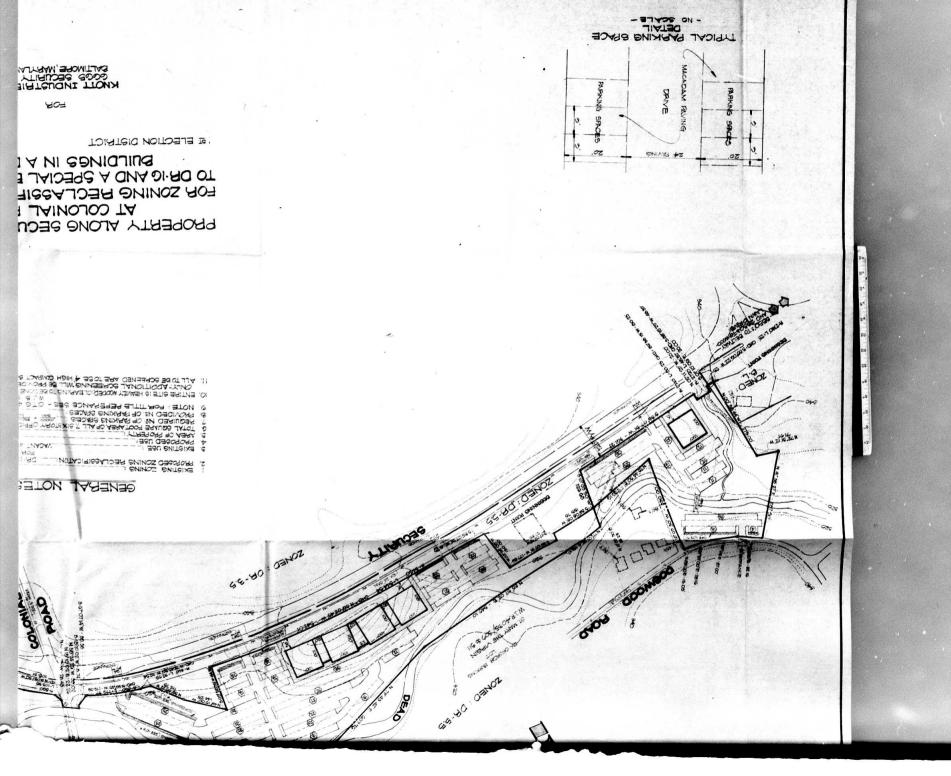
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