

Joint Exhibit
 RE: PETITION FOR VARIANCES :
 PETITION FOR SPECIAL HEARING :
 5/5 Bay Front Road, 190' :
 E of Lincoln Avenue, 15th District :
 ESTATE OF MARY C. CREMEN, :
 Petitioner :
 Case No. 78-222-ASPH

Petitioner, the Estate of Mary C. Cremen, and the office of People's Counsel for Baltimore County, in order to facilitate a resolution of this matter pending before the Board of Appeals of Baltimore County, hereby agree to the following facts and legal conclusions which, upon approval by the Board of Appeals, shall be binding:

1. Petitioner has operated for many years a trailer park located at 7405 Bay Front Road in the Dundalk area of Baltimore County. The park, known as Bay Front Mobile Home Park, currently has thirty ~~four~~ ^{two} units.

2. Since, in recent years, trailers have increased in length and width, it has become apparent that Baltimore County Zoning Regulations pertaining to setbacks could not be complied with, and so the present petition for special hearing and variances was brought.

3. Upon review, the Baltimore County Department of Health, by George H. Hummel, R.S., Acting Chief, Division of Community Hygiene, Bureau of Environmental Services, has noted that the Maryland State Regulations Governing Construction, Equipment, Sanitation Operations and Maintenance of Mobile Home Parks, COMAR, Section 10.03.23, Part 21, requires a minimum of twenty feet between any mobile home and the boundaries of the park. In addition, the National Fire Protection Association Standard for the Installation of Mobile Homes, including Mobile Home Park Requirements, (Section 501.A), 1975 edition has been adopted as of October 7, 1977 by the Maryland State Fire Prevention Commission as part of the Maryland State Fire Prevention Code. It is enforceable under Article 38a of the Annotated Code of the State of Maryland. Section 10.1.3 requires that mobile homes may not be located within ten feet of any other mobile

home. This information has been provided by Lt. Thomas Kelly, of the Baltimore County Fire Department. He has indicated also B.O.C.A. Code requirements of fifteen feet separation between individual trailers.

4. In order to protect the public safety, health, and welfare but at the same time avoid undue hardship in relieving a problem which has existed for many years, the parties have agreed that the requested variances and special hearing be granted, subject to the following conditions:

a. The Petitioner shall provide to the County Department of Permits and Licenses, Fire Department, Health Department and office of People's Counsel a copy of the current listing of tenants of tenants of the Bay Front Mobile Home Park as of the date of this agreement.

b. Upon the vacation of a unit by any current tenant, Petitioner shall notify the aforesaid County offices.

c. So long as the Petitioner remains in noncompliance with any County health, fire or building regulations pertaining to location of trailers, the location of other trailer units shall, ~~as spaces become~~ ^{as spaces become} vacated, be relocated as part of a program of the Petitioner, under the supervision of the aforesaid offices, to bring the mobile home park into substantial compliance.

d. Failure to comply with the foregoing conditions shall be cause, ipso facto, for the variances to be forfeited, void and of no effect. In addition, such violation may be deemed to authorize the aforesaid offices to bring enforcement action or to refer aforesaid matter for enforcement action by the appropriate agency.

Peter Max Zimmerman
 Peter Max Zimmerman
 Deputy People's Counsel
 John W. Heslety, III
 People's Counsel
 County Office Building
 Towson, Maryland 21204
 Telephone: 494-2188
John W. Heslety, III
 John W. Heslety, Jr.
 Attorney for Petitioner
 6905 Dunmanway
 Dundalk, Maryland 21222
 Telephone: 284-2860
 288-5270

BAY FRONT MOBILEHOME COURT

7405 BAY FRONT ROAD
 BALTIMORE, MARYLAND - 21210
 PHONE 477-4363

OCTOBER 24, 1978

PLATT LANE:

#1 - EUGENE P. JONDAKSON
 #2 - ALYRA L. L. L. L.
 #3 - COTILL GUNTER
 #4 - EDWARD S. STALLER
 #5 - HAROLD H. MC NEAR
 #6 - VACANT
 #7 - BETTY WHITE
 #8 - CHARLES M. M. M.
 #9 - HAROLD H. MC NEAR
 #10 - GEORGE D. DONLICKMAN
 #11 - JESSIE B. JAYSON
 #12 - VACANT
 #13 - WILLIAM C. LLOYD

KNOFF LANE:

#1 - MELVIN MC GARGISH
 #2 - LEO W. CLIPSON
 #3 - JIMIE HUBERTSON
 #4 - VALERIE D. BONGE
 #5 - GLENN J. BOGHEIMUTON
 #6 - DONALD B. FELTY
 #7 - ERMEL GUSTATHOUSE
 #8 - FREDERICK M. ELWOOD
 #9 - VAN J. NORTHINGTON
 #10 - URSULA L. BARCOWA
 #11 - BENJAMIN KOUGH
 #12 - HARRIETTA WHITE
 #13 - ROBERT D. CHASTIN
 #14 - ROSE LEE HALEGOS
 #15 - JOHN HAMMERBAKER
 #16 - ELEANOR ROSE
 #17 - JOHN GUSTATHOUSE
 #18 - JOHN GUSTATHOUSE

VAGABOND LANE:

#1 - GILBERT SHIPAST
 #2 - LEWIS A. WOODWELL
 #3 - JAMES C. MC CLAIN
 #4 - RICHARD H. FRANCIS
 #5 - LESTER WITKOLL
 #6 - VACANT

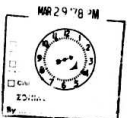
RE: PETITION FOR VARIANCE :
 PETITION FOR SPECIAL HEARING :
 5/5 of Bay Front Rd. 190' :
 E of Lincoln Avenue, 15th District :
 ESTATE OF MARY C. CREMEN, :
 Petitioner :
 Case No. 78-222-ASPH

Mr. Commissioner:

Pursuant to the authority contained in Section 524.1 of the Baltimore County Charter, I hereby 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 preliminary or final Order in connection therewith.

Charles E. Kuntz, Jr.
 Charles E. Kuntz, Jr.
 Deputy People's Counsel
 John W. Heslety, III
 People's Counsel
 County Office Building
 Towson, Maryland 21204
 494-2188

I HEREBY CERTIFY that on this 29th day of March, 1978, a copy of the foregoing Order was mailed to Norman R. Stone, Jr., Esquire, Howard and Stone, 6905 Dunmanway, Dundalk, Maryland 21222, Attorney for Petitioner.



VARIANCE from Section XIII H(4)(1945) :
 of the Baltimore County Zoning Regulations :
 SPECIAL HEARING to determine legal status :
 of an existing Trailer Park :
 5/5 of Bay Front Road 190' E. of Lincoln Ave. :
 15th District :
 Estate of Mary C. Cremen :
 Petitioner :
 Case No. 78-222-ASPH

OPINION

This case comes before the Board of Appeals on an appeal by the People's Counsel from an Order of the Deputy Zoning Commissioner granting the special hearing and request for variances, and finding the existing trailer park to be a legal non-conforming use, and granting the requested variances.

The special hearing as to the legality of the non-conforming use was testified to by Mr. James C. Cremen, Personal Representative of the estate of Mary C. Cremen. Mr. Cremen, forty-six years old, had personal memory of the use of this parcel as far back as 1942 for a trailer park, and noted the actual names of some of the trailer residents at that time. Since one of the Board members also remembers the existence of this trailer park use as far back as 1940, there seems to be no doubt as to its non-conforming use, so this will be granted. It should be noted that there were no protests present at this hearing.

The variances requested at this time are as follows: To permit a distance of 11 feet between the trailers and the right-of-way line of Bay Front Road in lieu of the required 50 feet; 3 feet between the trailers and the property lines in lieu of the required 15 feet; 5 feet between the trailers in lieu of the required 10 feet; and 10 feet between the trailers and the office utility room in lieu of the required 20 feet. The subject property contains 2.70 acres of land, more or less.

Testimony at this hearing indicated that the property is currently occupied by thirty-four trailers of various size. Testimony indicated that by reason of the fact that trailers have increased in length and width over the years, and because of the physical configuration of the land, the owners have encountered substantial hardship and

Estate of Mary C. Cremen - No. 78-222-ASPH

practical difficulty in meeting the requirements of the Baltimore County Zoning Regulations pertaining to required setbacks. Strict compliance with these regulations would result in long time residents being displaced from their homes. It should also be noted that through natural attrition the number of trailers has been reduced from about fifty trailers in 1947 to the present number of thirty-four.

In order to facilitate a resolution of this matter agreeable to the proper Baltimore County authorities and the Petitioner, the following conditions were proposed, pending approval of this Board.

In order to protect the public safety, health and welfare, but at the same time avoid undue hardship in relieving a problem which has existed for many years, the parties have agreed that the requested variances and special hearing be granted, subject to the following conditions:

a. The Petitioner shall provide to the County Department of Permits and Licenses, Fire Department, Health Department and office of People's Counsel a copy of the current listing of tenants of the Bay Front Mobile Home Park as of the date of this agreement.

b. Upon the vacation of a unit by any current tenant, Petitioner shall notify the aforesaid County offices.

c. So long as the Petitioner remains in noncompliance with any County health, fire or building regulations pertaining to location of trailers, the location of other trailer units, shall, as spaces become vacated, be relocated as part of a program of the Petitioner, under the supervision of the aforesaid offices, to bring the mobile home park into substantial compliance.

d. Failure to comply with the foregoing conditions shall be cause, ipso facto, for the variances to be forfeited, void and of no effect. In addition, such violation may be deemed to authorize the aforesaid offices to bring enforcement action or to refer aforesaid matter for enforcement action to the appropriate agency.

Estate of Mary C. Cremen - No. 78-222-ASPH

It is the judgment of this Board that the above proposed agreement between the parties represents a fair and equitable resolution of this matter, and shall so order.

For this reason the Board will grant the special hearing request and the requested variances, subject to all above agreed to conditions.

ORDER

For the reasons set forth in the foregoing Opinion, It is this 19th day of February, 1979, by the County Board of Appeals ORDERED, that the special hearing for determination of a legal non-conforming use, and the requested variances petitioned for, be and the same are hereby GRANTED, subject to the restrictions listed in the above Opinion.

Any appeal from this decision must be in accordance with Rules B-1 thru B-12 of the Maryland Rules of Procedure.

COUNTY BOARD OF APPEALS

OF BALTIMORE COUNTY

Robert L. Gifford
 Robert L. Gifford, Vice Chairman

Harbert A. Davis
 Harbert A. Davis

William T. Hackett
 William T. Hackett

RE: PETITION FOR SPECIAL HEARING :
 PETITION FOR VARIANCES :
 5/5 of Bay Front Road, 190' :
 E of Lincoln Avenue, 15th District :
 ESTATE OF MARY C. CREMEN, :
 Petitioner :
 Case No. 78-222-ASPH

Mr. Commissioner:

Please note an appeal from the decision of the Deputy Zoning Commissioner in the above-entitled matter, under date of May 18, 1978, to the County Board of Appeals and forward all papers in connection therewith to said Board for hearing.

Peter Max Zimmerman
 Peter Max Zimmerman
 Deputy People's Counsel
 John W. Heslety, III
 People's Counsel
 County Office Building
 Towson, Maryland 21204

I HEREBY CERTIFY that on this 23rd day of June, 1978, a copy of the foregoing Order was mailed to Norman R. Stone, Jr., Esquire, 6905 Dunmanway, Dundalk, Maryland 21222, Attorney for Petitioner.

Peter Max Zimmerman



FRANK S. LEE

Registered Land Surveyor

1277 NEIGHBORS AVE. - BALTIMORE, MD. 21237

October 5, 1977

Bay Front Trailer Park
No. 7405 Bay Front Road
15th District, Baltimore County, Maryland

Beginning for the same on the south side of Bay Front Road at the distance of 190 feet more or less measured along the south side of Bay Front Road from the east side of Lincoln Avenue, and thence running and binding on the south side of Bay Front Road North 87 degrees 02 minutes East 160 feet, thence running for a line of division South 12 degrees 30 minutes West 350 feet more or less to the waters of Patuxent River, thence along the waters of Patuxent River in a westerly direction 235 feet more or less, and thence running for a line of division North 17 degrees 36 minutes East 645 feet more or less to the place of beginning.

Containing 2.70 acres of land more or less.



HOWARD AND STONE
ATTORNEYS AT LAW
1000 EIGHTH AVENUE
BIRMINGHAM, MD. 21204

RE: PETITION FOR VARIANCE
PETITION FOR SPECIAL PERMIT
S/S of Bay Front Road 15th District
E of Lincoln Ave., 15th District

BEFORE THE
ZONING COMMISSIONER
OF
BALTIMORE COUNTY

ESTATE OF MARY C. CROMEN
Petitioners

BALTIMORE COUNTY
Case No. 78-22-ASM

MEMORANDUM

This case comes before the Commissioner on two Petitions:

- Petition to Establish Legal Status; and
- Petition for Variance as to Setbacks and Distances, etc.

This lot was part of a large family acreage and testimony revealed that no neighbors or relatives could be found to testify as to use prior to 1945. However, there was documentary evidence to establish a strong inference of the utilization of the premises as a trailer park prior to 1945 and a further documentation establishing permits being issued since 1947 which reflect the views of Baltimore County as to the valid nature of the trailer park as well as the vested interest on the part of the Petitioner. There was no protestant or contradictory testimony to rebut this evidence or the inference therefrom. A letter from the Zoning Commissioner, dated July 29, 1977, recited that a trailer park was officially set up in 1947 under case number 920-S in that office. The rational inference from this is that there was such a park in existence prior to that time and the hearing was brought about due to the necessity of obtaining permits for the building permit to construct shower rooms at that location. Copies of this letter from the Zoning Commissioner and permits reflect continuous issuance of permits allowing continuous use and approval of sewerage and electrical hook-ups for the said park and building permits for the shower rooms, etc. The permits, etc. attached constitute all that were able to be found in the decedent's papers, which were in a rather mixed-up condition and the older files pertaining to the park were not discovered.

We respectfully represent that this Honorable Commission could find that the property is a non-conforming use and is a legal park on the basis of the evidence submitted and the lack of any contradiction or dispute in any way

as to the legal status of this park. To rule otherwise would cause a great financial loss on the part of the Petitioner, who is the Executor of the Estate of Mary C. Cromen, and would amount in effect to a confiscation of a financial business to the detriment of the heirs of said estate. It is pointed out that the actions on the part of the decedent as a result of the permits allowed her gained her a vested interest in and to the operation of the park.

The Petition for Variance as to setbacks and distances between trailers was required primarily due to the size of the mobile homes which are in use at the present time. For the last several years, mobile homes have started at approximately sixty foot in length and upward, as opposed to the size of the house trailer in general use at the time of the establishment of the setback and distance regulations, which had a shorter length of thirty-five foot. The disapproval of the variances requested will result in the dislocation of about ninety persons, most of whom are long-term tenants and who have been very active in the community and have become leaders in the community affairs. This would create a hardship for them that would amount to, in effect, requiring them to dispose of their homes, due to the lack of mobile home space in Baltimore County especially in this community. It is needless to say that the financial loss to the Petitioner would be catastrophic.

Here again we point out that there was no opposition of any kind to testify to at the hearing opposing the granting of these variances and that all existing mobile homes sites in the park meet the requirements of the Health Department, Electrical Department and of other County departments, except for the variances requested herein.

Respectfully submitted,

Kirman R. Stone, Jr.
Kirman R. Stone, Jr.

HOWARD AND STONE
ATTORNEYS AT LAW
1000 EIGHTH AVENUE
BIRMINGHAM, MD. 21204

Baltimore County
Office of Planning and Zoning
TOWSON, MARYLAND 21204
(410) 381-3551

5. ERIC DITENHA
ZONING COMMISSIONER

July 29, 1977

Mr. & Mrs. Henry Vogel
3103 Soud Drive
Baltimore, Maryland 21208

R22 Bayfront Mobile Home Park
7405 Bayfront Road
15th Election District

Dear Mr. & Mrs. Vogel:

I am in receipt of your letter of July 26, 1977, in which you make inquiry as to whether the above referenced mobile home park is in compliance with applicable sections of the Baltimore County Zoning.

The subject property was established as a mobile home park in 1947, a subsequent to a public hearing (Case No. 920-S). I have enclosed a copy of the order for your reference. The 1945 Zoning Regulations, in effect at that time, established criteria for all mobile home parks to maintain. These requirements called for a minimum setbacks of ten feet (10') between trailers and fifteen feet (15') between any trailer and the front boundary. Additionally, no trailers are permitted to be located within twenty feet (20') of any service building or other structure, nor within fifty feet (50') of the road upon which the park fronts. A minimum lot area of four hundred (400) square feet must be allotted for each trailer.

In December of 1975, the Department of Permits and Licenses began forwarding all annual applications for mobile home park licenses to this office for review and approval. Our initial investigations revealed several apparent violations, with regard to the Baltimore County Zoning Regulations, at the majority of the mobile home parks in Baltimore County.

With specific regard to the subject park, please be advised that an inspection, conducted on December 15, 1975, revealed apparent violations with regard to all of the aforementioned requirements, except lot area. An inspection on July 29, 1977, revealed no change.

Because of these apparent violations, which are also in existence in most of the other parks, the task force has been created to review all applicable requirements, including Health, Fire, and Zoning, and to formulate and effect a coordinated enforcement program. The task force, chaired by myself, has yet to finalize their recommendations to the administration.

If further explanation or additional information is required, please feel free to contact this office.

Very truly yours,

S. ERIC DITENHA
S. ERIC DITENHA
Zoning Commissioner

SEED:smw
Attachment
cc: James E. Dyer, Zoning Supervisor
James B. Byrnes, III, Zoning Enforcement Section

No 00301 BALTIMORE COUNTY, MARYLAND
DEPARTMENT OF PERMITS AND LICENSES
County Office Building, Towson 4, Maryland YEAR
1970

CAMP OR MOTEL LICENSE

THIS CERTIFIES THAT Bayfront Mobile Home Court owned or operated by Mary S. Cromen at 7405 Bay Front Road, Baltimore, Md. 21219 for a Trailer CAMP/MOTEL License has been inspected by a duly authorized officer of the Baltimore County Health Department and found to conform to the regulations for the control of camps or motels promulgated by the Board of Health of Baltimore County in accordance with Title 36 of the Baltimore County Code, 1968 edition.

This license is not transferable and expires on December 31, 1970.

Granted this 9 day of January 1970.

Howard J. Ray
Director

POST CONSPICUOUSLY

DPL 122-4-1724 BALTIMORE COUNTY, MARYLAND
DEPARTMENT OF PERMITS AND LICENSES
County Office Building, Towson, Maryland 21204 YEAR
1971

CAMP OR MOTEL LICENSE

THIS CERTIFIES THAT Bayfront Mobile Home Court owned or operated by Mary S. Cromen at 7405 Bay Front Road, Baltimore, Maryland 21219 for a CAMP/MOTEL License has been inspected by a duly authorized officer of the Baltimore County Health Department and found to conform to the regulations for the control of camps or motels promulgated by the Board of Health of Baltimore County in accordance with Title 36 of the Baltimore County Code, 1968 edition.

This license is not transferable and expires on December 31, 1971.

Granted this 15 day of January 1971.

Director

POST CONSPICUOUSLY

DPL 122-4-1724 BALTIMORE COUNTY, MARYLAND
DEPARTMENT OF PERMITS AND LICENSES
County Office Building, Towson, Maryland 21204 YEAR
1972

CAMP OR MOTEL LICENSE

THIS CERTIFIES THAT Bayfront Mobile Home Court owned or operated by Mary S. Cromen at 7405 Bayfront Road, Baltimore, Md. 21219 for a Mobile CAMP/MOTEL License has been inspected by a duly authorized officer of the Baltimore County Health Department and found to conform to the regulations for the control of camps or motels promulgated by the Board of Health of Baltimore County in accordance with Title 36 of the Baltimore County Code, 1968 edition.

This license is not transferable and expires on December 31, 1972.

Granted this 12th day of January 1972.

Howard J. Ray
Director

POST CONSPICUOUSLY

DPL 122-4-1724 BALTIMORE COUNTY, MARYLAND
DEPARTMENT OF PERMITS AND LICENSES
County Office Building, Towson, Maryland 21204 YEAR
1973

CAMP OR MOTEL LICENSE

THIS CERTIFIES THAT Bayfront Mobile Home Court owned or operated by Mary S. Cromen at 7405 Bayfront Road, Baltimore, Maryland 21219 for a CAMP/MOTEL License has been inspected by a duly authorized officer of the Baltimore County Health Department and found to conform to the regulations for the control of camps or motels promulgated by the Board of Health of Baltimore County in accordance with Title 36 of the Baltimore County Code, 1968 edition.

This license is not transferable and expires on December 31, 1973.

Granted this 16 day of January 1973.

Director

POST CONSPICUOUSLY

DPL 122-4-1724 BALTIMORE COUNTY, MARYLAND
DEPARTMENT OF PERMITS AND LICENSES
County Office Building, Towson, Maryland 21204 YEAR
1974

CAMP OR MOTEL LICENSE

THIS CERTIFIES THAT Bayfront Mobile Home Court owned or operated by Mary S. Cromen at 7405 Bay Front Road, Baltimore, Md. 21219 for a Trailer CAMP/MOTEL License has been inspected by a duly authorized officer of the Baltimore County Health Department and found to conform to the regulations for the control of camps or motels promulgated by the Board of Health of Baltimore County in accordance with Title 36 of the Baltimore County Code, 1968 edition.

This license is not transferable and expires on December 31, 1974.

Granted this 10 day of January 1974.

Howard J. Ray
Director

POST CONSPICUOUSLY

JUN 13 1979

BALTIMORE COUNTY HEALTH DEPARTMENT

WILLIAM H. F. WARTHEM, M.D., M.P.H.
HEALTH OFFICER



BOARD OF HEALTH

CHIEF OF DIVISION
JAMES E. PETERMAN, M.D., M.P.H.
MURRAY BRANT, M.D., M.P.H.
LETHA R. ALLEN, M.D., M.P.H.
VANCE R. SULLIVAN

10 STREET BALTIMORE
NICHOLAS J. BRIDGEMAN
COLLETTA B. KANE
WILLIAM H. F. WARTHEM, M.D., M.P.H.
COUNTY

November 20, 1952

Mrs. James C. Cremen
Bay Front Trailer Court
7405 Bay Front Road
Baltimore 19, Maryland

Dear Mrs. Cremen:

There is enclosed an application for CAMP PERMIT to be filled in, signed by the camp owner or operator and sent by mail to the following:

William H. F. Warthem, M.D., Health Officer
Baltimore County Health Department
Townson, Maryland

Each application should be accompanied by a fee of two dollars (\$2.00) and check or money order for this purpose should be made payable to the COUNTY COMMISSIONERS OF BALTIMORE COUNTY.

Following receipt of the application, an inspection will be made of the facilities of the camp concerned by representatives of the Baltimore County Health Department. On the basis of this inspection, a recommendation will be made for licensure providing the facilities of the individual camp meet the requirements of the REGULATIONS FOR THE CONTROL OF CAMPS. It may be that the camp licensed previously by the Baltimore County Health Department has been discontinued. If this is the case please note the facts on the application and return it to the Health Department without an enclosed fee.

Very truly yours,

WILLIAM H. F. WARTHEM, M.D.
County Health Officer

B

Baltimore

8 13

ELECTRICAL CERTIFICATE
MIDDLE DEPARTMENT ASSOCIATION OF THE UNDERWRITERS
No. 533138 D
Philadelphia 6, Pa. 1/11/51
Certifies that the electrical equipment, shown below, has been examined and is approved as being in accord with the National Electrical Code or the Association's rules under conditions governing issuance as printed below.
Name of JAMES B. CROCKEN
Occupant SAME
Location 7405 BAY FRONT RD.
JONES CREEK, BALTIMORE CO, MD.
Inspected by
97 OUTLETS, 48 RECEPTACLES, 6-300 TYPE R, SERVICE CONDUCTORS, 40 AMP. EACH, 1-3/4 TYPE R, SERVICE CONDUCTORS, 70AMP.
GOLDENBERG BROS.
6002 YORK RD.
BALTIMORE, MD.
C. M. Newman,
NAT'L. ELEC. SUPPLY

NEW BUILDING COUNTY COMMISSIONERS OF BALTIMORE COUNTY No. 6993
PERMIT District: 15th
Date: June 17, 1947

This New Building Permit is Herely Granted To

MARY C. CREMEN, 7405 Bay Front Rd., Baltimore

To erect the following building:

Location 7405 Bay Front Rd., E. of Lincoln Ave.
Use of Building Shelter room on 1st floor - apartment on 2nd floor
Size of Building: Front 20 ft. Depth 20 ft. Height 20 ft.
Setback of Building: Front 200 ft.; Side Setbacks 25 and 16 ft. Corner lot - ft. from side street.
Character of Construction block frame, a walls, tin roof

Inspected By: The Building Department
Per
Date: June 27, 1947
Fee Paid \$5.00

This Permit shall be kept on the premises open to public inspection during the prosecution of the work and until completion of same. Upon completion, application shall be made to the Buildings Engineer for a Certificate of Occupancy.

ESTATE OF MARY C. CREMEN
De- 74 123
LAW OFFICES
HOWARD AND STONE
PROFESSIONAL BUILDING
6905 DUNDASWAY
DUNDALK, MARYLAND 21222
JUN 18 1947
JUN 18 1947

Mr. N. Commodari
Office of Zoning of
Baltimore County
County Office Building
Townson, Maryland 21204

RE: Cremen - Petition for Variance

Dear Mr. Commodari:

This will confirm my conversation with Mr. Howard of our office this date to the effect that the plan submitted for the above referenced Petition depicts examples of the most critical instances of need for the variances requested.

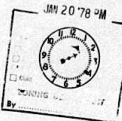
This plan was drawn in this fashion by the Surveyor to enable your office to see the picture in a simplified form rather than cluttering up the drawing with each trailer.

A trailer park of this vintage requires the variances in order to comply with present day regulations.

Thank you for your call in this regard.

Very truly yours,
Norman R. Stone, Jr.

NRS:rlh



BALTIMORE COUNTY ZONING PLANS ADVISORY COMMITTEE

COUNTY OFFICE BLDG.
111 W. Chesapeake Ave.
Townson, Maryland 21204

Chairman
Nicholas S. Commodari

MEMBERS
Bureau of Engineering
Department of Traffic Engineering
State Roads Commission
Bureau of Fire Prevention
Health Department
Project Planning
Building Department
Board of Education
Zoning Administration
Industrial Development

April 3, 1978

Norman R. Stone, Jr., Esquire
Howard and Stone
6905 Dundasway
Dundalk, Maryland 21222

RE: Special Hearing and
Variance Petition
Item Number 128
Petitioner - Estate of
Mary C. Cremen

Dear Mr. Stone:

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. These 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 with regard to the development plans that may have a bearing on this case. The Director of Planning may file a written report with the Zoning Commissioner with recommendations as to the suitability of the requested zoning.

Located on the south side of Bay Front Road approximately 150 feet east of Lincoln Avenue in the 15th Election District, this site is presently improved with an existing trailer park operation, which has existed at this location for sometime. To the west of this site is an existing community building for the Kacy Club, Incorporated, which was the subject of a previous zoning hearing 177-105-X-ASPH, while dwellings exist to the north and east. A review of our files indicates that this trailer park was granted a temporary use permit (920-S) for a period of two years commencing on May 27, 1947.

Norman R. Stone, Jr., Esq.
Page 2
Item Number 128
April 3, 1978

Since we have no record of any subsequent proceedings on this site, this Special Hearing is required in order to determine the legal status of this operation. The Variances are required because the trailers are located in conflict with the 1945 Zoning Regulations pertaining to same. In view of the fact that the exact location of all of the trailers are not indicated on the submitted site plan, there was some question as to whether the requested Variances included the strictest cases. As evidence by your letter of January 18, 1978, it is your interpretation that this, in fact, is the case.

Particular attention should be afforded the comments of the Bureau of Engineering concerning the proposed widening of Bay Front Road. I personally contacted Mr. John E. Klass, and he indicated that the right-of-way widening would include the land north of the northerly property line to this site. Because of this, the Variance request to permit a distance of 11 feet from the right-of-way line of Bay Front Road instead of the required 50 feet did not have to be changed. In addition to these comments, please note those of the Fire Department and the Department of Permits and Licenses.

This petition is accepted for filing on the date of the enclosed filing certificate. Notice of the hearing date and time, which will be held not less than 30 nor more than 90 days after the date on the filing certificate, will be forwarded to you in the near future.

Very truly yours,
Nicholas S. Commodari,
NICHOLAS S. COMMODARI, Chairman
Zoning Plans Advisory Committee

NBC:rlh

cc: Frank S. Lee - 1277 Neighbors Ave. - Balto., MD 21237

Baltimore County
Office of Planning and Zoning
TOWSON, MARYLAND 21204
201-624-2111

April 3, 1978

Mr. Eric S. DiNenna, Zoning Commissioner
Zoning Advisory Committee
Office of Planning and Zoning
Baltimore County Office Building
Townson, Maryland 21204

Dear Mr. DiNenna:

Comments on Item #128, Zoning Advisory Committee Meeting, December 20, 1977, are as follows:

Property Owner: Estate of Mary C. Cremen
Location: S/3 Bay Front Road 190' E. Lincoln Avenue
Existing Zoning: D.R.S.5
Proposed Zoning: Variance to permit a distance of 11' between trailers and right of way line in lieu of the required 50' and 3' between trailers and property line in lieu of the required 15' and to permit 5' between trailers in lieu of the required 10' and 10' between trailers and office utility room in lieu of the required 20'.
Acres: 2.70
District: 15th

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 bearing on this petition.

This plan has been reviewed and there are no site-planning factors requiring comment.

Very truly yours,

John L. Wimbley, Jr.,
John L. Wimbley
Planner III
Current Planning and Development

Norman R. Stone, Jr., Esquire
Howard and Stone
6905 Dundasway
Dundalk, Maryland 21222

Item No. 128

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

Your Petition has been received and accepted for filing this 15th day of February 1978.

Eric S. DiNenna
Zoning Commissioner

Petitioner: Estate of Mary C. Cremen
Petitioner's Attorney: Norman R. Stone

Nicholas S. Commodari
Chairman, Zoning Plans
Advisory Committee

Frank S. Lee
1277 Neighbors Avenue
Baltimore, Maryland 21237

THORNTON M. MOURING, P.E.
DIRECTOR

February 7, 1978

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

Re: Item #128 (1977-1978)
Property Owner: Estate of Mary C. Cremen
8/S Bay Front Rd. 190' E Lincoln Ave.
Existing Zoning: D.R. 5.5
Proposed Zoning: Variance to permit a distance of 11' between trailers and right-of-way line in lieu of the required 50' and 3' between trailers and property line in lieu of the required 15' and to permit 5' between trailers in lieu of the required 10' and 10' between trailers and office utility room in lieu of the required 20'.
Acres: 2.70 District: 15th

Dear Mr. DiNenna:

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.

Highways:

Bay Front Road, an existing public road, is proposed to be improved in the future as a 40-foot closed section roadway on the present 60-foot right-of-way. Any highway right-of-way widening necessary, including reversible easements for slopes, will be required in connection with any grading or building permit application.

The entrance locations are subject to approval by the Department of Traffic Engineering, and shall be constructed in accordance with Baltimore County standards.

Sediment Control:

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

Storm Drains:

Provisions for accommodating storm water or drainage have not been indicated on the submitted plan.

Item #128 (1977-1978)
Property Owner: Estate of Mary C. Cremen
Page 2
February 7, 1978

Storm Drains: (Cont'd)

The Petitioner must provide necessary drainage facilities (temporary or permanent) to prevent creating any nuisances or damages to adjacent properties, especially 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.

The property to be developed is located adjacent to the water front. The Petitioner is advised that the proper sections of the Baltimore County Building Code must be followed whereby elevation limitations are placed on first floor levels of residential and commercial development and other special construction features are required.

Water and Sanitary Sewer:

Public water supply and sanitary sewerage are serving this property. Although not indicated, there is an 8-inch public sanitary sewer traversing this property within a utility easement (Drawing #57-0271, File 1). The Petitioner is cautioned that no encroachment by construction of any structure, including footings, will be permitted within County rights-of-way or utility easements. During the course of any construction on this site, protection must be afforded by the contractor for the existing sanitary sewerage. Any damage sustained would be the full responsibility of the Petitioner. Additional fire hydrant protection is required in the vicinity.

Very truly yours,

Edward M. Dwyer, P.E.
ELLENWORTH H. DWYER, P.E.
Chief, Bureau of Engineering

END/EM:PM/les

cc: W. Munchel

J. Somers

A-NE Key Sheet
29 SE 31 West Sheet
SE 3 H Topo
111 Tax Map

STEPHEN E. COLLINS
DIRECTOR

March 17, 1978

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

Item No. 128 - ZAC - December 20, 1977
Property Owner: Estate of Mary C. Cremen
Location: 8/S Bay Front Rd. 190' E Lincoln Ave.
Existing Zoning: D.R. 5.5
Proposed Zoning: Variance to permit a distance of 11' between trailers and right of way line in lieu of the required 50' and 3' between trailers and property line in lieu of the required 15' and to permit 5' between trailers in lieu of the required 10' and 10' between trailers and office utility room in lieu of the required 20'.
Acres: 2.70
District: 15th

Dear Mr. DiNenna:

No increase in traffic generation is anticipated by the requested variance.

Very truly yours,

Michael S. Flanigan
Michael S. Flanigan
Traffic Engineer Associate

NEF/lms

DONALD J. ROOP, M.D., M.P.H.
DEPUTY STATE AND COUNTY HEALTH OFFICER

January 12, 1978

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

Dear Mr. DiNenna:

The following are comments on Item # 128, Zoning Advisory Committee Meeting of December 20, 1977:

Property Owner: Estate of Mary C. Cremen
Location: 8/S Bay Front Rd. 190' E Lincoln Ave.
Acres: 2.70
District: 15th

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

Very truly yours,

Thomas H. Devlin
Thomas H. Devlin, Director
BUREAU OF ENVIRONMENTAL SERVICES

TSD/KS/jp
SEC 35 118

Paul H. Reineke
CHIEF

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

Attention: N. Commodari, Chairman
Zoning Advisory Committee

Re: Property Owner: Estate of Mary C. Cremen

Location: 8/S Bay Front Rd. 190' E Lincoln Ave.

Item No. 128 Zoning Agenda Meeting of 12/20/77

Gentlemen:

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

- (x) 1. Fire hydrants for the referenced property are required and shall be located at intervals of 300 feet along an approved road in accordance with Baltimore County Standards as published by the Department of Public Works.
- () 2. A second means of vehicle access is required for the site.
- () 3. The vehicle dead end condition shown at _____ within the maximum allowed by the Fire Department.
- () 4. The site shall be made to comply with all applicable parts of the Fire Prevention Code prior to occupancy or beginning of operations.
- () 5. The buildings and structures existing or proposed on the site shall comply with all applicable requirements of the National Fire Protection Association Standard No. 101 "Life Safety Code", 1970 Edition prior to occupancy.
- () 6. Site plans are approved as drawn.
- () 7. The Fire Prevention Bureau has no comments, at this time.

REVIEWED BY: *dt/Plz* Noted and Approved: *George M. McGehee*
Planning Group Special Inspection Division Fire Prevention Bureau

JOHN D. SEIFERT
DIRECTOR

December 21, 1977

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

Dear Mr. DiNenna:

Comments on item #128 Zoning Advisory Committee Meeting, are as follows:

Property Owner: Estate of Mary C. Cremen
Location: 8/S Bay Front Road 190' E Lincoln Ave.
Existing Zoning: D.R. 5.5
Proposed Zoning: Variance to permit a distance of 11' between trailers and right of way line in lieu of the required 50' and 3' between trailers and property line in lieu of the required 15' and to permit 5' between trailers in lieu of the required 10' and 10' between trailers and office utility room in lieu of the required 20'.

Acres: 2.70

District: 15th

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.
- ☐ 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.
- ☐ 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 Building Department if distance is between 3'0" and 6'0" of property line.
- ☒ F. Comment. Additional Code requirements are listed in Section 425.0 of the Baltimore County Building Code.
- ☒ G. Requested setback variance conflicts with the Baltimore County Building Code. See Section 425.51.

Very truly yours,

Charles E. Burnham

Charles E. Burnham
Plans Review Chief
CER/jrj

BOARD OF EDUCATION
OF BALTIMORE COUNTY

TOWSON, MARYLAND - 21204

Date: December 28, 1977

Z.A.C. Meeting of: December 20, 1977

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

RE: Item No. 128
Property Owner: Estate of Mary C. Cremen
Location: 8/S Bay Front Rd. 190' E Lincoln Ave.
Present Zoning: D.R. 5.5
Proposed Zoning: Variance to permit a distance of 11' between trailers and right of way line in lieu of the required 50' and 3' between trailers and property line in lieu of the required 15' and to permit 5' between trailers in lieu of the required 10' and 10' between trailers and office utility room in lieu of the required 20'.

District: 15th
No. Acres: 2.70

Dear Mr. DiNenna:

No hearing on student population.

Very truly yours,

W. Nick Petrovich
W. Nick Petrovich,
Field Representative

JOSEPH M. HODGMAN, PRESIDENT
Y. BARAD, VICE-PRESIDENT
HARRISON J. HARRISON

THOMAS H. ROYER
MRS. LOU FINE, CHAIRMAN
ROBERT W. DUBEL, SUPERVISOR

ALVIN LORECE
MRS. WILTON R. SMITH, JR.
RICHARD W. TRACY, D.V.M.

OFFICE OF
THE TIMES
 NEWSPAPERS
 TOWSON, MD. 21204 March 30 1978

THIS IS TO CERTIFY, that the annexed advertisement of PETITION FOR VARIANCE & SPECIAL HEARING, Estate of Mary C. Cronan was inserted in the following:

- ☐ Catonsville Times
- ☐ Dundalk Times
- ☐ Essex Times
- ☐ Suburban Times East
- ☐ Towson Times
- ☐ Arbutus Times
- ☐ Community Times
- ☐ Suburban Times West

weekly newspapers published in Baltimore County, Maryland, once a week for one successive weeks before the 31st day of March 1978 that is to say, the same was inserted in the issues of March 30, 1978

STROMBERG PUBLICATIONS, INC.
 BY Edith Buga

CERTIFICATE OF PUBLICATION

TOWSON, MD. March 30 1978
 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 a week for one successive weeks before the 31st day of April 1978, the last publication appearing on the 30th day of March 1978

THE JEFFERSONIAN
Richard Smith
 Manager

Cost of Advertisement, \$.....

BALTIMORE COUNTY OFFICE OF PLANNING AND ZONING

County Office Building
 111 W. Crossapeake Avenue
 Towson, Maryland 21204

Your Petition has been received * this 8 day of Dec 1977. Filing Fee \$ 25.00 Received check
 _____ Cash
 _____ Other

S. Eric Dimenna
 Zoning Commissioner

Petitioner Mary C. Cronan Submitted by Stromberg

Petitioner's Attorney None Reviewed by Stromberg

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

CERTIFICATE OF POSTING ZONING DEPARTMENT OF BALTIMORE COUNTY Towson, Maryland

District 15 Date of Posting 2-7-78
 Posted for: Board of Appeals
 Petitioner: Cronan
 Location of property: _____
 Location of Sign: 315 Bay Forest Road 109'E of Lincoln Avenue
 Remarks: _____
 Posted by: G. Friedman Date of return: 2-7-78

CERTIFICATE OF POSTING ZONING DEPARTMENT OF BALTIMORE COUNTY Towson, Maryland

District 15 Date of Posting 3-30-78
 Posted for: Variances & Special Hearing
 Petitioner: Mary C. Cronan
 Location of property: 315 Bay Forest Road 109'E of Lincoln Avenue
 Location of Sign: Board of Appeals 315 Bay Forest Road
 Remarks: _____
 Posted by: Gary Friedman Date of return: 3-30-78

PETITION MAPPING PROGRESS SHEET

FUNCTION	Wall Map		Original		Duplicate		Tracing		200 Sheet	
	date	by	date	by	date	by	date	by	date	by
Descriptions checked and outline plotted on map										
Petition number added to outline										
Denied										
Granted by ZC, BA, CG, CA										

Reviewed by: Stromberg Revised Plans: _____
 Change in outline or description Yes _____ No _____
 Previous case: 315 Bay Forest Road Map # SC 3-H

BALTIMORE COUNTY, MARYLAND
 OFFICE OF FINANCE, REVENUE DIVISION
 MISCELLANEOUS CASH RECEIPT
 No. 65523
 DATE March 27, 1978 ACCOUNT 01-662
 AMOUNT \$25.00
 RECEIVED Messrs. Howard & Stone 6905 Dummerway, Dundalk, Md. 21222
 FOR Petition for Variances and Special Hearing for Estate of Mary C. Cronan - 78-222-APB
 250.00
 VALIDATION OR SIGNATURE OF CASHIER

BALTIMORE COUNTY, MARYLAND
 OFFICE OF FINANCE, REVENUE DIVISION
 MISCELLANEOUS CASH RECEIPT
 No. 65595
 DATE May 2, 1978 ACCOUNT 01-662
 AMOUNT \$79.95
 RECEIVED from Mary C. Cronan 7016 Dunhill Dr. Baltimore, Md. 21222
 FOR Posting & advertising property Case No. 78-222-APB
 79.95
 VALIDATION OR SIGNATURE OF CASHIER

BALTIMORE COUNTY, MARYLAND
 OFFICE OF FINANCE, REVENUE DIVISION
 MISCELLANEOUS CASH RECEIPT
 No. 73348
 DATE June 26, 1978 ACCOUNT 01-662
 AMOUNT \$10.00
 RECEIVED John V. Messian, III, Messian, People's Counsel
 FOR Cost of Appeal for Estate of Mary C. Cronan
 Case No. 78-222-APB
 10.00
 VALIDATION OR SIGNATURE OF CASHIER



