

Pursuant to the advertisement, posting of property, and public hearing on the above petition and it appearing that by reason of the following finding of facts:

the above Variance should be had; and it further appearing that by reason of:

a Variance should be granted.

IT IS ORDERED by the Zoning Commissioner of Baltimore County this

day of September, 1978, that the herein Petition for a Variance should be and the same is granted, from and after the date of this order.

Zoning Commissioner of Baltimore County

Pursuant to the advertisement, posting of property and public hearing on the above petition and it appearing that by reason of:

the above Variance should NOT BE GRANTED.

IT IS ORDERED by the Zoning Commissioner of Baltimore County, this day of September, 1978, that the above Variance be and the same is hereby DENIED.

Zoning Commissioner of Baltimore County



LESLIE H. GRANT
DIRECTOR

September 21, 1978

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

Dear Mr. DiNenna:

Comments on Item #13, Zoning Advisory Committee Meeting, July 25, 1978, are as follows:

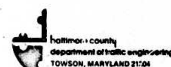
Property Owner: Endwood Holding Corp.
Location: SW/C Joppa Rd. & Prince Rd.
Existing Zoning: B.L.-C.C.C.
Proposed Zoning: Variance to permit 725 parking spaces in lieu of the required 821 spaces.
Acres: 14.6550
District: 9th

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.

A landscape plan must be provided. The Subdivision Regulations must be complied with.

Very truly yours,

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



STEPHEN S. COLLINS
DIRECTOR

July 28, 1978

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

Item No. 13 - SAC - Meeting of July 25, 1978
Property Owner: Endwood Holding Corp.
Location: SW/C Joppa Rd. & Prince Rd.
Existing Zoning: B.L.-C.C.C.
Proposed Zoning: Variance to permit 725 parking spaces in lieu of the required 821 spaces.
Acres: 14.6550
District: 9th

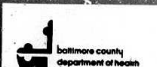
Dear Mr. DiNenna:

The requested variance to parking can be expected to cause parking problems in the area.

Sincerely yours,

Mike S. Flanagan
Mike S. Flanagan
Traffic Engineering Associate II

MSF/mjs



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

September 19, 1978

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

Dear Mr. DiNenna:

Comments on Item #13, Zoning Advisory Committee Meeting, July 25, 1978, are as follows:

Property Owner: Endwood Holding Corp.
Location: SW/C Joppa Rd. & Prince Rd.
Existing Zoning: B.L.-C.C.C.
Proposed Zoning: Variance to permit 725 parking spaces in lieu of the required 821 spaces.
Acres: 14.6550
District: 9th

The proposed variance should not pose any health hazards.

If a food service facility is proposed, complete plans and specifications must be submitted to the Division of Food Protection, Baltimore County Department of Health, for review and approval prior to construction.

Any new installation/s of fuel burning equipment should contact the Division of Air Pollution Control, 424-3775, to obtain requirements for such installation/s before work begins.

The parking area/s should be surfaced with a dustless, bonding material.

Very truly yours,

Thomas E. Devlin
Thomas E. Devlin, Director
BUREAU OF SANITARY SERVICES

TED/DEP/rhg

cc: J. J. Dieter
W. L. Phillips



Paul H. Helacke
CHIEF

July 27, 1978

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

Attention: N. Commodari, Chairman
Zoning Advisory Committee

Re: Property Owner: Endwood Holding Corp.

Location: SW/C Joppa Rd. & Prince Rd.

Item No. 13

Zoning Agenda Meeting of 07/25/78

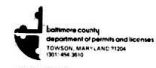
Comments:

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.

- () 1. Fire hydrants for the referenced property are required and shall be located at intervals of _____ 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 _____ exceeds 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.
- (x) 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", 1976 Edition prior to occupancy.
- () 6. Site plans are approved as drawn.
- () 7. The Fire Prevention Bureau has no comments at this time.

Planning Group
Special Inspection Division

Noted and Approved: *George M. Kagan*
Fire Prevention Bureau



JOHN S. SHERRY
DIRECTOR

August 15, 1978

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

Dear Mr. DiNenna:

Comments on Item # 13 Zoning Advisory Committee Meeting, July 25, 1978 are as follows:

Property Owner: Endwood Holding Corporation
Location: SW/C Joppa Rd. & Prince Rd.
Existing Zoning: B.L.-C.C.C.
Proposed Zoning: Variance to permit 725 parking spaces in lieu of the required 821 spaces

Acres: 14.6550
District: 9th

The items checked below are applicable:

- X A. Plans shall conform to Baltimore County Building Code (B.C.B.C.) 1976 Edition and the 1978 Supplement, State of Maryland Code for the Unincorporated and aged and other applicable codes.
- X B. A building permit shall be required before construction can begin.
- X C. Additional _____ permits may be required.
- D. Building shall be upgraded to new use - requires attention permit.
- E. Three sets of construction drawings will be required to file an application for a building permit.
- X F. 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.
- G. Wood frame walls are not permitted within 3'0" of a property line. Contact Building Department if distance is between 3'0" and 4'0" of property line.
- H. Requested setback variance conflicts with the Baltimore County Building Code. See Section _____.
- I. A. Comment: _____
- J. Comment: _____

Very truly yours,

Charles E. B. B.
Charles E. B. B.
Plans Review Chief

CEB/mjs

BOARD OF EDUCATION OF BALTIMORE COUNTY

TOWSON, MARYLAND - 21204

Date: July 21, 1978

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

Z.A.C. Meeting of: July 25, 1978

RE: Item No. 13
Property Owner: Endwood Holding Corp.
Location: SW/C Joppa Rd. & Prince Rd.
Present Zoning: B.L.-C.C.C.
Proposed Zoning: Variance to permit 725 parking spaces in lieu of the required 821 spaces.

District: 9th
No. Acres: 14.6550

Dear Mr. DiNenna:

No bearing on student population.

Very truly yours,

W. Nick Petrovich
W. Nick Petrovich,
Field Representative

JOHN W. HESLOP, PRESIDENT
Y. STANLEY WILLIAMS, JR., VICE-PRESIDENT
MARCOUS W. STANLEY

THOMAS E. DEVLIN
WILLIAM L. BRYAN, P. COMMISSIONER
ROBERT S. HAYSON

ALVIN LOROCK
WILLIAM L. BRYAN, JR.
ROBERT W. HAYSON, D.V.M.

RE: PETITION FOR VARIANCE
SW corner of Joppa Rd. and
Prince Rd., 9th District
OF BALTIMORE COUNTY

ELWOOD HOLDING CORPORATION
Petitioner

Case No. 79-127-A

ORDER TO ENTER APPEARANCE

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.

Peter Max Zimmerman
Peter Max Zimmerman
Deputy People's Counsel

John W. Heslop III
John W. Heslop, III
People's Counsel
County Office Building
Towson, Maryland 21204
494-2198

I HEREBY CERTIFY that on this 8th day of November, 1978, a copy of the foregoing Order was mailed to Newton A. Williams, Esquire, Nelson, Plunkhoff & Williams, 204 W. Pennsylvania Avenue, Towson, Maryland 21204, Attorney for Petitioner.

John W. Heslop III
John W. Heslop, III

RE: PETITION FOR VARIANCE
SW corner of Joppa and Prince
Roads - 9th Election District
Endwood Holding Corporation -
Petitioner
NO. 79-127-A (Item No. 13)

BEFORE THE
DEPUTY ZONING
COMMISSIONER
OF
BALTIMORE COUNTY

This matter comes before the Deputy Zoning Commissioner as a result of a Petition for Variance to permit 725 off-street parking spaces in lieu of the required 821 spaces, for an existing discount store and proposed restaurant, on property at the above location.

Testimony on behalf of the Petitioner indicated that Endwood Holding Corporation proposes to construct a "Sambo's Restaurant," approximately 4,573 square feet in size, on land which is presently used for parking. The proposed Variance represents about 12 percent of the total parking requirement, and the building, itself, would remove about 22 parking spaces. Further testimony indicated that this standardized building could not be constructed without the Variance.

Expert testimony by Mr. James D. Schroll, a transportation engineer and planner, indicated that his examination of the site showed that nearby Blue Cross & Blue Shield employees were using between 40 and 50 parking spaces without permission and that, "on a regular basis," less than one-third of the lot was used for parking.

A representative of Sambo's Restaurants testified that peak hours of operation would be from 7:00 A.M. to 9:00 A.M. and from 11:00 A.M. to 2:00 P.M. It was suggested that this would minimize the traffic and parking conflict in the area.

Nearby residents, in protest, stated they feared that the unwelcome parking of Blue Cross & Blue Shield employees would be difficult to remove,

that the proposed use would detract from the appearance of the nearby police memorial, and that over-flow traffic and parking would extend into residential areas.

Without reviewing the evidence further in detail but based upon all of the evidence presented at the hearing, in the judgment of the Deputy Zoning Commissioner, the prerequisites of Section 307 of the Baltimore County Zoning Regulations have been met and the health, safety, and general welfare of the community not being adversely affected, the Variance should be granted.

Therefore, IT IS ORDERED by the Deputy Zoning Commissioner of Baltimore County, this 11th day of January, 1979, that the Petition for Variance to permit 725 off-street parking spaces in lieu of the required 821 spaces, for an existing discount store and proposed restaurant, should be and the same is hereby GRANTED, from and after the date of this Order, subject to the approval of a site plan by the Department of Public Works, the Department of Traffic Engineering, and the Office of Planning and Zoning, to include landscaping approval by the Current Planning and Development Division.

[Signature]
Deputy Zoning Commissioner of
Baltimore County

IN THE MATTER OF
THE APPLICATION OF
ENDWOOD HOLDING CORP.
FOR VARIANCE FROM
SECTION 307 AND 409.26(4)
OF THE BALTIMORE COUNTY
ZONING REGULATIONS
SW CORNER OF JOPPA ROAD
AND PRINCE ROAD
9TH DISTRICT

BEFORE
COUNTY BOARD OF APPEALS
OF
BALTIMORE COUNTY
NO. 79-127-A

ORDER OF DENIAL

Petition of Endwood Holding Corporation, Sambo's Restaurant, Contract Purchase, for variance from 409.26(3) and 409.26(4) of the Baltimore County Zoning Regulations on property located on the southwest corner of Joppa Road and Prince Road in the Ninth Election District of Baltimore County.

WHEREAS, the Board of Appeals is in receipt of a Stipulated Order of Dismissal without Prejudice on Merits filed October 9, 1984, a copy of which is attached hereto and made a part hereof from the attorney representing the Petitioner in the above entitled matter; and

WHEREAS, the said attorney for the said Petitioner requests that the petition be dismissed without prejudice as to the merits as of October 9, 1984; and

WHEREAS, the said attorney for the said Petitioner also requests that a notation be made that no evidence was offered, nor was any hearing held and that the denial is not a denial on the merits after hearing.

IT IS HEREBY ORDERED this 11th day of October, 1984, that said petition be and the same is withdrawn and dismissed.

COUNTY BOARD OF APPEALS
OF BALTIMORE COUNTY

[Signature]
William S. Mackett, Chairman

[Signature]
John S. Pyle

[Signature]
Diana K. Vincent

ENDWOOD HOLDING CORPORATION
SW/C of Joppa Road and
Prince Road
9th District
Case No. 79-127-A

BEFORE THE
COUNTY BOARD OF APPEALS

STIPULATED ORDER OF DISMISSAL
WITHOUT PREJUDICE ON MERITS

Endwood Holding Corporation and Sambo's Restaurants, Restaurant Properties, Inc., by its attorneys, Newton A. Williams and Nolan, Plumbhoff and Williams, Chartered, Mr. Robert S. Stefan, individually and as President of the Towson Estates Community Association, by its attorneys Robert B. Karshaw and Quinn, Ward and Karshaw, and Phyllis C. Friedman, People's Counsel and Peter Max Zimmerman, Deputy People's Counsel, hereby stipulate that the above entitled parking variance case is hereby being discontinued by the Petitioner Endwood Holding Corporation, without a hearing or the offering of any evidence to the Board on the merits; and it is further stipulated and agreed that the requested parking variance of 725 off-street parking spaces for the required 821 off-street parking spaces shall be denied by stipulation by the County Board of Appeals for Baltimore County, with the notation that no evidence was offered, nor was any hearing held and that the denial is not a denial on the merits after hearing, and that the petition is being dismissed without prejudice as to the merits.

[Signature]
Newton A. Williams
NEWTON A. WILLIAMS

LAW OFFICE
NEWTON A. WILLIAMS
& WILLIAMS
CHARTERED
TOWSON, MD.

ORDER RECEIVED FOR FILING

DATE January 8, 1979
BY John D. Schroll

494-3180

County Board of Appeals
Room 219, Court House
Towson, Maryland 21204

June 25, 1980

NOTICE OF ASSIGNMENT

NO POSTPONEMENTS WILL BE GRANTED WITHOUT GOOD AND SUFFICIENT REASONS. REQUESTS FOR POSTPONEMENTS MUST BE IN WRITING AND IN STRICT COMPLIANCE WITH BOARD RULE 2(b). ABSOLUTELY NO POSTPONEMENTS WILL BE GRANTED WITHIN FIFTEEN (15) DAYS OF SCHEDULED HEARING DATE IN ACCORDANCE WITH RULE 5(c), COUNTY COUNCIL BILL 1109

CASE NO. 79-127-A

ENDWOOD HOLDING CORPORATION

Variance from Section 409.26(3) and 409.26(4) to permit 725 parking spaces in lieu of required 821 spaces

SW corner of Joppa Rd. and Prince Rd.
9th District

THURSDAY, JULY 31, 1980, at 10 a.m.

Counsel for Petitioner

ASSIGNED FOR:

for Newton A. Williams, Esq.

Robert S. Karshaw, Esq.

Mr. Robert S. Stefan

Ms. Margaret M. Davis

Dr. John MacLure

John W. Hession, Esq.

J. E. Dyer

W. E. Hammond

J. McNeill

Endwood Holding Corp.

Sambo's Restaurants

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

494-3180

COUNTY BOARD OF APPEALS
Room 219 Court House
Towson, Md. 21204

June 27, 1980

Hearing Room 218

NOTICE OF POSTPONEMENT

CASE NO. 79-127-A

ENDWOOD HOLDING CORPORATION

Variance from Sec. 409.26(3) and 409.26(4) to permit 725 parking spaces in lieu of required 821 spaces

SW corner of Joppa Rd. and Prince Rd.
9th District

Assigned for hearing on THURSDAY, JULY 31, 1980, at 10 a.m., has been

POSTPONED by the Board at the request of Counsel for the Petitioner.

for Newton A. Williams, Esq.

Robert S. Karshaw, Esq.

Mr. Robert S. Stefan

Ms. Margaret M. Davis

Dr. John MacLure

John W. Hession, Esq.

J. E. Dyer

W. E. Hammond

J. McNeill

Endwood Holding Corp.

Sambo's Restaurants

Counsel for Petitioner

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

494-3180

COUNTY BOARD OF APPEALS
Room 219 Court House
Towson, Md. 21204

January 24, 1980

Hearing Room 218

NOTICE OF POSTPONEMENT

CASE NO. 79-127-A

ENDWOOD HOLDING CORPORATION

Variance from Section 409.26(3) and 409.26(4) to permit 725 parking spaces in lieu of required 821 spaces

SW corner of Joppa Rd. and Prince Rd.
9th District

Assigned for hearing on TUESDAY, JANUARY 24, 1980, at 9 a.m., has been POSTPONED

by the Board at the request of Counsel for the Petitioner.

for Newton A. Williams, Esq.

Robert S. Karshaw, Esq.

Mr. Robert S. Stefan

Ms. Margaret M. Davis

Dr. John MacLure

John W. Hession, Esq.

Mr. J. E. Dyer

Mr. W. E. Hammond

Mr. J. O. Hession

Mr. Carl Karshaw

Endwood Holding Corp.

Sambo's Restaurants

Counsel for Petitioner

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

"Protestants"

Arne Holmen, Secretary

Arne Holmen, Secretary

Arne Holmen, Secretary

County Board of Appeals

Room 219 Court House
Towson, Maryland 21204
November 15, 1979

NOTICE OF POSTPONEMENT AND REASSIGNMENT

NO POSTPONEMENTS WILL BE GRANTED WITHOUT GOOD AND SUFFICIENT REASONS. REQUESTS FOR POSTPONEMENTS MUST BE IN WRITING AND IN STRICT COMPLIANCE WITH BOARD RULE 200. ABSOLUTELY NO POSTPONEMENTS WILL BE GRANTED WITHIN FIFTEEN (15) DAYS OF SCHEDULED HEARING DATE IN ACCORDANCE WITH RULE 200, COUNTY COUNCIL BILL #108

CASE NO. 79-127-A

EUDWOOD HOLDING CORPORATION

Variance - from Section 409.2a(3) and 409.2a(4) - to permit 725 parking spaces in lieu of required 821 spaces

SW corner of Joppa Road and Prince Road

9th District

Scheduled for hearing on Wednesday, January 9, 1980 at 10 a.m. has been

POSTPONED at the request of the attorney for the Petitioner (awaiting additional traffic studies) and

REASSIGNED FOR:

TUESDAY, MARCH 4, 1980 at 9 a.m.

cc: Newton A. Williams, Esq.

Counsel for Petitioner

Robert B. Kershaw, Esq.

Counsel for Protestants

Mr. Robert S. Stefan, President

Protestant

Towson Estates Community Assn.

Ms. Margaret M. Davis

Dr. John Menlove

John W. Hession, III, Esq.

People's Counsel

Mr. J. E. Dyer

Mr. W. E. Hammond

Mr. J. G. Harwell

Mrs. Carol Sarah

Eudwood Holding Corp. (Sent 11/19/79)

Samba's Restaurants (Sent 11/19/79)

Edith T. Elsenhart, Adm. Secretary

TLRCC

President
Harvey C. Byrd, III
Vice-President
George Fashien
Recording Secretary
Fred Schmidt
Corresponding Secretary
Bertie Lilly
Treasurer
John V. Perry, Jr.
Legal Counsel
Cyril B. Murphy, Jr.
Initiative Advisor

Mr. Eric Dikuma
Zoning Commissioner
County Office Building
Chesapeake Avenue
Towson, Maryland 21204

Dear Mr. Dikuma:

At its regular meeting held on December 11, 1978, the Officers and Board of Directors of the Towson-Loch Raven Community Council, Inc. voted to oppose the petition to reduce the parking requirements for the placement of a fast food restaurant on the corner of Goucher Boulevard and Joppa Road on the property currently utilized by "Ton Goya". Committee active in the membership of the Towson-Loch Raven Community Council endorsed the side and are very concerned regarding its proposed change in use. It is the position of the Towson-Loch Raven Community Council that the parking requirements should not be relaxed to permit use by a fast food restaurant for the following reasons:

1. There already exists a serious parking problem on the streets around the site caused by relaxing the parking requirements for Elm Cross. It should be noted that the site of the proposed restaurant is used as an overflow parking lot for Elm Cross employees currently and as even greater parking problem will be forthcoming if the County continues to allow relaxed parking requirements in this area of Towson.

2. The proposed restaurant use and the type of entrance to the site from Joppa Road will cause traffic congestion problems at the intersection of Goucher and Joppa. In addition, increased traffic will be generated on an already crowded street (Joppa) and at an intersection which during peak hours backs up traffic up Joppa Road beyond the entrance proposed for use by the restaurant.



County Board of Appeals

Room 219, Court House
Towson, Maryland 21204

October 29, 1979

NOTICE OF ASSIGNMENT

NO POSTPONEMENTS WILL BE GRANTED WITHOUT GOOD AND SUFFICIENT REASONS. REQUESTS FOR POSTPONEMENTS MUST BE IN WRITING AND IN STRICT COMPLIANCE WITH BOARD RULE 200. ABSOLUTELY NO POSTPONEMENTS WILL BE GRANTED WITHIN FIFTEEN (15) DAYS OF SCHEDULED HEARING DATE IN ACCORDANCE WITH RULE 200, COUNTY COUNCIL BILL #108

CASE NO. 79-127-A

EUDWOOD HOLDING CORPORATION

Variance - from Sec. 409.2a(3) and 409.2a(4) - to permit 725 parking spaces in lieu of required 821 spaces

SW corner Joppa Road and Prince Road

9th District

ASSIGNED FOR:

WEDNESDAY, JANUARY 9, 1980, at 10 a.m.

cc: Eudwood Holding Corp.

Petitioner

Newton A. Williams, Esq.

Counsel for Petitioner

Samba's Restaurants

Contract Purchaser

Robert B. Kershaw, Esq.

Counsel for Protestants

Mr. Robert S. Stefan, President

Protestant

Towson Estates Comm. Assn.

Ms. Margaret M. Davis

Dr. John Menlove

John W. Hession, III, Esq.

People's Counsel

Mr. James E. Dyer

Zoning

Mr. William Hammond

Mr. John Seyffer

Planning

Mrs. Carol Sarah

Ame Holmen, Secretary
County Board of Appeals

January 5, 1979
Mr. Eric Dikuma

3. The siting of a building on the property over-looking the Joppa and Goucher intersection will seriously affect the aesthetics surrounding the Police Memorial which was erected by the County at the base of the hill at the intersection. When considering all of the community's needs and the funds associated with the Police Memorial, it would certainly be degrading to have the site defaced by allowing the placement of a building at the crest of the hill overlooking it.

4. The proposed restaurant would operate on a 24 hour, 7 days a week basis which would cause hardships on the persons living nearest the site and subject these residents to noise and traffic at unreasonable times of the day and night which will have a tremendous negative impact on the residential neighborhood.

I certainly hope that our committee will receive your favorable consideration as your office considers the petitioner's request to reduce the parking requirements in this part of Towson which is already over-run with deficient parking services, where business and commercial patrons park on our streets.

Sincerely,

Harvey C. Byrd, III
President

RESUME OF JAMES D. SCHOLL

POSITION:

Transportation Engineer and Planner
Kidd Consultants, Inc.
1020 Crumell Bridge Road
Towson, Maryland

HOME ADDRESS:

1807 Park Avenue
Baltimore, Maryland

EDUCATION:

Bachelor of Science in Civil Engineering
The Ohio State University - 1975
Master of Science (Transportation Planning)
The Ohio State University - 1977
Various short courses and seminars

REGISTRATION:

E.I.T. No. 22978, Ohio, 1975

PROFESSIONAL AFFILIATIONS:

Institute of Transportation Engineers
American Society of Civil Engineers

SUMMARY OF TRAFFIC ENGINEERING EXPERIENCE:

Since joining Kidd Consultants, Inc. in 1977, I have worked on a wide range of projects. My primary responsibility is in the area of transportation planning and impact analysis. I have conducted traffic impact analyses for the Bloomsbury Avenue corridor in Baltimore County, Maryland, and for the Anne Arundel and Prince George's Counties, the Great Seneca Highway in Montgomery County, and three private developments, two in Anne Arundel County and one in Carroll County. In connection with the last project, I testified for the Westminster Department of Planning and Public Works at a public meeting.

In performing these studies I have conducted traffic counts, turning movement counts, confusion counts, intersection and roadway analyses, and inventories of physical conditions, traffic control devices, and parking. I have also designed and supervised an origin/destination study of some 2100 motorists in the Bloomsbury corridor, written reports, and designed graphic data representations.

In other areas, I have participated in a hazardous location study for Anne Arundel County, done traffic signal design in Baltimore, Carroll, and Anne Arundel Counties, provided signing services for U.S. Route 340 between Frederick, Maryland and West Virginia, and done site work for Edgewood Arsenal Chemical Warfare Laboratory facility.

My graduate career included a number of courses in city and regional planning in addition to transportation planning. My thesis was entitled "A Study of the Use of Designated Minimum Paths by Commuters". Since graduation, I have attended short courses covering Critical Lane Intersection Analysis, Traffic Signal Operation, Traffic Signal Systems and seminars on Maintenance of Traffic Through Construction, Legal Liability, and Transportation System Management.

The Honorable George J. Martinak
Deputy Zoning Commissioner
County Office Building
Towson, Maryland 21204

Dear Commissioner Martinak:

As a member of the Towson Estates Association and as a resident within that area, I am writing to request that the Baltimore County Zoning Commission reject the application for change in the zoning restrictions which change would allow the construction of a Samba's Restaurant at the corner of East Joppa Road and Goucher Boulevard. In making this request I ask you to consider the following:

- Parking.** The street-level portion of the corner does not have room for an adequate parking lot. While there might be sufficient space in the adjacent section of the Two Gays lot, that space is not available because Two Gays has closed its food store operation. If that operation or a similar venture should be reopened, the parking space would be insufficient. To compensate for the parking situation, the portion of the Two Gays lot in question is now being heavily used during the week, apparently by employees of Elm Cross who do not have adequate space to park nearer their building. If the Two Gays lot were to somehow be closed to them, the entire area would have to find on-street parking, most likely in nearby residential areas such as Towson Estates; such areas are neither designed to accommodate such traffic and parking patterns, nor are these neighborhoods in themselves used to such pressures.
- Appearance.** The Police Memorial is a tasteful and attractive feature of the corner in question. To put a restaurant - not to mention the lighted signs and other advertising prominently-behind the structure would spoil the appearance of the corner and defeat the intention of the Police Memorial itself to honor our Baltimore County Police.
- Safety and Health.** Many children within the general area cross Joppa Road to walk to school; this traffic will only be increased with the proposed closing of Towson Junior High School. Since a lot of this traffic crosses at Prince Road, the safety of this intersection will be even more of a problem if there is a influx of morning traffic associated with the restaurant. At the same time, the trash which is bound to be a part of the operation will add to the already existing trash problem, having to other places to live, will certainly find homes in the drain system of Towson Estates.
- Need.** There are already four restaurants in the Eudwood shopping area. Although none of them is open twenty-four hours-a-day, they appear to be more than enough to handle the existing need for food service. There are also two all-night restaurants within the general area: one at East Joppa Road and Loch Raven Boulevard, the other at York Road and Goucher Boulevard. (Neither of them is closely associated with a residential area.)
- General Character.** The entire Two Gays/Eudwood Plaza complex is not only shielded from the Towson Estates residential area by a high wall, all three now close by 10:00 PM. Late evening and night hours are quiet and traffic tends to be light. To set a restaurant out in the

Commissioner Martinak

open on such a corner as is proposed, to display the advertising sufficient to attract customers, and then to keep it operating all night long would greatly change the character of the business area. The inevitable noise and increased traffic would have an inevitable and negative effect for these residents in the immediate area. The property value of all nearby houses would have to be adversely affected. (Ask any home owner currently living in front of the Scott's Garden Center about the difficulty of even selling a home at any price when there is an existing a commercial venture nearby.) In the long run, the value of all homes within the Towson Estates neighborhood area would have to be adversely affected.

To summarize, neither I nor my neighbors want a Samba's Restaurant to be permitted to open business on the corner of East Joppa Road and Goucher Boulevard. Please do not allow such a damaging thing to happen. We look on the Baltimore County Zoning Commission as a body set up to protect our rights and our interests in our homes and neighborhoods. We expect such protection and have faith that the Commission will not ignore our trust and their duty.

Sincerely,

John D. Martinak
211 East Joppa Road
Towson, Maryland 21204
Phone: 82-5594

John D. Martinak
211 East Joppa Road
Towson, Maryland 21204



7/14/80
79-127-A
224 East Joppa Road
Towson, Maryland 21204
December 14, 1978

Dear Sirs:

As a resident of Towson Estates I would like to present my reasons for not wanting the granting of a parking variance enabling Sambo's to build a restaurant.

1. Rats---since the closing of the food store at Two Guys we have had only occasional encounters with rats. As the road drainage for the new Joppa Road flows into an open gully at the foot of our street, the rats travel freely into our neighborhood. As I have four small children, I hate to think of one of them being bitten by a rat. We are lucky in one respect, nature gave us rat snakes to eat the rats but that gives us two hazards for the children. While they tell us the snake bite is not poisonous, I still hate the thought of one of them biting my ten month old--or any of my others for that matter.

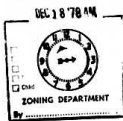
I realize this was not discussed at the hearing but those of us that attended were neophytes and found ourselves trying hard to absorb the opposition arguments.

As it is a real danger I ask you to consider it thoroughly.

2. Pollution---as our street is a dead end and off the traffic flow, it is a haven for loiterers. Right now our street is cluttered by broken beer bottles, cans, empty six pack cartons and used prophylactics. With a restaurant (Sambo's) open 24 hours, it is possible that these loiterers might take advantage of the availability of food to fortify themselves, and add more clutter to our neighborhood, in the way of paper wrappings and cups.

3. Flaws---at the hearing some of the experts mentioned that our houses are shielded from Two Guys by a tree filled park so we shouldn't see Two Guys, or the area in question for the restaurant. As a resident (who saw ten of these trees removed due to decay and not replaced, let me say first of all the trees don't have leaves from mid-fall to mid-spring leaving a good bit of time bare. Secondly, the leaves are at the top of the tree leaving the lower part always bare, and thirdly most of the lights that offend come through these bare spots. At night, any car exiting by way of the Joppa Road exit shines its headlights into my livingroom, which is most annoying when we try to watch television.

4. Noise---right now we hear the truck noise and the air-conditioner motor from Two Guys. These at least stop around ten so we



usually get some sleep---although we may be jarred awake by the refuse company dropping the dumpster!! the vibrations of which shake our homes. With a restaurant open 24 hours we will have the constant annoyance of traffic and other assorted noises. We purchased our home in this community because of its proximity to shopping and other facilities but also because it on the other hand was a quiet neighborhood & a good place to raise children.

5. Decorations---the police memorial now has the sky as a backdrop a perfect backdrop for flying tribute. (As one drives through Baltimore City, the monuments there are not set off by a commercial backdrop) To put a building behind this memorial would lessen its impact.

6. Need---should Two Guys ever open the unused portion of the store again, for whatever use, they would need all of the available parking space as the lot now stands. (They may they have no plans to do so, but who can tell---the potential is there. I had no plans to move to Maryland, but here I am) If Two Guys don't utilize it, but still the entire store to someone else who does utilize the building to its capacity---then all the parking spaces are needed!!

7. Convenience---while the experts who testified what they did not see people parking in Two Guys lot and walking over to Edgewood, I have seen them. With East Community store taking up many of the spaces in Edgewood people do use Two Guys.

8. Within Edgewood Shopping Area there are at least six places one can eat, with Roy Rogers restaurant just outside. Certainly another eatery is not needed.

The above are the reasons why I hope you decide not to allow the parking variance for Two Guys and the subsequent building of Sambo's.

Sincerely,

Margaret M. Lewis

The Hon. George J. Martens.

County Office Bldg.
Towson 21204

Re: Zoning of Two Guys.

My name is Bruce Adams and I am a home owner in Towson Estates living at 822 E. Joppa Rd. which is directly across the street from the proposed Sambo's fast food outlet.

I protest this rezoning on the following points.

Sambo's is a 24-hour operation with one of its busiest periods being after midnight until approx. 3 AM. There is the quietest part of the 24 hour period we would be subjected to banging car doors, racing motors, loud talk & laughter when I and my neighbors & the children are getting their sleep. Sambo's claim to be a family restaurant which is basically untrue. It is merely a fast food establishment with take & waiters service and a very limited menu.

12-16-78

There is a Ray Rogers a block away that was a fish fast food before and a Ray Rogers drive-in hamburger before that all operated by Monmouth but apparently unsuccessful. Ray Rogers is also a "family restaurant".

There would also be the possible problem of the trash odor & rodents.

The entrance to two guys parking lot is on a bad spot on the side of a grade up Joppa Rd. which would make it difficult for the extra traffic in & out as Joppa is already a busy street with its normal traffic.

Presently Blue Cross employees use that area covered by Sambo's and about 100 cars park there and should Two Guys make use of their now vacant food dept. the parking would be impossible.

Towson Estates was instrumental in building the memorial to the Baltimore County Police which is directly in front of Sambo's.

7/14/80
79-127-A
224 East Joppa Road
Towson, Maryland 21204
December 14, 1978

bill from the Sambo's proposed site. should a Sambo's or any other building be allowed it would tend to overshadow and demean this memorial & any new sign would certainly confuse the viewer.

For these reasons I respectfully submit that we do not need another fast food family restaurant that is open 24 hours only when there is a Howard Johnson a few blocks to the west on Joppa Rd & a Look Rave dinner a few blocks to the east on Joppa Rd. Both of these being open 24 hours a day.

It would not be democratic to inconvenience Towson Estates families and the house across Sambo's from the site so that we profit from my nation would be established.

Thank you for reading this letter. Yours truly, Bruce Adams

END-8000 HALLWAY OVER
Room 16.18

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

September 20, 1978

Nicholas B. Commodari, Chairman
Zoning Advisory Committee
Zoning Commissioner's Office
Baltimore County Office Building
Towson, Maryland 21204

Re: Probable Revised Parking Calculations for Parking Variance Case for Sambo's Restaurant Site at the Two Guys Center, Joppa Road and Goucher Boulevard, Baltimore County, Md.

Dear Mr. Commodari:

In accordance with our telephone conversation of September 14, it would appear that you are correct with regard to the need for revised parking calculations in this matter.

On Sheet C-3, the Sambo's Restaurant is shown as 70 feet in width on Goucher Boulevard by 66.33 feet in depth of 4,783.1 square feet. Similarly, the foyer scales at 1.1 feet by 8 feet, for a total of an additional 104 square feet. According to my calculations then, which I am asking your engineers and architects to verify, the square footage of the restaurant including the foyer is 4,887.1 square feet.

Thus, this square footage of 4,887.1 requires 98 spaces, at one space for each 50 square feet, rather than 92 spaces as shown on Sheet SV-1.

Adding the 98 spaces to the 729 spaces required by the existing Two Guys store operation brings the new required parking total to 827 spaces. According to Sheet SV-1, the site presently provides 725 parking spaces, and thus 725 spaces subtracted from 827 spaces would indicate a variance of 102 spaces for the entire site.

By copy of this letter to Sambo's, their engineers and architects, I am asking them to check and determine whether 1073 square feet as shown on Sheet SV-1, or rather



Page two - Nicholas B. Commodari - September 20, 1978

4783.1 square feet plus 104 square feet for the foyer, as shown on Sheet C-3 is correct.

It would appear that the more detailed Sheet, C-3, is correct, and as soon as definite word is received on this point we will be in touch with your office. Of course, as we all know, it is most important to post and advertise the property correctly, rather than discovering any problem at the building permit stage. At this stage the situation can be easily straightened out by filing 10 revised plans, presumably of Sheet SV-1, showing the correct calculation, and making five available to this office for use during the case. As soon as the case is available, we will be in touch. Thanking you for your interest, demonstrated by uncovering this possible discrepancy, I am, with best regards,

Sincerely,
Newton J. Williams
Newton A. Williams

NAM/nl
cc: Leonard Scamardo, Regional Manager
Real Estate Development
Restaurant Properties, Inc.
2720 Interpacific Parkway
Richmond, Virginia 23229

Franklin D. Rothenberg,
Asst. Vice Pres. for Real Estate
Vornado, Inc.
174 Passaic Street
Garfield, New Jersey 07076

Mark S. Segall, Vice President
Mr. Sid Hicks
Trot & Fox
5 East Redwood Street
Baltimore, Md. 21202

Greg E. Sawyer, A.I.A.
Sierra West Architects
51 S. Main Avenue, Suite 220
Clearwater, Florida 33513

Mr. Richard L. Smith
Mr. David Houston
Kiddie Consultants, Inc.
1020 Cromwell Bridge Road
Towson, Md. 21204

7/14/80

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

October 17, 1978

Nicholas B. Commodari, Chairman
Zoning Advisory Committee
Zoning Commissioner's Office
Baltimore County Office Building
Towson, Maryland 21204

Re: Proposed Revisions to Parking Calculations for Parking Variance Case for Sambo's Restaurant Site at the Two Guys Center, Joppa Road and Goucher Boulevard, Baltimore County, Maryland.
623 SPACES REQUIRED, 725 SPACES PROVIDED - REQUIRED VARIANCE 98 SPACES.

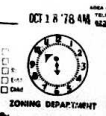
Dear Mr. Commodari:

Please refer to my letter of September 20, 1978 in this matter.

We have confirmed with Sambo's architects, Sierra West in Clearwater, Florida, that the correct dimensions of the proposed Sambo's at this location are as follows:

1. The main building is 65'4" x 70'; and
2. There is an enclosed foyer with double doors, approximately 8' x 13', and this additional 104 square feet, at 50 square feet per space raises the overall parking requirement for the restaurant from 82 spaces to 94 spaces; and
3. The correct calculations according to all the information which we have is that Two Guys requires 729 spaces, Sambo's requires an additional 94 spaces, for a total of 823 spaces and the Two Guys site provides 725 spaces, including four spaces in the existing 5' wide bays, which we are counting in our calculations.

Also, we presume from our conversations with you that there are no zoning Advisory Committee Comments requiring any other plat revisions - are we correct? As yet we have not received copies of the ZNC Comments.



cc: Robert B. Kershaw, Esq.
Ober, Grimes & Shriver
1600 Maryland National Bank Building
Baltimore, Md. 21202

Leonard Scamardo, Regional Mgr.
Real Estate Department
Restaurant Properties, Inc.
1760 The Exchange
Court Yard Building
Atlanta, Georgia 30329

Dear Stewart, Project Mgr.
Restaurant Properties, Inc.

Franklin D. Rothenberg,
Assistant Vice President
Real Estate
Vornado, Inc.
174 Passaic Street
Garfield, N. J. 07026

Mr. Robert Jeffries
Restaurant Properties, Inc.

Floyd Haines, District Mgr.
Two Guys
Joppa Road at Goucher
Towson, Md. 21204

Ken Poznaniak, Mgr.
Two Guys

Mark S. Segall, Vice Pres.
Mr. Sid Hicks
Trout & Fox
Five E. Redwood Street
Baltimore, Md. 21202

Bruce DeFelix, A.I.A.
Sierra West Architects
41 S. Main Ave., Suite 320
Clearwater, Florida 33513

Mr. Richard L. Smith
Mr. James Schollie
Kiddie Consultants, Inc.
1020 Cromwell Bridge Road
Towson, Maryland 21204

Mr. Hugh E. Gelston
202 W. Pennsylvania Ave.
Towson, Md. 21204

LAW OFFICES OF
NOLAN, PUMPHOFF & WILLIAMS
204 WEST PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204

JAMES D. NOLAN
J. EARLE PUMPHOFF
WILLIAM A. WILLIAMS
THOMAS J. REIDEN
MICHAEL A. HEDDER
STEPHEN J. HANLEY
ROBERT S. GILCHRIST, JR.

AREA CODE 301
TELEPHONE
823 7800

November 13, 1979

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

Re: Rudowood Holding Corporation, Case No. 79-127-A.
Scheduled Board Date Wednesday, January 9, 1980
at 10:00 A.M.

Dear Chairman Reiter:

In response to the Board's recent Notice of Assignment dated October 29, we have corresponded with all interested parties on the Petitioner's side of the case.

Two Guys in Towson has just completed a renovation of its store, and a renovation of the closed supermarket section will be taking place over the next ten to twelve weeks. A new supermarket operation is expected to open around February 1, 1979, and of course the parking situation must be studied by our traffic experts at Kiddie Consultants following this supermarket reopening.

Accordingly, we would respectfully request that in order to obtain this very vital data for the Board, that the scheduled January 1st hearing date be postponed until at least after March 1, in order that followup traffic studies may be made with the supermarket open.

Thanking the Board and all concerned for this important postponement in order to gather the traffic data, I am

Respectfully,

James D. Nolan
James D. Nolan

JDN/hl
cc: See next page:

*11/15/79 Had progress
Best plan. 11/15 at 7:00*

RECEIVED
BALTIMORE COUNTY
CLERK OF COURT
NOV 15 1979
11:15 AM

cc: Mrs. June Holman
Secretary, County Board of Appeals

Robert B. Kershaw, Esquire
Ober, Grimes & Shriver
1600 Maryland National Bank Building
Baltimore, Md. 21202

Leonard Scamardo, Regional Mgr.
Real Estate Department
Restaurant Properties, Inc.
1760 The Exchange
Court Yard Building
Atlanta, Georgia 30329

Dean Stewart, Project Mgr.
Restaurant Properties, Inc.
1760 The Exchange
Atlanta, Ga. 30329

Franklin D. Rothenberg,
Assistant Vice President
Real Estate
Vornado, Inc.

174 Passaic Street
Garfield, N. J. 07026

Mr. Robert Jeffries
Restaurant Properties, Inc.

Floyd Haines, District Mgr.
Two Guys
Joppa Road at Goucher
Towson, Md. 21204

Ken Poznaniak, Mgr.
Two Guys

Mark S. Segall, Vice Pres.
Mr. Sid Hicks
Trout & Fox
Five E. Redwood Street
Baltimore, Md. 21202

Bruce DeFelix, A.I.A.
Sierra West Architects
41 S. Main Ave., Suite 320

Mr. Richard L. Smith
Mr. James Schollie
Kiddie Consultants, Inc.
1020 Cromwell Bridge Road
Towson, Md. 21204

Mr. Hugh E. Gelston
202 W. Pennsylvania Ave.
Towson, Md. 21204

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

Re: Case No. 79-127-A, Rudowood Holding Corporation,
Parking Variance Case. Notification to the
Board and to the Petendants that Sambo's has
abandoned plans for this Two Guys Site, and
Consequent Postponement of Hearing for Tuesday,
March 4, 1980 at 9:00 A.M.

Dear Chairman Reiter:

In response to several recent letters directed to Sambo's, Two Guys and the commercial realtors involved, we have been informed by Two Guys and by the realtors that Sambo's Restaurants are in the process of a reorganization and have abandoned plans to place a restaurant on the Two Guys Site at Joppa and Goucher Boulevard.

We have communicated this abandonment to Mr. Kershaw, counsel for the protestants, primarily residents of the Towson Estates Community, and he is agreeable to a postponement of the scheduled hearing date for Tuesday, March 4, 1980 at 9:00 A.M.

Until a new user is found, preferably a less intensive and a non-twenty-four-hour-a-day user, we will not be able to tell either the protestants or the Board the details of our proposal. Furthermore, the possibility exists that if the new user is acceptable to the Towson Estates Community and to Mr. Kershaw, their counsel, that the need for a Board hearing will be obviated, since a variance more than sufficient to accommodate a less intensive user has already been granted by the Zoning Commission. Martinak's Opinion and Order of February 8, 1979.

RECEIVED
BALTIMORE COUNTY
CLERK OF COURT
NOV 17 1979
3:01 PM
11/23/80 - WAR grant
proposed

Accordingly, it will be greatly appreciated if the Board will remove the case from its docket for March 4th, and not reset the case unless requested to do so by counsel for either party in the matter.

Thanking the Board and counsel for their cooperation in this regard and assuring the Board and counsel for the protestants that we will inform them of any new developments, I am

Respectfully,

Newton A. Williams
Newton A. Williams

NAM:hl

cc: Leonard Scamardo, Regional Mgr.
Real Estate Department
Restaurant Properties, Inc.
1760 The Exchange
Court Yard Building
Atlanta, Georgia 30329

Franklin D. Rothenberg,
Assistant Vice President
Real Estate
Vornado, Inc.
174 Passaic Street
Garfield, N. J. 07026

Dean Stewart, Project Mgr.
Sambo's Restaurant Properties, Inc. Towson, Md. 21204
1760 The Exchange

Mr. Robert Jeffries
Sambo's Restaurant Properties, Inc.

Floyd Haines, District Mgr.
Two Guys
Joppa Road at Goucher
Towson, Md. 21204

Ken Poznaniak, Mgr.
Two Guys

Mark S. Segall, Vice Pres.
Trout & Fox
Five East Redwood Street
Baltimore, Md. 21202

10/25/79 - Notified the following of appeal hear. scheduled for WEDNESDAY, Jan. 9 at 10 a.m.

Eudowood Holding Corp.
Newton A. Williams, Esq.
Sambo's Restaurants
Robert B. Kershaw, Esq.
Robert S. Stefan
Mr. Margaret M. Davis
Dr. John Haskew
John Haskew
James Dyer

William Hammond
John Seiffert
Carol Beresh

*Disputed 11-5-79
By J. D. Williams*

11/15/79 - Above notified of POSTPONEMENT and REASSIGNMENT for TUESDAY, MARCH 4, 1980 at 9 a.m.

*11-15-79 NOTIFIED - EUDOWOOD HOLDING & SAMBO'S RESTAURANTS
NEWSPAPERS FORWARDED BY J. NOLAN
11-15-79*

11/15/79

Mr. Williams:

For attached copy of returned envelopes to both Eudowood Holding Corp. and Sambo's Restaurants marked "Address Unknown" and "Moved Left no Address", we did not send a copy of this Notice to either the Petitioner nor to the Contract Purchaser. If you have proper address, we would appreciate listing advised to us can correct our file. Thank you.

Edith T. Eisenhart

LAW OFFICES
NOLAN, PUMPHOFF & WILLIAMS
204 WEST PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204

J. EARLE PUMPHOFF
NOLAN & WILLIAMS
THOMAS J. REIDEN
MICHAEL A. HEDDER
STEPHEN J. HANLEY
ROBERT S. GILCHRIST, JR.

OF COUNSEL
RALPH E. GRIFF
3008 LUMBER ROAD
BALDWINSTOWN, MARYLAND 21033
(301) 882-2001

April 2, 1984

The Honorable William T. Hackett
Chairman, County Board of Appeals
Court House
Towson, Maryland 21204

Re: Status of the Rudowood Holding Corporation case, Case No. 79-127-A

Dear Chairman Hackett:

Confirming my recent conversation with a member of your staff, we have put forward a settlement proposal to Mr. Kershaw and his clients, but the President of the Towson Estates Improvement Association will be out of town until mid April.

Accordingly, as soon as I have heard from Mr. Kershaw and his clients, we will be in touch with the Board.

Thanking the Board and its staff for its consideration in this matter, I am

Respectfully,

Newton A. Williams
Newton A. Williams

NAM:ylm

cc: Robert B. Kershaw, Esquire
Mr. James J. Fallon
Mr. Richard Rowan

COMMUNICATIONS
APR 2 1984
APR 2 1984

LAW OFFICES
NOLAN, PUMPHOFF & WILLIAMS
204 WEST PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204

J. EARLE PUMPHOFF
NOLAN & WILLIAMS
THOMAS J. REIDEN
MICHAEL A. HEDDER
STEPHEN J. HANLEY
ROBERT S. GILCHRIST, JR.

February 3, 1984

The Honorable William T. Hackett
Chairman, County Board of Appeals
Room 219, Court House
Towson, Maryland 21204

Re: Disposition of the Eudowood Holding Corporation case, Case No. 79-127-A

Dear Chairman Hackett:

Confirming my telephone conversation of February 1, 1984, it is our understanding that the Board of Appeals wishes to dispose of this five year old matter one way or the other. We can readily understand the Board wishing to clear its docket, and we appreciate the Board's indulgence in the matter up to this point.

By carbon copy of this letter directed to Mr. Rowan at Vornado, Inc. we are asking that a final decision be made as to the status of this case. Of course this pending variance goes back to Commissioner Martinak's opinion and order of January 8, 1979, and Commissioner Martinak granted the order. Thus, if the case is to be abandoned and the variance disposed, it will be necessary for the Board to reset the matter, take no testimony and reverse the earlier decision by agreement of all parties.

As soon as we have heard from Mr. Rowan and Vornado, Inc. we will be promptly back in touch with the Board.

Respectfully,

Newton A. Williams
Newton A. Williams

NAM:lib

cc: Robert B. Kershaw, Esquire
Honorable Phyllis Friedman
Honorable Peter M. Zimmerman
Richard Rowan

Back to Mr. Hackett

baltimore county
office of planning and zoning
TOWSON, MARYLAND 21204
(301) 464-2343

S. ERIC DINENNA
ZONING COMMISSIONER
George J. Martinak
Deputy Zoning Commissioner

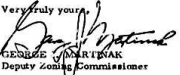
January 8, 1979

Newton A. Williams, Esquire
204 West Pennsylvania Avenue
Towson, Maryland 21204

RE: Petition for Variance
SW/corner of Joppa and Prince
Roads - 9th Election District
Edgewood Holding Corporation -
Petitioner
NO. 79-127-A (Item No. 13)

Dear Mr. Williams:

I have this date passed my Order in the above referenced matter,
in accordance with the attached.

Very truly yours,

GEORGE J. MARTINAK
Deputy Zoning Commissioner

GJm:mr

Attachments

cc: Mr. Robert S. Stefan
11 Edgewood Road
Towson, Maryland 21204

Ms. Margaret K. Davis
824 East Joppa Road
Towson, Maryland 21204

John W. Hession, III, Esquire
People's Counsel

Dr. John Manlove
814 East Joppa Road
Towson, Maryland 21204
→ Key phone
Call at
1-10-49
(copy of
order will be)

CERTIFICATE OF PUBLICATION

TOWSON, MD. November 2, 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., commencing
on the 1st day of November, 1978, before the 22nd
day of November, 1978, the 1978 publication
appearing on the 2nd day of November
1978.

THE JEFFERSONIAN

Manager

Cost of Advertisement, \$

baltimore county
office of planning and zoning
TOWSON, MARYLAND 21204
(301) 464-2343

S. ERIC DINENNA
ZONING COMMISSIONER

February 8, 1979

Newton A. Williams, Esquire
204 West Pennsylvania Avenue
Towson, Maryland 21204

RE: Petition for Variance
SW/corner of Joppa and Prince Roads
9th District
Edgewood Holding Corporation - Petitioner
No. 79-127-A (Item No. 13)

Dear Mr. Williams:

Please be advised that an appeal has been filed by Robert S. Kershaw, Esquire
in behalf of Mr. Robert S. Stefan, President, Towson Estates Community Association,
from the decision rendered by the Deputy Zoning Commissioner of Baltimore County
in the above referenced matter.

You will be notified of the date and time of the appeal hearing when it is
scheduled by the Baltimore County Board of Appeals.

Very truly yours,

S. ERIC DINENNA
Zoning Commissioner

SEE/MS

cc: Ms. Margaret K. Davis
824 East Joppa Road
Towson, Maryland 21204

Dr. John Manlove
814 East Joppa Road
Towson, Maryland 21204

John W. Hession, III, Esquire
People's Counsel

OFFICE OF
THE
TIMES
NEWSPAPERS
TOWSON, MD. 21204 November 9 1978

THIS IS TO CERTIFY that the annexed advertisement of
Petition for Variance - Edgewood Holding
Corporation
was inserted in the following:

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

weekly newspapers published in Baltimore County, Maryland,
once a week for one successive weeks before the
22nd day of November, 1978, that is to say, the same
was inserted in the issues of November 9, 1978

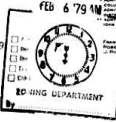
STROMBERG PUBLICATIONS, INC.

BY 

OBER, GRIMES & SHRIVER
ATTORNEYS AT LAW

1400 BALTIMORE NATIONAL BANK BUILDING
BALTIMORE, MARYLAND 21202
Telephone (301) 468-0900
Cable Address: "OBER"
Telex 8-7774
WASHINGTON, D.C. OFFICE
1725 K STREET, N.W.
WASHINGTON, D.C. 20007
Telex 17-1748-0500
Cable Address: "OBER"
Telex 8-7774

February 5, 1979



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

RE: Case No. 79-127-A
Petition of Edgewood Holding Corporation
for Variance - Southwest corner of Joppa
Road and Prince Road, 9th District

Dear Mr. Dinenna:

On behalf of our client, Towson Estates Community
Association and Robert S. Stefan, President of Towson
Estates Community Association, we hereby note our appeal
from the Order of the Deputy Zoning Commissioner of Baltimore
County dated January 8, 1979, in the captioned case.

Enclosed please find our check in the amount of \$50.00
to cover the cost of filing our appeal and posting the
property.

Thank you for your attention and cooperation in this
matter.

Very truly yours,

Robert B. Kershaw

RBR/bms

Enclosure

cc: Mr. Robert S. Stefan, President
Towson Estates Community Association
11 Edgewood Road
Towson, Maryland 21204

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

S. Eric Dinenna
Zoning Commissioner
TO: _____ Date: November 24, 1978
Leslie H. Graf
FROM: _____
Director of Planning
SUBJECT: _____
Petition 79-127-A, Item #13

Petition for Variance for off-street parking
Southwest corner of Joppa Road and Prince Road
Petitioner - Edgewood Holding Corporation

9th District

HEARING: Wednesday, November 29, 1978

This office shares the concerns expressed by the Department of Traffic
Engineering's representative to the Zoning Advisory Committee.

If this petition is granted, it is suggested that the applicant to and approval
of a detailed landscaping plan to the Current Planning and Development
Division be made a condition of the order.


Leslie H. Graf
Director of Planning

LHG/LJG:mw

Newton A. Williams, Esquire
204 W. Pennsylvania Avenue
Towson, Maryland 21204

NOTICE OF HEARING

Re: Petition for Variance, by/owner of Joppa Rd. & Prince Rd. - 9th District,
Edgewood Holding Corp. - Petitioner, Case No. 79-127-A

TIME: 11:00 A.M.

DATE: Wednesday, November 29, 1978

PLACE: ROOM 106 COUNTY OFFICE BUILDING, 111 W. CHESAPEAKE AVENUE,

TOWSON, MARYLAND


S. ERIC DINENNA
ZONING COMMISSIONER OF
BALTIMORE COUNTY

71-3792

Edgewood Holding Corp.
Nov. 24, 78

LETTERS OF
NULAK, PLAT 1007 & WILLIAMS
204 WEST PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204

October 30, 1978



Nicholas B. Commodari, Chairman
Zoning Advisory Committee
Zoning Commissioner's Office
County Office Building
Towson, Maryland 21204

Re: Perkins Variance Case for Sambo's Restaurant
Site at Two Guys Center, Towson, Joppa Road
and Goucher Boulevard, Baltimore County, Md.
CORRECT CALCULATION OF SPACES REQUIRED 821
SPACES. 725 SPACES PROVIDED (INCLUDING FOUR
SPACES IN SERVICE GARAGE AREA), REQUIRED
VARIANCE 96 SPACES.

Dear Mr. Commodari:

We have been informed by our client and by the archi-
tects that our letter of October 17, 1978, is erroneous.

The correct data is as follows:

1. The restaurant building is 65 feet 1 inches by 70
feet, 4573.1 square feet, and at one space for each 50 square
feet, requires 92 spaces.

2. There are no external enclosed foyers, and the
building is rectangular in shape, and the protrusions shown
on the north side of the building and the south side of the
building are retaining walls and planters, and are not en-
closed portions of the building. There had been a communi-
cation problem between the various parties involved regarding
this point, and I am assured that this is the correct infor-
mation.

3. As you know, our parking calculations as shown on
both sheets, (B-1 and C-3), include the four spaces which
located in the service garage area in the east end of the Two
Guys building, which were granted in Case 69-97-2A. A care-
ful count with Mr. Commodari on October 27 confirmed that
these four spaces are included in the 725 spaces provided and
the 821 spaces required, all according to Sheets B-1 and C-3,
prepared by Sierra West Architects and Sambo's local engineers,
Kilde Associates.

4. A conference with Mr. Dyer and Mr. Commodari confirmed that these 4 spaces, according to long standing zoning office policy, can be counted, and Mr. Dyer stated that even spaces within a car wash have been counted for parking purposes.

5. Based upon these assurances as to the propriety of counting the 4 spaces, and based upon the fact that the restaurant requires 92 spaces, as set out in paragraph 1, we believe that based on our factors at least there is no need for the plans to be revised; however, we have not seen all of the Zoning Advisory Committee Comments and are wondering if any revisions are required as a result of these comments?

6. If there is any doubt, we would prefer to advertise and post the case as requiring a variance of 100 spaces, 92 spaces required minus 72 spaces provided, equals 96 spaces plus the 4 in the service garage for a total of 100. However, if the Zoning Commissioner, the Deputy Zoning Commissioner, Mr. Dyer, Mr. Commodari and the Staff are all satisfied, we will be satisfied to proceed with a 96-space variance as presently requested.

It will be greatly appreciated if the contents of this letter will be reviewed, any ZAC comments requiring revisions being immediately brought to our attention and prompt arrangements made to advertise and post the case for a hearing. It will be appreciated if Mr. Commodari will call me regarding these matters before setting a hearing date.

Thanking everyone for their kind attention and review of this matter, I am

Respectfully,

Newton A. Williams
Newton A. Williams

NAM/hl
cc: See next page

cc: The Hon. S. Eric DiKenna
Zoning Commissioner
Baltimore County Office Building
Towson, Md. 21204

The Hon. George J. Martinak
Deputy Zoning Commissioner

Mr. James E. Dyer
Society Supervisor
Baltimore County Office Building
Towson, Md. 21204

Leonard Scamardo, Regional Manager
Real Estate Development
Restaurant Properties, Inc.
1760 The Exchange
Court Yard Building
Atlanta, Georgia 30329

Franklin D. Rothenberg,
Asst. Vice Pres. for Real Estate
Vornado, Inc.
174 Passaic Street
Garfield, New Jersey 07026

Mick S. Segall, Vice Pres.
Mr. Sid Ricks
5 East Redwood Street
Baltimore, Md. 21202

Bruce DeFelix, A.I.A.
Sierra West Architects
51 E. Main Ave., Suite 320
Clearwater, Fla. 33513

Mr. Richard L. Smith
Mr. David Mongan
Kilde Consultants, Inc.
1020 Cromwell Bridge Road
Towson, Md. 21204

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

S. Eric DiKenna
Zoning Commissioner
TO: Leslie H. Groat
FROM: Director of Planning
SUBJECT: Petition #79-127-A, Item #13

Date: November 24, 1978

Petition for Variance for off-street parking
Southwest corner of Joppa Road and Prince Road
Petitioner - Edgewood Holding Corporation

9th District

HEARING: Wednesday, November 29, 1978

This office shares the concerns expressed by the Department of Traffic Engineering's representative to the Zoning Advisory Committee.

If this petition is granted, it is suggested that the submittal to and approval of a detailed landscaping plan to the Current Planning and Development Division be made a condition of the order.

Leslie H. Groat
Leslie H. Groat
Director of Planning

LHGJGH:hw

CHIEF OF PLANNING AND ZONING
TOWSON, MARYLAND 21204
(410) 354-2551

DIRECTOR
ANNAPOLIS

November 22, 1978

Stephen A. Williams, Region
200 W. Pennsylvania Ave.
Towson, Md. 21204

Re: Petition for Variance
20/Annex Joppa Rd. & Prince Rd.
Edgewood Holding Corp. - Petitioner
Case No. 79-127-A

Dear Sir:

This is to advise you that \$11.35 is due for advertising and posting of the above property.

Please make check payable to Baltimore County, Maryland and remit to Mrs. Campagna, Room 113, County Office Building, Towson, Maryland 21204, before the hearing.

Very truly yours,

S. Eric DiKenna
S. Eric DiKenna
Zoning Commissioner

SSD/me

CERTIFICATE OF POSTING ZONING DEPARTMENT OF BALTIMORE COUNTY Towson, Maryland

78-127-A

District: 9 Date of Posting: 11/12
Posted for: *Edgewood Holding Corp.*
Petitioner: *Edgewood Holding Corp.*
Location of property: *Southwest corner of Joppa Rd. & Prince Rd.*
Location of Sign: *North side of Prince Rd. entrance to Town*
Sign posting area on West side of Joppa Rd. at Prince Rd.
Remarks: *See above* Date of return: 11/12

entrance to two sign posting area
③ *West side of Joppa Rd entrance to two sign posting area*

RESUME OF JAMES D. SCHROLL

POSITION: Transportation Engineer and Planner
Kilde Consultants, Inc.
1020 Cromwell Bridge Road
Towson, Maryland

HOME ADDRESS: 1407 Park Avenue
Baltimore, Maryland

EDUCATION: Bachelor of Science in Civil Engineering
The Ohio State University - 1975
Master of Science (Transportation Planning)
The Ohio State University - 1977
Various short courses and seminars

REGISTRATION: E.I.T. No. 22978, Ohio, 1975

PROFESSIONAL AFFILIATIONS: Institute of Transportation Engineers
American Society of Civil Engineers

SUMMARY OF TRAFFIC ENGINEERING EXPERIENCE:

Since joining Kilde Consultants, Inc. in 1977, I have worked on a wide range of projects. My primary responsibility is in the area of transportation planning and impact analysis. I have conducted traffic impact analyses for the Bloomsbury Avenue corridor in Baltimore County, Maryland Route 3 in Anne Arundel and Prince George's Counties, the Great Service Highway in Montgomery County, and three private developments, two in Anne Arundel County and one in Carroll County. In connection with the last project, I testified for the Westminster Department of Planning and Public Works at a public meeting.

In performing these studies I have conducted traffic counts, turning movement counts, composition counts, intersection and roadway analysis, and inventories of physical conditions, traffic control devices, and parking. I have also designed and supervised an origin/destination study of some 2100 motorists in the Bloomsbury corridor, written reports, and designed graphic data representations.

In other areas, I have participated in a hazardous location study for Anne Arundel County, done traffic signal design in Baltimore, Carroll, and Anne Arundel Counties, provided signing services for U.S. Route 30 between Frederick, Maryland and West Virginia, and done site work for Edgewood Animal Welfare Laboratory facility.

My graduate career included a number of courses in city and regional planning in addition to transportation planning. My thesis was entitled "A Study of the Use of Designated Minimal Paths by Commuters". Since graduation, I have attended short courses covering Critical Lane Intersection Analysis, Traffic Signal Operation, Traffic Signal Systems and seminars on Maintenance of Traffic Through Construction, Legal Liability, and Transportation Systems Management.

PETITION FOR VARIANCE

9th District
ZONING: Petition for Variance for off-street parking
LOCATION: Southwest corner of Joppa Road and Prince Road
DATE & TIME: Wednesday, November 29, 1978 at 11:00 A.M.
PUBLIC HEARING: Room 106, County Office Building, 111 W. Chesapeake Avenue, Towson, Maryland

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

Petition for Variance to increase 725 parking spaces in lieu of the required 820 parking spaces for an existing discount store and proposed restaurant

The Zoning Regulation to be exempted as follows:

Section 109-26(3)(6) - minimum off-street parking spaces required for restaurant and retail store

All that parcel of land in the Ninth District of Baltimore County

Being the property of Edgewood Holding Corporation, as shown on plat plan filed with the Register Department

Hearing Dates Wednesday, November 29, 1978 at 11:00 A.M.
Public Hearings Room 106, County Office Building, 111 W. Chesapeake Avenue, Towson, Md.

BY ORDER OF
S. ERIC DIKENNA, ZONING COMMISSIONER
AND
GEORGE J. MARTINAK, DEPUTY ZONING COMMISSIONER



Kilde Consultants, Inc. / ENGINEERS - ARCHITECTS - PLANNERS
1020 Cromwell Bridge Road
Towson, Maryland 21204
(410) 323-8800

To contact the writer direct call
(301) 321-

DESCRIPTION

14.6550 ACRE PARCEL, SOUTH SIDE OF JOPPA ROAD, WEST SIDE OF PRINCE ROAD, NORTHEAST SIDE OF GOUCHER BOULEVARD, NINTH ELECTION DISTRICT, BALTIMORE COUNTY, MARYLAND.

THIS DESCRIPTION IS FOR PARKING VARIANCE.

Beginning for the same on the south side of Joppa Road at the northwest end of the gusset line connecting said south side of Joppa Road with the west side of Prince Road, seventy feet wide, running thence along said gusset line, (1) S 20° 38' 48" E 28.63 feet, thence binding on the west and northwest side of said Prince Road three courses: (2) S 23° 38' 33" W 660.42 feet, (3) southeasterly, by a curve to the right with the radius of 270.67 feet, the arc distance of 222.61 feet, and (4) S 70° 45' 57" W 40.86 feet, thence along the gusset line connecting said northwest side of Prince Road with the northeast side of Goucher Boulevard, (5) N 65° 08' 49" W 79.00 feet, thence binding on said northeast side of Goucher Boulevard ten courses: (6) northeasterly, by a curve to the left with the radius of 1965.00 feet, the arc distance of 184.05 feet, (7) northeasterly, by a curve to the right with the radius of 89.00 feet, the arc distance of 29.48 feet, (8) northeasterly, by

OFFICES IN
Baltimore, Maryland
Chesapeake, Maryland
Hagerstown, Maryland
Lanham, Maryland
Pikesville, Maryland
Towson, Maryland
Washington, D.C.

KIDDE CONSULTANTS, INC.

Subsidiary of Water Kable & Company, Inc.

Case # 44-00000
Town # 1708
1500 Convent Boulevard
Baltimore, Maryland 21204
(301) 371-5000

Direct Dial Number
321-5542

November 16, 1978

Mr. Newton A. Williams
Holen, Plunkett, & Williams
204 W. Pennsylvania Avenue
Towson, Maryland 21204

Re: SAMBO'S PARKING STUDY
KCI J.O. No. 01-78069-A

Dear Mr. Williams:

We have reviewed the parking situation of the Two Guys Edwood store. We believe that the requested parking variance is entirely justified. Our report is as follows:

The site in question comprises approximately 14.655 acres and is bounded by Joppa Road, Prince Road, and Goucher Boulevard. There are three access points, one from each of the bounding roadways.

The existing 2-Guys building has a floor area of some 146,500 square feet, of which 146,137 square feet is devoted to retail area and 2,363 square feet to service area. According to Baltimore County zoning regulations, this site requires 723 parking spaces. There are presently some 747 parking spaces, including four service bay spaces. According to the Two Guys Management, the store is open between 10 a.m. and 9 p.m. The peak shopping period is between 7 and 9 p.m. with a secondary peak between 1 and 3:30 p.m.

In order to determine the usage of the existing parking lots, periodic counts were made of the number of parked cars throughout the day of November 9, 1978 and in the evening of November 14, 1978. By observing the parking patterns within the present lots, three distinct types of parking became readily identifiable. The parking spaces to the north (and a few to the east) of the building were primarily used by employees of 2-Guys. These parking areas located just south of the building were used mostly by 2-Guys patrons. To the west of the building, in the area of the proposed Sambo's site, the parking spaces were used almost exclusively by motorists with destinations other than 2-Guys. The attached table shows the volumes counted in each area throughout the day.

The western lot was filled by shortly after 8:00 a.m. It appears as though most of these parks are destined for the offices of Blue Cross, located between Joppa Road, Goucher Boulevard, and Providence Road. There was also evidence of a few car-pools forming in this lot, but the vast majority of motorists simply parked and walked toward blue Cross. These parks not only filled the western lot, they also parked at the ends of aisles and in the front lot.

Petitioner's Ex. 5

KIDDE CONSULTANTS, INC.

Subsidiary of Water Kable & Company, Inc.

November 16, 1978
Page Two

Re: SAMBO'S PARKING STUDY
KCI J.O. No. 01-78069-A

The northern, or rear, lot was used primarily by employees of 2-Guys. There were generally between 40 and 50 cars parked here. The peak usage occurred at 5:30 p.m., during the 2-Guys shift change.

The remainder of the parking appears to be mostly people destined for 2-Guys. There did not appear to be any spill over parking from the Edwood Shopping Center or Roy Rogers Restaurant. The peak usage occurred between 7 and 8 p.m. with a smaller peak in the early afternoon. The observed parking patterns coincide with Two Guys reported peak shopping periods.

Including the cars parked at the western end of the site, that is, those with destinations other than 2-Guys, the entire parking lot was never more than one-third full at any time of the day. If the extraneous parkers are removed from consideration, the lot was always at least three-quarters empty.

These counts, taken during the first half of November, reflect parking demands of average, or slightly above average, levels. According to Mr. Poznanlak, the 2-Guys store manager, the present 2-Guys work force consists of approximately 140 employees (total full and part-time). He stated that this number rises to about 175 before Christmas and falls to 125 during slower sales periods. He further indicated that the 40 to 60 cars parked behind the store represented typical employee parking volumes.

The proposed Sambo's Restaurant would be located at the westernmost corner of the parking lot. Primary access would be via the Joppa Road and Goucher Boulevard entrance. The building would comprise 523 square feet and require 92 parking spaces. The total required parking for Two Guys and Sambo's would be 821 spaces. Since only 723 spaces are proposed, a 98 space variance is required.

According to Sambo's management, Sambo's does a large breakfast trade between 7 and 9 a.m. Their secondary peak occurs between 11:30 and 2:00 p.m. and there is a light dinner trade between 6 and 7:30 p.m.

There should be no parking problem what-so-ever with the introduction of the Sambo's Restaurant. The location of the restaurant at the western end of the lot will discourage Blue Cross employees from parking in the Two Guys lot. A minimal enforcement effort should be able to reduce outside parkers to a minimum. The 723 parking spaces should be more than adequate. Even if 2-Guys' parking demand were to triple, there would still be some 240 spaces available to Sambo's (more than 2 1/2 times the zoning requirement).

The Sambo's parking should not interfere with Two Guys parking. The parking area that will serve Sambo's is now used by the quietest parkers, so there should be no conflict with Two Guys patrons. Further, since Sambo's peak period occurs before Two Guys opens, and Two Guys' peak occurs during a relatively light period for Sambo's, there will be little interference. Also, there would undoubtedly be many instances where shoppers patronize both establishments during one trip. These double purpose trips would serve to reduce the total parking demand somewhat.

KIDDE CONSULTANTS, INC.

Subsidiary of Water Kable & Company, Inc.

November 16, 1978
Page Three

Re: SAMBO'S PARKING STUDY
KCI J.O. No. 01-78069-A

In summary, the present Two Guys lot is greatly under-utilized. If outside parkers are removed, the lot appears to remain at least 75% used at all times. The proposed location of the Sambo's Restaurant is an area not presently used by Two Guys shoppers. There is more than adequate capacity in the parking lot for both uses, and there should be little interference between them.

In addition to the studies already undertaken, we intend to survey the parking lots on November 24, 1978, the day after Thanksgiving. This is traditionally one of the heaviest shopping days of the year. If, as we expect, the present parking lot is not fully utilized on that day, the case for allowing the parking variance will be further strengthened.

If we can provide any further information regarding our studies, please do not hesitate to contact us. We look forward to meeting with you tomorrow afternoon.

Sincerely,

KIDDE CONSULTANTS, INC.

Carol Schell
Carol Schell
JAMES B. SCHILL

JOS:11

79-127-A EUDWOOD HOLDING CORPORATION
PETITIONER'S EXHIBITS from DZC

KIDDE CONSULTANTS, INC.

Subsidiary of Water Kable & Company, Inc.

PARKING USAGE

TIME	DATE	FRONT ¹	REAR ²	WESTERN ³	TOTAL
7:15 a.m.	11/9/78	0	0	5	5
7:30 a.m.	11/9/78	0	0	20	20
7:45 a.m.	11/9/78	N.C.	N.C.	36	N.C.
8:00 a.m.	11/9/78	N.C.	N.C.	70	N.C.
8:15 a.m.	11/9/78	N.C.	N.C.	97	N.C.
8:30 a.m.	11/9/78	6	0	101	107
10:00 a.m.	11/9/78	26	32	109	174
10:15 a.m.	11/9/78	61	39	109	209
12:00 Noon	11/9/78	88	45	103	236
12:25 p.m.	11/9/78	92	46	112	240
1:50 p.m.	11/9/78	100	42	95	246
3:40 p.m.	11/9/78	53	48	96	197
5:10 p.m.	11/9/78	46	43	8	97
5:30 p.m.	11/9/78	46	60	3	109
6:30 p.m.	11/9/78	61	48	1	110
7:00 p.m.	11/14/78	120*	37	2	159
7:50 p.m.	11/14/78	131*	37	1	169

Notes:

- Includes spaces south of building and east of auto service area.
 - Includes spaces north of building and remainder of eastern spaces.
 - Includes spaces west of building and at western end of front lot. N.C. - No count made
- * Includes one car in service bay



A. LOOKING NORTHWEST FROM THE SAMBO'S SITE, SHOWING JOPPA ROAD AND GOUCHER BOULEVARD



B. LOOKING FROM THE WEST SIDE OF GOUCHER BOULEVARD AT SITE ENTRANCE (MARKED AS REMOVED)



C. LOOKING NORTHEAST FROM THE WEST SIDE OF GOUCHER AT THE WEST END OF TWO GUYS STORE



D. THE TWO GUYS SOUTHEAST ENTRANCE TO THE SOUTHERN AND WESTERN LOTS



E. THE TWO GUYS SOUTHEAST ENTRANCE TO THE SOUTHERN LOT AND WESTERN LOT



F. PRINCE ROAD LOOKING NORTH FROM NEAR THE TWO GUYS SITE



G. WESTERN END OF THE TWO GUYS LOT - PROPOSED SAMBO'S SITE LOOKING WEST



H. WESTERN END OF THE TWO GUYS LOT LOOKING NORTHWEST AT THE PROPOSED SAMBO'S SITE



I. THE TWO GUYS STORE AT ABOUT 4:00 P.M. - 1 AN AUTUMN, 1973 AFTERNOON



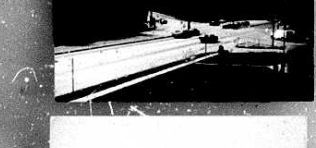
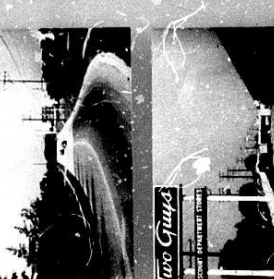
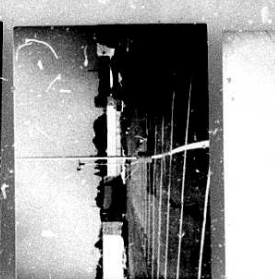
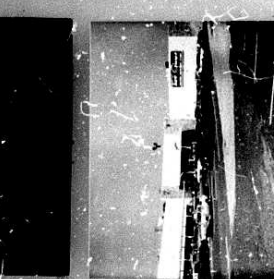
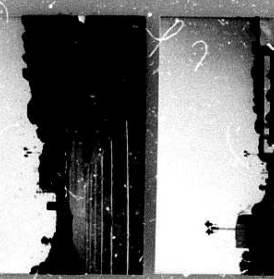
J. THE JOPPA ROAD TWO GUYS ENTRANCE CLOSEST TO THE PROPOSED SAMBO'S SITE



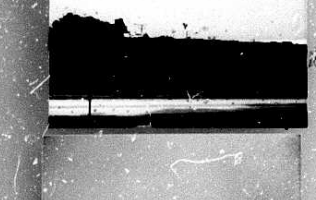
K. THE TWO GUYS ENTRANCE FROM NORTHBOUND GOUCHER BOULEVARD



L. THE INTERSECTION OF PRINCE ROAD AND GOUCHER BOULEVARD LOOKING INTO GOUCHER STREET, SHOWING APPROXIMATE



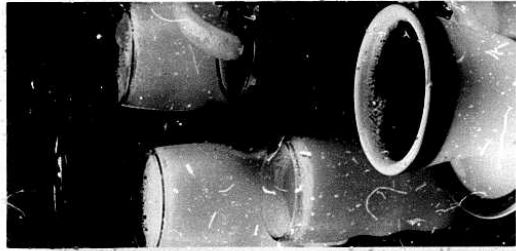
S. VIEW OF A ROAD INTERSECTION, LIKELY PRINCE ROAD AND GOUCHER BOULEVARD



T. VIEW OF A ROAD INTERSECTION, LIKELY PRINCE ROAD AND GOUCHER BOULEVARD



U. VIEW OF A ROAD INTERSECTION, LIKELY PRINCE ROAD AND GOUCHER BOULEVARD



Beverages

Size	Price
8 oz.	25
12 oz.	35
16 oz.	45
20 oz.	55
24 oz.	65
32 oz.	75
48 oz.	85
64 oz.	95
80 oz.	1.05
96 oz.	1.15
112 oz.	1.25
128 oz.	1.35
144 oz.	1.45
160 oz.	1.55
176 oz.	1.65
192 oz.	1.75
208 oz.	1.85
224 oz.	1.95
240 oz.	2.05
256 oz.	2.15
272 oz.	2.25
288 oz.	2.35
304 oz.	2.45
320 oz.	2.55
336 oz.	2.65
352 oz.	2.75
368 oz.	2.85
384 oz.	2.95
400 oz.	3.05
416 oz.	3.15
432 oz.	3.25
448 oz.	3.35
464 oz.	3.45
480 oz.	3.55
496 oz.	3.65
512 oz.	3.75
528 oz.	3.85
544 oz.	3.95
560 oz.	4.05
576 oz.	4.15
592 oz.	4.25
608 oz.	4.35
624 oz.	4.45
640 oz.	4.55
656 oz.	4.65
672 oz.	4.75
688 oz.	4.85
704 oz.	4.95
720 oz.	5.05
736 oz.	5.15
752 oz.	5.25
768 oz.	5.35
784 oz.	5.45
800 oz.	5.55
816 oz.	5.65
832 oz.	5.75
848 oz.	5.85
864 oz.	5.95
880 oz.	6.05
896 oz.	6.15
912 oz.	6.25
928 oz.	6.35
944 oz.	6.45
960 oz.	6.55
976 oz.	6.65
992 oz.	6.75
1008 oz.	6.85
1024 oz.	6.95
1040 oz.	7.05
1056 oz.	7.15
1072 oz.	7.25
1088 oz.	7.35
1104 oz.	7.45
1120 oz.	7.55
1136 oz.	7.65
1152 oz.	7.75
1168 oz.	7.85
1184 oz.	7.95
1200 oz.	8.05
1216 oz.	8.15
1232 oz.	8.25
1248 oz.	8.35
1264 oz.	8.45
1280 oz.	8.55
1296 oz.	8.65
1312 oz.	8.75
1328 oz.	8.85
1344 oz.	8.95
1360 oz.	9.05
1376 oz.	9.15
1392 oz.	9.25
1408 oz.	9.35
1424 oz.	9.45
1440 oz.	9.55
1456 oz.	9.65
1472 oz.	9.75
1488 oz.	9.85
1504 oz.	9.95
1520 oz.	10.05
1536 oz.	10.15
1552 oz.	10.25
1568 oz.	10.35
1584 oz.	10.45
1600 oz.	10.55
1616 oz.	10.65
1632 oz.	10.75
1648 oz.	10.85
1664 oz.	10.95
1680 oz.	11.05
1696 oz.	11.15
1712 oz.	11.25
1728 oz.	11.35
1744 oz.	11.45
1760 oz.	11.55
1776 oz.	11.65
1792 oz.	11.75
1808 oz.	11.85
1824 oz.	11.95
1840 oz.	12.05
1856 oz.	12.15
1872 oz.	12.25
1888 oz.	12.35
1904 oz.	12.45
1920 oz.	12.55
1936 oz.	12.65
1952 oz.	12.75
1968 oz.	12.85
1984 oz.	12.95
2000 oz.	13.05
2016 oz.	13.15
2032 oz.	13.25
2048 oz.	13.35
2064 oz.	13.45
2080 oz.	13.55
2096 oz.	13.65
2112 oz.	13.75
2128 oz.	13.85
2144 oz.	13.95
2160 oz.	14.05
2176 oz.	14.15
2192 oz.	14.25
2208 oz.	14.35
2224 oz.	14.45
2240 oz.	14.55
2256 oz.	14.65
2272 oz.	14.75
2288 oz.	14.85
2304 oz.	14.95
2320 oz.	15.05
2336 oz.	15.15
2352 oz.	15.25
2368 oz.	15.35
2384 oz.	15.45
2400 oz.	15.55
2416 oz.	15.65
2432 oz.	15.75
2448 oz.	15.85
2464 oz.	15.95
2480 oz.	16.05
2496 oz.	16.15
2512 oz.	16.25
2528 oz.	16.35
2544 oz.	16.45
2560 oz.	16.55
2576 oz.	16.65
2592 oz.	16.75
2608 oz.	16.85
2624 oz.	16.95
2640 oz.	17.05
2656 oz.	17.15
2672 oz.	17.25
2688 oz.	17.35
2704 oz.	17.45
2720 oz.	17.55
2736 oz.	17.65
2752 oz.	17.75
2768 oz.	17.85
2784 oz.	17.95
2800 oz.	18.05
2816 oz.	18.15
2832 oz.	18.25
2848 oz.	18.35
2864 oz.	18.45
2880 oz.	18.55
2896 oz.	18.65
2912 oz.	18.75
2928 oz.	18.85
2944 oz.	18.95
2960 oz.	19.05
2976 oz.	19.15
2992 oz.	19.25
3008 oz.	19.35
3024 oz.	19.45
3040 oz.	19.55
3056 oz.	19.65
3072 oz.	19.75
3088 oz.	19.85
3104 oz.	19.95
3120 oz.	20.05
3136 oz.	20.15
3152 oz.	20.25
3168 oz.	20.35
3184 oz.	20.45
3200 oz.	20.55
3216 oz.	20.65
3232 oz.	20.75
3248 oz.	20.85
3264 oz.	20.95
3280 oz.	21.05
3296 oz.	21.15
3312 oz.	21.25
3328 oz.	21.35
3344 oz.	21.45
3360 oz.	21.55
3376 oz.	21.65
3392 oz.	21.75
3408 oz.	21.85
3424 oz.	21.95
3440 oz.	22.05
3456 oz.	22.15
3472 oz.	22.25
3488 oz.	22.35
3504 oz.	22.45
3520 oz.	22.55
3536 oz.	22.65
3552 oz.	22.75
3568 oz.	22.85
3584 oz.	22.95
3600 oz.	23.05
3616 oz.	23.15
3632 oz.	23.25
3648 oz.	23.35
3664 oz.	23.45
3680 oz.	23.55
3696 oz.	23.65
3712 oz.	23.75
3728 oz.	23.85
3744 oz.	23.95
3760 oz.	24.05
3776 oz.	24.15
3792 oz.	24.25
3808 oz.	24.35
3824 oz.	24.45
3840 oz.	24.55
3856 oz.	24.65
3872 oz.	24.75
3888 oz.	24.85
3904 oz.	24.95
3920 oz.	25.05
3936 oz.	25.15
3952 oz.	25.25
3968 oz.	25.35
3984 oz.	25.45
4000 oz.	25.55
4016 oz.	25.65
4032 oz.	25.75
4048 oz.	25.85
4064 oz.	25.95
4080 oz.	26.05
4096 oz.	26.15
4112 oz.	26.25
4128 oz.	26.35
4144 oz.	26.45
4160 oz.	26.55
4176 oz.	26.65
4192 oz.	26.75
4208 oz.	26.85
4224 oz.	26.95
4240 oz.	27.05
4256 oz.	27.15
4272 oz.	27.25
4288 oz.	27.35
4304 oz.	27.45
4320 oz.	27.55
4336 oz.	27.65
4352 oz.	27.75
4368 oz.	27.85
4384 oz.	27.95
4400 oz.	28.05
4416 oz.	28.15
4432 oz.	28.25
4448 oz.	28.35
4464 oz.	28.45
4480 oz.	28.55
4496 oz.	28.65
4512 oz.	28.75
4528 oz.	28.85
4544 oz.	28.95
4560 oz.	29.05
4576 oz.	29.15
4592 oz.	29.25
4608 oz.	29.35
4624 oz.	29.45
4640 oz.	29.55
4656 oz.	29.65
4672 oz.	29.75
4688 oz.	29.85
4704 oz.	29.95
4720 oz.	30.05
4736 oz.	30.15
4752 oz.	30.25
4768 oz.	30.35
4784 oz.	30.45
4800 oz.	30.55
4816 oz.	30.65
4832 oz.	30.75
4848 oz.	30.85
4864 oz.	30.95
4880 oz.	31.05
4896 oz.	31.15
4912 oz.	31.25
4928 oz.	31.35
4944 oz.	31.45
4960 oz.	31.55
4976 oz.	31.65
4992 oz.	31.75
5008 oz.	31.85
5024 oz.	31.95
5040 oz.	32.05
5056 oz.	32.15
5072 oz.	32.25
5088 oz.	32.35
5104 oz.	32.45
5120 oz.	32.55
5136 oz.	32.65
5152 oz.	32.75
5168 oz.	32.85
5184 oz.	32.95
5200 oz.	33.05
5216 oz.	33.15
5232 oz.	33.25
5248 oz.	33.35
5264 oz.	33.45
5280 oz.	33.55
5296 oz.	33.65
5312 oz.	33.75
5328 oz.	33.85
5344 oz.	33.95
5360 oz.	34.05
5376 oz.	34.15
5392 oz.	34.25
5408 oz.	34.35
5424 oz.	34.45
5440 oz.	34.55
5456 oz.	34.65
5472 oz.	34.75
5488 oz.	34.85
5504 oz.	34.95
5520 oz.	35.05
5536 oz.	35.15
5552 oz.	35.25
5568 oz.	35.35
5584 oz.	35.45
5600 oz.	35.55
5616 oz.	35.65
5632 oz.	35.75
5648 oz.	35.85
5664 oz.	35.95
5680 oz.	36.05
5696 oz.	36.15
5712 oz.	36.25
5728 oz.	36.35
5744 oz.	36.45
5760 oz.	36.55
5776 oz.	36.65
5792 oz.	36.75
5808 oz.	36.85
5824 oz.	36.95
5840 oz.	37.05
5856 oz.	37.15
5872 oz.	37.25
5888 oz.	37.35
5904 oz.	37.45
5920 oz.	37.55
5936 oz.	37.65
5952 oz.	37.75
5968 oz.	37.85
5984 oz.	37.95
6000 oz.	38.05
6016 oz.	38.15
6032 oz.	38.25
6048 oz.	38.35
6064 oz.	38.45
6080 oz.	38.55
6096 oz.	38.65
6112 oz.	38.75
6128 oz.	38.85
6144 oz.	38.95
6160 oz.	39.05
6176 oz.	39.15
6192 oz.	39.25
6208 oz.	39.35
6224 oz.	39.45
6240 oz.	39.55
6256 oz.	39.65
6272 oz.	39.75
6288 oz.	39.85
6304 oz.	39.95
6320 oz.	40.05
6336 oz.	40.15
6352 oz.	40.25
6368 oz.	40.35
6384 oz.	40.45
6400 oz.	40.55
6416 oz.	40.65
6432 oz.	40.75
6448 oz.	40.85
6464 oz.	40.95
6480 oz.	41.05
6496 oz.	41.15
6512 oz.	41.25
6528 oz.	41.35
6544 oz.	41.45
6560 oz.	41.55
6576 oz.	41.65
6592 oz.	41.75
6608 oz.	41.85
6624 oz.	41.95
6640 oz.	42.05
6656 oz.	42.15
6672 oz.	42.25
6688 oz.	42.35
6704 oz.	42.45
6720 oz.	42.55
6736 oz.	42.65
6752 oz.	42.75
6768 oz.	42.85
6784 oz.	42.95
6800 oz.	43.05
6816 oz.	43.15
6832 oz.	43.25
6848 oz.	43.35
6864 oz.	43.45
6880 oz.	43.55
6896 oz.	43.65
6912 oz.	43.75
6928 oz.	43.85
6944 oz.	43.95
6960 oz.	44.05
6976 oz.	44.15
6992 oz.	44.25
7008 oz.	44.35
7024 oz.	44.45
7040 oz.	44.55
7056 oz.	44.65
7072 oz.	44.75
7088 oz.	44.85
7104 oz.	44.95
7120 oz.	45.05
7136 oz.	45.15
7152 oz.	45.25
7168 oz.	45.35
7184 oz.	45.45
7200 oz.	45.55
7216 oz.	45.65
7232 oz.	45.75
7248 oz.	45.85
7264 oz.	45.95
7280 oz.	46.05
7296 oz.	46.15
7312 oz.	46.25
7328 oz.	46.35
7344 oz.	46.45
7360 oz.	46.55
7376 oz.	46.65
7392 oz.	46.75
7408 oz.	46.85
7424 oz.	46.95
7440 oz.	47.05
7456 oz.	47.15
7472 oz.	47.25
7488 oz.	47.35
7504 oz.	47.45
7520 oz.	47.55
7536 oz.	47.65
7552 oz.	47.75
7568 oz.	47.85
7584 oz.	47.95

60	Onion rings	60	Tossed green salad
45	French fries	50	Soup of the day
45	Hash browns	45	Vegetable of the day
40	Potato salad	55	Meat (in season)
35	Coleslaw	35	Cottage cheese
35	Burger patty	50	Half grapefruit
40	Hard-boiled egg	65	Tomato slices (6)

Sambo's hamburgers are made with large, 100% pure beef patties, grilled to order, served on a toasted bun, with tomato, lettuce, onion, pickles and our special 'frosting. Served alone or on request. Tossed green salads come with your choice of 'les Cheeks, Thousand Island, French or Old & Vinegar dressing.

1.90	Hamburger deluxe	1.95	Hamburger combo
2.15	With 2 sides united cheese	1.90	Hamburger, tomato green salad, French fries
	With 2 sides united cheese	1.25	Hamburger deluxe
	With 2 sides united cheese	2.10	Hamburger, tomato green salad, French fries
	With 2 sides united cheese	1.65	Hamburger deluxe
	With 2 sides united cheese	2.50	Hamburger, tomato green salad, French fries
	With 2 sides united cheese	2.65	Hamburger deluxe
	With 2 sides united cheese	2.05	Hamburger, tomato green salad, French fries
	With 2 sides united cheese	1.80	Hamburger deluxe
	With 2 sides united cheese	1.95	Hamburger, tomato green salad, French fries

New York steak sandwich	3.10
Thin hot steak or butterflied tenderloin with $\frac{1}{2}$ inch fries	
With tossed green salad	3.65
Extra sandwich	2.25
Extra large ground beef steak covered with cheese, served open-faced on toast, with French fries	2.70
With tossed green salad	1.85
Patty melt	
Beef patty with American or Swiss cheese, grilled in ry, with coleslaw or French fries	2.30
With tossed green salad	1.85
Tuna melt	
Tuna salad with Swiss or American cheese, served on ry, with coleslaw or French fries	2.40
Grilled on ry, with coleslaw or French fries	2.40

Served on white, whole wheat or rye bread.
In your choice of coldcut or potato salad.

Ham stack 1.60
Thinly sliced ham stacked deli-style

Ham & Swiss 1.75
Thinly sliced ham stacks deli-style, with
two slices of Swiss cheese

B.L.T. 1.35
Toasted bread with bacon, lettuce & tomato
grilled ham or bacon with cheese 1.70
Served with your choice of American
or Swiss cheese

ave soup of the day with any sandwich
for only 40 more. Ask your waitress
for today's selection.

With chopped onion on request	1.10
With diced cheese	1.10

193 diced chicken

Soft Drink	Price
Coca-Cola	.25
Lemonade	.25
Milk	.30
Chocolate Milk	.30

Other Soft Drinks .25 .30 .40

Ice Cream Sundae
Delicious chocolate or strawberry

Ask for your Tiger Birthday Club application.

Fish fillet plate 1.90
Fried fillet in cream fat, tartar sauce, melba toast, cottage cheese and choice of sliced peaches or tomatoes

Beef patty plate 1.80
Fried patty, melba toast, cottage cheese and choice of sliced peaches or tomatoes

Enhance your meal with chilled fruit or juice.
 Melon (in season) .55 Half grapefruit

Reg. .45 Large .60

All our delicious salads are served with your choice of Bleu Cheese, Thousand Island, French or Oil & Vinegar dressing. Dinner bread on request.

2.10
Large
slices and hard-boiled egg

Large
and hard-boiled egg

chilled peaches and cottage cheese as a bag of
crisp lettuce

Ex. 11, Vol. 3A

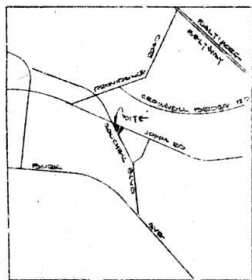
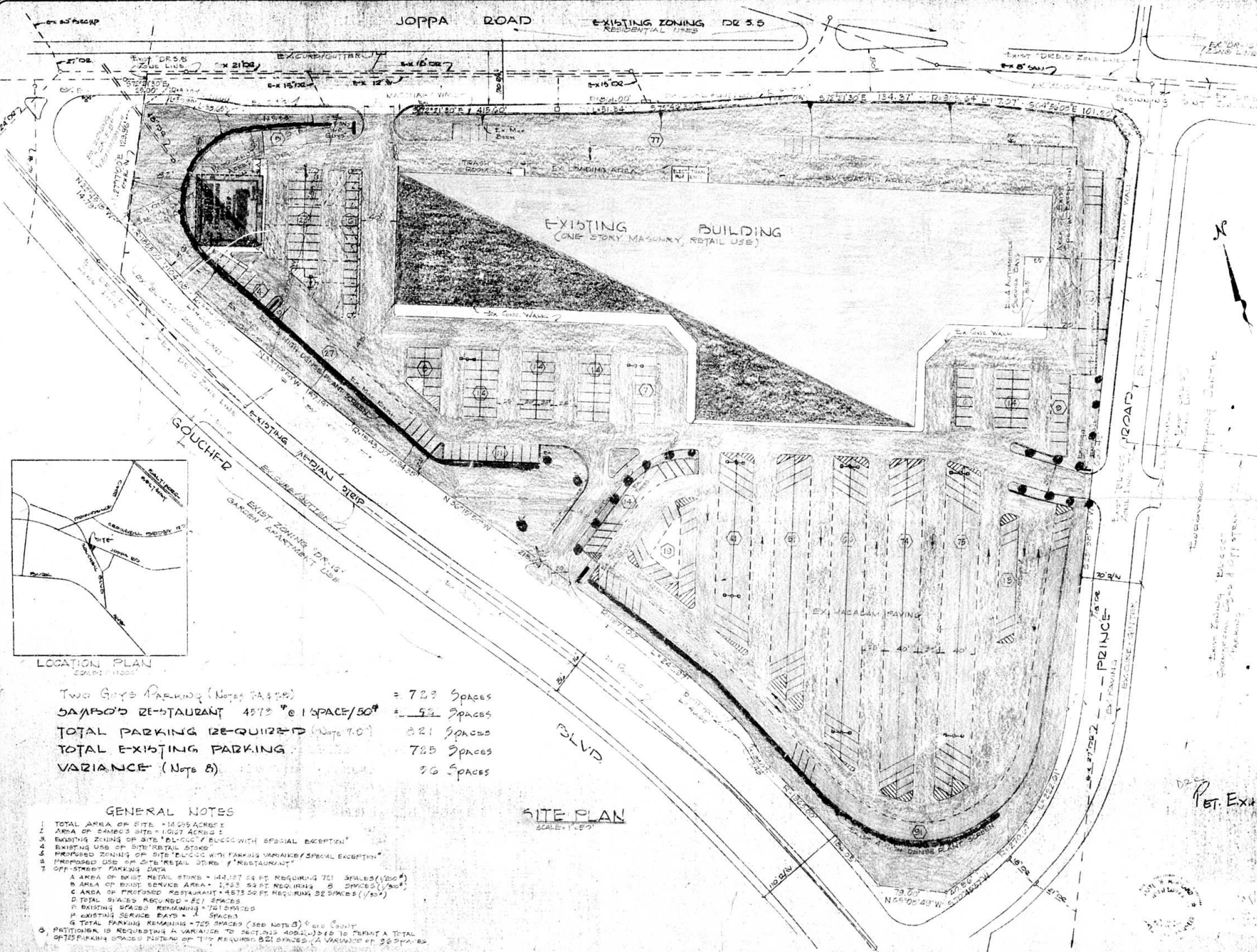
7

Soft Drink	Price
Coca-Cola	.25
Lemonade	.25
Milk	.30
Chocolate Milk	.30

Other Soft Drinks .25 .30 .40

Ice Cream Sundae
Delicious chocolate or strawberry

Ask for your Tiger Birthday Club application.



LOCATION PLAN
22.1.2 - 1120

TWO GUYS PARKING (Notes 1A, 1B)	= 723 Spaces
SAMBO'S RESTAURANT 4573 @ 1 SPACE/50'	= 52 Spaces
TOTAL PARKING REQUIRED (Note 7.0)	821 Spaces
TOTAL EXISTING PARKING	723 Spaces
VARIANCE (Note 8)	98 Spaces

GENERAL NOTES

- TOTAL AREA OF SITE = 11.05 ACRES
- AREA OF EXISTING SITE = 1.017 ACRES
- EXISTING ZONING OF SITE = DR 3.5
- EXISTING USE OF SITE = RETAIL STORE
- PROPOSED ZONING OF SITE = DR 3.5 WITH PARKING VARIANCE/SPECIAL EXCEPTION
- PROPOSED USE OF SITE = RETAIL STORE / RESTAURANT
- OFF-STREET PARKING DATA
 - A. AREA OF EXISTING RETAIL STORE = 14,127 SQ. FT. REQUIRING 723 SPACES (1/50')
 - B. AREA OF EXISTING SERVICE AREA = 1,923 SQ. FT. REQUIRING 32 SPACES (1/50')
 - C. AREA OF PROPOSED RESTAURANT = 4,573 SQ. FT. REQUIRING 52 SPACES (1/50')
 - D. TOTAL SPACES REQUIRED = 821 SPACES
 - E. EXISTING SPACES REMAINING = 723 SPACES
 - F. EXISTING SERVICE BAYS = 1 SPACE
 - G. TOTAL PARKING REMAINING = 723 SPACES (See Note 3) @ 1/50' RATIO
- PARTITIONER IS REQUESTING A VARIANCE TO REDUCE ADDITIONAL TO PERMIT A TOTAL OF 723 PARKING SPACES INSTEAD OF THE REQUIRED 821 SPACES. A VARIANCE OF 98 SPACES.

SITE PLAN
SCALE = 1" = 50'

DATE: 11/20/2011

BY: [Signature]

PROJECT NO: 1120

DATE: 11/20/2011

DATE: 11/20/2011

BY: [Signature]

PROJECT NO: 1120

DATE: 11/20/2011

PLAT TO ACCOMPANY PETITION FOR PARKING VARIANCE AT TWO GUYS

SIERRA WEST architects

51 South Main Avenue, Building P, Suite 320
Clearwater, Florida 33515 (813) 461-4322

ST-1

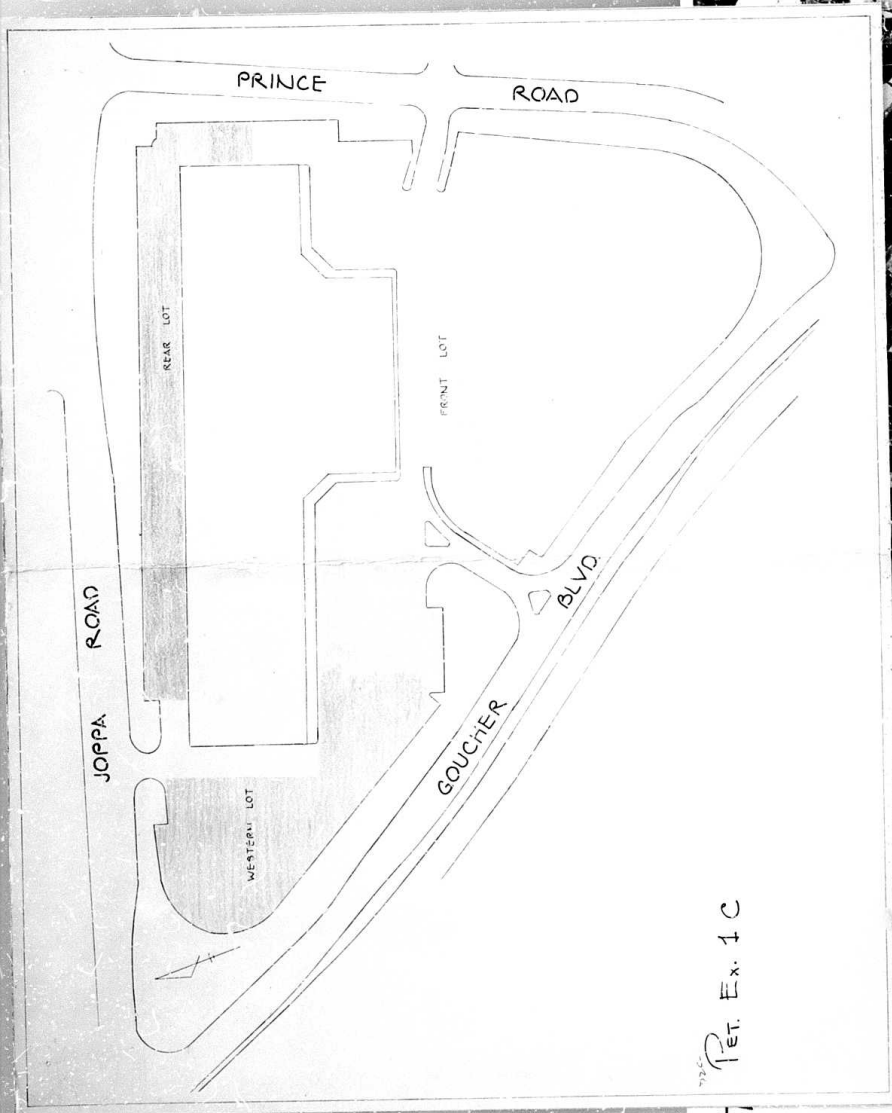
of 2

DATE: 11/20/2011

BY: [Signature]

PROJECT NO: 1120

DATE: 11/20/2011



SCALE: 1"=200'

Pet. Ex. 1D

16-4 NW

EXISTING ZONING (22.5-1)

JOHNS ROAD

LEGAL DESCRIPTION

ALL THE CORNER, PART, THREE (3) OF LOTS 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.

GENERAL NOTES

1. TOTAL AREA OF PROPERTY IS 10.00 ACRES.
2. EXISTING ZONING OF PROPERTY IS 22.5-1.
3. PROPOSED USE OF PROPERTY IS RESTAURANT.
4. OFF-STREET PARKING DATA:
 - A. AREA OF BUILDING REQUIRED 50 FT
 - B. 2 BUILDING SPACES
 - C. 1-100 FT NO. PARKING SPACES REQUIRED 100 FT
 - D. TOTAL AREA OF PROPOSED BUILDING 100 FT
 - E. 100 FT NO. OF BUILDING SPACES 100 FT
 - F. 100 FT NO. OF BUILDING SPACES 100 FT
 - G. 100 FT NO. OF BUILDING SPACES 100 FT
 - H. 100 FT NO. OF BUILDING SPACES 100 FT
 - I. 100 FT NO. OF BUILDING SPACES 100 FT
 - J. 100 FT NO. OF BUILDING SPACES 100 FT
 - K. 100 FT NO. OF BUILDING SPACES 100 FT
 - L. 100 FT NO. OF BUILDING SPACES 100 FT
 - M. 100 FT NO. OF BUILDING SPACES 100 FT
 - N. 100 FT NO. OF BUILDING SPACES 100 FT
 - O. 100 FT NO. OF BUILDING SPACES 100 FT
 - P. 100 FT NO. OF BUILDING SPACES 100 FT
 - Q. 100 FT NO. OF BUILDING SPACES 100 FT
 - R. 100 FT NO. OF BUILDING SPACES 100 FT
 - S. 100 FT NO. OF BUILDING SPACES 100 FT
 - T. 100 FT NO. OF BUILDING SPACES 100 FT
 - U. 100 FT NO. OF BUILDING SPACES 100 FT
 - V. 100 FT NO. OF BUILDING SPACES 100 FT
 - W. 100 FT NO. OF BUILDING SPACES 100 FT
 - X. 100 FT NO. OF BUILDING SPACES 100 FT
 - Y. 100 FT NO. OF BUILDING SPACES 100 FT
 - Z. 100 FT NO. OF BUILDING SPACES 100 FT
5. RESTAURANT PROPOSED TO BE A 100 FT NO. OF BUILDING SPACES 100 FT.
6. OTHER PROPOSED LOCATIONS AT THE CORNERS OF THE PROPERTY ARE 100 FT NO. OF BUILDING SPACES 100 FT.
7. PROPOSED BUILDING DATA:
 - A. BUILDING DATA 100 FT
 - B. BUILDING DATA 100 FT
 - C. BUILDING DATA 100 FT
 - D. BUILDING DATA 100 FT
 - E. BUILDING DATA 100 FT
 - F. BUILDING DATA 100 FT
 - G. BUILDING DATA 100 FT
 - H. BUILDING DATA 100 FT
 - I. BUILDING DATA 100 FT
 - J. BUILDING DATA 100 FT
 - K. BUILDING DATA 100 FT
 - L. BUILDING DATA 100 FT
 - M. BUILDING DATA 100 FT
 - N. BUILDING DATA 100 FT
 - O. BUILDING DATA 100 FT
 - P. BUILDING DATA 100 FT
 - Q. BUILDING DATA 100 FT
 - R. BUILDING DATA 100 FT
 - S. BUILDING DATA 100 FT
 - T. BUILDING DATA 100 FT
 - U. BUILDING DATA 100 FT
 - V. BUILDING DATA 100 FT
 - W. BUILDING DATA 100 FT
 - X. BUILDING DATA 100 FT
 - Y. BUILDING DATA 100 FT
 - Z. BUILDING DATA 100 FT
8. LIGHT POLLUTION: 100 FT NO. OF BUILDING SPACES 100 FT.

ET. EX. 1B

SIERRA WEST RESTAURANT
CORNER OF SHIRLEY RD & SOUTHERN BLVD.
TOWSON, MD

SIERRA WEST architects

1501 E. Tenth St. AKA. Annapolis
Chesapeake, Virginia 22065

81 South Main Avenue, Building 2, Suite 300
Chesapeake, Virginia 22065 (855) 461-4322

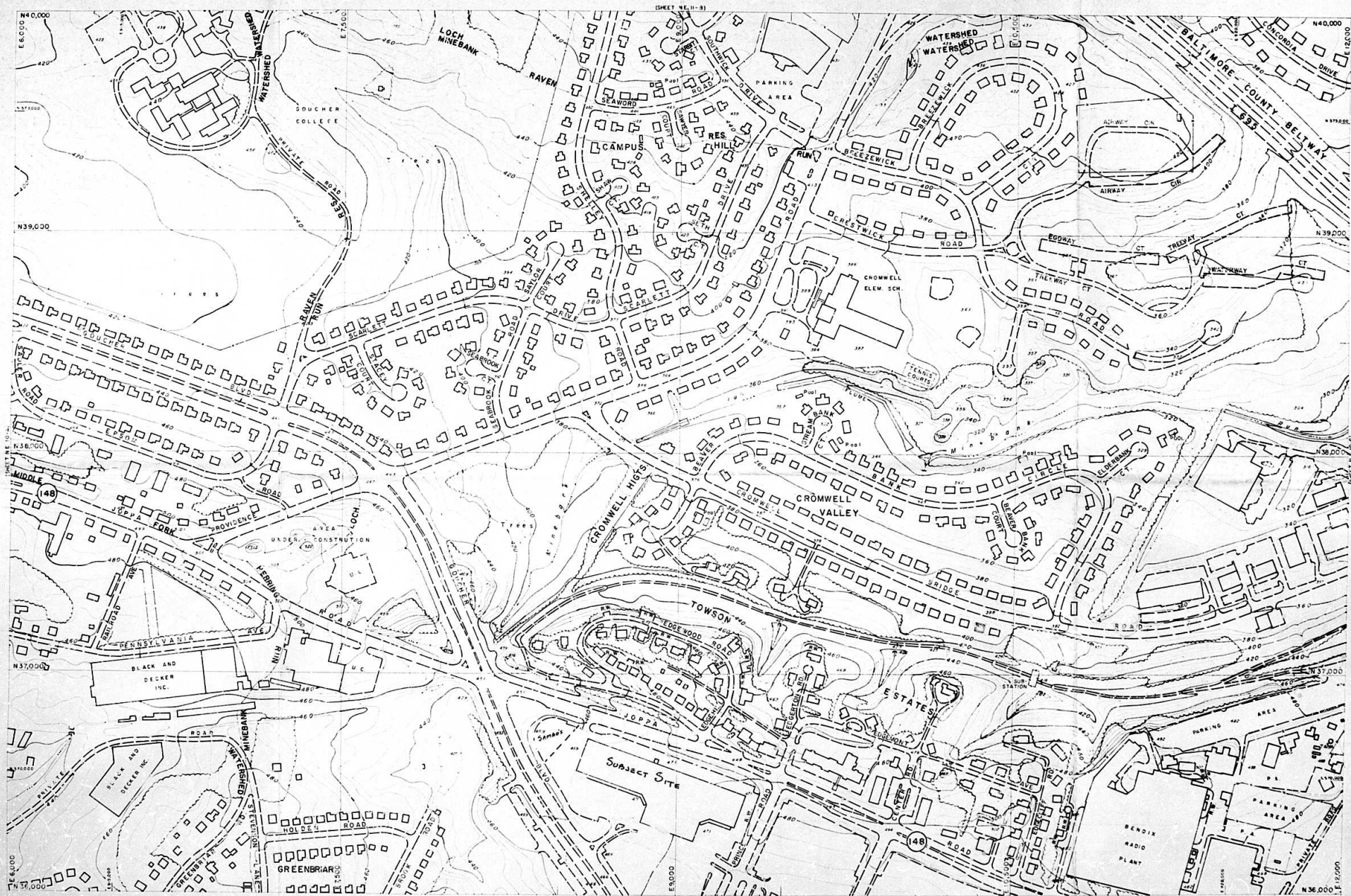
GENERAL NOTES

1. TOTAL AREA OF PROPERTY BEING ACQUIRED
2. EXISTING ZONING OF PROPERTY
3. PROPOSED USE OF PROPERTY - RESTAURANT
4. OFF-STREET PARKING DATA
 - A. AREA OF BUILDING FRONT
 - B. BUILDING FRONT
 - C. EXISTING PARKING SPACES
 - D. TOTAL PARKING SPACES REQUIRED
 - E. DIFFERENCE TO BE REQUESTED AS VARIANCE TO SECTION 409.8 TO PROVIDE A TOTAL OF 20 SPACES
 - F. VARIANCE OF SPACES
5. RESTAURANT PARKING AREA WILL BE SUPERVISOR'S PROPERTY
6. FIRE HYDRANT LOCATED AT THE CORNER OF SECTION 409.8 & 409.9
7. PROPERTY BEING WITHIN

SECTION 409.8	08
SECTION 409.9	10
SECTION 409.10	10
SECTION 409.11	2
SECTION 409.12	4
8. LIGHT PARKING WILL BE 20' OF SPACES
9. LIGHT POLES ARE 30' IN HEIGHT

ET. EX. 1B

C-3

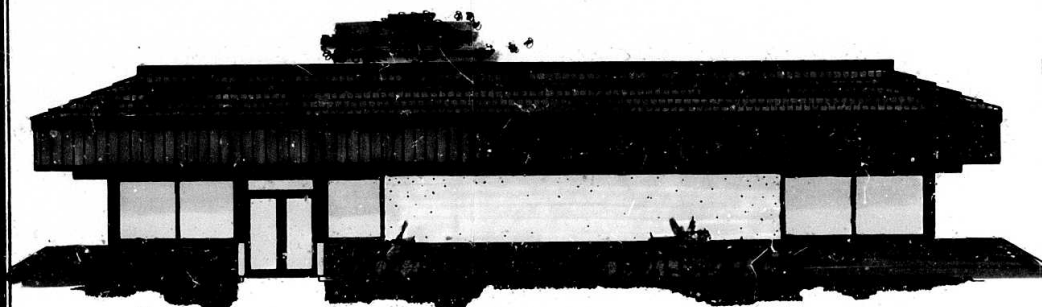


N - NW
R - SW

PHOTOGRAMMETRIC MAP OF BALTIMORE COUNTY METROPOLITAN AREA

REVISIONS			SCALE 1" = 200'	LOCATION EUDWOOD TOWSON ESTATES TOWSON HEIGHTS	SHEET NE. 10-B
BY	DATE				
Topographic	MAT S.	4-11-70	DATE OF PHOTOGRAPHY APRIL 1953		
Topography Compiled By Photogrammetric Methods AEC SERVICE CORPORATION-PHILADELPHIA, PA.					

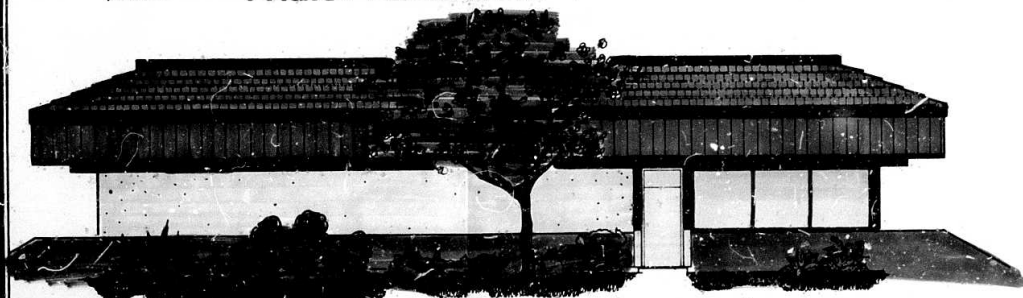
Sheet
NE. 10-B
Pet. Ex. 1 E



South RIGHT SIDE ELEVATION



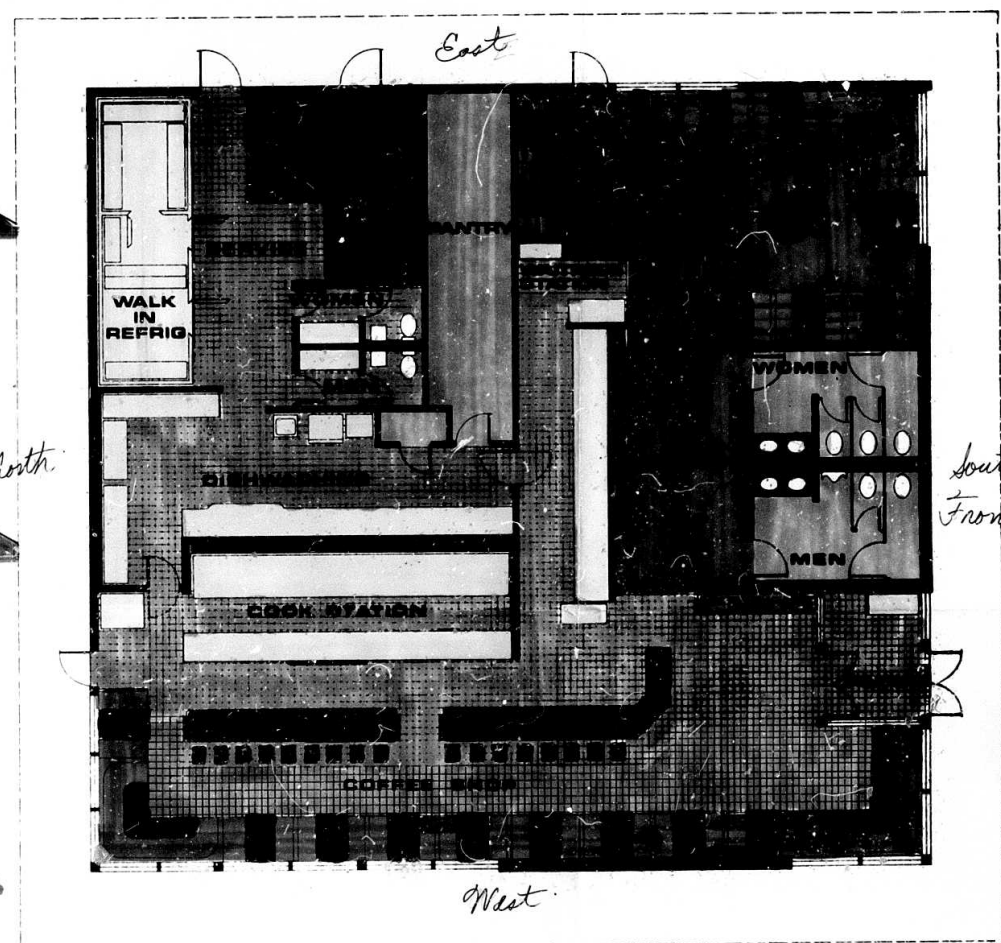
West FRONT ELEVATION



LEFT SIDE ELEVATION - *North*



REAR ELEVATION *East*



FLOOR PLAN

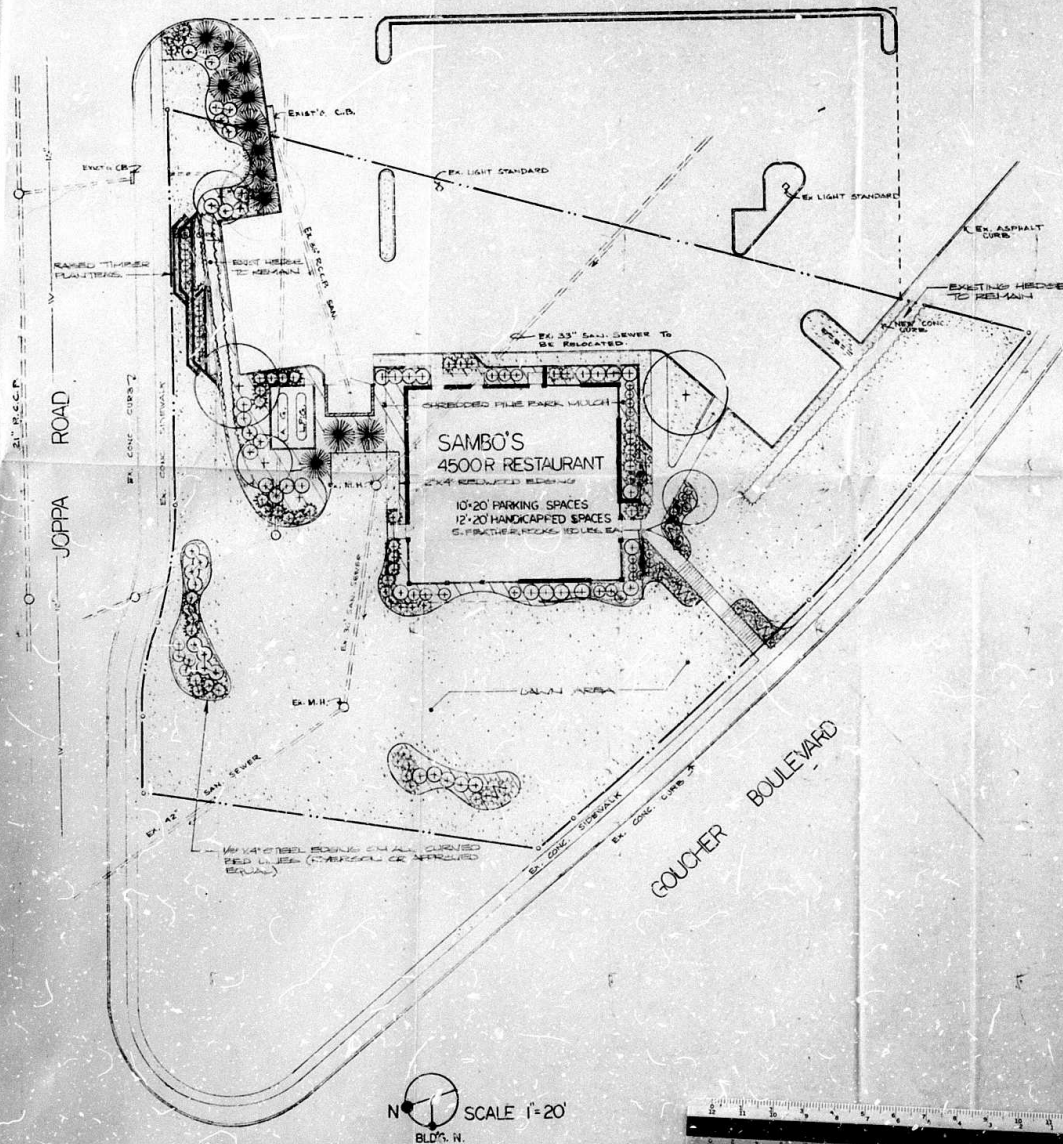
4500R

AREA 4573 SQ. FT.
HEIGHT 18'-0" MAX.
DIMENSIONS 85'-4" x 70'-0"

PET. EX. 2

SAMBO'S
TOWSON MARYLAND

EXIST'G DEPARTMENT STORE



KIDDE CONSULTANTS, INC.
 Subsidiary of White-Kelley & Company, Inc.

a curve to the left with the radius of 111.00 feet, the arc distance of 40.63 feet, (9) northwesterly, by a curve to the left with the radius of 1977.00 feet, the arc distance of 242.97 feet, (10) N 36° 15' 50" N 218.44 feet, (11) northwesterly, by a curve to the right with the radius of 1843.00 feet, the arc distance of 94.35 feet, (12) N 33° 19' 50" N 107.19 feet, (13) northwesterly, by a curve to the right with the radius of 389.90 feet, the arc distance of 49.81 feet, (14) northwesterly, by a curve to the right with the radius of 1655.00 feet, the arc distance of 104.88 feet, and (15) N 22° 45' 18" N 14.79 feet, thence (16) N 27° 17' 00" E 129.96 feet to a point on the south side of Joppa Road, and thence blinding thereon ten courses: (17) S 72° 21' 30" E 25.00 feet, (18) southeasterly, by a curve to the right with the radius of 89.00 feet, the arc distance of 30.99 feet, (19) southeasterly, by a curve to the left with the radius of 111.00 feet, the arc distance of 38.65 feet, (20) S 72° 21' 30" E 415.60 feet, (21) easterly, by a curve to the left with the radius of 861.00 feet, the arc distance of 51.34 feet, (22) S 75° 46' 30" E 150.05 feet, (23) easterly, by a curve to the right with the radius of 839.00 feet, the arc distance of 50.03 feet, (24) S 72° 21' 30" E 134.37 feet, (25) easterly, by a curve to the right with the radius of 903.64 feet, the arc distance of 117.07 feet, and (26) S 64° 56' 08" E 101.20 feet to the place of beginning.

Containing 14.6550 acres of land

HGM:mps

J.O. 1-78069
 W. O. 21862



drawn by
 project no.
 date
 date - const.

date by

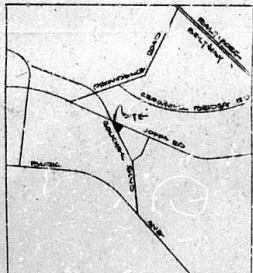
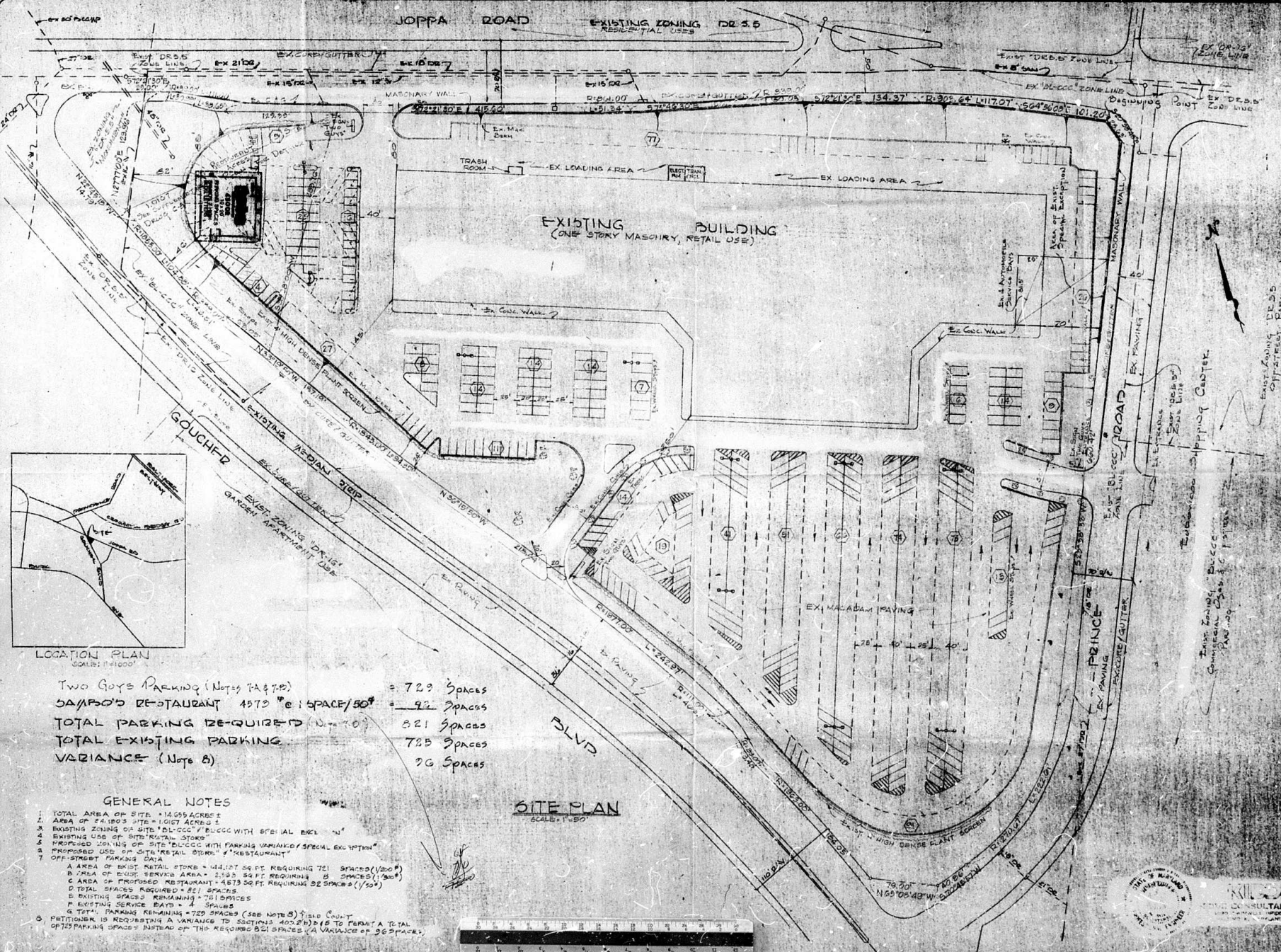
SAMBO'S
 SE CORNER OF JOPPA RD. AND GOUCHER BLVD.
 TOWSON, MARYLAND



SIERRA WEST architects

sheet

of



LOCATION PLAN
SCALE: 1"=1000'

TWO GUYS PARKING (Notes TA & TB)	= 723 SPACES
DAMPO'S RESTAURANT 1875' @ 1 SPACE/80'	= 92 SPACES
TOTAL PARKING REQUIRED (Notes TA & TB)	821 SPACES
TOTAL EXISTING PARKING	725 SPACES
VARIANCE (Note B)	96 SPACES

GENERAL NOTES

- TOTAL AREA OF SITE = 14.955 ACRES ±
- AREA OF 24.1803 SITE = 1.0127 ACRES ±
- EXISTING ZONING OF SITE "BL-CCC" / "BL-CCC" WITH SPECIAL EXC "N"
- EXISTING USE OF SITE "RESTAURANT, STORE"
- PROPOSED ZONING OF SITE "BL-CCC" WITH PARKING VARIANCE / SPECIAL EXC "PTN"
- PROPOSED USE OF SITE "RETAIL STORE" / "RESTAURANT"
- OFF-STREET PARKING DATA
 - A. AREA OF EXIST. RETAIL STORE = 14,127 SQ. FT. REQUIRING 721 SPACES (1/80')
 - B. AREA OF EXIST. SERVICE AREA = 2,153 SQ. FT. REQUIRING 27 SPACES (1/80')
 - C. AREA OF PROPOSED RESTAURANT = 1875 SQ. FT. REQUIRING 23 SPACES (1/80')
 - D. TOTAL SPACES REQUIRED = 821 SPACES
 - E. EXISTING SPACES REMAINING = 725 SPACES
 - F. EXISTING SERVICE DATA = 27 SPACES
 - G. TOTAL PARKING REMAINING = 725 SPACES (SEE NOTE B) & 96 SPACES
- PETITIONER IS REQUESTING A VARIANCE TO SECTIONS 400.2(b) & (c) TO PERMIT A TOTAL OF 725 PARKING SPACES INSTEAD OF THE REQUIRED 821 SPACES (A VARIANCE OF 96 SPACES).

SITE PLAN
SCALE: 1"=50'



COMPANY PETITION
FOR
VARIANCE

TWO GUYS
1875' @ 1 SPACE/80'
DAMPO'S RESTAURANT
1875' @ 1 SPACE/80'

WEST architects

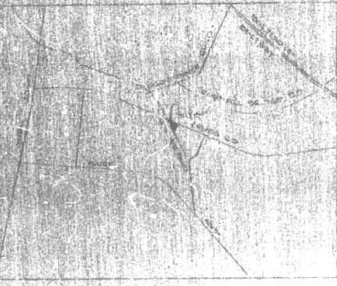
ALFRED J. WEST, AIA, Architect

31 South West Avenue, Suite 320
Charleston, South Carolina 29405
(815) 461-4322



CONSULTANTS, INC.
1000 MARKET STREET, SUITE 200
PHILADELPHIA, PA 19104
TEL: 215-591-1100
FAX: 215-591-1101

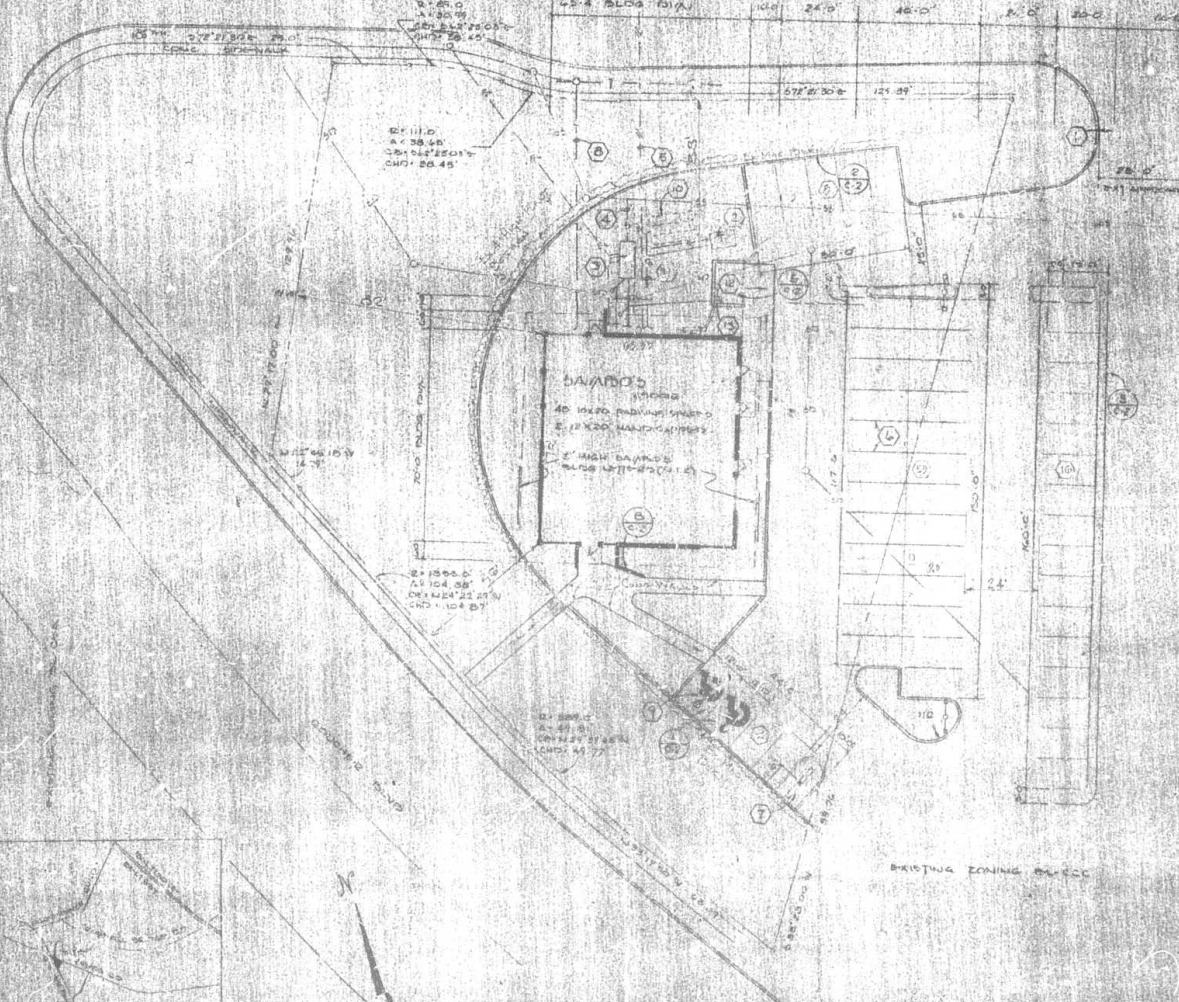
ST-1



LOCATION MAP



KIRBY



GENERAL NOTES

1. TOTAL AREA OF PROPERTY THOUGH IS AT AREA
2. EXISTING ZONING OF PROPERTY IS RES-2
3. PROPOSED USE OF PROPERTY IS RESTAURANT
4. OFF STREET PARKING SPOTS
 - A. AREA OF BUILDING EQUALS 50 FT
 - B. BUILDING SPACES
 - C. TOTAL SPACES PROPOSED EQUALS 50 FT
 - D. SPACES TO BE LOCATED WITHIN 20 FT OF BUILDING
5. DRIVEWAY SHALL BE LOCATED WITHIN 20 FT OF BUILDING
6. DRIVEWAY SHALL BE LOCATED WITHIN 20 FT OF BUILDING
7. PROPERTY SHALL BE WITHIN 20 FT OF BUILDING
8. DRIVEWAY SHALL BE LOCATED WITHIN 20 FT OF BUILDING
9. DRIVEWAY SHALL BE LOCATED WITHIN 20 FT OF BUILDING
10. DRIVEWAY SHALL BE LOCATED WITHIN 20 FT OF BUILDING

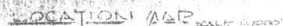
SIERRA WEST ARCHITECTS
1000 P. Suite 200
San Francisco, CA 94103

C-3

SIERRA WEST ARCHITECTS

1000 P. Suite 200
San Francisco, CA 94103

1000 P. Suite 200
San Francisco, CA 94103



KIDDE
KIDDE COMPANY, LTD. NEW YORK, N.Y.

GENERAL NOTE:-

1. TOTAL AREA OF PROPERTY EQUALS TOTAL AREA
2. EXISTING ZONING OF PROPERTY REMAINS
3. PROPOSED USE OF PROPERTY IS NEIGHBORLY
4. OFF STREET PARKING MUST
 - A. AREA OF BUILDING EQUALS 100 FT² REQUIRING 4 SPACES
 - B. 200 FT² BUILDING REQUIRING 8 SPACES
 - C. TOTAL SPACE PROPOSED EQUALS 500 FT²
 - D. 100 FT² OR LESS IS GRANTED A VARIANCE TO 2 SPACES INSTEAD OF THE REGULATORY VARIANCE OF 4 SPACES
5. EMBROIDERY MAKING SHALL NOT BE CONSIDERED AN INDUSTRY
6. HOME WORKSHOP LOCATED AT THE CORNER OF DRAUGHTER BLVD & JOHNS RD
7. PROPOSED SHALL BE WITHIN

SETBACK DIST	0 ft
FRONT YARD	10
REAR YARD DIST	0
CONSIDERED DIST	0
CONSIDERED DIST	0
8. TYPE REQUIRED ALTHOUGH DISTANCE OF PROPOSED CONSTRUCTION IS 20 FT FROM EXISTING POWER
9. LIGHT POLARITY ALL - 80 IN HEIGHT

SAMBO'S RESTAURANT
CORNER OF JOPPA RD
TOWSON, MD

SIERRA WEST architects

sheet
C-3
of

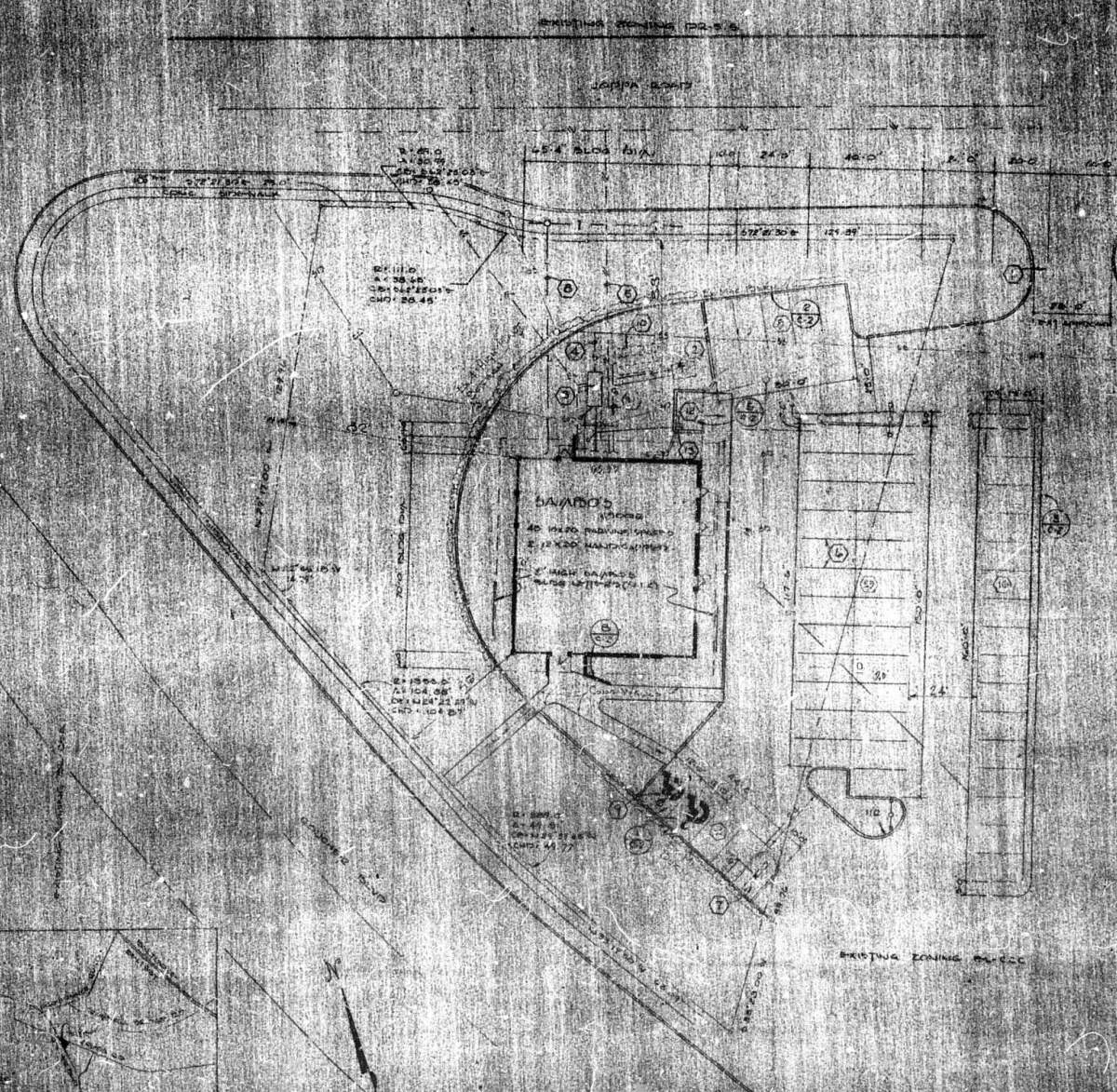
Gerald L. Suenholz, AIA, Architect

0-520
-4322

0-520
-4322



LOCATION MAP SCALE 1/4" = 100'



GENERAL NOTES

1. TOTAL AREA OF PROPERTY EQUALS 1.017 ACRES
2. EXISTING ZONING OF PROPERTY "R-100"
3. PROPOSED USE OF PROPERTY "RESTAURANT"
4. OFF-STREET PARKING DATA
 - A. AREA OF BUILDING EQUALS 50,000 SQ. FT.
 - B. EXISTING PARKING SPACES 50
 - C. TOTAL SPACES PROPOSED WOULD BE 50
 - D. PROVISIONS TO SECURE OTHER A VARIANCE TO SECTION 109.2 TO PERMIT A TOTAL OF 50 SPACES, MINIMUMS OF THE REQUIRED 50 A VARIANCE OF SPACES
5. RESTAURANT PARKING AREA WILL BE SUPERVISED BY RESTAURANT STAFF
6. FIRE HYDRANT LOCATED AT THE CORNER OF BOWLING DRIVE & JEFFERSON ST. 1/2 MILE
7. PROPERTY PAID TO CITY

ENLARGEMENT DIST	10
PRESENT DIST	10
UNIMPROVED DIST	10
CONCRETE DIST	10
COUNCILMAN DIST	10
8. TYPE PARKING WILL CONSIST OF 50 OF ASPHALT CONCRETE AND 50 OF GRAVEL & DIRT ROAD
9. LIGHT POLES ALL 30' IN HEIGHT



KIDDE
KIDDE CONSULTANTS, INC.
1000 W. 10th St., Suite 100
Tulsa, Oklahoma 74103

RESTAURANT
KIDDE CONSULTANTS, INC.
1000 W. 10th St., Suite 100
Tulsa, Oklahoma 74103

