

PETITION FOR ZONING RE-CLASSIFICATION AND/OR SPECIAL EXCEPTION

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY:

I, or we, John A. Farley, Jr. legal owner, of the property situate in Baltimore County and which is described in the description and plat attached hereto and made a part hereof, hereby petition (1) that the zoning status of the herein described property be re-classified, pursuant to the Zoning Law of Baltimore County, from an RD-16 zone to an an RD-16 zone; for the following reasons:

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

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

Contract purchaser John A. Farley, Jr. Legal Owner
Address 101 E. Redwood Street
Baltimore, Maryland 21202

Coady & Farley
Petitioner's Attorney
Address 101 E. Redwood Street
Baltimore, MD 21202
752-4226

Protestant's Attorney
Address 101 E. Redwood Street
Baltimore, MD 21202
752-4226

ORDERED By The Zoning Commissioner of Baltimore County, this 2nd day of February, 1979, that the subject matter of this petition be advertised, as required by the Zoning Law of Baltimore County, in two newspapers of general circulation throughout Baltimore County, that property be posted, and that the public hearing be had before the Zoning Commissioner of Baltimore County in Room 106, County Office Building in Towson, Baltimore County, on the 12th day of March, 1979, at 1:00 o'clock P.M.

Eric Dinenna
Zoning Commissioner of Baltimore County.

(over)

PETITION FOR ZONING VARIANCE FROM AREA AND HEIGHT REGULATIONS

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY:

I, or we, John A. Farley, Jr. legal owner, of the property situate in Baltimore County and which is described in the description and plat attached hereto and made a part hereof, Known as #406 W. Pennsylvania Avenue hereby petition for a Variance from Section 1B02.2B (VR-2) to permit side yard setbacks of 10' & 15' instead of the required 25' in a DR-16 zone.

of the Zoning Regulations of Baltimore County, to the Zoning Law of Baltimore County; for the following reasons: (Indicate hardship or practical difficulty) The porch which is on the west side of the dwelling is an integral part of the dwelling and violates the variance laws, as do all other properties in this block. This is an area variance and not a use variance. Said variance would be in general harmony with the zoning plan and would not adversely affect the neighboring properties and the general neighborhood (all improved property on the south side of this block are office use and also violate the variance laws)

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

Contract purchaser John A. Farley, Jr. Legal Owner
Address 101 E. Redwood Street
Baltimore, MD 21202

Michael L. Snyder
Petitioner's Attorney
Address 101 E. Redwood Street
Baltimore, MD 21202
752-4226

Protestant's Attorney
Address 101 E. Redwood Street
Baltimore, MD 21202
752-4226

ORDERED By The Zoning Commissioner of Baltimore County, this 2nd day of February, 1979, that the subject matter of this petition be advertised, as required by the Zoning Law of Baltimore County, in two newspapers of general circulation throughout Baltimore County, that property be posted, and that the public hearing be had before the Zoning Commissioner of Baltimore County in Room 106, County Office Building in Towson, Baltimore County, on the 12th day of March, 1979, at 1:00 o'clock P.M.

Eric Dinenna
Zoning Commissioner of Baltimore County.

(over)

IDCA APPLICATION FOR SPECIAL EXCEPTION AND OR SPECIAL PERMIT

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY

I, or we, John A. Farley, Jr. and Contract Purchasers legal owner, of the property situate in Baltimore County, the property outline of which is drawn to scale, complete with bearings and distances on 200 FT. SCALE MAPS, WHICH ARE ATTACHED HERETO, HEREBY MAKE APPLICATION TO FILE FOR A SPECIAL EXCEPTION IN A DR-16 ZONE TO USE THE HEREIN DESCRIBED PROPERTY FOR OFFICES

THE PROPERTY IS EXPECTED TO BE IMPROVED AS FOLLOWS:

GROSS SITE AREA 0.23 DEED REF. JRS 1901-438

GRADING 40 % OF OVERALL SITE WILL REQUIRE GRADING.

BUILDING SIZE Irregular

GROUND FLOOR 33'x43'x30'x40' AREA 2700 - 1st

NUMBER OF FLOORS three TOTAL HEIGHT 35'

FLOOR AREA RATIO = TOTAL FLOOR AREA DIVIDED BY SITE AREA = 0.38

BUILDING USE

GROUND FLOOR Offices OTHER FLOORS 2nd - Offices

3rd - Floor Storage

REQUIRED NUMBER OF PARKING SPACES

GROUND FLOOR Nine OTHER FLOORS 2nd = 6 TOTAL 15

PAVING

AREA OF SITE TO BE PAVED TO ACCOMMODATE REQUIRED PARKING SPACES 60'x90' = 5400 sq. ft.
(PAVED AREA MAY BE ESTIMATED BY MULTIPLYING REQUIRED NUMBER OF SPACES BY 360)

UTILITIES

WATER: ☒ PUBLIC ☐ PRIVATE, TYPE OF SYSTEM Existing Metered Service

SEWER: ☒ PUBLIC ☐ PRIVATE, TYPE OF SYSTEM Existing Sewerage Service

UTILITIES SECURITY APPROVAL

I CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE AND BELIEF

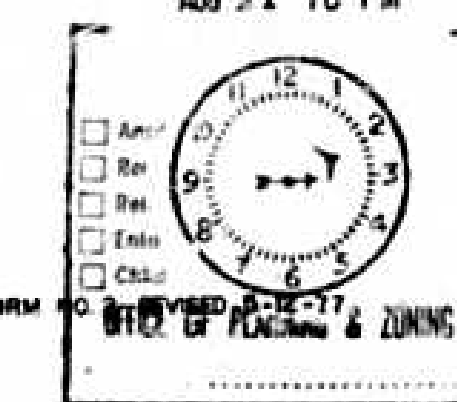
John A. Farley, Jr.
APPLICANT, LESSEE OR CONTRACT PURCHASER

Marie Kelley
LEGAL OWNER

ADDRESS 101 E. Redwood Street
Baltimore, Maryland 21202

ADDRESS 101 E. Redwood St.
Baltimore, Maryland 21202

THE PLANNING BOARD HAS DETERMINED ON AUG 31 78 PM THAT THE PROPOSED DEVELOPMENT DOES / DOES NOT CONFORM TO THE REQUIREMENTS OF SUBSECTION 22-61(P) OF THE BALTIMORE COUNTY CODE, 1968.



DATE AUG 31 78 PM CHAIRMAN, BALTIMORE COUNTY PLANNING BOARD

494-3180

COUNTY BOARD OF APPEALS
Room 219 Court House
Towson, Md. 21204
July 25, 1979
Hearing Room 218

NOTICE OF POSTPONEMENT

CASE NO. 79-210-XA JOHN A. FARLEY, JR., ET AL
NE cor. Pennsylvania Ave. and Highland Ave.
9th District

The above case, scheduled for hearing on WEDNESDAY, AUGUST 8, 1979 at 10:00 a.m., HAS BEEN POSTPONED by the Board at the request of Protestants (out of town).

cc: Michael L. Snyder, Esq. Counsel for Petitioners
John A. Farley, Jr., Esq. Petitioner
John T. Coady, Esq. "
Mrs. Katherine Turner Protestant
Mrs. Mary E. Ginn Protestant
Mrs. Roger Herriott "
Dr. and Mrs. Francis Pettijohn "
John H. Ergel "
John W. Hession, III, Esq. People's Counsel
Mr. James E. Dyer
Mr. William Hammond
Mr. John Seyffert Board of Education
Mrs. Carol Beresh

Muriel E. Buddemeier
County Board of Appeals

BALTIMORE COUNTY

ZONING PLANS

ADVISORY COMMITTEE



PETITION AND SITE PLAN

EVALUATION COMMENTS

BALTIMORE COUNTY OFFICE OF PLANNING AND ZONING

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

Your petition does not meet the Zoning Commissioner's requirements for filing, as per attached.

Eric Dinenna
S. ERIC DINENNA,
Zoning Commissioner

Owner(s) Name: Messrs. Farley and Coady

Reviewed by: Nicholas B. Commodari

Messrs. John A. Farley Jr.
and John T. Coady
101 East Redwood Street
Baltimore, Maryland 21202

cc: Donald B. Ratcliffe
34 West 25th Street
Baltimore, Maryland 21218

BALTIMORE COUNTY ZONING PLANS ADVISORY COMMITTEE

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

cc: Nicholas B. Commodari
Chairman

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

January 18, 1979

Messrs. John A. Farley, Jr.
and John T. Coady
101 East Redwood Street
Baltimore, Maryland 21202

RE: Item No. 92
Petitioners - Farley & Coady
Special Exception Petition

Gentlemen:

The Zoning Plans Advisory Committee has reviewed the plans submitted with the above referenced petition and has made an on-site field inspection of the property. The following comments are not intended to indicate the appropriateness of the zoning action requested, but to assure that all parties are made aware of plans or problems with regard to the development plans that may have a bearing on this case. The Director of Planning may file a written report with the Zoning Commissioner with recommendations as to the suitability of the requested zoning.

Because of your proposal to convert the existing dwelling, located on the northeast corner of Pennsylvania and Highland Avenues, to offices and construct an addition to the side and rear of this structure, this Special Exception is required. In addition, a Variance is also required to allow the proposed 10' side yard setback from the easterly property line. These forms must be submitted before this Petition will be scheduled for a hearing.

The submitted site plan must be revised to reflect the proposed widening of both Pennsylvania and Highland Avenues and the existing alley to the north. The setbacks of the existing structure must be taken

Item No. 92
January 18, 1979
Page 2

from these new widening lines. If said setbacks are not in conformance with the Baltimore County Zoning Regulations, they must be included with the requested Variance.

Please call if you need additional information.

Very truly yours,

Nicholas B. Commodari
NICHOLAS B. COMMODARI
Chairman
Zoning Plans Advisory Committee

NBC/sf

cc: Donald B. Ratcliffe
34 West 25th Street
Baltimore, Maryland 21218

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

the above Reclassification should be had; and it further appearing that by reason of _____

a Special Exception for a _____ should be granted.

IT IS ORDERED by the Zoning Commissioner of Baltimore County this _____ day of _____, 197 _____, that the herein described property or area should be and the same is hereby reclassified; from a _____ zone to a _____ zone, and/or a Special Exception for a _____ 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 failure to meet the requirements of Section 502.1.1 of the Baltimore County Zoning Regulations, the Special Exception for offices should not be granted.

IT IS ORDERED by the Zoning Commissioner of Baltimore County, this _____ day of _____, 197 _____, that the herein Petition for Special Exception for offices be and the same is hereby DENIED.

Zoning Commissioner of Baltimore County

Pursuant to the advertisement, posting of property, and public hearing on the Petition and it appearing that by reason of the following finding of facts that strict compliance with the Baltimore County Zoning Regulations would result in practical difficulty and unreasonable hardship upon the Petitioner(s), the Variance(s) should be had; and it further appearing that by reason of the granting of the Variance(s) requested not adversely affecting the health, safety, and general welfare of the community, the Variance(s) should be granted.

IT IS ORDERED by the Zoning Commissioner of Baltimore County, this _____ day of _____, 19____, that the herein Petition for Variance(s) to permit

Zoning Commissioner of Baltimore County

Pursuant to the advertisement, posting of property, and public hearing on the Petition and it appearing that by reason of failure to show practical difficulty and/or unreasonable hardship, the Variance(s) should not be granted.

IT IS ORDERED by the Zoning Commissioner of Baltimore County, this _____ day of _____, 197____, that the herein Petition for Variance(s) to permit side yard setbacks of 10 feet and 15 feet in lieu of the required 25 feet be and the same is hereby DENIED.

Zoning Commissioner of Baltimore County

ORDER RECEIVED FOR FILING

DATE March 13, 1979
BY Leslie H. Gray
ADMINISTRATIVE ASSISTANT

baltimore county
department of permits and licenses
TOWSON, MARYLAND 21204
(301) 494-2615

JOHN D. SEYFERT
DIRECTOR

October 30, 1978

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

Dear Mr. DiNenna:

Comments on Item # 92 Zoning Advisory Committee Meeting, October 24, 1978 are as follows:

Property Owner: John A. Farley, Jr. & John T. Coady
Location: NE/C Pennsylvania Ave. & Highland Ave.
Existing Zoning: D.R. 16
Proposed Zoning: Special Exception for offices (IDCA 78-53-X)

Acres: 0.344
District: 9th

The items checked below are applicable:

- X A. Structure shall conform to Baltimore County Building Code (B.C.C.A.) 1970 Edition and the 1971 Supplement, State of Maryland Code for the Handicapped and aged and other applicable codes.
- X B. A building permit shall be required before construction can begin. Change of Occupancy & miscellaneous Permits shall be required.
- X C. Additional _____ Permits shall be required.
- X D. Building shall be upgraded to new use - requires alteration permit.
- E. Three sets of construction drawings will be required to file an application for a building permit.
- 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 6'0" of property line.
- E. Requested setback variance conflicts with the Baltimore County Building Code. See Section _____.
- I. No Comment.
- X J. Comment: Compliance to State Handicapped Code is not indicated. Building may exceed allowable height for Use Group "E" Table 6 - 4 B construction B.C.C.A. Code 1970 Edition.

Charles E. Burnham
Plans Review Chief

baltimore county
office of planning and zoning
TOWSON, MARYLAND 21204
(301) 494-3211

LESLIE H. GRAY
DIRECTOR

January 5, 1979

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

Dear Mr. DiNenna:

Comments on Item #92, Zoning Advisory Committee Meeting, October 24, 1978, are as follows:

Property Owner: John A. Farley, Jr and John T. Coady
Location: NE/C Pennsylvania Avenue and Highland Ave.
Existing Zoning: D.R. 16
Proposed Zoning: Special Exception for offices (IDCA 78-53-X)
Acres: 0.344
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.

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

Very truly yours,

John L. Wimbley
Planner III
Current Planning and Development

baltimore county
department of traffic engineering
TOWSON, MARYLAND 21204
(301) 494-3550

STEPHENE COLLINS
DIRECTOR

December 19, 1978

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

Item No. 92 - ZAC - Meeting of October 24, 1978
Property Owner: John A. Farley, Jr. & John T. Coady
Location: NE/C Pennsylvania Avenue & Highland Ave.
Existing Zoning: D.R. 16
Proposed Zoning: Special Exception for offices (IDCA 78-53-X)

Acres: 0.344
District: 9th

Dear Mr. DiNenna:

The requested special exception for offices can be expected to generate approximately 95 trips per day.

Very truly yours,

Michael S. Flanagan
Engineer Associate II

MSF/mjm

Item #92 (1978-1979)
Property Owner: John A. Farley, Jr. & John T. Coady
Page 2
December 20, 1978

Storm Drains:

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

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

Water and Sanitary Sewer:

There are public 4 and 8-inch water mains in Pennsylvania Avenue and Highland Avenue, respectively. There is 8-inch public sanitary sewerage within the alley at the rear of this property.

Very truly yours,

Ellsworth N. Diver, P.E.
Chief, Bureau of Engineering

END:EAM:FWR:SS

cc: J. Tronner
J. Wimbley
J. Somers

N-W Key Sheet
US NE 1 Pos. Sheet
NE 10A Topo
70A Tax Map

baltimore county
no department
TOWSON, MARYLAND 21204
(301) 825-7310

Paul H. Reincke
CHIEF

November 6, 1973

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

Attention: N. Commodari, Chairman
Zoning Advisory Committee

Re: Property Owner: John A. Farley, Jr. & John T. Coady
Location: NE/C Pennsylvania Ave. & Highland Ave.

Item No. 92 Zoning Agenda Meeting of 10/24/78

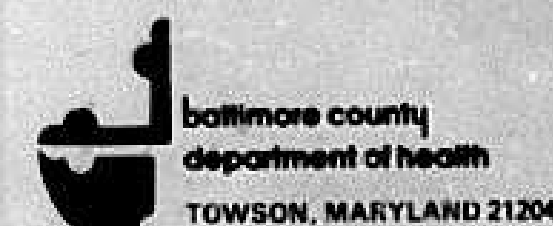
Gentlemen:

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

- (x) 1. Fire hydrants for the referenced property are required and shall be located at intervals of 300 feet along an approved road in accordance with Baltimore County Standards as published by the Department of Public Works.
- () 2. A second means of vehicle access is required for the site.
- () 3. The vehicle dead end condition shown at _____ 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", 1970 Edition prior to occupancy.
- () 6. Site plans are approved as drawn.
- () 7. The Fire Prevention Bureau has no comments, at this time.

REVIEWER: Paul H. Reincke 11/6/78
Planning Group
Special Inspection Division

Noted and Approved: George M. Wiegandt
Fire Prevention Bureau



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

December 11, 1978

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

Dear Mr. DiNenna:

Comments on Item #92, Zoning Advisory Committee Meeting of
October 24, 1978, are as follows:

Property Owner: John A. Farley, Jr. & John T. Coady
Location: NE/C Pennsylvania Ave. & Highland Ave.
Existing Zoning: D.R. 16
Proposed Zoning: Special Exception for offices (IDCA 78-53-X)
Acres: 0.344
District: 9th

Metropolitan water and sewer exist.

Very truly yours,

Thomas H. Devlin, Director
BUREAU OF ENVIRONMENTAL SERVICES

THD/JRE/lth

BOARD OF EDUCATION OF BALTIMORE COUNTY

TOWSON, MARYLAND - 21204

Date: October 23, 1978

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

Z.A.C. Meeting of: October 24, 1978

RE: Item No. 92
Property Owner: John A. Farley, Jr. & John T. Coady
Location: NE/C Pennsylvania Ave. & Highland Avenue
Present Zoning: D.R. 16
Proposed Zoning: Special Exception for offices (IDCA 78-53-X)

District: 9th
No. Acres: 0.344

Dear Mr. DiNenna:

No bearing on student population.

Very truly yours,

W. Nick Petrovich,
Field Representative

WSP/bp

JOSEPH N. MCGOWAN, PRESIDENT
T. SAYAR, WILLIAMS, JR., VICE-PRESIDENT
MARCUS M. BOYBARI

THOMAS H. ROYER
MRS. LORRAINE F. CHIRCUS
ROGER B. NAYDEN

ALVIN GORECK
MRS. MILTON E. SMITH, JR.
RICHARD W. TRACY, D.V.M.

ROBERT T. DUBEL, SUPERINTENDENT

BALTIMORE COUNTY ZONING PLANS ADVISORY COMMITTEE

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

odo
Nicholas B. Commodari
Chairman

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

February 22, 1979

Messrs. John A. Farley, Jr.
and John T. Coady
101 East Redwood Street
Baltimore, Maryland 21202

RE: Item No. 92
Petitioners - Farley & Coady
Special Exception Petition

Gentlemen:

Because revised site plans and Variance forms were submitted
in response to my original comments of January 18, 1979, I proceeded
to schedule this petition for a hearing date. However, if this petition
is granted and at the time of application for the necessary building
permits, the site plan must again be revised to indicate an 8 foot
setback for the proposed parking along Highland Avenue.

If you have any questions concerning this matter, please do
not hesitate to contact this office.

Very truly yours,

Nicholas B. Commodari
NICHOLAS B. COMMODARI
Chairman
Zoning Plans Advisory Committee

NBC/sf

cc: Donald B. Ratcliffe
34 West 25th Street
Baltimore, Maryland 21218

RE: PETITION FOR SPECIAL EXCEPTION : BEFORE THE ZONING COMMISSIONER
PETITION FOR VARIANCES
NE corner of Pennsylvania Ave.
and Highland Ave., 9th District : OF BALTIMORE COUNTY

JOHN A. FARLEY, JR., et al, Petitioners : Case No. 79-210-XA

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
Dep. People's Counsel

John W. Hession, III
People's Counsel
County Office Building
Towson, Maryland 21204
494-2138

I HEREBY CERTIFY that on this 27th day of February, 1979, a copy of the
aforegoing Order was mailed to Coady & Farley, 101 E. Redwood Street, Baltimore,
Maryland 21202, Petitioners' Attorneys.

John W. Hession, III

RE: PETITIONS FOR SPECIAL EXCEPTION : BEFORE THE ZONING
AND VARIANCES : COMMISSIONER
NE/ corner of Pennsylvania and : OF BALTIMORE COUNTY
Highland Avenues, 9th Election :
District : Case No. 79-210
JOHN A. FARLEY, JR., et al, : (Item No. 92)
Petitioners : : : : : :

ORDER FOR APPEAL

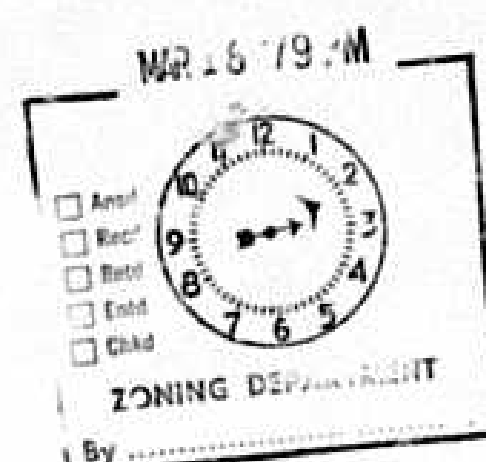
Mr. Commissioner:

We wish to take an appeal on behalf of the Petitioners listed
below from the decision of the Zoning Commissioner in the above-
entitled matter, under date of March 13, 1979, to the County Board
of Appeals and wish you to forward all papers in connection there-
with to said Board for hearing.

MICHAEL L. SNYDER
COADY & FARLEY
101 E. Redwood Street
Baltimore, MD 21202
752-4226
Attorneys for Petitioners

JOHN A. FARLEY, JR.
101 E. Redwood Street
Baltimore, MD 21202
752-4226
JOHN T. COADY
101 E. Redwood Street
Baltimore, MD 21202
752-4226
Petitioners

I HEREBY CERTIFY that on this 15th day of March, 1979, a copy
of the above Order was mailed to Katherine Turner, 618 West
Chesapeake Avenue, Towson, Maryland 21204, Mary E. Ginn, 606 Horn-
crest Road, Towson, Maryland 21204, and John W. Hession, III, Esquire,
People's Counsel for Baltimore County, County Office Building,
Towson, Maryland 21204.



JOHN A. FARLEY, JR.

RE: PETITIONS FOR SPECIAL EXCEPTION : BEFORE THE ZONING
AND VARIANCES : COMMISSIONER
NE/ corner of Pennsylvania and : OF BALTIMORE COUNTY
Highland Avenues, 9th Election :
District : Case No. 79-210
JOHN A. FARLEY, JR., et al, : (Item No. 92)
Petitioners : : : : : :

ORDER FOR APPEAL

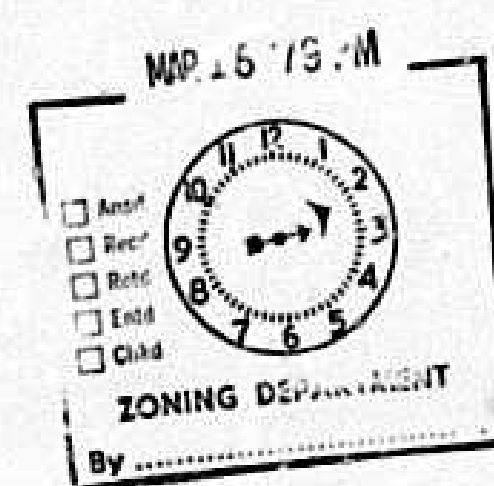
Mr. Commissioner:

We wish to take an appeal on behalf of the Petitioners listed
below from the decision of the Zoning Commissioner in the above-
entitled matter, under date of March 13, 1979, to the County Board
of Appeals and wish you to forward all papers in connection there-
with to said Board for hearing.

MICHAEL L. SNYDER
COADY & FARLEY
101 E. Redwood Street
Baltimore, MD 21202
752-4226
Attorneys for Petitioners

JOHN A. FARLEY, JR.
101 E. Redwood Street
Baltimore, MD 21202
752-4226
JOHN T. COADY
101 E. Redwood Street
Baltimore, MD 21202
752-4226
Petitioners

I HEREBY CERTIFY that on this 15th day of March, 1979, a copy
of the above Order was mailed to Katherine Turner, 618 West
Chesapeake Avenue, Towson, Maryland 21204, Mary E. Ginn, 606 Horn-
crest Road, Towson, Maryland 21204, and John W. Hession, III, Esquire,
People's Counsel for Baltimore County, County Office Building,
Towson, Maryland 21204.



JOHN A. FARLEY, JR.

Case No. 79-210-XA

March 20, 1979

John A. Farley, Jr., et al

NE/corner of Pennsylvania and Highland
Avenues - 9th District

1. Copy of Petition
2. Copy of Description of Property
3. Copy of Certificate of Posting - 1 sign
4. Copy of Certificates of Publication
5. Copy of Zoning Advisory Committee Comments
6. Copy of Comments from the Director of Planning
7. Planning Board Comments and Accompanying Map
8. Copy of Order to Enter Appearance, John W. Hession, III
9. Copy of Order - Zoning/Deputy Zoning Commissioner
10. Copy of Plat of Property
11. 200' Scale Location Plan
12. 1600' Scale Location Plan
13. Memorandum in Support of Petition
14. Letter(s) from Protestant(s)
15. Letter(s) from Petitioner(s)
16. Protestants' Exhibits A-1 to A-6 Photos
17. Petitioners' Exhibits to
18. Letter of Appeal
19. IDCA Application and Approval
20. Aerial Map
21. Topo Map

Michael L. Snyder, Esquire
101 E. Redwood St.
Baltimore, Md. 21202

Attorney for Petitioners

John A. Farley, Jr., Esquire
101 E. Redwood St.
Baltimore, Md. 21202

Petitioner

John T. Coady, Esquire
101 E. Redwood St.
Baltimore, Md. 21202

Petitioner

Mrs. Katherine Turner
618 W. Chesapeake Ave.
Towson, Md. 21204

Protestant

Mrs. Mary E. Ginn
606 Horncrest Rd.
Towson, Md. 21204

Protestant

Case No. 79-210-XA
Page 2
March 20, 1979

John W. Hession, III, Esquire
James E. Dyer

People's Counsel
Request Notification

Recd 3-26-77
11 AM

County Board of Appeals

Room 219, Court House
Towson, Maryland 21204

May 3, 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 2(b). ABSOLUTELY NO POSTPONEMENTS WILL BE GRANTED WITHIN FIFTEEN (15) DAYS OF SCHEDULED HEARING DATE IN ACCORDANCE WITH RULE 2(c), COUNTY COUNCIL BILL #108

CASE NO. 79-210-XA

JOHN A FARLEY, JR., et al

for SE-Offices
for Variance Sec. 1802.28 (VB.2) -
to permit side yard setbacks of 10' & 15'
instead of required 25' in a DR 16 zone

NE cor. of Penn. Ave. and Highland Ave.

9th District

ASSIGNED FOR:

WEDNESDAY, AUGUST 8, 1979 at 10:00 a.m.

cc: Michael L. Snyder, Esq.

Attorney for Petitioners

John A. Farley, Jr., Esq.

Petitioner

John T. Coady, Esq.

Petitioner

Mrs. Katherine Turner

Protestant

Mrs. Mary E. Ginn

Protestant

John W. Hession, III, Esq.

People's Counsel

Mr. James Dyer, Zoning

Mrs. Carol Beresh

Mr. E. DiNenna, Zoning

Mr. L. Graef, Planning

Meta J. Painter
County Board of Appeals

606 Horncrest Road
Towson, Md. 21204
December 23, 1979

Walter Reiter, Chairman
County Board of Appeals
Old Court House, Towson

Dear Mr. Reiter:

Re: Case No. 79-210-XA John A. Farley, Jr., et al

As a party to the above proceeding, appearing before the board on my own behalf, I can appreciate that the board is administrative in nature and that under Rule 7, the board can apply the rules of evidence...to the end that needful and proper evidence shall be most conveniently, inexpensively and speedily produced while preserving the substantial rights of the parties." (Emphasis added.)

As one of the parties to the proceeding, my substantial rights include:

- o the right to have paid witnesses be qualified and accepted as "experts" before they offer direct oral or documentary "expert" testimony in their area of expertise as evidence in the proceeding
- o the right to have such paid "experts" personally present for the purpose of cross-examination on their testimony.
- o the right to object when paid "experts" qualified in one area begin to offer direct testimony in areas outside their area of expertise.
- o the right to object to the testimony of paid "experts" outside their area of expertise as "immaterial" and therefore to be excluded from the record by the board.

You will recall that this proceeding took place on several hearing dates. During the first portion of the hearings, I was permitted to exercise these rights. During the portion of the hearings conducted on December 19, 1979, the board denied my exercise of these rights and thus failed...to preserve the substantial rights of the parties...as it is required to do by the board's own Rule 7.

Specifically, the board allowed testimony regarding traffic congestion in the affected neighborhood to be entered into the record by allowing the testimony of paid non-resident witnesses who were not traffic engineers and who were neither qualified or accepted as "experts" in traffic matters and then denied the parties the right to object to the introduction of such testimony. The board then denied the parties the right to object to the admission into the record of such testimony by a paid non-resident, non-expert, as immaterial.

While these arguments are perhaps more appropriate in any subsequent appeal of this case to the Circuit Court, it is only fair to point out to the board that in its proceedings, it is committing errors that are prejudicial to both the rights of the parties and to the creation of a credible record.

Mary Elizabeth Ginn
MARY ELIZABETH GINN

MEG:me

5/3/79 - Notified of appeal hearing scheduled for: WEDNESDAY, AUGUST 8, 1979 at 10 am

Michael L. Snyder, Esq.
John A. Farley, Jr., Esq.
John T. Coady, Esq.
Mrs. Katherine Turner
Mrs. Mary E. Ginn
John W. Hession, III, Esq.

Attorney for Petitioner
Petitioner
Petitioner
Protestant
Protestant
People's Counsel

7/31/79 - Above notified of appeal hearing scheduled for WEDNESDAY, OCTOBER 17, 1979 at 10 am

10/18/79 - Above notified of CONTINUED HEARING on WEDNESDAY, DECEMBER 19, 1979 at 9 am

County Board of Appeals

Room 219, Court House
Towson, Maryland 21204

July 31, 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 2(b). ABSOLUTELY NO POSTPONEMENTS WILL BE GRANTED WITHIN FIFTEEN (15) DAYS OF SCHEDULED HEARING DATE IN ACCORDANCE WITH RULE 2(c), COUNTY COUNCIL BILL #108

CASE NO. 79-210-XA

JOHN A. FARLEY, JR., ET AL

for Special Exception for Offices
" Variance from Sec. 1802.28 (VB.2) - side yard setbacks

NE cor. Pennsylvania and Highland Aves.

9th District

3/13/79 - Z.C. Denied Petition

ASSIGNED FOR:

WEDNESDAY, OCTOBER 17, 1979 at 10 a.m.

cc: Michael L. Snyder, Esq.

Counsel for Petitioners

John A. Farley, Jr., Esq.

Petitioner

John T. Coady, Esq.

"

Mrs. Katherine Turner

Protestant

Mrs. Mary E. Ginn

"

Mrs. Roger Herriott

"

Dr. and Mrs. Francis Pettijohn

"

Mr. John H. Engel

"

John W. Hession, III, Esq.

People's Counsel

Mr. James E. Dyer
Mr. William Hammond
Mr. John Seyffert
Board of Education
Mrs. Carol Beresh

Muriel E. Buddemeier
County Board of Appeals

County Board of Appeals

Room 219, Court House
Towson, Maryland 21204

June 9, 1980

RE: JOHN A. FARLEY, JR., et al
Case No. 79-210-XA

Received from County Bd. of Appeals of Baltimore County, Petitioner's Exhibits, #'s 3 thru 10 (Plans).

John A. Farley, Jr.

Mr. Walter A. Reiter, Jr., Chairman
Board of Appeals, Baltimore County
Courthouse, Towson, Md. 21204

Dear Mr. Reiter and Board Members:

It came to our attention yesterday, December 19, 1979 at the hearing of Coady/ Farley for 40+ West Pennsylvania Avenue, Towson, that ---

the Coady/Farley building at 400 Allegheny Ave., Towson is proceeding under an amended plat.

Those of us who testified on that long ago case did so on the plat presented at the hearings before your Board. The comment made yesterday was that an amended plat had been presented to the Board before their decision was rendered. We question which plat was presented at the hearing. Please investigate. The amended plat -or the building in progress- shows a difference in the size of the addition to 400 Allegheny Ave.

Thanks you for your consideration.

Katherine C. Turner, representative/Board of Directors
Southland Hills Improvement Association, Inc.

518 W. Chesapeake Ave.
Towson, Md. 21204

RECEIVED
BALTIMORE COUNTY
JUN 11 2 40 PM '80
BY: [Signature]

12/20/79

7/24, 1979

Mr. Walter Reiter
Chairman of the Board of Appeals
2nd Floor, Old Court House
Towson, Maryland 21204

Re: 79-210XA
Farley: West Pennsylvania Avenue,
Towson, Maryland

Dear Mr. Reiter,

On behalf of the appellants Mrs. Roger Herriott, who will not return from Vermont until late October or early November; Dr. and Mrs. Francis Pettijohn, who are presently in Alaska; and myself, who will be unable to attend the hearing on August 8, 1979 due to my business schedule, we request a postponement of the August 8, 1979 hearing.

Sincerely,

John H. Engel
618 Highland Avenue
Towson, Maryland 21204

JHE/km

Rec'd 7/24/79
4:30 pm

CHARLES P. COADY, JR. (COUNSEL)
JOHN A. FARLEY, JR.
JOHN T. COADY
MICHAEL L. SNYDER

COADY & FARLEY

ATTORNEYS AND COUNSELLORS AT LAW
101 EAST REDWOOD STREET
BALTIMORE, MARYLAND 21202
TELEPHONE 752-4128 AREA CODE 301

CHARLES P. COADY, JR.
JOHN A. FARLEY, JR.
JOHN T. COADY
MICHAEL L. SNYDER

March 15, 1979

Zoning Commissioner
County Office Building
Towson, MD 21204

Re: Petitions for Special Exception
and Variances
NE/ corner of Pennsylvania and
Highland Avenues - 9th Election
District
John A. Farley, Jr., et al -
Petitioners
No. 79-210-XA (Item No. 92)

Dear Mr. Commissioner:

I enclose herewith an Order for Appeal by the Petitioners in the above matter. I send also our office check, made payable to the order of Baltimore County, MD, in the amount of \$75.00 to cover costs of the Appeal plus the cost of posting.

If there are any questions, please communicate with the writer of this letter.

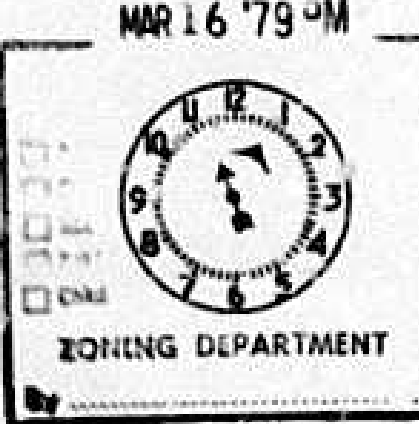
Very truly yours,

COADY & FARLEY

By: [Signature]
John A. Farley, Jr.

JAF:sg

Enc.

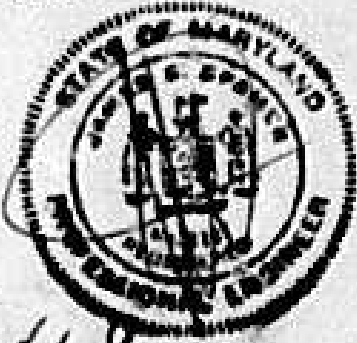


LEGAL DESCRIPTION

OF

406 W. PENNSYLVANIA AVENUE
9th ASSESSMENT DISTRICT, BALTIMORE COUNTY

BEGINNING for the same at the Northeast corner of Pennsylvania Avenue and Highland Avenue and running thence Northerly and binding on the East side of Highland Avenue 150 feet to the South side of a 20 foot alley there situate to be opened; thence Easterly binding on the South side of said alley with the use thereof in common 100 feet to the end of the second line of that parcel of land which by Deed dated March 31, 1916 and duly recorded among the Land Records of Baltimore County in Liber W.P.C. No. 464, folio 50 was conveyed by Arthur L. Bosley, et al, Trustees to Henry G. Shirley; thence running with a binding on the third line of said lot Southerly 150 feet to the North side of Pennsylvania Avenue; thence Westerly binding on the North side of Pennsylvania Avenue 100 feet to the place of beginning. The improvements on said parcel of land being known as No. 406 Pennsylvania Avenue.



BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

S. Eric DiNenna
Zoning Commissioner

March 1, 1979
Date

TO: Leslie H. Groff, Director
Office of Planning and Zoning

FROM: Petition #79-210XA, Item 92

SUBJECT: Petition for Special Exception for offices and Variance for side yard setbacks
Northeast corner of Pennsylvania Avenue and Highland Avenue
Petitioner - John A. Farley, Jr. and John T. Coady

9th District

HEARING: Monday, March 12, 1979 (1:00 P.M.)

Office use would be appropriate here. If granted, it is recommended that the special exception be limited to conversion of the existing buildings. Further, a detailed landscaping plan should be submitted to and approved by the Current Planning and Development Division. It is suggested that access be confined via the alley and that the parking layout be revised accordingly. Finally, during the Planning Board review of the subject IDCA petition, the Board committee requested that particular attention be given to ensure that this project not create storm water run-off problems.

Leslie H. Groff
Leslie H. Groff, Director
Office of Planning and Zoning

LHG:JGH:rw

Baltimore County
Office of Planning and Zoning
TOWSON, MARYLAND 21204
(301) 494-3351

S. ERIC DIENNA
ZONING COMMISSIONER

March 8, 1979

Michael L. Snyder, Esquire
101 E. Redwood Street
Baltimore, Maryland 21202

RE: Petition for Special Exception and
Variance
John A. Farley, Jr. and John T. Coady
Case No. 79-210-XA

Dear Sir:

This is to advise you that \$60.33 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 DiNenna
S. ERIC DIENNA
Zoning Commissioner

SED/oc

Reserve. John A. Farley, Jr. and
John T. Coady
101 E. Redwood Street
Baltimore, Maryland 21202

NOTICE OF HEARING

RE: Petition for Special Exception and Variance, NE corner Pennsylvania Ave. & Highland Ave.
Case No. 79-210-XA

TIME: 1:00 P.M.

DATE: Monday, March 12, 1979

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

TOWSON, MARYLAND

S. Eric DiNenna
ZONING COMMISSIONER OF
BALTIMORE COUNTY

Mr. Walter Ritten
Chairman, Bd. of Appeals
Towson, Ind., 21204

R.D., Horegried, Va.
05663
July 21, 1979

Dear Mr. Ritten,

I've just learned that the hearing for case # 79-210-XA has been scheduled for August 8 at 10 a.m., and am writing to ask that it be postponed until after my return to Towson around the end of October.

I live almost directly across Highland Ave from the property in question, and would appreciate the opportunity to be present at the hearing, if this could be arranged.

* Coady & Farley
406 W. Pa. Ave.

Sincerely,

Cynthia M. Jernice

Rec'd 7/25/79 - 1pm

Mr. Roger Jernice
R.D., Horegried, Va.
05663

Mr. Walter Ritten
Chairman, Board of Appeals
Old Court House
Towson,
Ind. 21204

No. 78576

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT

DATE March 12, 1979 ACCOUNT 01-662

AMOUNT \$60.33

RECEIVED FROM Coady & Farley

FOR Cash of Advertising and Posting Case No. 79-210-XA

6033 NO

No. 78588

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT

DATE March 12, 1979 ACCOUNT 01-662

AMOUNT \$75.00

RECEIVED FROM John A. Farley, Jr.

FOR Cash of Appeal for Case No. 79-210-XA

7500 NO

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT

DATE February 12, 1979 ACCOUNT 01-662

AMOUNT \$50.00

RECEIVED FROM Coady & Farley

FOR Filing Fee for Case No. 79-210-XA

501 FIFTH 14 50.00 NO

VALIDATION OR SIGNATURE OF CARRIER

CERTIFICATE OF POSTING
ZONING DEPARTMENT OF BALTIMORE COUNTY
Towson, Maryland

District 9th Date of Posting MARCH 23, 1979

Posted for: APPEAL

Petitioner: JOHN A. FARLEY, JR., ET AL

Location of property: NE COR. PENNSYLVANIA AND HIGHLAND AVES.

Location of Sign: NE COR. PENNSYLVANIA AND HIGHLAND AVES.

Remarks: Thomas L. Richard

Posted by: Signature Date of return: MARCH 30, 1979

1-SIGN

PETITION MAPPING PROGRESS SHEET

FUNCTION	Wall Map		Original		Duplicate		Tracing		200 Sheet	
	date	by	date	by	date	by	date	by	date	by
Descriptions checked and outline plotted on map					10-17	1-18				
Petition number added to outline										
Denied										
Granted by ZC, BA, CC, CA										
Reviewed by:	Revised Plans: Change in outline or description Yes No									
Previous case:	Map # 1614A									

BALTIMORE COUNTY OFFICE OF PLANNING & ZONING

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

Your Petition has been received and accepted for filing
this 1st day of February, 1979

S. Eric DiNenna
S. ERIC DIENNA
Zoning Commissioner

Petitioner: Farley & Coady
Petitioner's Attorney

Reviewed by: Nicholas B. Commodari
Chairman, Zoning Plans
Advisory Committee

Reserve. John A. Farley, Jr.
and John T. Coady
101 East Redwood Street
Baltimore, Maryland 21202

cc: Donald B. Pennington
34 West 35th Street
Baltimore, Maryland 21202

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


S. Eric DiNenna,
Zoning Commissioner

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

79-210-XA

District: 9th Date of Posting: FEB. 24, 1979
Posted for: PETITION FOR SPECIAL EXEMPTION AND VARIANCE
Petitioner:
Location of property: NE CORNER OF Pennsylvania Ave. & Highland Ave.
Location of Signs: NE COR. OF Pennsylvania Ave. & Highland Ave.
Remarks:
Posted by: Thomas G. Boland Date of return: MARCH 1, 1979
Signature

2. -S. can.

**PETITION FOR SPECIAL
EXCEPTION AND VARIANCE
9th DISTRICT**

ZONING: Petition for Special Exemption for offices and Variance for side yard setback.
LOCATION: Northeast corner of Pennsylvania Avenue and Highland Avenue.
DATE & TIME: Monday, March 12, 1979 at 1:00 P.M.
PUBLIC HEARING: Room 106, County Office Building, 111 W. Champagne Ave in TOWNSEN, Maryland.

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

Petition for Special Exception for offices and Variance to permit side yard setbacks of 10 feet and 15 feet instead of the required 25 feet in a D.R.16 Zone

The Zoning Regulation to be excepted as follows:

Section 1802.3B (VR.2) -- side yard setbacks.

All that parcel of land in the North District of Baltimore City situated at the same as the Northeast corner of Pennsylvania Avenue and running easterly and binding on the East side of Highland Avenue to the South side of said alley there being a 20 foot alley there between; do opened; thence Easterly along the South side of said alley 100 feet to the end of said alley; thence South along the second line of that parcel of land 100 feet to the E. 1/4 of Sec. 21, 1916 which by deed recorded among the Land Records of Baltimore County in Liber W.C. 48, folio 20 was given by Arthur L. Bailey, et al Trustees to Henry C. Baer, et al; thence Easterly binding on the third line of said lot southerly 150 feet to the North side of Pennsylvania Avenue; thence Westerly along the North side of Pennsylvania Avenue 100 feet to the beginning of the improvements on said parcel of land being known as No. 429 Frederick

Being the property of John A. Farley, Jr. and John T. Condy, as shown on plat plan filed with the Department.

Hearing Date: Monday, March 12, 1979 at 1:00 P.M.
Public Hearing: Room 106, County Office Building, 11 W. Chesapeake Avenue, Towson, Md. 21204.

By Order Of
S. ERIC DINENNA
Zoning Commissioner, and
GEORGE J. MARTINAK,
Deputy Zoning Commissioner
of Baltimore County
Feb. 22.

TCWSON, MD.,.....February 22....., 1979.

THIS IS TO CERTIFY, that the annexed advertisement was published in THE JEFFERSONIAN, a weekly newspaper printed and published in Towson, Baltimore County, Md., ~~once in each~~ one time ~~successive weeks~~ before the 12th day of March, 1979, the ~~first~~ publication appearing on the 22nd day of February, 1979.

THE JEFFERSONIAN.
G. Leach, Jr.
 Manager
 Cost of Advertisement, \$ *78⁰⁰*

PETITION FOR
SPECIAL EXCEPTION
AND VARIANCE

ZONING—The Planning & Zoning Commission will hold a public hearing for officers and variances for side yard setbacks.

All parcels located at the Northwest corner of Pennsylvania Avenue and Highland Avenue, 1200 W. Monday, March 12, 1979 at 1:00 P.M.

PUBLIC HEARING: Room 106, City Hall, Baltimore, Md., 111 W. Chesapeake Avenue, Towson, Maryland.

The Zoning/Disposal Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Ordinance of Baltimore County, will hold a public hearing.

Petition for Special Exception for a change from R-1 to R-1A zoning code yard setbacks of 10 feet instead of 15 feet instead of the required 25 feet.

The Zoning Regulation is so accepted as follows:

R-1A Zone 25' to 10' B-2 Zone 10' to 5' Yard Setbacks

All that parcel of land in the North District for the same at the Northeast corner of Pennsylvania Avenue and Highland Avenue, 1200 W. Monday and binding on the East side of Virginia Avenue 150 feet to the West (the Petitioner) shall be

located between Easterly binding on the South side of said alley with the use hereof in common 100 feet to the West side of said alley and the portion of land which by Deed dated March 31, 1918 and said record map is known as the Linn-Nebraska Improvement Co. in Labor W.P.C. No. 34, lot 50 was conveyed by Arthur L. Bosley, et al. Trustees to the Linn-Nebraska Improvement Co. with a binding on the West line of said lot 50 southerly 150 feet to the North side of the Parcel of land known as the Linn-Nebraska Improvement Co. on the North side of "Pentecosts" Avenue, more or less, and the improvements on said parcel of land being known as the 400 Pentecosts Avenue, a group of John A. Farley, Jr. and John T. Coady, as shown on plat plan filed with the County Clerk of Lincoln, Nebraska.

Hearing Date: Monday, March 12, 1927 at 1:00 P.M.

Room 111 of the County Office Building, 111 1/2 Chesapeake Avenue, Topeka, Mo.

S. ERIC DE HENNA
COUNTY COMMISSIONER

GEORGE J. MARTINIAN
DEPUTY
COUNTY COMMISSIONER
C. 341 CANE COUNTY



OFFICE OF
THE
TIMES
NEWSPAPERS

TOWSON, MD. 21204 February 22 1979

THIS IS TO CERTIFY, that the annexed advertisement of
PETITION FOR SPECIAL EXCEPTION AND VARIANCE -
John A. Farley, Jr. et al
was inserted in the following:

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

weekly newspapers published in Baltimore, County, Maryland,
once a week for one successive weeks before the
25th day of February, 1979, that is to say, the same
was inserted in the issues of February 22, 1979

STROMBERG PUBLICATIONS, INC.

BY Ethel Berger



OFFICE OF
THE
THE TIMES
NEWSPAPERS

TOWSON, MD 21204 February 22 1979

THIS IS TO CERTIFY, that the annexed advertisement of
PETITION FOR SPECIAL EXCEPTION & VARIANCE -
John A. Farley, Jr. at al
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 23rd day of February, 1979, that is to say, the same was inserted in the issues of February 22, 1979.

STROMBERG PUBLICATIONS, INC.

BY Esther Burge



baltimore county
office of planning and economic development
TOWSON, MARYLAND 21204

2.C. Protestants Exhibits # 79-210-XA
John A. Freley, Sr.
Photos A-1 thru A-6



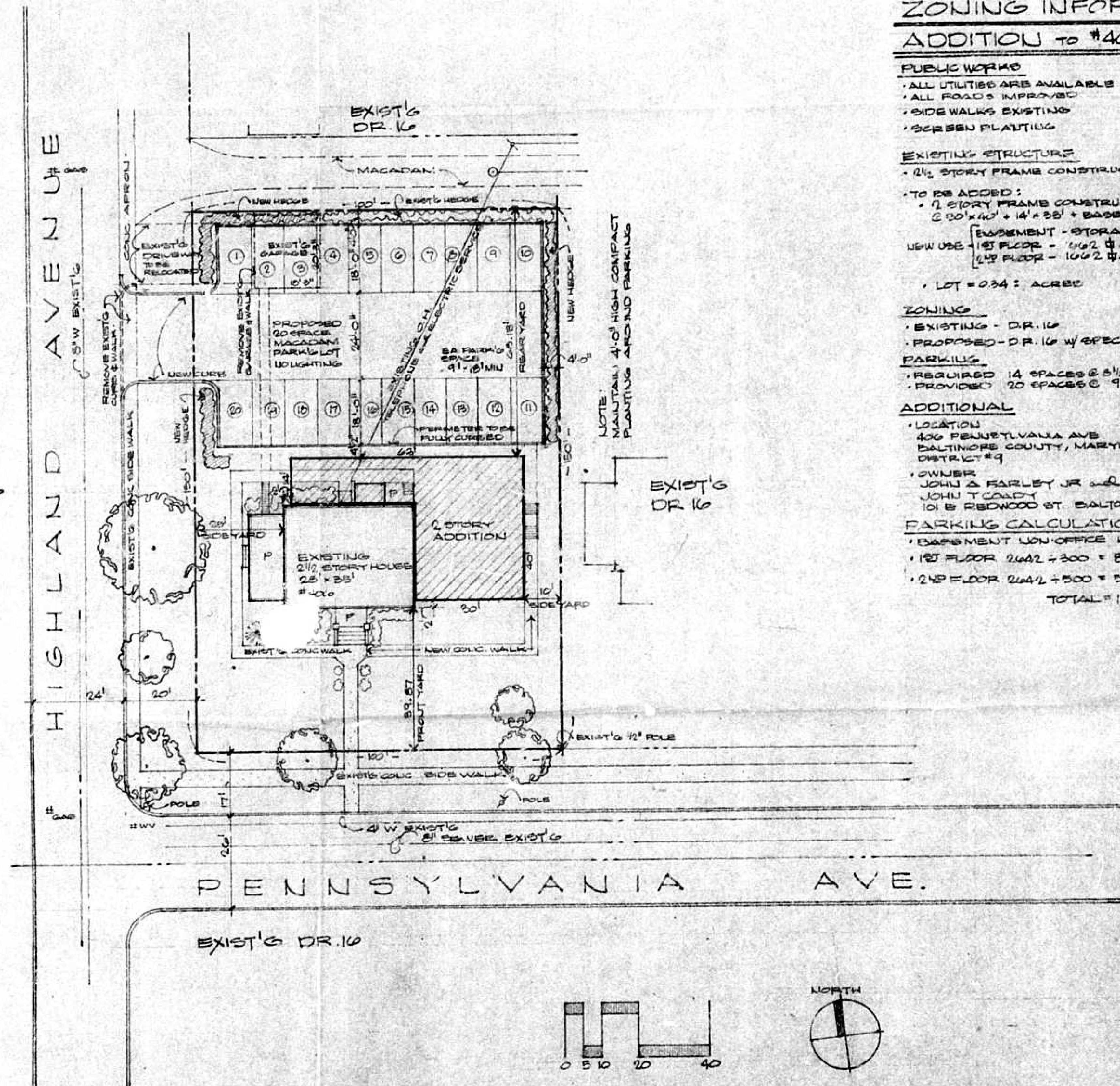
O-NE W-NW
S-SE R-SW
JAMES S. SPAMER & ASSOCIATES
ENGINEERS & SURVEYORS
PO Box 9804
WILMINGTON, DE 19804

PHOTOGRAMMETRIC MAP OF BALTIMORE COUNTY METROPOLITAN AREA



REVISIONS			SCALE	LOCATION	SHEET
NO.	BY	DATE			
1	Topographic	MAPS 4-11-70	1" = 200'	TOWSON	10/A
2	INC		DATE OF PHOTOGRAPHY APRIL 1963		

Topography Compiled By Photogrammetric Methods
AERO SERVICE CORPORATION PHILADELPHIA, PA



SITE PLAN

ZONING INFORMATION FOR
ADDITION TO #406 PENNSYLVANIA AVE.

PUBLIC WORKS

- ALL UTILITIES ARE AVAILABLE (FIRE PROTECTION AS REQ'D)
- ALL ROADS IMPROVED
- SIDE WALKS EXISTING
- SCREEN PLANTING

EXISTING STRUCTURE

- 2 1/2 STORY FRAME CONSTRUCTION 25' x 35'

TO BE ADDED:

- 2 STORY FRAME CONSTRUCTION + BASEMENT 25' x 40' + 14' x 25' + BASEMENT

- NEW USE - BASEMENT - STORAGE
- 1ST FLOOR - 1002 1/2 ATTORNEY'S OFFICES
- 2ND FLOOR - 1002 1/2 ATTORNEY'S OFFICES

- LOT = 0.34 : ACRES

ZONING

- EXISTING - DR. 16
- PROPOSED - DR. 16 w/ SPECIAL EXCEPTION FOR OFFICES

PARKING

- REQUIRED 14 SPACES @ 8 1/2' x 10' EA.
- PROVIDED 20 SPACES @ 9' x 10' EA.

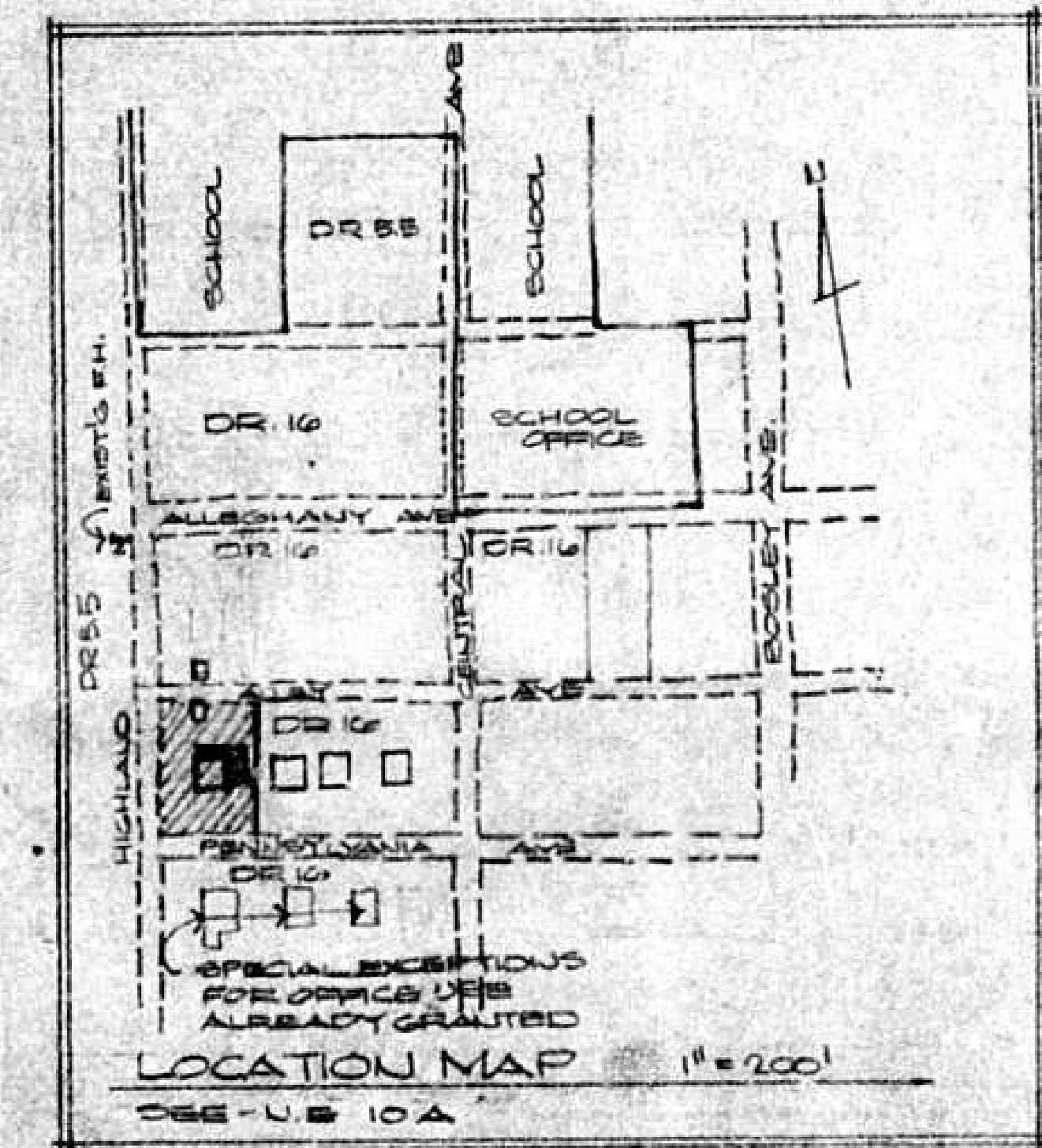
ADDITIONAL

- LOCATION
406 PENNSYLVANIA AVE
BALTIMORE COUNTY, MARYLAND
DISTRICT 19
- OWNER
JOHN A FARLEY JR & JR
JOHN T FARLEY
101 E REDWOOD ST BALTO 21201

PARKING CALCULATIONS

- BASEMENT NON-OFFICE NO COUNT
- 1ST FLOOR $2442 \div 300 = 8.14$
- 2ND FLOOR $2442 \div 300 = 8.14$
- TOTAL = 14.28 = 14

NEW SCREEN PLANTING



UPDATED SURVEY OF AUGUST 1, 1978 BY:
 JAMES S. SPANER & ASSOCIATES
 SURVEYORS & ENGINEERS
 2017 YORK ROAD
 TOWSON, MARYLAND 21204

PLAT FOR ZONING PURPOSES

EXISTING DR. 16 - APPLICATION FOR SPECIAL EXCEPTION FOR OFFICE PLATS

James S. Spaner
 2181

DATE	30
REVISION	1
BY	JSS
CHECKED	JSS
DATE	11-17-78
BY	JSS
DATE	11-17-78
BY	JSS



0-NE N-NW
S-SE R-SW
JAMES J. SPANER & ASSOCIATES
ENGINEERS & SURVEYORS
PO Box 9804
WILSON, MD 21202

PHOTOGRAMMETRIC MAP OF BALTIMORE COUNTY METROPOLITAN AREA



REVISIONS			SCALE	LOCATION	SHEET
Topographic	BY MAPS NC	DATE 4-11-70	1" = 200'	TOWSON	NE 107A
Topography Compiled By Photogrammetric Methods AERO SERVICE CORPORATION-P			DATE OF PHOTOGRAPHY APRIL 1953		

REVISED PLANS
JAN 92
TOD 2:20 PM



Office of
DONALD B. RATCLIFFE
ARCHITECTS
34 W. 25TH ST.
BALTIMORE, MD.

ZONING INFORMATION FOR ADDITION TO #406 PENNSYLVANIA AVE.

PUBLIC WORKS

- ALL UTILITIES ARE AVAILABLE (FIRE PROTECTION AS REQ'D)
- ALL ROADS IMPROVED
- SIDE WALKS EXISTING
- SCREEN PLANTING

EXISTING STRUCTURE

- 2 1/2 STORY FRAME CONSTRUCTION @ 25' x 35'

TO BE ADDED:

- 2 STORY FRAME CONSTRUCTION + BASEMENT NEW SCREEN PLANTING
- 25' x 40' + 14' x 35' + BASEMENT + ENCLOSED EXISTING 10' x 34' SIDE YARD

NEW USE:

- BASEMENT - STORAGE
- 1ST FLOOR - 1902 ATTORNEY'S OFFICES
- 2ND FLOOR - 1902 ATTORNEY'S OFFICES

- LOT = 0.34 ACRES (EXISTING BEFORE HWY STREET WIDENING)

ZONING

- EXISTING - DR 16
- PROPOSED - DR 16 W/ SPECIAL EXCEPTION FOR OFFICES & SIDEYARD VARIANCES

PARKING

- REQUIRED 15 SPACES @ 3 1/2' x 15' BA.
- PROVIDED 20 SPACES @ 9' 1" x 12' BA.

ADDITIONAL

- LOCATION
406 PENNSYLVANIA AVE
BALTIMORE COUNTY, MARYLAND
DISTRICT #9
- OWNER
JOHN A. FARLEY JR. & CO.
JOHN T. COODY
101 E. BROADWOOD ST. BALTO. 21202

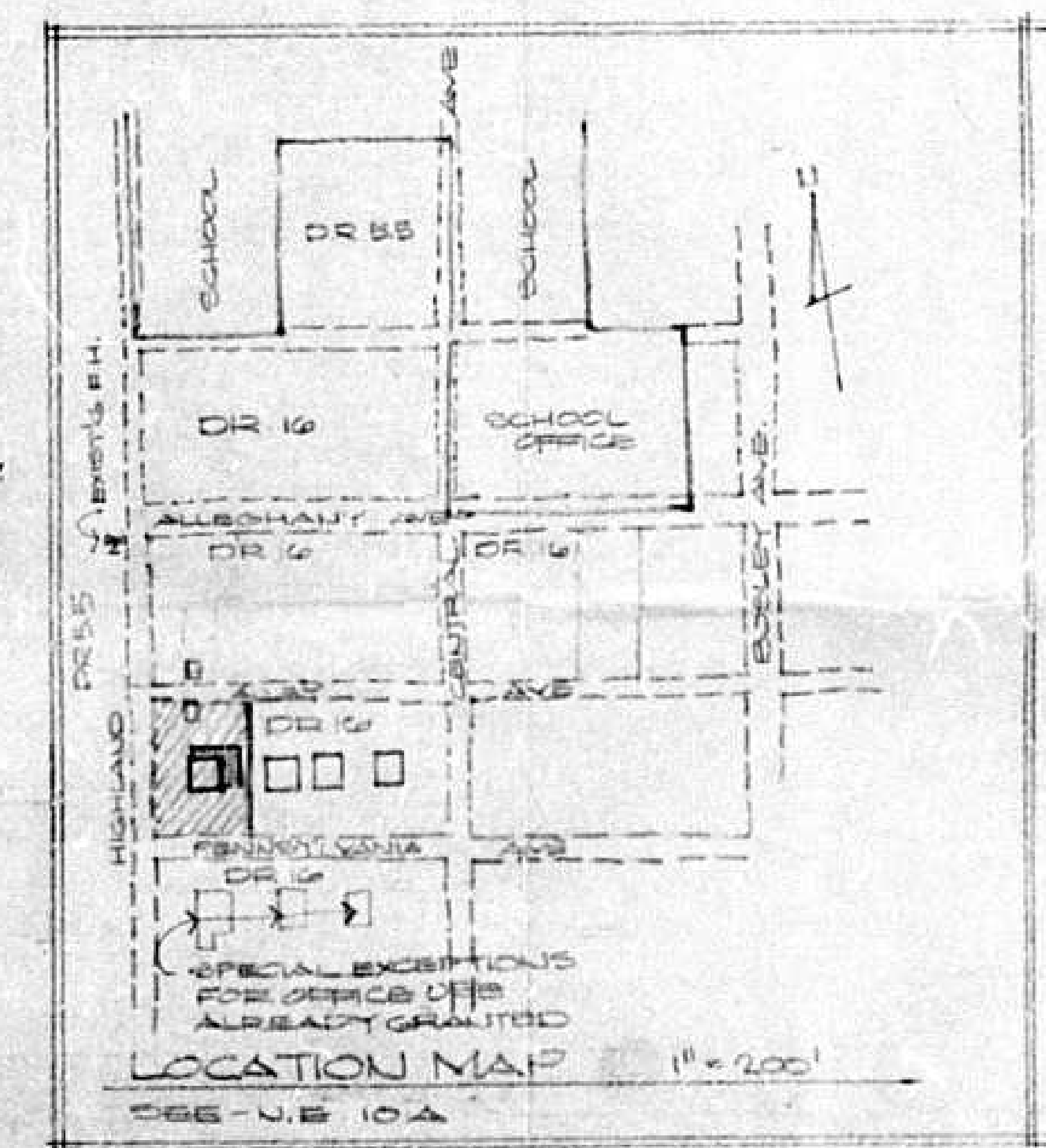
PARKING CALCULATIONS

- BASEMENT NON-OFFICE LOT COUNT
- 1ST FLOOR 2882 ÷ 300 = 9.27
- 2ND FLOOR 2641 ÷ 500 = 5.28

TOTAL = 14.55 ± 15

PROPOSED STREETS & ALLEY WIDENING:

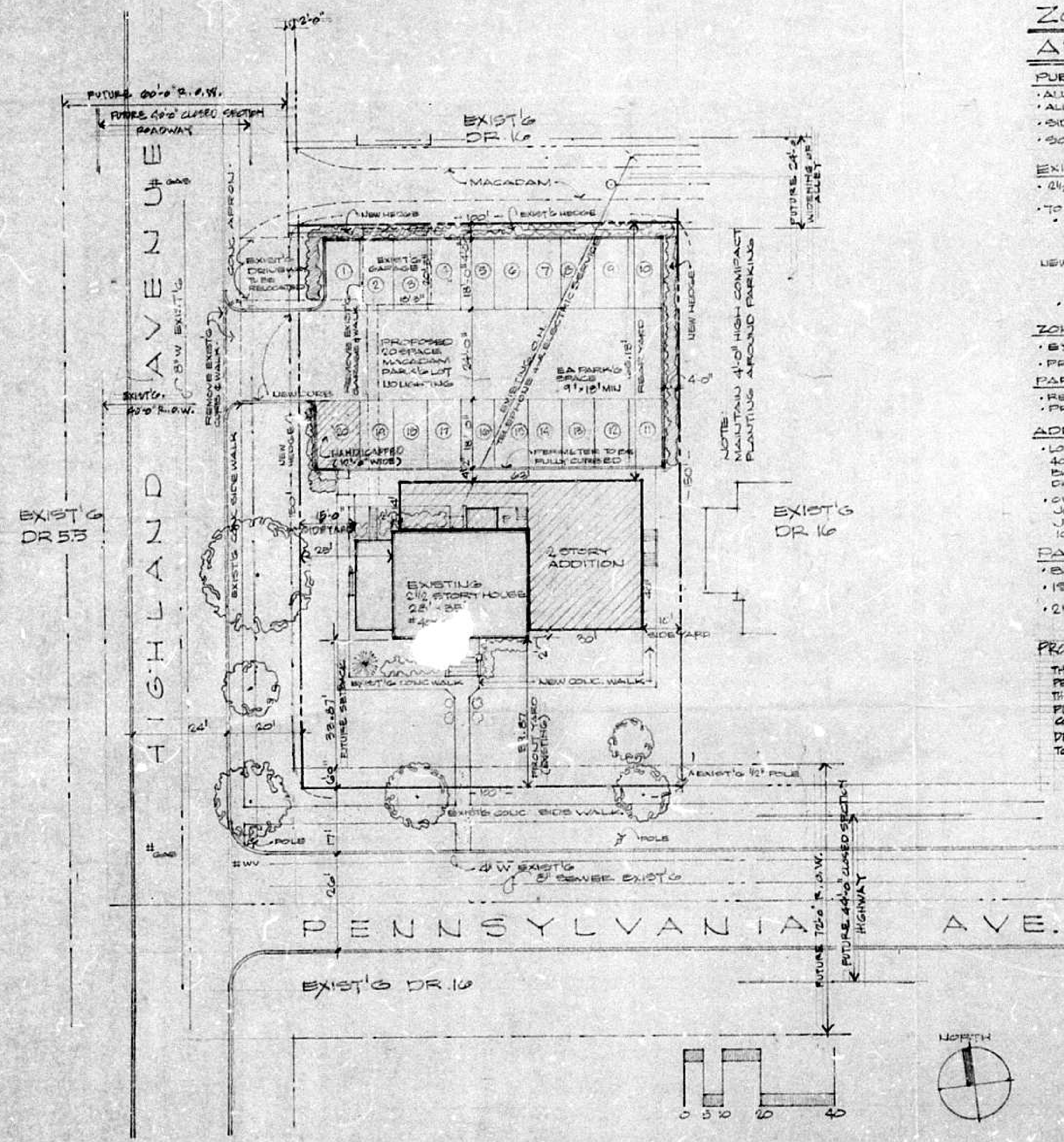
THE SHOWING OF PROPOSED WIDENING OF PENNSYLVANIA AVE. AND HIGHLAND AVE. AND THE ALLEY TO THE NORTH IS FOR IDENTIFICATION PURPOSES ONLY AND IN NO WAY SHALL BE CONSIDERED A RESTRICTION ON USE OR A DEDICATION OR OFFER OF DEDICATION TO PUBLIC USE.



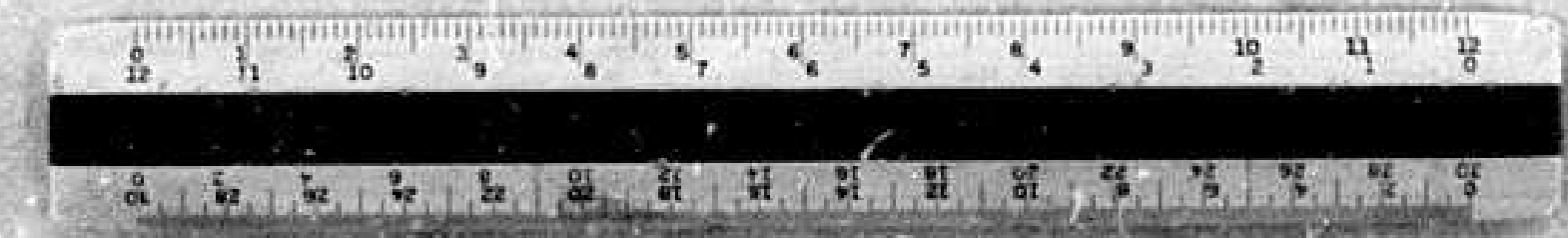
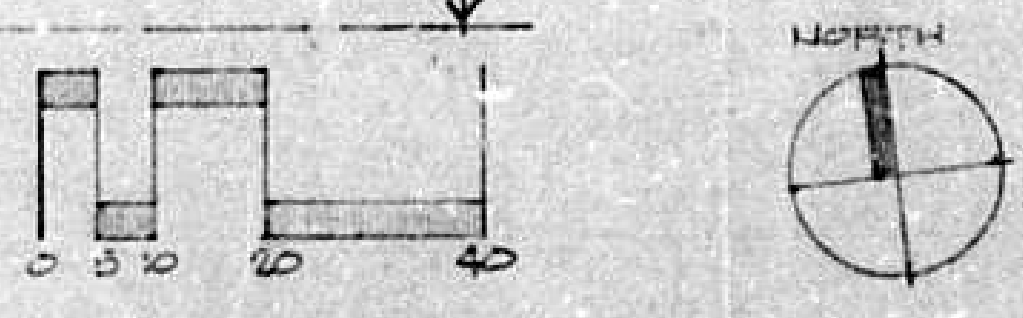
UPDATED SURVEY OF AUGUST 1, 1978 BY:
JAMES S. SPANER & ASSOCIATES
ENGINEERS & SURVEYORS
8017 YORK ROAD
TOWSON, MARYLAND 21204

PLAN FOR ZONING PURPOSES (ITEM #92 0170-1717) (DCA 75-53X)

1. EXISTING DR 16 - APPLICATION FOR SPECIAL EXCEPTION FOR OFFICE BLDG.
2. VARIATION #5:
3. REQUEST SIDEYARD SETBACK OF 10'-0" INSTEAD OF 25'-0" REQUIRED ON EAST SIDE OF PROPOSED BUILDING
4. REQUEST SIDEYARD SETBACK OF 15'-0" FROM PROPERTY LINE INSTEAD OF 25'-0" REQUIRED ON HIGHLAND AVENUE



SITE PLAN



Addition to
406 Pennsylvania Avenue
Towson, Maryland

John A. Farley Jr.

Drawn: [blank]
Scale: [blank]
Revised: [blank]
Date: [blank]
Drawing: **SP1**

RESTRICTIONS - ZONING CASE # 79-210-XA

1. PROPERTY SHALL BE USED FOR NONMEDICAL OFFICES ONLY
2. THERE SHALL BE NO SUBSTANTIAL CHANGE TO THE EXTERIOR OF THE EXIST'G STRUCTURE THAT WOULD IN ANY WAY ALTER ITS RESIDENTIAL APPEARANCE. THE WEST SIDE PORCHES MAY BE ENCLOSED AND UTILIZED FOR OFFICES SO LONG AS THE ENCLOSURE OF THESE PORCHES PROVIDE A FINISHED EXTERIOR APPEARANCE THAT IS RESIDENTIAL IN CHARACTER
3. ALL EXTERIOR LIGHTING MUST BE DIRECTED AWAY FROM THE SURROUNDING PROPERTIES
4. THIS SPECIAL EXCEPTION MUST BE UTILIZED WITHIN TWO(2) YEARS FROM THE DATE OF THIS ORDER (4-29-1980). AFTER SAID DATE, THIS SPECIAL EXCEPTION SHALL BE NULL & VOID

PLANS APPROVED OFFICE OF PLANNING & ZONING

BY John J. Sullivan
PLANNING
DATE 2/26/81
BY James E. Lane
ZONING COMMISSIONER
DATE 2/26/81
79-210 XA
C-144-B1

LEGEND

- LOT = 0.24 ± ACRES (EXISTING BEFORE NEW STREET WIDENING)

ZONING

- EXISTING - R.O. - PR-16 NITE SPECIAL EXCEPTION FOR OFFICES
- AND SIDE YARD VARNICES

PARKING

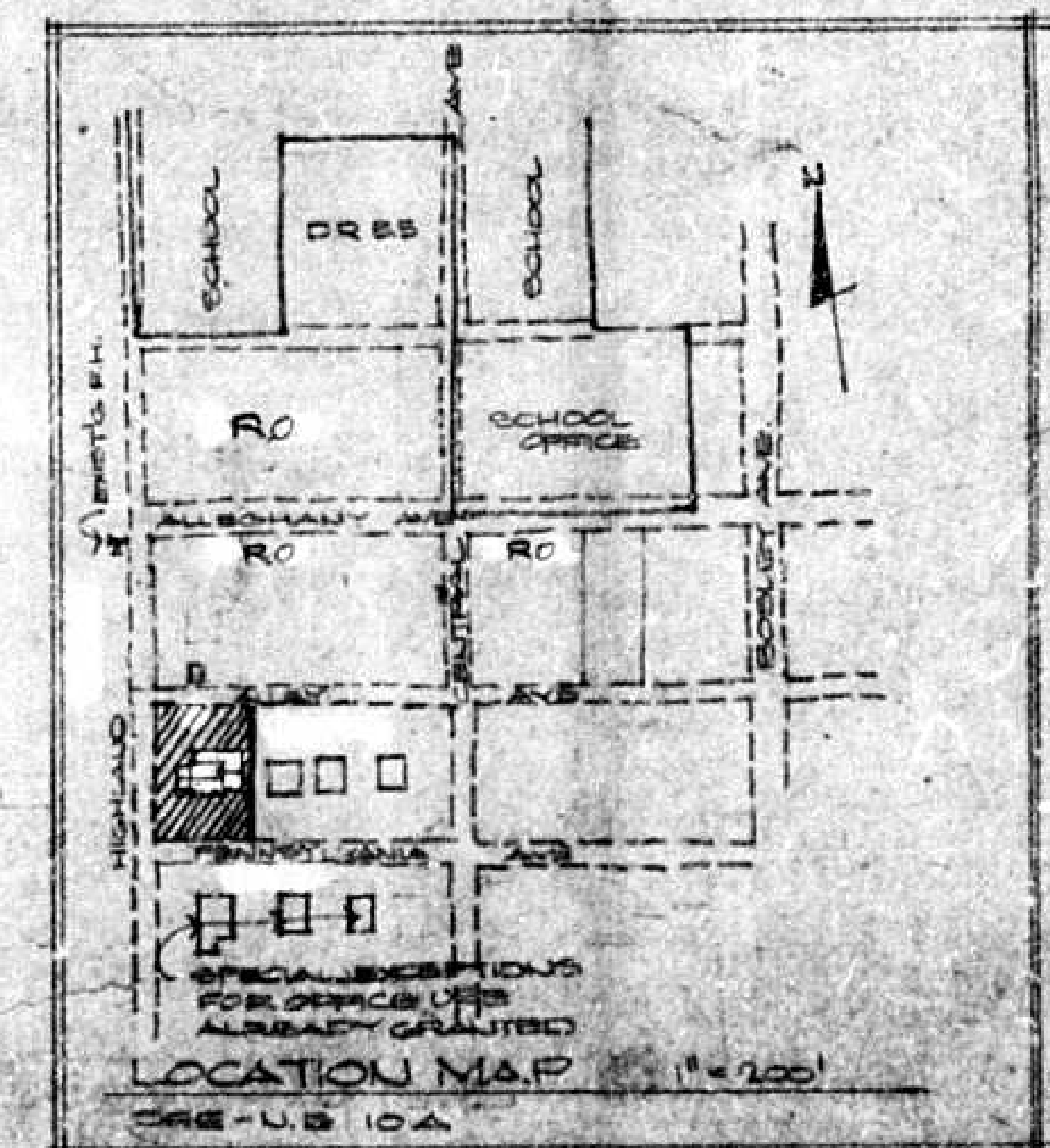
- REQUIRED 16 SPACES @ 8'11" x 12' 6"
- PROVIDED 20 SPACES @ 9'1" x 10' 6"

ADDITIONAL

- LOCATION
400 PENNSYLVANIA AVE
BALTIMORE COUNTY, MARYLAND
DISTRICT #9
- OWNER
JOHN A. FARLEY JR. & CO.
JOHN T. COADY
101 E. REDWOOD ST. BALTO. 21202

PARKING CALCULATIONS

- BASEMENT 1200 ÷ 300 = 4.00
- 1ST FLOOR 2282 ÷ 300 = 7.60
- 2ND FLOOR 2041 ÷ 500 = 4.00
- TOTAL = 15.60 ±



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