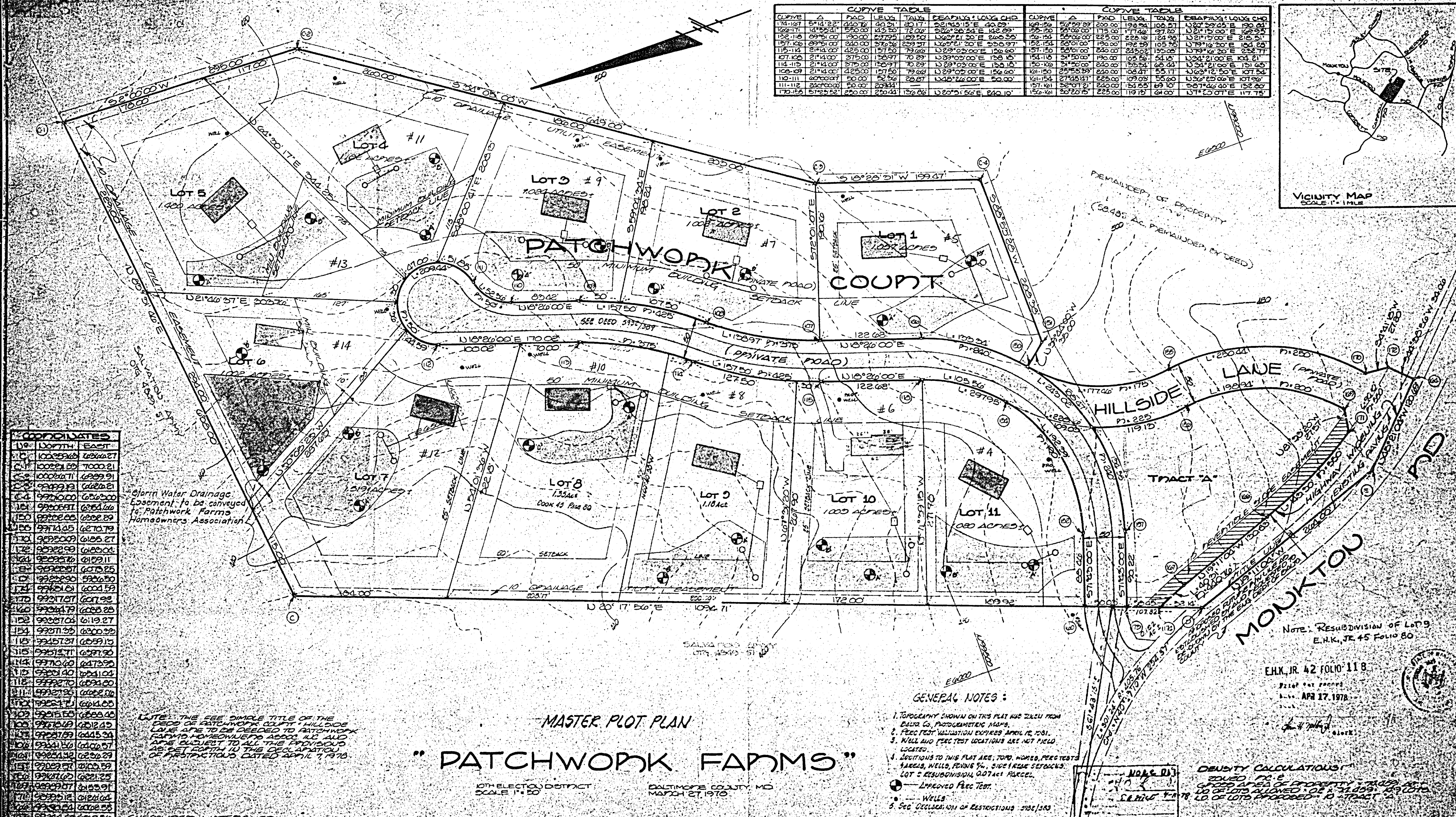


CUPVE TABLE					CUPVE TABLE				
CUPVE	Δ	PAD	LEXA	TANZ	CUPVE	Δ	PAD	LEXA	TANZ
174-107	51°14'22"	1540	1540	1540	1540	51°14'22"	1540	1540	1540
166-117	14°25'51"	1540	1540	1540	1540	14°25'51"	1540	1540	1540
152-116	09°51'00"	1540	1540	1540	1540	09°51'00"	1540	1540	1540
157-106	09°51'00"	2400	2400	2400	2400	09°51'00"	2400	2400	2400
115-114	21°14'00"	4250	15150	7300	1540	21°14'00"	4250	15150	7300
107-105	21°14'00"	3750	15697	7029	1540	21°14'00"	3750	15697	7029
107-115	21°14'00"	3750	15697	7029	1540	21°14'00"	3750	15697	7029
110-111	21°14'00"	4250	15697	7029	1540	21°14'00"	4250	15697	7029
110-111	21°14'00"	50	5250	2500	1540	21°14'00"	50	5250	2500
111-112	21°14'00"	50	2500	2500	1540	21°14'00"	50	2500	2500
170-155	25°25'52"	2500	2500	2500	1540	25°25'52"	2500	2500	2500



NOTE: RESUBDIVISION OF LOT 5
TO 15 EQUAL 80

FHX IR 42 FOLIO 118

Ex 107 941 record
A. 6. A83 17 187

CALCULATIONS
 DC 8
 AREA OF PROPERTY = 71,059 ACRES
 ALLOWED = 0.2 = 14,212 ACRES
 PROPOSED = 10 TRACT 4

PETITIONER'S
EXHIBIT 4
WELLS ASSOCIATES
 PROFESSIONAL LAND SERVICE
 1001 COLONY BLVD
 LOWESBORO, MD 21703

MASTER PLOT PLAN

"PATCHWORK FARMS"

GENERAL NOTES

1. TOPOGRAPHY SHOWN ON THIS PLAT WAS EXCEL FROM DALLAS CO. PHOTOGRAMMETRIC MAPS.
 2. PEFC TEST VALIDATION EXPIRES APRIL 12, 2011.
 3. WELLS AND PEFC TEST LOCATIONS ARE NOT FIELD LOCATIONS.
 4. LOCATIONS TO THIS PLAT ARE: TOWN, NORTON, PEFC TESTS, GARDEN, WELLS, PAVING YW, SIDE 1 RISE SOUTHWEST. LOT 5 RESUBDIVISION 007465 PARCEL.
- APPROVED PEFC TEST.
- --- WELLS
 - SEE DEFERRAL UNIT OR EXEMPTION UNIT - see page

OWNER'S CERTIFICATE

THE REQUIREMENTS OF SECTION 59 TO 62 ARTICLE 17 OF THE ANNOTATED CODE OF MARYLAND 1957 EDITION (TITLE: CLERKS OF THE COURT) TITLE 1, CLERKS OF THE CIRCUIT COURTS) AND CAPAS THEY RELATE TO THE MAKING OF PLATS AND THE SETTING OF MARKERS HAVE BEEN COMPLIED WITH.

Richard A. Moore - 3-27-76

SURVEYOR'S CERTIFICATE

I, EUGENE F. FARMER, A REGISTERED PROFESSIONAL LAND SURVEYOR OF THE STATE OF MARYLAND, DO HEREBY CERTIFY THAT THE LAND SHOWN HEREON HAS BEEN Laid OUT AND THE PLAT THEREOF PREPARED IN ACCORDANCE WITH THE PROVISIONS OF THE LAW RELATING TO THE SURVEYSIONS OF LANDS KNOWN AS HOUSE BUILDING ACT OF THE STATE OF MARYLAND, 1966 AND ACCORDING TO THE INSTRUMENTS OF

Est. Raphael 3.25.7

INTER

HIGHWAY AND HIGHWAY WIDENING
BODIES HAVE BEEN IDENTIFIED AS
MEANS TO SHOW THE PEOPLE ARE DE-
SERVED UNDER THE DEVELOPMENT AND
ARE HEREBY OFFERED FOR CREDIT
CREDIT TO BE OBTAINED BY CREDIT AND
DEPRECIATION AND ASSIGN
SHALL COME TO THE PEOPLE OF
DEED TO CALIF. CO. MD. AT THE COST

DEVELOPMENT AND DEVELOPMENT
SHOWN TO THE PEOPLE ARE OFFERED
TO CALIF. CO. MD. AT THE COST

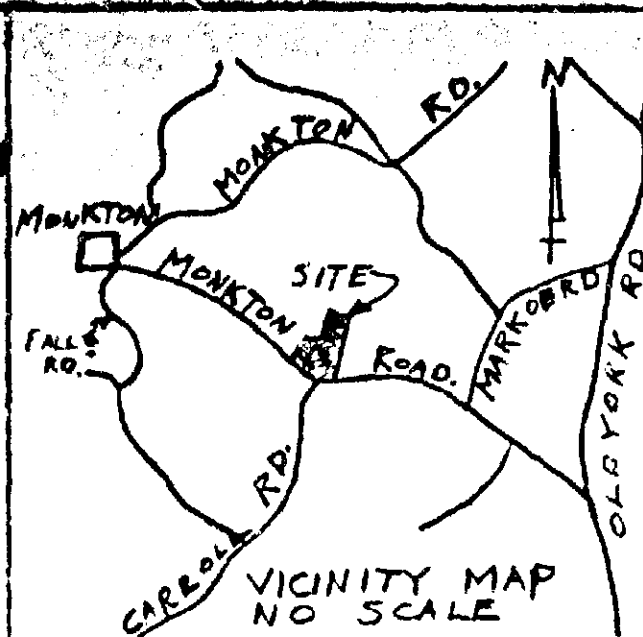
STREETS AND ON ROADS SHOWING
HERPES AND MENTION THE OF M
DECEITFUL AND FOLLOWS OF
A RE NOT THE SAME
MATED TO PUBLIC USE TO BE
A TITLE TO THE
IS EXPOSED TO THE PEOPLE
S A UTORIS OF THE
THIS QUALITY ATTACHED TO THEM
HELPS AND A

DEARINGS AND COORDINATES
SHOWN ON THIS PLAT ARE REFERRED
TO DATUM OF METROPOLITAN GRID

SYSTEM STATUS X-102-X-101

COORDINATES		
13°	NORTH	EAST
13.0	000559.66	01064.27
13.1	000559.59	7000.21
13.2	000559.71	0239.91
13.3	000559.13	0626.81
13.4	999500.00	0650.50
13.5	999500.01	0652.16
13.6	999500.05	0652.89
13.7	997142.65	0670.79
13.8	995500.09	0185.27
13.9	995500.99	0185.04
14.0	995500.76	0159.11
14.1	995500.57	0233.25
14.2	995200.90	5926.50
14.3	995501.01	0004.59
14.4	993171.07	0601.92
14.5	993041.79	0608.25
14.6	990057.04	0119.27
14.7	999711.25	0030.29
14.8	994573.37	0659.13
14.9	995151.71	0597.90
15.0	997020.60	0671.99
15.1	999201.40	0634.04
15.2	999500.70	0654.00
15.3	999231.95	0058.06
15.4	999231.71	0064.00
15.5	999500.55	0658.40
15.6	997500.49	0672.42
15.7	999500.59	0645.34
15.8	999201.56	0060.57
15.9	999231.92	0050.59
16.0	997020.97	0601.35
16.1	999200.05	0200.91
16.2	999500.15	0201.01
16.3	999500.54	0060.55

1. PAVING (09.01) GULFON LEFT WATER ONE
 2. WAYS DEPARTMENT OF BALTIMORE COUNTY
APPROVED FOR STREET ALIGNMENT LOCATION
DATE 1/14/8 1/14/8
DATE
APPROVED FOR ADULT & HEALTH DEPARTMENT
DATE 1/14/8
APPROVED FOR ADULT & HEALTH DEPT ONE 11/1
APPROVED FOR ADULT & PLANNING BOARD
DATE



DEVELOPER PLEASE NOTE

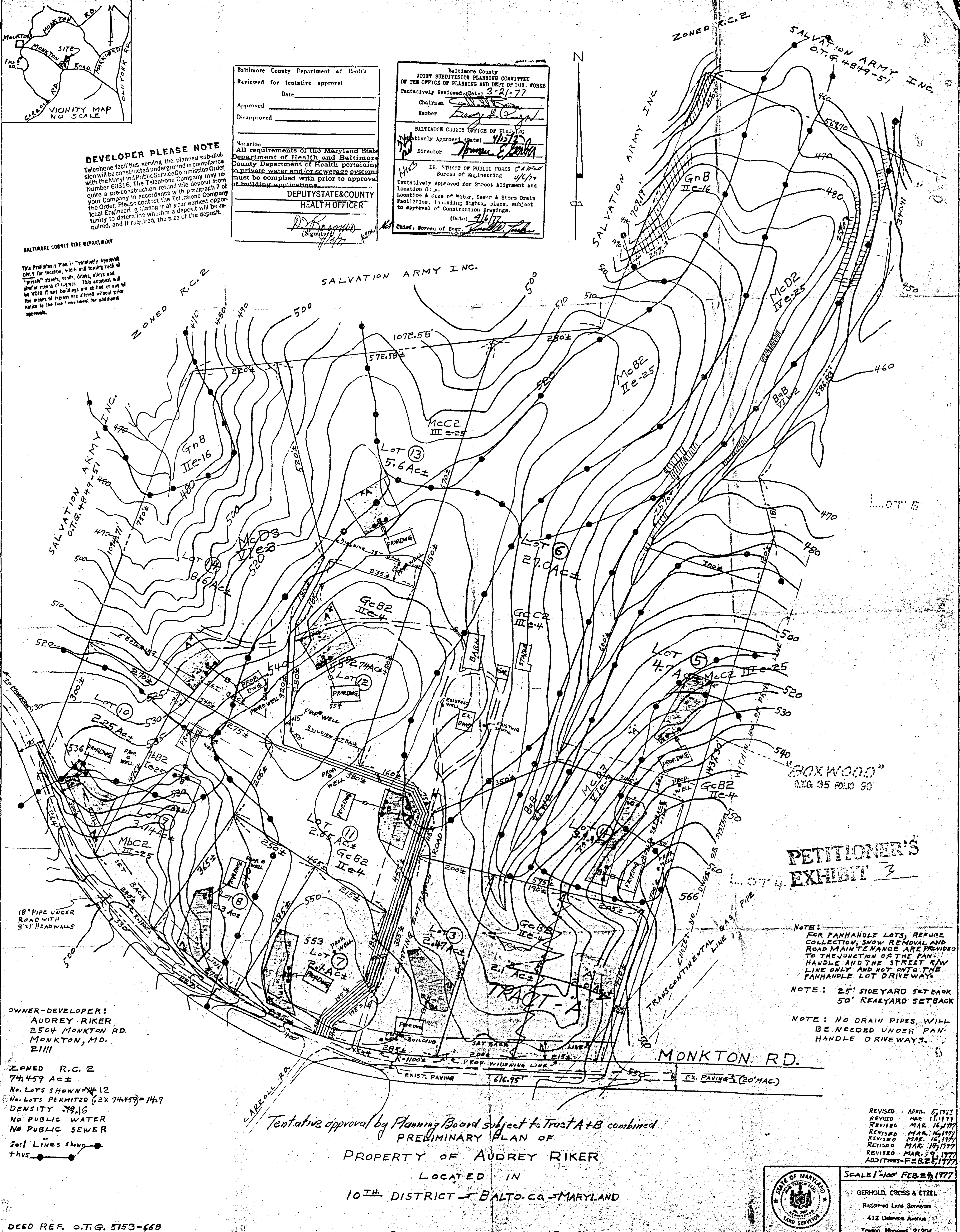
Telephone facilities serving the planned subdivision will be constructed underground in compliance with the Maryland Public Service Commission Order Number 60316. The Telephone Company may require a pre-construction refundable deposit from your Company in accordance with paragraph 7 of the Order. Please contact the Telephone Company local Engineer & Manager at your earliest opportunity to determine whether a deposit will be required, and if required, the size of the deposit.

BALTIMORE COUNTY FIRE DEPARTMENT

This Preliminary Plan is Tentatively Approved ONLY for location, width and turning radii of "private" streets, roads, drives, alleys and similar means of ingress. This approval will be VOID if any buildings are shifted or any of the means of ingress are altered without prior notice to the Fire Department for additional approval.

Baltimore County Department of Health
Reviewed for tentative approval
Date _____
Approved _____
Disapproved _____
Notation _____
All requirements of the Maryland State Department of Health and Baltimore County Department of Health pertaining to private water and/or sewerage systems must be complied with prior to approval of building applications.
DEPUTY STATE & COUNTY HEALTH OFFICER
[Signature]
4/16/77

Baltimore County
JOINT SUBDIVISION PLANNING COMMITTEE
OF THE OFFICE OF PLANNING AND DEPT OF PUB. WORKS
Tentatively Reviewed (Date) 3-21-77
Chairman _____
Member _____
BALTIMORE COUNTY OFFICE OF PLANNING
Tentatively Approved (Date) 4/16/77
Director _____
DEPT. OF PUBLIC WORKS
Bureau of Engineering
Tentatively Approved for Street Alignment and Location Only.
Location & Size of Water, Sewer & Storm Drain Facilities, including Highway plans, subject to approval of Construction Drawings.
(Date) 4/16/77
Chief, Bureau of Engr. _____



PETITIONER'S EXHIBIT 3

NOTE: FOR PANHANDLE LOTS, REFUGE COLLECTION, SNOW REMOVAL AND ROAD MAINTENANCE ARE PROVIDED TO THE JUNCTION OF THE PANHANDLE AND THE STREET RUN LINE ONLY AND NOT ONTO THE PANHANDLE LOT DRIVEWAYS.
NOTE: 25' SIDEYARD SETBACK 50' REARYARD SETBACK
NOTE: NO DRAIN PIPES WILL BE NEEDED UNDER PANHANDLE DRIVEWAYS.

OWNER-DEVELOPER:
AUDREY RIKER
2504 MONKTON RD.
MONKTON, MD.
21111
ZONED R.C.2
74,459 AC±
No. LOTS SHOWN 12
No. LOTS PERMITTED (2X 74,459) = 14.9
DENSITY 1.16
NO PUBLIC WATER
NO PUBLIC SEWER
Soil Lines shown
thus _____

Tentative approval by Planning Board subject to Tract A+B combined
PRELIMINARY PLAN OF
PROPERTY OF AUDREY RIKER
LOCATED IN
10TH DISTRICT BALTO. CO. MARYLAND

REVISED APRIL 5, 1977
REVISED MAR. 11, 1977
REVISED MAR. 16, 1977
REVISED MAR. 16, 1977
REVISED MAR. 16, 1977
REVISED MAR. 16, 1977
ADDITIONS FEB. 25, 1977



SCALE 1"=100' FEB. 24, 1977
GERHOLD, CROSS & ETZEL
Registered Land Surveyors
412 Delaware Avenue
Towson, Maryland 21204

DEED REF. O.T.G. 5153-668

-GUNPOWDER FALLS DRAINAGE AREA-

Robert E. Carney
ROBERT E. CARNEY JR.

My Commission Expires

0061 1950 2316991 8-7-78
0061 1950 2316991 8-7-78

Rec'd for record SEP 7 1970 *322*
Per Elmer H. Kahline, Jr., Clerk
Mail to *Robert E. Carney Jr.*
Receipt No. *3*

BEING part of all that property which by deed dated January 16 1978, and recorded among the Land Records of Baltimore County in Liber E.H.K.Jr. No. 5848, folio 237, was granted and conveyed by Audrey Riker unto the said party of the first part.

NY-9-79	246197d	***19050
NY-9-79	24619708	****8200
NY-9-79	24619807	***10250
NY-9-79	24619508	*****600

BEING part of all that property which by deed dated January 16, 1978, and recorded among the Land Records of Baltimore County in Liber E.H.K.-Jr. No. 5848, folio 237, was granted and conveyed by Audrey Riker unto) the said party of the first part.

TRANSFER TAX NOT REQUIRED
 RANDOLPH B. ROSENCRANTZ
 DIRECTOR OF FINANCE
 BALTIMORE COUNTY, MARYLAND

For: Rose J. Colburn
 6-11-80 AUTHORIZED SIGNATURE June 85

NY-0-70 2461078 ***19050
NY-0-70 2461070B ***46200
NY-0-70 2461050E ***10250
NY-0-70 2461050H ***00600

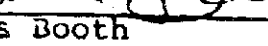
IN WITNESS WHEREOF, I have hereunto set my hand and official seal

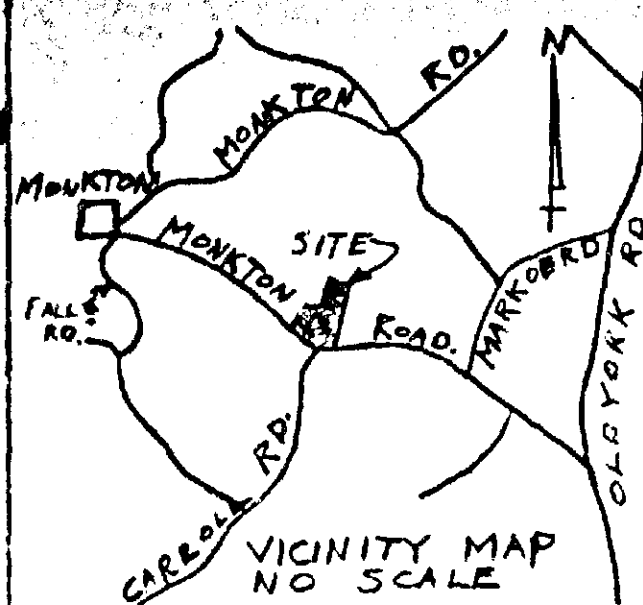
Mail to COLONIAL TITLE CO. INC.

Fiomena Coon 14 Patchwork Ct. Moncton
 Kora Longoff 6 Patchwork Ct. Moncton
 William F. Long 6 Patchwork Ct. Moncton
 J. E. Runkini 11 Patchwork Ct. Moncton
 Bruce G. Downer 7 Patchwork Ct. "
 John T. Dixon 5 Patchwork Ct. Moncton NB
~~James B. Coon~~ 14 Patchwork Ct. Moncton NB
 Sheila F. Haskell 9 Patchwork Ct. Moncton NB
 Peggy Haskell 9 Patchwork Ct. Moncton
 Ronald F. Bell 4 Patchwork Ct. Moncton, NB

PROTESTANT'S
EXHIBIT

Based on the members' common sense understanding of what they, or the majority of them, were told, it was their understanding and belief that Mr. Moore's farm, which was fully enclosed by fencing, would not be sub-divided for further development. Tract A was fenced, as was the rest of Mr. Moore's farm, and, to the untrained and uneducated eye, appeared to be a part of Mr. Moore's farm, which was governed by the twenty-five year restriction on further development.

 Ronald Baldwin	 Jeannette Baldwin
 Francis Booth	 Filomena Booth
 James Davis	 Patricia Davis
 John Dillon	 Darlene Dillon



DEVELOPER PLEASE NOTE

Telephone facilities serving the planned subdivision will be constructed underground in compliance with the Maryland Public Service Commission Order Number 60316. The Telephone Company may require a pre-construction refundable deposit from your Company in accordance with paragraph 7 of the Order. Please contact the Telephone Company local Engineer & Manager at your earliest opportunity to determine whether a deposit will be required, and if required, the size of the deposit.

BALTIMORE COUNTY FIRE DEPARTMENT

This Preliminary Plan is Tentatively Approved ONLY for location, width and turning radii of "private" streets, roads, drives, alleys and similar means of ingress. This approval will be VOID if any buildings are shifted or any of the means of ingress are altered without prior notice to the Fire Department for additional approval.

Baltimore County Department of Health
Reviewed for tentative approval
Date _____
Approved _____
Disapproved _____

Notation
All requirements of the Maryland State Department of Health and Baltimore County Department of Health pertaining to private water and/or sewerage systems must be complied with prior to approval of building applications.

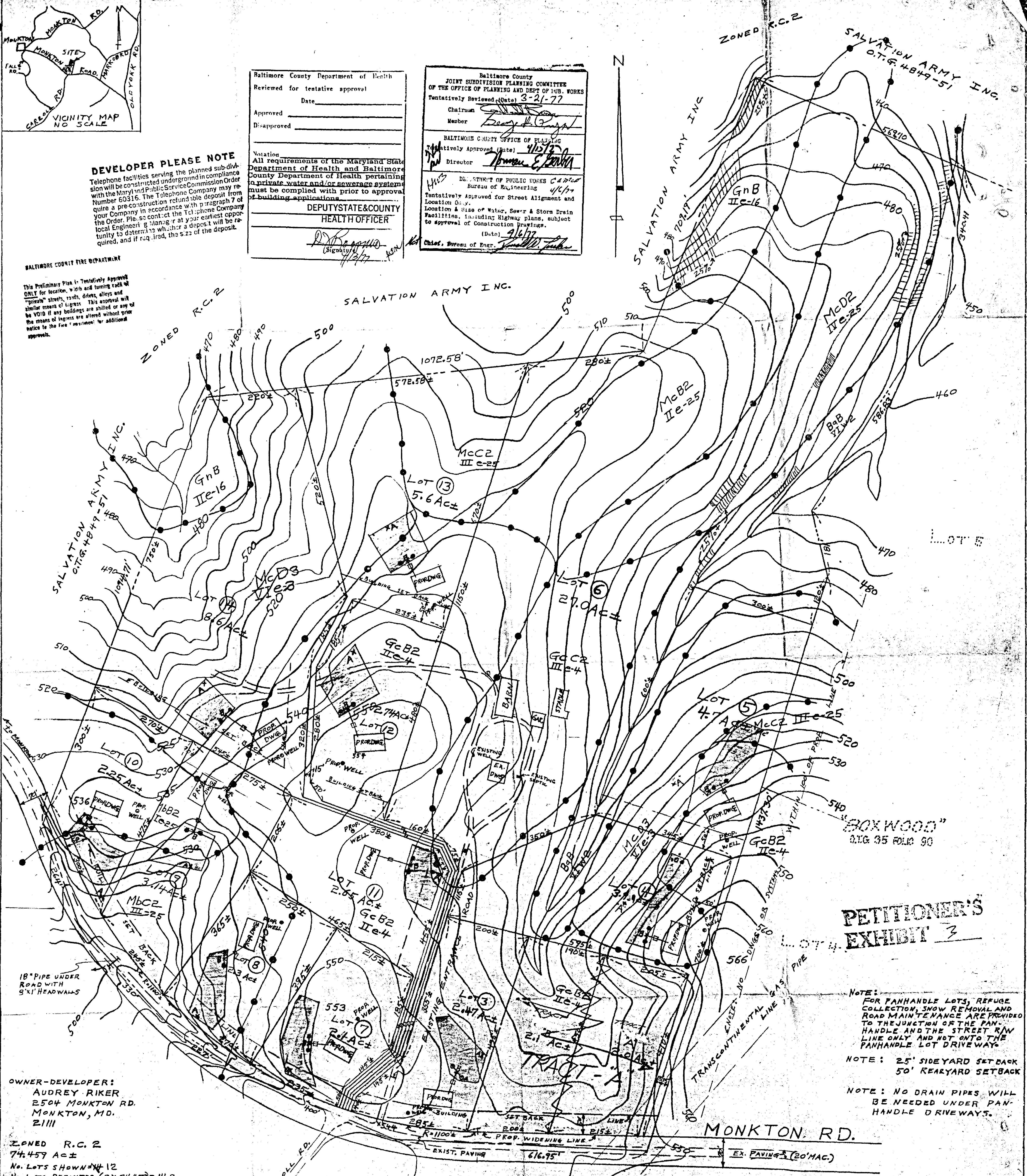
DEPUTY STATE & COUNTY HEALTH OFFICER

[Signature]
4/6/77

Baltimore County
JOINT SUBDIVISION PLANNING COMMITTEE
OF THE OFFICE OF PLANNING AND DEPT OF PUB. WORKS
Tentatively Reviewed (Date) 3-21-77
Chairman _____
Member _____

BALTIMORE COUNTY OFFICE OF PLANNING
Tentatively Approved (Date) 4/6/77
Director _____

DEPT. OF PUBLIC WORKS
Bureau of Engineering
Tentatively Approved for Street Alignment and Location Only.
Location & Size of Water, Sewer & Storm Drain Facilities, including Highway plans, subject to approval of Construction Drawings.
(Date) 4/6/77
Chief, Bureau of Engr. _____



OWNER-DEVELOPER:
AUDREY RIKER
2504 MONKTON RD.
MONKTON, MD.
21111

ZONED R.C. 2
74,459 AC±
No. LOTS SHOWN 12
No. LOTS PERMITTED (2X 74,459) = 14.9
DENSITY 1.16
NO PUBLIC WATER
NO PUBLIC SEWER
Soil Lines shown
thus _____

Tentative approval by Planning Board subject to Tract A+B combined

PRELIMINARY PLAN OF

PROPERTY OF AUDREY RIKER

LOCATED IN

10TH DISTRICT - BALTO. CO - MARYLAND

-GUNPOWDER FALLS DRAINAGE AREA-

PETITIONER'S
EXHIBIT 3

NOTE:
FOR PANHANDLE LOTS, REFUGE COLLECTION, SNOW REMOVAL AND ROAD MAINTENANCE ARE PROVIDED TO THE JUNCTION OF THE PANHANDLE AND THE STREET RAIL LINE ONLY AND NOT ONTO THE PANHANDLE LOT DRIVEWAYS.

NOTE: 25' SIDEYARD SETBACK
50' REARYARD SETBACK

NOTE: NO DRAIN PIPES WILL BE NEEDED UNDER PANHANDLE DRIVEWAYS.

MONKTON RD.

DEED REF. O.T.G. 5153-668



SCALE 1"=100' FEB 24, 1977
GERHOLD, CROSS & ETZEL
Registered Land Surveyors
412 Delaware Avenue
Towson, Maryland 21204

REVISED APRIL 5, 1977
REVISED MAR 11, 1977
REVISED MAR 16, 1977
REVISED MAR 16, 1977
REVISED MAR 16, 1977
REVISED MAR 16, 1977
ADDITIONS FEB 25, 1977

Brice G. Dowell
Susan Dowell
William F. Farnoff
Karen Farnoff
Donald Haskell
Sheila Haskell
John Rinehimer
Nancy Rinehimer

IN RE: PETITION SPECIAL HEARING
NE/S of Monkon Road, 700'
NW of Carroll Road - 10th
Election District
Richard A. Moore,
Petitioner
* * * * *
BEFORE THE
ZONING COMMISSIONER
OF BALTIMORE COUNTY
Case No. 86-20-SPH
* * * * *
ORDER
Pursuant to the Order of Dismissal rendered in Case No. CBA-85-114 on January 10, 1986 by the Board of Appeals for Baltimore County, IT IS ORDERED by the Zoning Commissioner of Baltimore County, this 17th day of January, 1986, that the request for approval of the Second Amended Final Development Plan of Patchwork Farms, which shows building envelopes on Tract A, is moot since Section 1801.3.A.7.b.i, Baltimore County Zoning Regulations (BCZR), requires prior approval of a proposed amendment to a development plan by the Baltimore County Planning Board before the Zoning Commissioner may approve same and since the subject matter in Case No. CBA-85-114 and the instant case was and is the same and, as such, the Petition for Special Hearing is hereby DISMISSED without prejudice.

Stephen J. Nolan, Esquire
People's Counsel

ORDER RECEIVED FOR FILING

DATE 1/17/86
BY [Signature]
ADMINISTRATIVE ASSISTANT
cc: Stephen J. Nolan, Esquire
Mr. Ronald F. Baldwin
People's Counsel

E. F. RAPHEL & ASSOCIATES
Registered Professional Land Surveyors
201 COURTLAND AVENUE
TOWSON, MARYLAND 21204
DESCRIPTION TO ACCOMPANY
SECOND AMENDED PARTIAL DEVELOPMENT PLAN
"PATCHWORK FARMS"
April 1, 1985
Beginning for the same at a point in the center of Monkon Road, said point being located northwesterly, 700' ± from the intersection formed by the center of Monkon Road and the center of Carroll Road, running thence in Monkon Road N 45° 21' 04" W 120.69', and N 19° 11' 04" W 264.00', thence leaving Monkon Road, and binding on the outline of "Patchwork Farms", the following courses and distances 1) N 20° 17' 56" E 1094.71', 2) N 83° 31' 46" E 638.00', 3) S 2° 00' 00" W 295.00', 4) S 34° 05' 00" W 649.00', 5) S 18° 28' 31" W 199.47', 6) S 88° 53' 28" W 208.38', 7) N 39° 44' 00" W 35.00', to a point on the southeastern side of Patchwork Court and Hillside Lane, thence leaving Patchwork Court, and binding on the southeast side of Hillside Lane, 8) by a curve to the left, with a radius of 175', for a distance of 177.46', 9) by a curve to the right, with a radius of 250', for a distance of 290.44', 10) S 4° 41' 18" W 27.20', thence leaving Hillside Lane 11) S 44° 38' 56" W 34.06' to the place of beginning.
Being known as "Patchwork Farms", a subdivision of Baltimore County.



E. F. Raphael
Reg. Prof. Land Surveyor
#2246

PETITION FOR SPECIAL HEARING
10th Election District
LOCATION: Northeast side of Monkon Road, 700 feet Northwest of Carroll Road
DATE AND TIME: Monday, July 15, 1985 at 10:30 a.m.
PUBLIC HEARING: Room 106, County Office Building, 111 West Chesapeake Avenue, Towson, Maryland
The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County, will hold a public hearing:

Petition for Special Hearing under Section 500.7 of the Baltimore County Zoning Regulations, to determine whether or not the Zoning Commissioner and/or Deputy Zoning Commissioner should approve the Second Amended Final Development Plan of Patchwork Farms showing building envelopes on Tract A.

Being the property of Richard A. Moore as shown on the plat filed with the Zoning Office.
In the event that this Petition is granted, a building permit may be issued within the thirty (30) day appeal period. The Zoning Commissioner will, however, entertain any request for a stay of the issuance of said permit during this period for good cause shown. Such request must be received in writing by the date of the hearing set above or made at the hearing.

BY ORDER OF
ARNOLD JABLON
ZONING COMMISSIONER
OF BALTIMORE COUNTY

RE: PETITION FOR SPECIAL HEARING : BEFORE THE ZONING COMMISSIONER
NE/S of Monkon Rd., 700' NW
of Carroll Rd., 10th District : OF BALTIMORE COUNTY
RICHARD A. MOORE, Petitioner : Case No. 86-20-SPH

ENTRY OF APPEARANCE

Please enter the appearance of the People's Counsel in the above-captioned matter. Notices should be sent of any hearing dates or other proceedings in this matter and of the passage of any preliminary or final Order.

Phyllis Cole Friedman
Phyllis Cole Friedman
People's Counsel for Baltimore County

Peter Max Zimmerman
Peter Max Zimmerman
Deputy People's Counsel
Rm. 225, Court House
Towson, MD 21204
494-2188

I HEREBY CERTIFY that on this 21st day of June, 1985, a copy of the foregoing Entry of Appearance was mailed to Stephen J. Nolan, Esquire, Nolan, Plumbhoff & Williams, Chartered, 204 W. Pennsylvania Ave., Towson, MD 21204, Attorney for Petitioner.

Peter Max Zimmerman
Peter Max Zimmerman

BALTIMORE COUNTY
OFFICE OF PLANNING & ZONING
TOWSON, MARYLAND 21204
494-3353
ARNOLD JABLON
ZONING COMMISSIONER

July 11, 1985

Stephen J. Nolan, Esquire
204 West Pennsylvania Avenue
Towson, Maryland 21204

RE: Petition for Special Hearing
NE/S Monkon Rd., 700' NW/Carroll Road
10th Election District
Richard A. Moore - Petitioner
Case No. 86-20-SPH

Dear Mr. Moore,

This is to advise you that \$77.52 is due for advertising and posting of the above property. This fee must be paid before an Order is issued.

This fee must be paid and the zoning sign and post returned on the day of the hearing. Do not remove sign until day of the hearing.

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT
No. 007395
DATE 7/23/85 ACCOUNT R-01-615-000
AMOUNT \$77.52
RECEIVED FROM Stephen J. Nolan, Esquire
FOR Advertising and Posting Case No. 86-20-SPH
8657*****775218 6232F
VALIDATION OR SIGNATURE OF CASHIER

Baltimore County, Maryland,
County Office Building,
B.
rely,
D. JABLON
Zoning Commissioner

Stephen J. Nolan, Esquire
204 West Pennsylvania Avenue
Towson, Maryland 21204
June 12, 1985

NOTICE OF HEARING

RE: PETITION FOR SPECIAL HEARING
NE/S Monkon Rd., 700' NW/Carroll Road
10th Election District
Richard A. Moore - Petitioner
Case No. 86-20-SPH

TIME: 10:30 a.m.
DATE: Monday, July 15, 1985
PLACE: Room 106, County Office Building, 111 West Chesapeake Avenue, Towson, Maryland

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT
No. 007443
DATE 7/27/85 ACCOUNT R-01-615-000
AMOUNT \$100.00
RECEIVED FROM Peter Nolan
FOR Filing fee for Petition # 307
8657*****775218 6232F
VALIDATION OR SIGNATURE OF CASHIER

BALTIMORE COUNTY ZONING PLANS ADVISORY COMMITTEE
July 8, 1985

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

Stephen J. Nolan, Esquire
204 West Pennsylvania Avenue
Towson, Maryland 21204

RE: Item No. 307 - Case No. 86-20-SPH
Petitioner - Richard A. Moore
Special Hearing Petition

Dear Mr. Nolan:

The Zoning Plans Advisory Committee has reviewed the plans submitted with the above-referenced petition. 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.

In view of the fact that your client is amending the final development plan of Patchwork Farms, said amendment was required to be first approved by the Planning Board in accordance with Section 1801.3.A.7.b. of the Zoning Regulations. Even though the Planning Board disapproved this proposal on June 14, 1985, it was your decision to have this petition scheduled for a hearing date anyway.

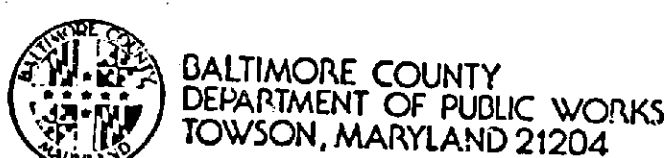
Enclosed are all comments submitted from the members of the Committee at this time that offer or request information on your petition. If similar comments from the remaining members are received, I will forward them to you. Otherwise, any comment that is not informative will be placed in the hearing file. This petition was accepted for filing on the date of the enclosed filing certificate and a hearing scheduled accordingly.

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

NB:mr

Enclosures

cc: E. F. Raphael & Associates
201 Courtland Avenue
Towson, Maryland 21204



HARRY J. PISTEL, P.E.
DIRECTOR

July 3, 1985

Mr. Arnold Jablon
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Re: Item #307 (1984-1985)
Property Owner: Richard A. Moore
N/E side Monkton Road
District 10th

Dear Mr. Jablon:

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

General Comments:

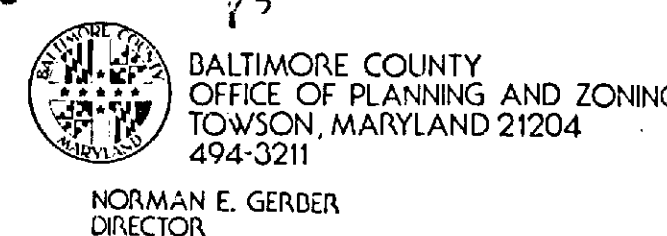
Since no public facilities are involved, this office has no comment.

Very truly yours,
James A. Markle
JAMES A. MARKLE, P.E., Chief
Bureau of Public Services

JAM:PMO:blp

cc: File

7/5
86-20-SPH



NORMAN E. GERBER
DIRECTOR

May 24, 1985

Mr. Richard A. Moore
P.O. Box 193
Phoenix, Maryland 21131

Re: Proposed 2nd Amended Final Development
Plan for Patchwork Farms Subdivision X-147

Dear Mr. Moore:

This is to advise you, the Baltimore County Planning Board at its regular scheduled meeting on Thursday, May 16, 1985, failed to approve the proposal of the 2nd Amended Final Development Plan for Patchwork Farms subdivision.

Presentations were made, first by Mr. Ronald Baldwin, representing the current eleven (11) property owners residing in Patchwork Farms and then by your attorney Mr. Stephen J. Nolan. After testimony the Board by an eight (8) to two (2) vote disapproved the amendment.

Sincerely yours,
Norman E. Gerber
Norman E. Gerber
Secretary to the Planning Board

NEG:rh

cc: Arnold Jablon
Stephen J. Nolan

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

Arnold Jablon
TO: Zoning Commissioner

Date: June 14, 1985

Norman E. Gerber
FROM: Director of Planning and Zoning

SUBJECT: PROPOSED SECOND AMENDED FINAL DEVELOPMENT PLAN,
"PATCHWORK FARMS" (ZAC ITEM #307)

At its regular meeting on Thursday, May 16, 1985, the Baltimore County Planning Board adopted the following Resolutions:

RESOLVED, that the Baltimore County Planning Board DISAPPROVES the proposal of the second amended Final Development Plan, for "Patchwork Farms" subdivision as not being in accord with provisions adopted under authority of Section 504 of the Baltimore County Zoning Regulations.

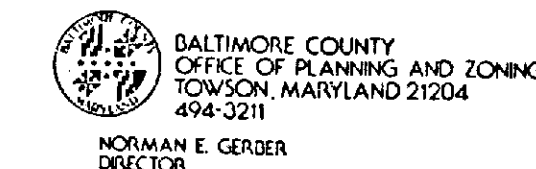
A copy of the amended plat will be forwarded separately.

NEG:pat

cc: Nick Commodari
James Hoswell
Sue Carrell
Ed Johnson
Frank Shearer
File

Norman E. Gerber
Norman E. Gerber
Secretary to the Planning Board

7/5
86-20-SPH



Mr. Arnold Jablon
Zoning Commissioner
County Office Building
Towson, Maryland 21204

JUNE 25, 1985

Re: Zoning Advisory Meeting of APRIL 30, 1985
Item # 307 RICHARD A. MOORE
Location: NE SIDE MONKTON RD. 700'
N/W OF CARROLL RD.

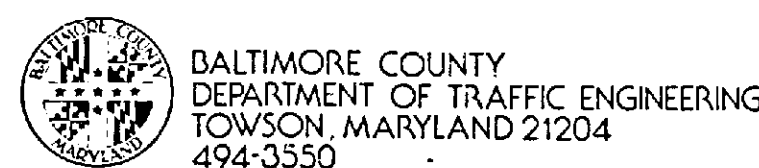
Dear Mr. Jablon:

The Division of Current Planning and Development has reviewed the subject petition and offers the following comments. The items checked below are applicable:

- (X) There are no site planning factors requiring comment.
- () A County Review Group Meeting is required.
- () This site is part of a larger tract; therefore it is defined as a subdivision. The plan must show the entire tract.
- () A record plat will be required and must be recorded prior to issuance of a building permit.
- () The access is not satisfactory.
- () The circulation on this site is not satisfactory.
- () The parking arrangement is not satisfactory.
- () The parking calculations must be shown on the plan.
- () This property contains soils which are defined as wetlands, and development on these soils is prohibited.
- () Construction in or alteration of the floodplain is prohibited under the provisions of Section 22-58 of the Development Regulations.
- () Development of this site may constitute a potential conflict with the Baltimore County Master Plan.
- (X) The amended development plan was ~~disapproved~~ by the Planning Board on ~~THURSDAY - MAY 16, 1985~~ MAY 16, 1985.
- () The property is located in a deficient service area as defined by 8111.178-79. No building permit may be issued until a Reserve Capacity Use Certificate has been issued. The deficient service is:
- () The property is located in a traffic area controlled by a "D" level intersection as defined by 8111.178-79, and as conditions change are re-evaluated annually by the County Council.
- (X) Additional comments:
THE PROPOSED SECOND AMENDED FINAL DEVELOPMENT PLAN "PATCHWORK FARMS" FILE # 307 WAS DISAPPROVED BY THE PLANNING BOARD ON 5/16/85

cc: James Hoswell

Eugene A. Sobor
Chief, Current Planning and Development



STEPHEN E. COLLINS
DIRECTOR

May 16, 1985

Mr. Arnold Jablon
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Item No. 296, 299, 300, 301, 302, 303, 304, 305, 307, 308, 309, 310, 311, 312
Property Owner: 313, 314 Meeting of April 30, 1985
Location:
Existing Zoning:
Proposed Zoning:

Acres:
District:

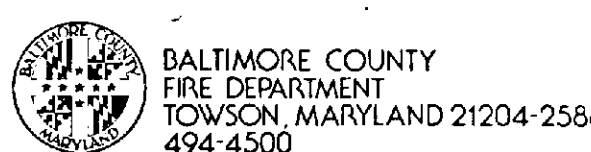
Dear Mr. Jablon:

The Department of Traffic Engineering has no comments for item numbers 296, 299, 300, 301, 302, 303, 304, 305, 307, 308, 309, 310, 311, 312, 313, and 314.

Michael S. Flanigan
Michael S. Flanigan
Traffic Engineering Assoc. II

MSF/ccm

7/5
86-20-SPH



PAUL H. REINCKE
CHIEF

May 15, 1985

Mr. Arnold Jablon
Zoning Commissioner
Office of Planning and Zoning
Baltimore County Office Building
Towson, Maryland 21204

Attention: Nick Commodari, Chairman
Zoning Plans Advisory Committee

RE: Property Owner: Richard A. Moore

Location: N/E side Monkton Road, 700' N/W of Carroll Road

Item No.: 307 Zoning Agenda: Meeting of 4-30-85

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.

- () 1. Fire hydrants for the referenced property are required and shall be located at intervals or 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 operation.
- (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.

REVIEWER: *Carol M. Barlow* Noted and Approved: *Carol M. Barlow*
Planning Group Fire Prevention Bureau
Special Inspection Division

/mb

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Nicholas Commodari, Zoning Department Date: May 13, 1985

FROM: *Ed Johnson*, Chief, Building Plans Review C 2 B

SUBJECT: Zoning Advisory Committee Meeting
Scheduled April 30, 1985

- | | |
|-----------|------------------------|
| Item #296 | See Comment |
| Item #297 | See April 23rd, Agenda |
| Item #298 | See April 23rd, Agenda |
| Item #299 | See Comment |
| Item #300 | See Comment |
| Item #301 | Standard Comment |
| Item #302 | See Comment |
| Item #303 | Standard Comment |
| Item #304 | Standard Comment |
| Item #305 | Standard Comment |
| Item #306 | See Comments |
| Item #307 | No Comment |
| Item #308 | No Comment |
| Item #309 | See Comment |
| Item #310 | Standard Comments |
| Item #311 | See Comments |
| Item #312 | See Comments |
| Item #313 | Standard Comments |
| Item #314 | See Comments |

Cycle I - Item #7 - No Further Comment

Item #212 (Revised) No Further Comment

CEB/vv

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

Arnold Jablon
TO: Zoning Commissioner

Date: July 3, 1985

Norman E. Gerber, Director
FROM: Office of Planning and Zoning

SUBJECT: Zoning Petition No. 86-20-SPH

On May 16, 1985, the Baltimore County Planning Board disapproved the proposed Second Amended Development Plan of Patchwork Farms. Consequently, the subject petition is not in conformance with Section 1801.3.A.7.b.i. of the Baltimore County Zoning Regulations and the special exception may not be granted. Additionally, it should be noted that the Planning Board decision has been appealed by the petitioner to the County Board of Appeals.

It is, therefore, the opinion of this office that the subject petition should not be considered at this time.

NEG:JGH:slm

Norman E. Gerber
Norman E. Gerber, Director
Office of Planning and Zoning

15-2483
LAW OFFICES
NOLAN, PLUMHOFF & WILLIAMS
CHARTERED
204 WEST PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204
(301) 823-7800
JUNE 3, 1985

*ALSO ADMITTED IN D.C.

HAND DELIVERY

Mr. Norman E. Gerber
Secretary to the Planning Board
Office of Planning and Zoning
Towson, Maryland 21204

Re: Notice of Appeal of Richard A. Moore - Proposed
2nd Amended Final Development Plan For
Patchwork Farms Subdivision X - 147.

Dear Mr. Gerber:

As counsel for the appellant, Richard A. Moore, I am hand delivering
herewith an original and two copies of Notice of Appeal for filing with the
County Board of Appeals with regard to the decision of the Baltimore
County Planning Board on May 16, 1985.

Also enclosed is our check in the amount of \$100.00 to cover the
cost of filing this appeal. I will appreciate your acknowledging your
timely receipt of this appeal notice by signing or receipting the enclosed
copy of this letter and returning the same to me in the enclosed self-
addressed envelope.

Thank you for your kind assistance.

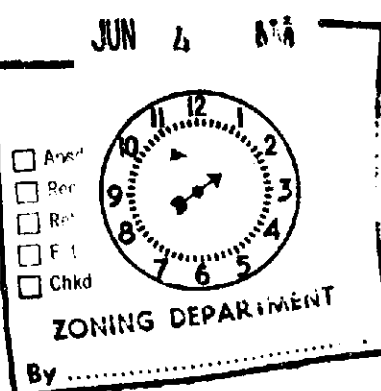
Very truly yours,

Stephen J. Nolan
Stephen J. Nolan

SJN/cac

Enclosures

cc: Edith T. Eisenhart,
Administrative Secretary to the
County Board of Appeals of Baltimore County
Arnold Jablon
Zoning Commissioner



Mr. Norman E. Gerber
June 3, 1985
Page 2

cc: Mr. Ronald Baldwin
Brice G. Dowell, Esquire

Cene Raphael, P.L.S.
E. F. Raphael Associates

Mr. Richard A. Moore

IN THE MATTER OF THE
PROPOSED 2ND AMENDED
FINAL DEVELOPMENT PLAN
OF RICHARD A. MOORE
FOR PATCHWORK FARMS
SUBDIVISION X-147,
TRACT A

10th DISTRICT

BEFORE THE
COUNTY BOARD OF APPEALS
OF
BALTIMORE COUNTY
Case No.

NOTICE OF APPEAL

Madame Secretary:

Please docket an appeal to the County Board of Appeals of
Baltimore County, pursuant to Section 22-61(A) of the Baltimore County Code,
from the decision of the Baltimore County Planning Board at its regular
meeting on May 16, 1985. A copy of the Planning Board's letter dated
May 24, 1985, concerning the action from which this appeal is taken, is
attached hereto and incorporated herein by reference as "Exhibit A."

Kindly enter the appearance of STEPHEN J. NOLAN and NOLAN, PLUMHOFF
& WILLIAMS, Chartered as counsel for the Appellant, RICHARD A. MOORE, whose
address is 3312 Paper Mill Road, Post Office Box 193, Phoenix, Maryland
21131.

The grounds for this appeal are that the decision of the Baltimore
County Planning Board in failing and refusing to approve the requested
2nd Amended Final Development Plan for Patchwork Farms subdivision was
arbitrary, capricious, illegal, not supported by the evidence, and not in
accordance with the applicable regulations and sound planning policies and
practice.

LAW OFFICES
NOLAN, PLUMHOFF
& WILLIAMS,
CHARTERED

Stephen J. Nolan
STEPHEN J. NOLAN

LAW OFFICES
NOLAN, PLUMHOFF
& WILLIAMS,
CHARTERED

Nolan, Plumhoff & Williams
NOLAN, PLUMHOFF & WILLIAMS
204 W. Pennsylvania Avenue
Towson, Maryland 21204
(301) 823-7800
Attorneys for Appellant,
Richard A. Moore

DATED: June 3, 1985

-2-

BALTIMORE COUNTY
OFFICE OF PLANNING AND ZONING
TOWSON, MARYLAND 21204
494-3211
NORMAN E. GERBER
DIRECTOR

EXHIBIT "A"

May 24, 1985

Mr. Richard A. Moore
P.O. Box 193
Phoenix, Maryland 21131

Re: Proposed 2nd Amended Final Development
Plan for Patchwork Farms Subdivision X-147

Dear Mr. Moore:

This is to advise you, the Baltimore County Planning Board at its
regular scheduled meeting on Thursday, May 16, 1985, failed to approve
the proposal of the 2nd Amended Final Development Plan for Patchwork
Farms subdivision.

Presentations were made, first by Mr. Ronald Baldwin, representing
the current eleven (11) property owners residing in Patchwork Farms
and then by your attorney Mr. Stephen J. Nolan. After testimony the
Board by an eight (8) to two (2) vote disapproved the amendment.

Sincerely yours,

Norman E. Gerber
Norman E. Gerber
Secretary to the Planning Board

NEG:rh

cc: Arnold Jablon
Stephen J. Nolan

PATCHWORK HOMEOWNERS
ASSOCIATION

July 17, 1985

Mr. Arnold Jablon, Zoning Commissioner
Baltimore County Office Building, Room 109
111 West Chesapeake Avenue
Towson, Maryland 21204

Dear Mr. Jablon:

Per your request during the recent special zoning hearing
(86-20-SPH), I am forwarding a copy of the Patchwork Homeowners
Association Annual Meeting Minutes of January 16, 1985. On page
two, you will find the recorded results of our yearly election of
officers.

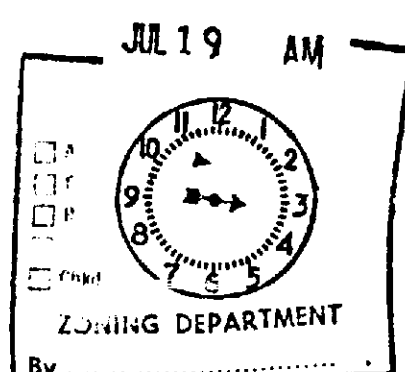
Please let me know if you need any additional information. Thank
you for your attention.

Sincerely yours,

Ronald L. Baldwin
Ronald L. Baldwin, President
Patchwork Homeowners Assn.

Enclosure

*4 Patchwork Ct
Morton Md
5/11/85*



PATCHWORK HOMEOWNERS' ASSOCIATION
ANNUAL MEETING

January 16, 1985

Brice Dowell opened the meeting with a summary of the discussion
he had had earlier in the week with Dick Moore. At that time, Dick
had indicated that there is only a "remote" chance of the County's
taking over our roadway because of the County's requirements of a
three-inch overlay (we have only about 2 inches) and an 18-foot width
(we have 16 feet).

Brice then proceeded to outline the three issues which Dick, in
his absence, wished brought up at this meeting. First, Dick offered
to deed to the Association a small parcel of land fronting Monoton Road.
Discussion centered around the potential value or liabilities of owning
the land, and Ron Baldwin moved to table the issue until some determina-
tion can be made with the Salvation Army regarding a possible trade of
the frontage piece for the portion of our roadway owned by that organi-
zation. The motion carried.

Second, Dick has sold the building lot located roughly where the
paper Hillside Lane existed and requests that Association membership
be granted to the lot so that the builder may have driveway access to
Patchwork Court. While an additional membership would result in addi-
tional funds for the Association, questions arose regarding the size
and style of the new house, and, in particular, the affect the new house
would have on the view from the Baldwin's home. The members voted to
table any decision on this matter until further information could be
gathered regarding the aesthetics of the proposed house and property
grading.

Third, Dick Moore offered to deed to the Association the drainage
ditch easement, which would give the Association the right to clean or
repair that pipeline. Ron Baldwin moved that the Association accept
the deed, and the motion passed.

Additional information which Brice reported from his meeting with
Dick Moore was that Dick plans to build "modest" speculation homes on
the remaining two lots.

A question arose regarding whether the horse farm adjoining our
lots was sold without any covenant protecting its farm status. Sheila
Haskell noted that their contract of sale on their lot includes a
requirement that Moore honor such a covenant. Brice will check out
this matter and report back to the members.

Jim Davis then asked about the Salvation Army land, and it was
reported that while the land is for sale, the land is zoned so that
only one house per 50 acres is permitted, and the selling price is
nearly \$500,000 for those 171 acres.

Page Two

The Treasurer's report showed that we have \$187.65 in a checking
account for annual dues, and \$362.30 in a savings account for road funds.
We also have a C.D. of \$624 for road funds.

This report spurred a discussion of the road condition. Martha
Young moved that the Association obtain estimates to repair the immediate
and long-term problems of the roadway. The motion passed. Ron Baldwin
indicated that he would ask his subcontractor for estimates, and Nancy
Rinehimer would request estimates from Jeff Rodgers' subcontractor.

Election of officers for 1985 was held. Ron Baldwin was elected
President, and Karen Fornoff will serve as Secretary-Treasurer.

In the ensuing discussion of new issues, Brice moved that our current
\$20.00 annual dues remain the same. The motion was adopted, and the 1985
dues are payable by March. The determination of the amount of the road
fund assessment was postponed until we have further information on the
need for any road repairs.

Karen Fornoff expressed concern about the need for a sign to encourage
drivers in the Court to slow down for the sake of the children. John
Dillon stated that he could obtain the sign at a wholesale price. Karen
moved that a sign be posted stating, "Slow Children at Play." The motion
was accepted.

The meeting was then adjourned.

DEC 22 1985

PATCHWORK HOMEOWNERS ASSOCIATION

July 19, 1985

Mr. Arnold Jablon, Zoning Commissioner
Baltimore County Office Building, Room 109
111 West Chesapeake Avenue
Towson, Maryland 21204

Dear Mr. Jablon:

Per your request during the recent special zoning hearing (86-20-SPH), I am forwarding copies of (a) the Haskell's contract of sale for Lot number 3 including the "SPECIAL COVENANT" restricting the development of the adjacent farm and (b) the Declaration of Restrictions which includes Lots 1 through 11 but makes no reference to TRACT 'A'.

I am sure these documents will be helpful to you in making your decision. Please let me know if you need any additional information. Thank you for your attention.

Sincerely yours,

Ronald L. Baldwin
Ronald L. Baldwin, President
Patchwork Homeowners Assn.

Enclosures

LAW OFFICES
NOLAN, PLUMHOFF & WILLIAMS
CHARTERED

204 WEST PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204
(301) 823-7800

OF COUNSEL
RALPH E. DEITE
5028 LIBERTY ROAD
RANDALLSTOWN, MARYLAND 21133
(301) 822-2181
RUSSELL J. WHITE

*ALSO ADMITTED IN D.C.

HAND-DELIVERY

July 22, 1985

Honorable Arnold Jablon
Zoning Commissioner for
Baltimore County
County Office Building
Towson, Maryland 21204

Re: Case No. 86-20-SPH, Item No. 307
Petitioner: Richard A. Moore
Proposed Second Amended Final Development Plan for
"Patchwork Farms", Lot 12
Hearing Date: July 15, 1985

Dear Commissioner Jablon:

As counsel for the Petitioner in the above-entitled case, I am writing to submit certain additional documentation with regard to the hearing you held on July 15, 1985 concerning Lot 12 of Patchwork Farms.

At that hearing, Mrs. Sheila Haskell testified concerning representations she contends were made to her by Mr. Moore or his agent with regard to restrictions on the development of "Tract A", which is the subject of the July 15th hearing. The Petitioner testified and he continues to assert that there was never any agreement that "Tract A" would not be improved with a house. In support of this contention, we submit the following documents which were obtained by Mr. Moore at our office after the July 15th hearing:

1. Contract of Sale for Lot 3 of Patchwork Farms dated February 6, 1979 between Mr. Moore and Mrs. Haskell. The handwritten notation at the bottom of page one which refers to the restricted development of the "adjacent property" has been ~~stricken~~ and initialed by all parties.
2. A typewritten addendum with a provision entitled "Special Covenant" discloses that Mr. Moore agreed that he would "not

Honorable Arnold Jablon
Zoning Commissioner for
Baltimore County

July 22, 1985
Page 2

subdivide the 60 acre farm adjoining the eastern boundary of 'Patchwork Farms' into more than three building lots....[and that this] covenant shall not apply to any other land of the grantor herein...." [Emphasis added].

3. Deed dated May 7, 1979 for Lot 3 and recorded among the Land Records of Baltimore County in Liber 6018, folio 612 which does not refer to any restrictions on remaining lands of grantor. A copy of this last document was obtained by our office.

In view of the fact that the "Special Covenant" appended to the Contract of Sale is directed to the "farm adjoining the eastern boundary of 'Patchwork Farms'" and Tract A is not by definition within the scope of the Special Covenant, we respectfully contend that no agreement exists which would limit Mr. Moore's right to construct a building on Tract A, now called Lot 12.

Inasmuch as these documents were only obtained by Mr. Moore immediately following last Monday's hearing, his review of documents concerning other Patchwork lots is continuing. We will promptly provide the Commissioner with any other relevant documentation when it is obtained.

Thank you for your consideration of these supplemental materials which are clearly responsive to the issues raised at the recent hearing.

Very truly yours,

Stephen J. Nolan
Stephen J. Nolan

SJN:md
Enclosures

c.c.s. Mr. Ronald Baldwin

Peter Max Zimmerman, Esquire
Deputy People's Counsel

Mr. and Mrs. Donald P. Haskell

Mr. Richard A. Moore

Mr. Eugene F. Raphael, P.L.S.

LAW OFFICES
NOLAN, PLUMHOFF & WILLIAMS
CHARTERED

204 WEST PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204
(301) 823-7800

OF COUNSEL
RALPH E. DEITE
5028 LIBERTY ROAD
RANDALLSTOWN, MARYLAND 21133
(301) 822-2181
RUSSELL J. WHITE

*ALSO ADMITTED IN D.C.

HAND DELIVERY

December 24, 1985

Edith T. Eisenhart,
Administrative Secretary to the
County Board of Appeals of
Baltimore County
Court House
Towson, Maryland 21204

Re: Case No. CBA-85-114
In the matter of RICHARD A. MOORE
Re: Second Amended Final Development
Plan of Patchwork Farms Subdivision,
X-147, Tract A
10th District

Dear Madam Secretary:

As counsel for the Appellant, Richard A. Moore, I am filing herewith a Motion for Voluntary Dismissal and proposed Order in the above-entitled case.

As the result of an Agreement which was reached with Patchwork Farms Homeowners Association, Inc., we have obtained the signatures of all homeowners in the subdivision on the subject Second Amended Final Development Plan of Patchwork Farms Subdivision and will proceed to record the same after the requisite approvals by the Office of Planning and Zoning and the Zoning Commissioner have been obtained.

Pursuant to Board Rule 3(b), we are requesting that the dismissal be entered without prejudice to our client's right to proceed with the recording of the subject plan.

Richard A. Moore
December 24, 1985
Page 2

Thank you for your kind assistance.

Very truly yours,

Stephen J. Nolan
Stephen J. Nolan

SJN/jmg

cc: Arnold Jablon
Zoning Commission for
Baltimore County
Norman E. Gerber
Secretary to the Planning Board
Thomas J. Bollinger, Esquire
Counsel to the Board of Appeals
Susan S. Carrell
Office of Current Planning
Mr. Ronald L. Baldwin, President
Patchwork Farms Homeowners Association, Inc.
Mr. Richard A. Moore
Mr. Eugene F. Raphael

IN THE MATTER OF * BEFORE
RICHARD A. MOORE * COUNTY BOARD OF APPEALS
Re: Second Amended Final * OF
Development Plan- * BALTIMORE COUNTY
Patchwork Farms Subdivision, * No. CBA-85-114
X-147, Tract A *
10th District * * * * *

MOTION FOR VOLUNTARY DISMISSAL OF APPEAL

MADAM SECRETARY:

The Appellant, RICHARD A. MOORE, by his attorneys, Stephen J. Nolan, and Nolan, Plumhoff & Williams, Chartered, voluntarily moves for dismissal of his Notice of Appeal which was filed in this case on June 3, 1985, without prejudice.

Dated: December 24, 1985

Stephen J. Nolan
STEPHEN J. NOLAN
Nolan, Plumhoff & Williams
NOLAN, PLUMHOFF & WILLIAMS,
CHARTERED
204 W. Pennsylvania Avenue
Towson, Maryland 21204
(301) 823-7800
Attorneys for the Appellant,
Richard A. Moore

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of December, 1985, copies of the foregoing Motion for Voluntary Dismissal of Appeal and proposed Order were mailed or hand delivered to:

Thomas J. Bollinger, Esquire
Assistant County Attorney
Office of Law
Court House - Mezzanine
Towson, Maryland 21204
Norman E. Gerber, Director
Office of Planning & Zoning
Courts Building, Fourth Floor
Towson, Maryland 21204

Arnold Jablon
Zoning Commissioner for
Baltimore County
County Office Building
Towson, Maryland 21204
(Case No. 86-20-SPH)

Mr. Ronald L. Baldwin, President
Patchwork Farms Homeowners Association, Inc.
4 Patchwork Court
Monkton, Maryland 21111

Susan S. Carrell
Office of Current Planning
County Office Building
Towson, Maryland 21204

Stephen J. Nolan
Stephen J. Nolan

SJN-12/24/85

IN THE MATTER OF * BEFORE
RICHARD A. MOORE * COUNTY BOARD OF APPEALS
Re: Second Amended Final * OF
Development Plan- * BALTIMORE COUNTY
Patchwork Farms Subdivision, * No. CBA-85-114
X-147, Tract A *
10th District * * * * *

ORDER OF DISMISSAL

Appeal of RICHARD A. MOORE from the decision of the Baltimore County Planning Board which was filed on May 16, 1985, regarding property located on the northeast side of Monkton Road, northwest of Carroll Road, in the Tenth Election District of Baltimore County.

WHEREAS, the Board of Appeals is in receipt of a Motion for Voluntary Dismissal of Appeal filed on December 24, 1985, a copy of which is attached hereto and made a part hereof, from the attorney representing the Appellant in the above entitled matter; and
WHEREAS, the said attorney for the Appellant requests that the appeal filed by them be dismissed without prejudice and withdrawn as of December 24, 1985.

IT IS HEREBY ORDERED this ___ day of ___, 1985, that said appeal be and the same is DISMISSED WITHOUT PREJUDICE.

COUNTY BOARD OF APPEALS OF
BALTIMORE COUNTY

WILLIAM T. HACKETT, Chairman

SJN-12/24/85-2

DEC 22 1985

26-7440

County Board of Appeals of Baltimore County
New 200 Court House
Towson, Maryland 21204
(301) 494-3180
January 10, 1986

JAN 13 AM

ZONING DEPARTMENT

Stephen J. Nolan, Esq.
204 W. Pennsylvania Ave.
Towson, MD. 21204

Re: Case No. CBA-85-114
Richard A. Moore

Dear Mr. Nolan:

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

Very truly yours,
June Holmen, Secretary

Encl. Richard A. Moore
Ron Baldwin
Brice G. Dowell, Esq.
Gene Raphael
Thomas J. Bollinger, Esq.
Arnold Jablon
Norman Gerber
James Hoswell
Susan Carrell

IN THE MATTER OF * BEFORE
RICHARD A. MOORE * COUNTY BOARD OF APPEALS

Re: Second Amended Final * OF
Development Plan- * BALTIMORE COUNTY
Patchwork Farms Subdivision, *
X-147, Tract A * No. CBA-85-114
10th District * * * * *

ORDER OF DISMISSAL

Appeal of RICHARD A. MOORE from the decision of the Baltimore County Planning Board which was filed on May 16, 1985, regarding property located on the northeast side of Monkton Road, northwest of Carroll Road, in the Tenth Election District of Baltimore County.

WHEREAS, the Board of Appeals is in receipt of a Motion for Voluntary Dismissal of Appeal filed on December 24, 1985, a copy of which is attached hereto and made a part hereof, from the attorney representing the Appellant in the above entitled matter; and

WHEREAS, the said attorney for the Appellant requests that the appeal filed by them be dismissed without prejudice and withdrawn as of December 24, 1985.

IT IS HEREBY ORDERED this 10th day of January, 1986, that said appeal be and the same is DISMISSED WITHOUT PREJUDICE.

COUNTY BOARD OF APPEALS OF
BALTIMORE COUNTY

William T. Hackett
WILLIAM T. HACKETT, Chairman
Lawrence E. Schlicht
LeRoy V. Spurrier

SJN-12/24/85-2

IN THE MATTER OF * BEFORE
RICHARD A. MOORE * COUNTY BOARD OF APPEALS

Re: Second Amended Final * OF
Development Plan- * BALTIMORE COUNTY
Patchwork Farms Subdivision, *
X-147, Tract A * No. CBA-85-114
10th District * * * * *

MOTION FOR VOLUNTARY DISMISSAL OF APPEAL

MADAM SECRETARY:

The Appellant, RICHARD A. MOORE, by his attorneys, Stephen J. Nolan, and Nolan, Plunhoff & Williams, Chartered, voluntarily moves for dismissal of his Notice of Appeal which was filed in this case on June 3, 1985, without prejudice.

Dated: December 24, 1985

Stephen J. Nolan
STEPHEN J. NOLAN
Nolan, Plunhoff & Williams,
CHARTERED
204 W. Pennsylvania Avenue
Towson, Maryland 21204
(301) 823-7800

Attorneys for the Appellant,
Richard A. Moore

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of December, 1985, copies of the foregoing Motion for Voluntary Dismissal of Appeal and proposed Order were mailed or hand delivered to:

Thomas J. Bollinger, Esquire
Assistant County Attorney
Office of Law
Court House - Mezzanine
Towson, Maryland 21204

Norman E. Gerber, Director
Office of Planning & Zoning
Courts Building, Fourth Floor
Towson, Maryland 21204

Arnold Jablon
Zoning Commissioner for
Baltimore County
County Office Building
Towson, Maryland 21204
(Case No. 86-20-SPH)

Susan S. Carrell
Office of Current Planning
County Office Building
Towson, Maryland 21204

Mr. Ronald L. Baldwin, President
Patchwork Farms Homeowners Association, Inc.
4 Patchwork Court
Monkton, Maryland 21111

Stephen J. Nolan
Stephen J. Nolan

COUNTY BOARD OF APPEALS
RIS DEC 26 A 0 12

SJN-12/24/85

2

PETITION FOR SPECIAL HEARING

10th Election District

LOCATION: Northeast side of Monkton Road, 700 feet Northwest of Carroll Road

DATE AND TIME: Monday, July 15, 1986 at 10:00 a.m.

PUBLIC HEARING: Room 106, County Office Building, 111 W. Chesapeake Avenue, Towson, Maryland

THIS IS TO CERTIFY, that the annexed advertisement was published in THE TOWSON TIMES, a weekly newspaper distributed in Towson, Baltimore County, Md., once a week for 1 consecutive weeks, the first publication appearing on the 26th day of June, 1985.

The TOWSON TIMES
M. Carrell

Cost of Advertisement: \$27.77

86-20-SPH
CERTIFICATE OF PUBLICATION

TOWSON, MD. June 27, 1985

THIS IS TO CERTIFY, that the annexed advertisement was published in THE JEFFERSONIAN, a weekly newspaper printed and published in Towson, Baltimore County, Md., appearing on June 27, 1985.

THE JEFFERSONIAN,
18 Kentish
Publisher

Cost of Advertising
24.75

CERTIFICATE OF POSTING

ZONING DEPARTMENT OF BALTIMORE COUNTY
Towson, Maryland

District: 10TH Date of Posting: 6/27/85

Posted for: Special Hearing

Petitioner: Richard A. Moore

Location of property: N.E.S., Monkton Rd., 700' N.W. Carroll Rd.

Location of Sign: Facing Monkton Rd. across 15' E. to 2nd St., 82' property of R. L. Wilson

Remarks: [Signature]

Posted by: [Signature] Date of return: 6/28/85

Number of Signs: 1

Case No. 86-20-SPH

BALTIMORE COUNTY OFFICE OF PLANNING & ZONING

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

Your petition has been received and accepted for filing this 10th day of June, 1985.

Arnold Jablon
Zoning Commissioner

Petitioner Richard A. Moore
Petitioner's Attorney Stephen J. Nolan, Esquire
cc: E. P. Raphael & Associates

Received by: [Signature]
Nicholas B. Commodore
Chairman, Zoning Plans Advisory Committee

PETITIONER'S
EXHIBIT A

GENERAL NOTES

AREA OF PROPERTY 74.559 Acres
EXISTING ZONE R-2
NO. OF LOTS PERMITTED 14-9 Lots
NO. OF LOTS PROPOSED 12 LOTS

1. Private water and septic systems to be installed in accordance with Baltimore County Health Department Regulation.
2. There shall be two (2) off street parking spaces (9 x 20) provided for each lot constructed with macadam surface.
3. Location of drives and parking to be determined by location of residence.
4. No grading of the entire site.
5. There shall be no clear cutting of trees and shrubs from any lot, only dead, damaged or trees necessary for the safety of homes and drives are to be removed.
6. Minimum grading shall be performed as required for the owner.
7. Planting on each lot to be provided by the owner of the lot.
8. The building height of any structure shall be 35 feet.
9. Water vegetation - grassland.
10. No open space required.
11. Contours shown hereon are Baltimore County Photogrammetric Min. building setbacks required - 75' from centerline of line street, and 25' from both side lot lines or a minimum of 50' from any rear lot line.
12. The owner reserves the right to create and realign all drainage easements prior to the sale of the lots.
13. Lot dimensions and acreage as shown are approximate and are substantially in accordance with the Plat of Section 11.
14. The owner and maintenance rights for individual lots prior to sale.
15. Fresh removable by Baltimore County.
16. Envelopes shown hereon are for the location of all principal buildings only, accessory structures, fences and projections into yards may be constructed outside the envelopes shown hereon, subject to convenient & applicable building regulations.
17. Front of house to be 50' from property line.
18. Access road shown hereon is for the lot is shown in the Plat.
19. The majority of the soils contained in the lot is class 1 or 2.

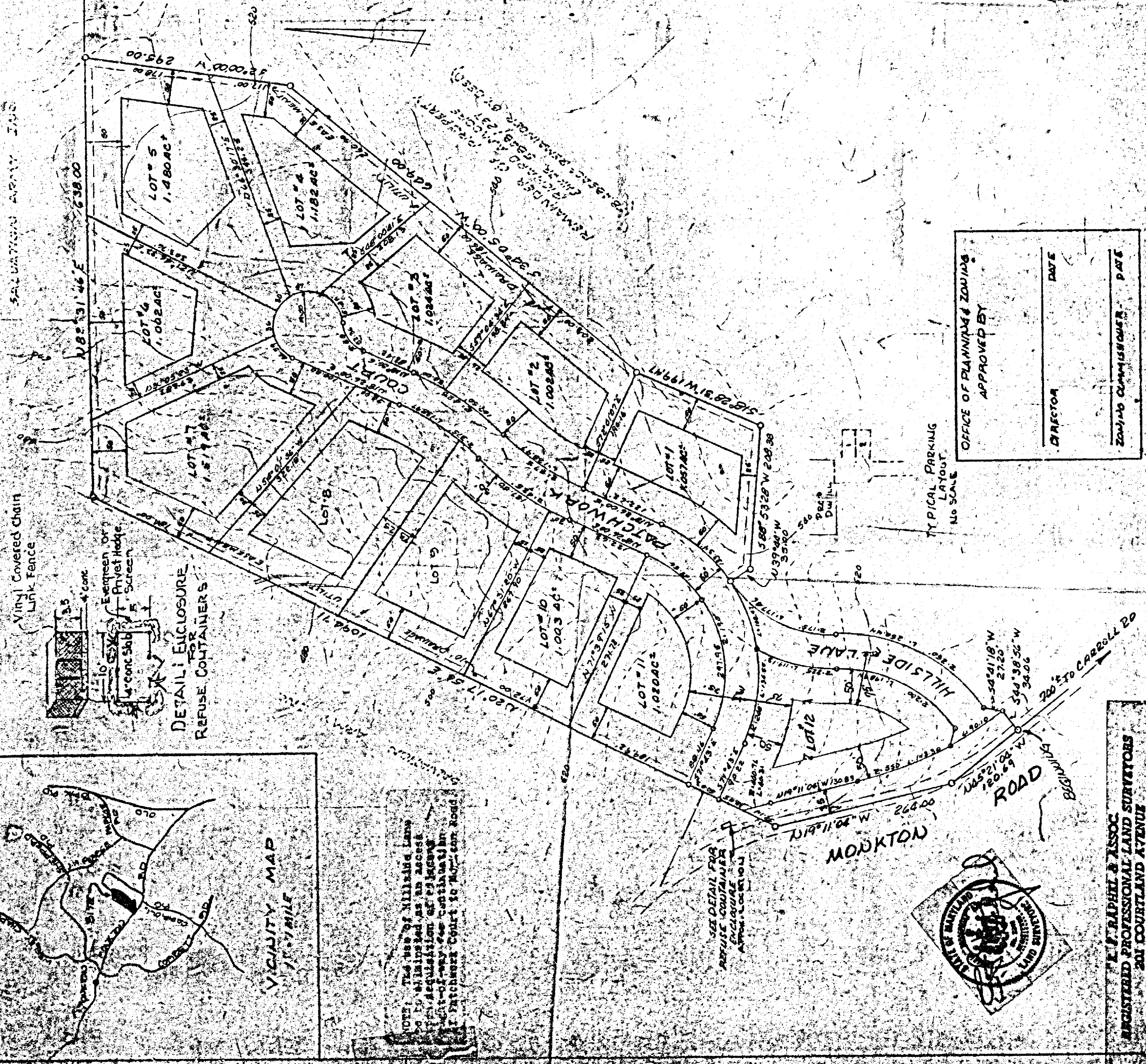
MAY 10, 1985

REASON FOR 2nd AMENDED FINAL DEVELOPMENT PLAN
1) TO RECALL TRACT A TO LOT 12
2) TO SHOW 50 ENVELOPES ON LOT 12
3) LOTS HAVE BEEN SOLD WITHIN 300' OF THE ABOVE CURVE
4) PUBLIC HEARING IS REQUIRED AND HAS BEEN FILED
FOR ITEM # 307

2nd AMENDED
FINAL DEVELOPMENT PLAN
PATCHWORK FARMS
10th ELECT. DIST
SCALE 1" = 100'

OWNER: RICHARD A. MOORE
B. MOORE & MATTHEWS CONSULTANT CO.
PO. BOX 200 PHOENIX MD. 21151

1985



PETITIONER'S
EXHIBIT A

GENERAL NOTES

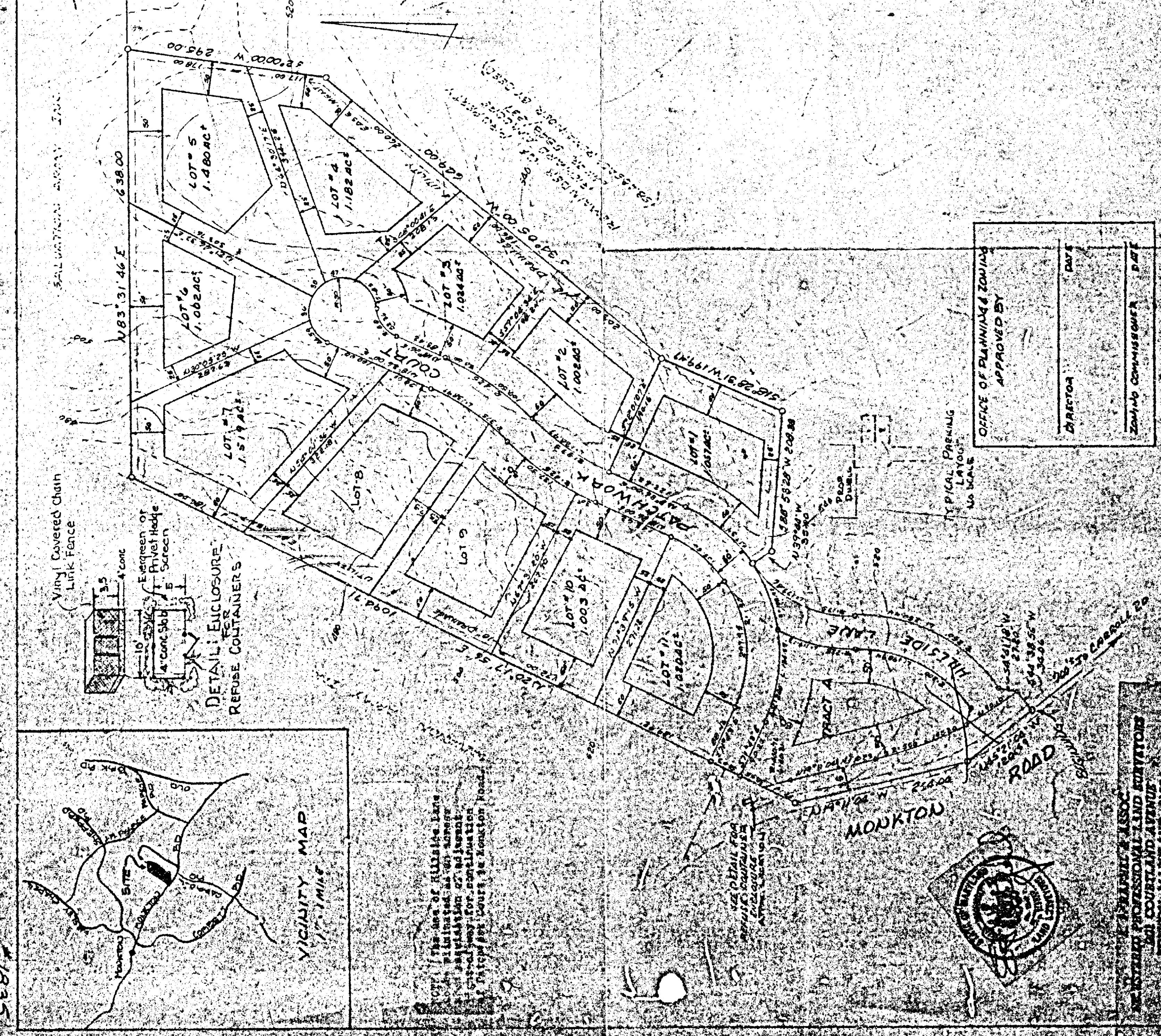
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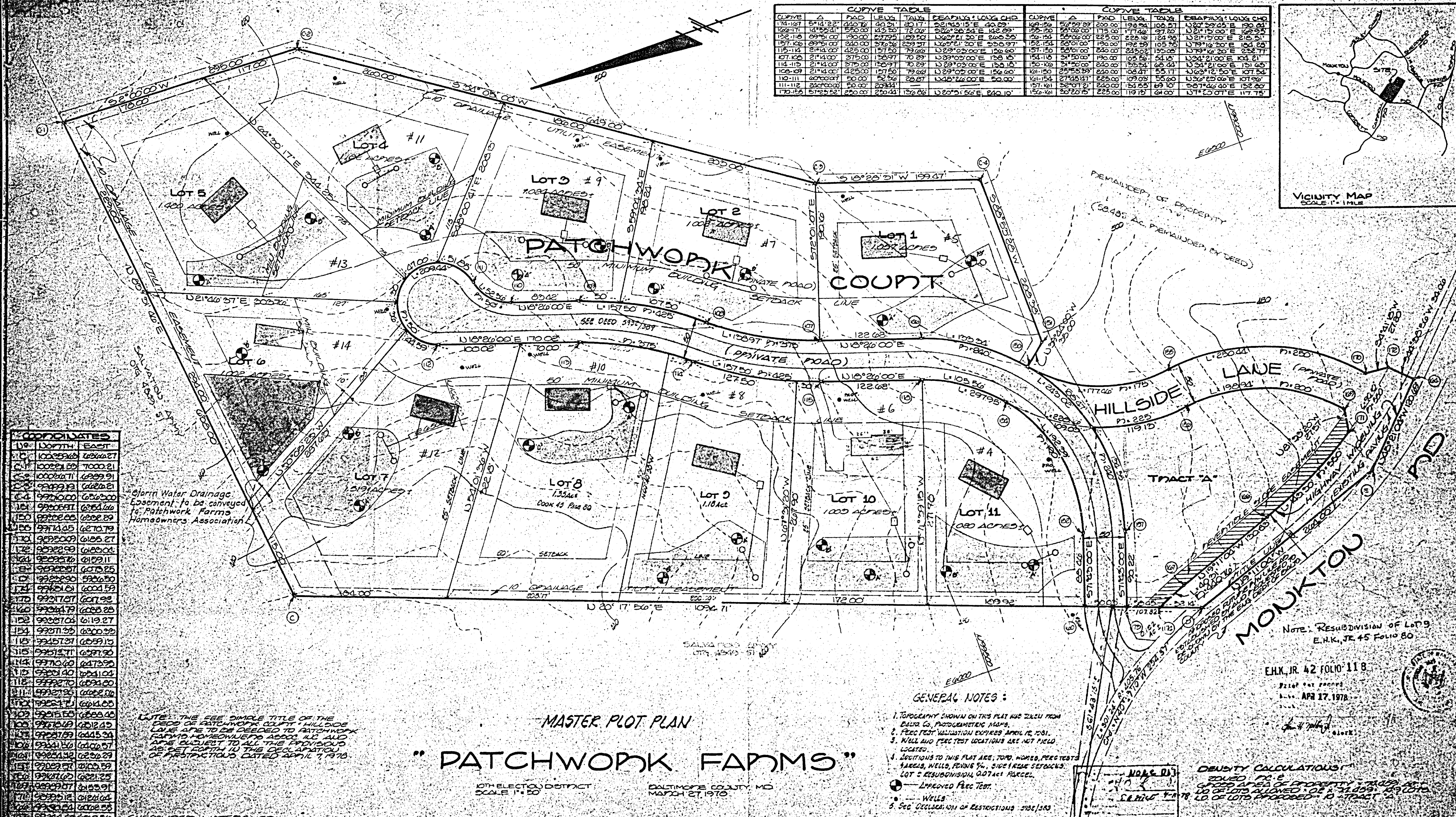
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2nd AMENDED
FINAL DEVELOPMENT PLAN
PATCHWORK FARMS
10th ELECT. DIST
SCALE 1" = 100'

OWNER: RICHARD A. MOORE
B. MOORE & MATTHEWS CONSULTANT CO.
PO. BOX 200 PHOENIX MD. 21151



CUPVE TABLE					CUPVE TABLE				
CUPVE	Δ	PAD	LEXA	TANZ	CUPVE	Δ	PAD	LEXA	TANZ
174-107	51°14'22"	1540	1540	1540	1540	51°14'22"	1540	1540	1540
166-117	14°25'51"	1540	1540	1540	1540	14°25'51"	1540	1540	1540
152-116	09°51'00"	1540	1540	1540	1540	09°51'00"	1540	1540	1540
157-106	09°51'00"	2400	2400	2400	2400	09°51'00"	2400	2400	2400
115-114	21°14'00"	4250	15150	7300	1540	21°14'00"	4250	15150	7300
107-105	21°14'00"	3750	15697	7029	1540	21°14'00"	3750	15697	7029
107-115	21°14'00"	3750	15697	7029	1540	21°14'00"	3750	15697	7029
110-111	21°14'00"	4250	15697	7029	1540	21°14'00"	4250	15697	7029
110-111	00°00'00"	50	50	50	50	00°00'00"	50	50	50
111-112	21°14'00"	50	20331	20331	20331	21°14'00"	50	20331	20331
170-155	25°25'52"	2500	25044	13060	1540	25°25'52"	2500	25044	13060



COORDINATES		
NO.	NORTH	EAST
10	00255.60	7030.2
11	00255.13	7030.21
12	00255.11	7030.91
13	00255.13	7030.21
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Oforin Water Drainage
Easement to be conveyed
to Patchwork Farms
Homeowners Association

NOTE: THE FEE SIMPLE TITLE OF THE
DEED OF RATCHWORK COUNT "HILLIDE
LAKE ARE TO BE DEEDED TO RATCHWORK
FARM HOMEOWNERS ASSOC. INC. AND
ARE SUBJECT TO ALL THE PROVISIONS
AS SET FORTH IN THE DECLARATION.

MASTER PLOT PLAN

"PATCHWORK FARMS"

10TH ELECTION DISTRICT BALTIMORE COUNTY, MD

GENERAL NOTES

1. TOPOGRAPHY SHOWN ON THIS PLAT HAS BEEN FROM DAVID CO. PHOTOGRAPHIC MAPS.
 2. FEED TEST VALIDATION EXPIRES APRIL 1, 1981.
 3. WELLS AND FEED TEST LOCATIONS ARE NOT FIELD LOCATED.
 4. ADDITIONS TO THIS PLAT ARE: TOWN WARDEN, FEED TESTS #4828, WELLS, FOWNS SW, SIDE RIZKE SOUTHWEST, LOT 5 RESUBDIVISION, ODDAGE PARCEL.
- ⊕ — APPROVED FEED TEST.
- — WELLS
 - — FEED TESTS

NOTE: RESUBDIVISION OF LOT 5
15 EQU 80

FHX IR 42 FOLIO 118

Prior to record
 date APR 17 1979

RECEIVED: 1994-01-15

DENSITY CALCULATIONS:
ZONED PG-2
GROSS AREA OF PROPERTY = 74,059 SQ. FT.
NO. OF LOTS ALLOWED = 0.5 x 74,059 = 39 LOTS
2 OF LOTS REQUIRED FOR TRACT.

NOTES:
HIGHWAY AND HIGHWAY VIOLATIONS
SCENE OF CRASH AND AT THE CRASH
MENTS SHOW HEREON ARE RE-
FERRED UNTO THE DEVELOPER AND
ARE HEREBY OFFERED FOR DEDIC-
ATION TO CALTRANS COUNTY AND
THE DEVELOPER, HIS PERSONAL
REPRESENTATIVES AND ASSIGNS
SHALL CONVEY SAID AREAS OF
DEED TO CALTRANS AND CALTRANS COAST

DEARINGS AND DEVELOPMENTS
SHOW ON THIS PLAN ARE REFERRED
TO CALTRANS METROPOLITAN GRID

STREETS AND ON ROADS SHOW
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THE CITY OF THE CITY

OWNER'S CERTIFICATE:
THE REQUIREMENTS OF SECTION
59 TO 62 ARTICLE 17 OF THE ANNO-
TATED CODE OF MARYLAND 1957
EDITION (TITLE: CLERK OF THE COURT
600 TITLE: CLERKS OF THE CIRCUIT
COUNTS) AS CAPAS THE DELATE
TAKING OF BIRTH RECORDS IN THE
SECTION OF MARYLAND HAVE BEEN
COMPLIED WITH

SURVEYOR'S CERTIFICATE
I, **ENGINEER F. ADRIAN A. BOSTER**,
ED OF **PROFESSIONAL LAND SURVEYORS** OF
THE STATE OF **MISSISSIPPI**, DO HEREBY
CERTIFY THAT THE SAID **CHOW HEE JOO**
HAS DEED TO AND OWNED THE PLAT
THESE **DISPERSED IN ACCORDANCE**
WITH THE **PROVISIONS OF THE**
LAW, TO THE **EDUCATION OF** **WALDO**
KNOWAN **AND** **HOUGH** **GILL** **AND** **DAVIS**
OF THE **STATE** **OF** **MISSISSIPPI** **IN** **THE**
OF THE **STATE** **OF** **MISSISSIPPI** **IN** **THE**

PETITIONER'S
 EXHIBIT 4
 PHILIP ASSOCIATES
 PROFESSIONAL LAND SURVEYORS
 2001 COASTAL BLVD.

Brice G. Dowell
Susan Dowell
William F. Farnoff
Karen Farnoff
Donald Haskell
Sheila Haskell
John Rinehimer
Nancy Rinehimer

IN RE: PETITION SPECIAL HEARING
NE/S of Monkon Road, 700'
NW of Carroll Road - 10th
Election District
Richard A. Moore,
Petitioner
* * * * *
BEFORE THE
ZONING COMMISSIONER
OF BALTIMORE COUNTY
Case No. 86-20-SPH
* * * * *
ORDER
Pursuant to the Order of Dismissal rendered in Case No. CBA-85-114 on January 10, 1986 by the Board of Appeals for Baltimore County, IT IS ORDERED by the Zoning Commissioner of Baltimore County, this 17th day of January, 1986, that the request for approval of the Second Amended Final Development Plan of Patchwork Farms, which shows building envelopes on Tract A, is moot since Section 1801.3.A.7.b.i, Baltimore County Zoning Regulations (BCZR), requires prior approval of a proposed amendment to a development plan by the Baltimore County Planning Board before the Zoning Commissioner may approve same and since the subject matter in Case No. CBA-85-114 and the instant case was and is the same and, as such, the Petition for Special Hearing is hereby DISMISSED without prejudice.

Stephen J. Nolan, Esquire
People's Counsel

ORDER RECEIVED FOR FILING
DATE 1/17/86
BY [Signature]
ADMINISTRATIVE SERVICES
cc: Stephen J. Nolan, Esquire
Mr. Ronald F. Baldwin
People's Counsel

E. F. RAPHEL & ASSOCIATES
Registered Professional Land Surveyors
201 COURTLAND AVENUE
TOWSON, MARYLAND 21204
DESCRIPTION TO ACCOMPANY
SECOND AMENDED PARTIAL DEVELOPMENT PLAN
"PATCHWORK FARMS"
April 1, 1985
Beginning for the same at a point in the center of Monkon Road, said point being located northwesterly, 700' ± from the intersection formed by the center of Monkon Road and the center of Carroll Road, running thence in Monkon Road N 45° 21' 04" W 120.69', and N 19° 11' 04" W 264.00', thence leaving Monkon Road, and binding on the outline of "Patchwork Farms", the following courses and distances 1) N 20° 17' 56" E 1094.71', 2) N 83° 31' 46" E 638.00', 3) S 2° 00' 00" W 295.00', 4) S 34° 05' 00" W 649.00', 5) S 18° 28' 31" W 199.47', 6) S 88° 53' 28" W 208.38', 7) N 39° 44' 00" W 35.00', to a point on the southeastern side of Patchwork Court and Hillside Lane, thence leaving Patchwork Court, and binding on the southeast side of Hillside Lane, 8) by a curve to the left, with a radius of 175', for a distance of 177.46', 9) by a curve to the right, with a radius of 250', for a distance of 290.44', 10) S 4° 41' 18" W 27.20', thence leaving Hillside Lane 11) S 44° 38' 56" W 34.06' to the place of beginning.
Being known as "Patchwork Farms", a subdivision of Baltimore County.

E. F. RAPHEL
Reg. Prof. Land Surveyor
#2246

PETITION FOR SPECIAL HEARING
10th Election District
LOCATION: Northeast side of Monkon Road, 700 feet Northwest of Carroll Road
DATE AND TIME: Monday, July 15, 1985 at 10:30 a.m.
PUBLIC HEARING: Room 106, County Office Building, 111 West Chesapeake Avenue, Towson, Maryland
The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County, will hold a public hearing:

Petition for Special Hearing under Section 500.7 of the Baltimore County Zoning Regulations, to determine whether or not the Zoning Commissioner and/or Deputy Zoning Commissioner should approve the Second Amended Final Development Plan of Patchwork Farms showing building envelopes on Tract A.

Being the property of Richard A. Moore as shown on the plat filed with the Zoning Office.
In the event that this Petition is granted, a building permit may be issued within the thirty (30) day appeal period. The Zoning Commissioner will, however, entertain any request for a stay of the issuance of said permit during this period for good cause shown. Such request must be received in writing by the date of the hearing set above or made at the hearing.

BY ORDER OF
ARNOLD JABLON
ZONING COMMISSIONER
OF BALTIMORE COUNTY

RE: PETITION FOR SPECIAL HEARING : BEFORE THE ZONING COMMISSIONER
NE/S of Monkon Rd., 700' NW
of Carroll Rd., 10th District : OF BALTIMORE COUNTY
RICHARD A. MOORE, Petitioner : Case No. 86-20-SPH

ENTRY OF APPEARANCE

Please enter the appearance of the People's Counsel in the above-captioned matter. Notices should be sent of any hearing dates or other proceedings in this matter and of the passage of any preliminary or final Order.

Phyllis Cole Friedman
Phyllis Cole Friedman
People's Counsel for Baltimore County

Peter Max Zimmerman
Peter Max Zimmerman
Deputy People's Counsel
Rm. 225, Court House
Towson, MD 21204
494-2188

I HEREBY CERTIFY that on this 21st day of June, 1985, a copy of the foregoing Entry of Appearance was mailed to Stephen J. Nolan, Esquire, Nolan, Plumbhoff & Williams, Chartered, 204 W. Pennsylvania Ave., Towson, MD 21204, Attorney for Petitioner.

Peter Max Zimmerman
Peter Max Zimmerman

BALTIMORE COUNTY
OFFICE OF PLANNING & ZONING
TOWSON, MARYLAND 21204
494-3353
ARNOLD JABLON
ZONING COMMISSIONER

July 11, 1985

Stephen J. Nolan, Esquire
204 West Pennsylvania Avenue
Towson, Maryland 21204

RE: Petition for Special Hearing
NE/S Monkon Rd., 700' NW/Carroll Road
10th Election District
Richard A. Moore - Petitioner
Case No. 86-20-SPH

Dear Mr. Moore,

This is to advise you that \$77.52 is due for advertising and posting of the above property. This fee must be paid before an Order is issued.

This fee must be paid and the zoning sign and post returned on the day of the hearing. Do not remove sign until day of the hearing.

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT
No. 007395
DATE 7/23/85 ACCOUNT R-01-615-000
AMOUNT \$77.52
RECEIVED FROM Stephen J. Nolan, Esquire
FOR Advertising and Posting Case No. 86-20-SPH
8657*****775218 6232F
VALIDATION OR SIGNATURE OF CASHIER

Baltimore County, Maryland,
County Office Building,
B.
rely,
D JABLON
g Commissioner

Stephen J. Nolan, Esquire
204 West Pennsylvania Avenue
Towson, Maryland 21204
June 12, 1985

NOTICE OF HEARING

RE: PETITION FOR SPECIAL HEARING
NE/S Monkon Rd., 700' NW/Carroll Road
10th Election District
Richard A. Moore - Petitioner
Case No. 86-20-SPH

TIME: 10:30 a.m.
DATE: Monday, July 15, 1985
PLACE: Room 106, County Office Building, 111 West Chesapeake Avenue, Towson, Maryland

BALTIMORE COUNTY, MARYLAND
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT
No. 007443
DATE 7/27/85 ACCOUNT P-01-615-000
AMOUNT \$100.00
RECEIVED FROM Peter Nolan
FOR Filing fee for Petition # 307
8657*****775218 6232F
VALIDATION OR SIGNATURE OF CASHIER

BALTIMORE COUNTY ZONING PLANS ADVISORY COMMITTEE
July 8, 1985

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

Chairman
Nicholas B. Commodari

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

Stephen J. Nolan, Esquire
204 West Pennsylvania Avenue
Towson, Maryland 21204

RE: Item No. 307 - Case No. 86-20-SPH
Petitioner - Richard A. Moore
Special Hearing Petition

Dear Mr. Nolan:

The Zoning Plans Advisory Committee has reviewed the plans submitted with the above-referenced petition. 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.

In view of the fact that your client is amending the final development plan of Patchwork Farms, said amendment was required to be first approved by the Planning Board in accordance with Section 1801.3.A.7.b. of the Zoning Regulations. Even though the Planning Board disapproved this proposal on June 14, 1985, it was your decision to have this petition scheduled for a hearing date anyway.

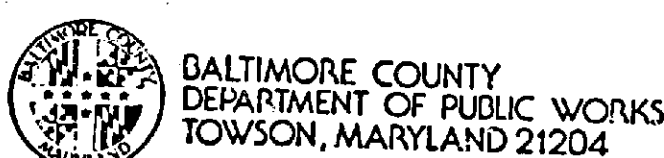
Enclosed are all comments submitted from the members of the Committee at this time that offer or request information on your petition. If similar comments from the remaining members are received, I will forward them to you. Otherwise, any comment that is not informative will be placed in the hearing file. This petition was accepted for filing on the date of the enclosed filing certificate and a hearing scheduled accordingly.

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

NB:mr

Enclosures

cc: E. F. Raphael & Associates
201 Courtland Avenue
Towson, Maryland 21204



HARRY J. PISTEL, P.E.
DIRECTOR

July 3, 1985

Mr. Arnold Jablon
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Re: Item #307 (1984-1985)
Property Owner: Richard A. Moore
N/E side Monkton Road
District 10th

Dear Mr. Jablon:

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

General Comments:

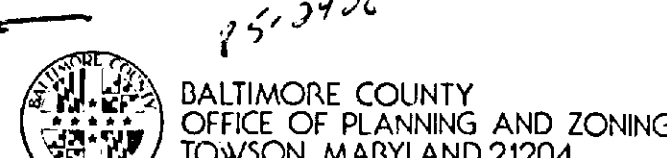
Since no public facilities are involved, this office has no comment.

Very truly yours,
James A. Markle
JAMES A. MARKLE, P.E., Chief
Bureau of Public Services

JAM:PMO:blp

cc: File

7/5
86-20-SPH



NORMAN E. GERBER
DIRECTOR

May 24, 1985

Mr. Richard A. Moore
P.O. Box 193
Phoenix, Maryland 21131

Re: Proposed 2nd Amended Final Development
Plan for Patchwork Farms Subdivision X-147

Dear Mr. Moore:

This is to advise you, the Baltimore County Planning Board at its regular scheduled meeting on Thursday, May 16, 1985, failed to approve the proposal of the 2nd Amended Final Development Plan for Patchwork Farms subdivision.

Presentations were made, first by Mr. Ronald Baldwin, representing the current eleven (11) property owners residing in Patchwork Farms and then by your attorney Mr. Stephen J. Nolan. After testimony the Board by an eight (8) to two (2) vote disapproved the amendment.

Sincerely yours,
Norman E. Gerber
Norman E. Gerber
Secretary to the Planning Board

NEG:rh

cc: Arnold Jablon
Stephen J. Nolan

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

Arnold Jablon
TO: Zoning Commissioner

Date: June 14, 1985

Norman E. Gerber
FROM: Director of Planning and Zoning

SUBJECT: PROPOSED SECOND AMENDED FINAL DEVELOPMENT PLAN,
"PATCHWORK FARMS" (ZAC ITEM #307)

At its regular meeting on Thursday, May 16, 1985, the Baltimore County Planning Board adopted the following Resolutions:

RESOLVED, that the Baltimore County Planning Board DISAPPROVES the proposal of the second amended Final Development Plan, for "Patchwork Farms" subdivision as not being in accord with provisions adopted under authority of Section 504 of the Baltimore County Zoning Regulations.

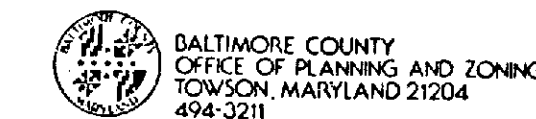
A copy of the amended plat will be forwarded separately.

NEG:pat

cc: Nick Commodari
James Hoswell
Sue Carrell
Ed Johnson
Frank Shearer
File

Norman E. Gerber
Norman E. Gerber
Secretary to the Planning Board

7/5
86-20-SPH



NORMAN E. GERBER
DIRECTOR

JUNE 25, 1985

Re: Zoning Advisory Meeting of APRIL 30, 1985
Item # 307 RICHARD A. MOORE
Location: NE SIDE MONKTON RD. 700'
N/W OF CARROLL RD.

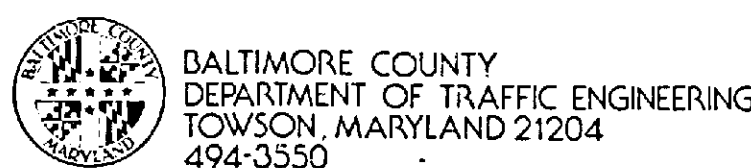
Dear Mr. Jablon:

The Division of Current Planning and Development has reviewed the subject petition and offers the following comments. The items checked below are applicable:

- (X) There are no site planning factors requiring comment.
- () A County Review Group Meeting is required.
- () This site is part of a larger tract; therefore it is defined as a subdivision. The plan must show the entire tract.
- () A record plat will be required and must be recorded prior to issuance of a building permit.
- () The access is not satisfactory.
- () The circulation on this site is not satisfactory.
- () The parking arrangement is not satisfactory.
- () The parking calculations must be shown on the plan.
- () This property contains soils which are defined as wetlands, and development on these soils is prohibited.
- () Construction in or alteration of the floodplain is prohibited under the provisions of Section 22-58 of the Development Regulations.
- () Development of this site may constitute a potential conflict with the Baltimore County Master Plan.
- (X) The amended development plan was ~~disapproved~~ by the Planning Board on ~~THURSDAY - MAY 16, 1985~~ MAY 16, 1985.
- () The property is located in a deficient service area as defined by 8111.178-79. No building permit may be issued until a Reserve Capacity Use Certificate has been issued. The deficient service is:
- () The property is located in a traffic area controlled by a "D" level intersection as defined by 8111.178-79, and as conditions change are re-evaluated annually by the County Council.
- (X) Additional comments:
THE PROPOSED SECOND AMENDED FINAL DEVELOPMENT PLAN "PATCHWORK FARMS" FILE # 307 WAS DISAPPROVED BY THE PLANNING BOARD ON 5/16/85

cc: James Hoswell

Eugene A. Sobor
Chief, Current Planning and Development



STEPHEN E. COLLINS
DIRECTOR

May 16, 1985

Mr. Arnold Jablon
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Item No. 296, 299, 300, 301, 302, 303, 304, 305, 307, 308, 309, 310, 311, 312
Property Owner: 313, 314 Meeting of April 30, 1985
Location:
Existing Zoning:
Proposed Zoning:

Acres:
District:

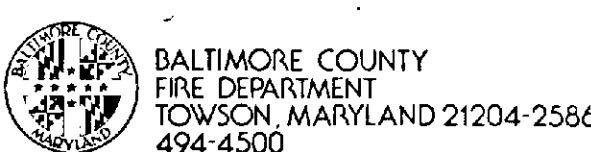
Dear Mr. Jablon:

The Department of Traffic Engineering has no comments for item numbers 296, 299, 300, 301, 302, 303, 304, 305, 307, 308, 309, 310, 311, 312, 313, and 314.

Michael S. Flanigan
Michael S. Flanigan
Traffic Engineering Assoc. II

MSF/ccm

7/15
86-20-SPH



PAUL H. REINCKE
CHIEF

May 15, 1985

Mr. Arnold Jablon
Zoning Commissioner
Office of Planning and Zoning
Baltimore County Office Building
Towson, Maryland 21204

Attention: Nick Commodari, Chairman
Zoning Plans Advisory Committee

RE: Property Owner: Richard A. Moore

Location: N/E side Monkton Road, 700' N/W of Carroll Road

Item No.: 307 Zoning Agenda: Meeting of 4-30-85

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.

- () 1. Fire hydrants for the referenced property are required and shall be located at intervals or 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 operation.
- (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.

REVIEWER: *Carol M. Berkowitz* Noted and Approved: *Carol M. Berkowitz*
Planning Group Fire Prevention Bureau
Special Inspection Division

/mb

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Nicholas Commodari, Zoning Department

Date: May 13, 1985

FROM: *Ed Johnson*, Chief, Building Plans Review C 2 B

SUBJECT: Zoning Advisory Committee Meeting
Scheduled April 30, 1985

- | | |
|-----------|------------------------|
| Item #296 | See Comment |
| Item #297 | See April 23rd, Agenda |
| Item #298 | See April 23rd, Agenda |
| Item #299 | See Comment |
| Item #300 | See Comment |
| Item #301 | Standard Comment |
| Item #302 | See Comment |
| Item #303 | Standard Comment |
| Item #304 | Standard Comment |
| Item #305 | Standard Comment |
| Item #306 | See Comments |
| Item #307 | No Comment |
| Item #308 | No Comment |
| Item #309 | See Comment |
| Item #310 | Standard Comments |
| Item #311 | See Comments |
| Item #312 | See Comments |
| Item #313 | Standard Comments |
| Item #314 | See Comments |

Cycle I - Item #7 - No Further Comment

Item #212 (Revised) No Further Comment

CEB/vv

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

Arnold Jablon
TO: Zoning Commissioner

Date: July 3, 1985

Norman E. Gerber, Director
FROM: Office of Planning and Zoning

SUBJECT: Zoning Petition No. 86-20-SPH

On May 16, 1985, the Baltimore County Planning Board disapproved the proposed Second Amended Development Plan of Patchwork Farms. Consequently, the subject petition is not in conformance with Section 1801.3.A.7.b.i. of the Baltimore County Zoning Regulations and the special exception may not be granted. Additionally, it should be noted that the Planning Board decision has been appealed by the petitioner to the County Board of Appeals.

It is, therefore, the opinion of this office that the subject petition should not be considered at this time.

NEG:JGH:slm

Norman E. Gerber
Norman E. Gerber, Director
Office of Planning and Zoning

15-2483
LAW OFFICES
NOLAN, PLUMHOFF & WILLIAMS
CHARTERED
J. EARLE PLUMHOFF
NEWTON A. WILLIAMS
WILLIAM M. TESSON, JR.
THOMAS J. REINER
WILLIAM R. ENGLEHART, JR.
STEPHEN J. NOLAN
G. SCOTT BARNHART
ROBERT L. HANLEY, JR.
ROBERT S. GLUSHAKOW
204 WEST PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204
(301) 823-7800
June 3, 1985
OF COUNSEL
RALPH E. DEITZ
9026 LIBERTY ROAD
RANDALLSTOWN, MARYLAND 21133
(301) 822-2181
RUSSELL J. WHITE

*ALSO ADMITTED IN D.C.

HAND DELIVERY

Mr. Norman E. Gerber
Secretary to the Planning Board
Office of Planning and Zoning
Towson, Maryland 21204

Re: Notice of Appeal of Richard A. Moore - Proposed
2nd Amended Final Development Plan For
Patchwork Farms Subdivision X - 147.

Dear Mr. Gerber:

As counsel for the appellant, Richard A. Moore, I am hand delivering
herewith an original and two copies of Notice of Appeal for filing with the
County Board of Appeals with regard to the decision of the Baltimore
County Planning Board on May 16, 1985.

Also enclosed is our check in the amount of \$100.00 to cover the
cost of filing this appeal. I will appreciate your acknowledging your
timely receipt of this appeal notice by signing or receipting the enclosed
copy of this letter and returning the same to me in the enclosed self-
addressed envelope.

Thank you for your kind assistance.

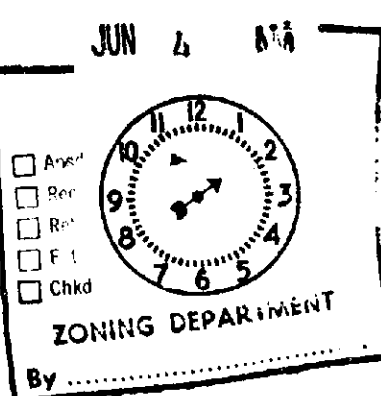
Very truly yours,

Stephen J. Nolan
Stephen J. Nolan

SJN/cac

Enclosures

cc: Edith T. Eisenhart,
Administrative Secretary to the
County Board of Appeals of Baltimore County
Arnold Jablon
Zoning Commissioner



Mr. Norman E. Gerber
June 3, 1985
Page 2

cc: Mr. Ronald Baldwin
Brice G. Dowell, Esquire

Cene Raphael, P.L.S.
E. F. Raphael Associates

Mr. Richard A. Moore

IN THE MATTER OF THE
PROPOSED 2ND AMENDED
FINAL DEVELOPMENT PLAN
OF RICHARD A. MOORE
FOR PATCHWORK FARMS
SUBDIVISION X-147,
TRACT A
10th DISTRICT

* BEFORE THE
* COUNTY BOARD OF APPEALS
* OF
* BALTIMORE COUNTY
* Case No. _____

* * * * *

NOTICE OF APPEAL

Madame Secretary:

Please docket an appeal to the County Board of Appeals of
Baltimore County, pursuant to Section 22-61(A) of the Baltimore County Code,
from the decision of the Baltimore County Planning Board at its regular
meeting on May 16, 1985. A copy of the Planning Board's letter dated
May 24, 1985, concerning the action from which this appeal is taken, is
attached hereto and incorporated herein by reference as "Exhibit A."

Kindly enter the appearance of STEPHEN J. NOLAN and NOLAN, PLUMHOFF
& WILLIAMS, Chartered as counsel for the Appellant, RICHARD A. MOORE, whose
address is 3312 Paper Mill Road, Post Office Box 193, Phoenix, Maryland
21131.

The grounds for this appeal are that the decision of the Baltimore
County Planning Board in failing and refusing to approve the requested
2nd Amended Final Development Plan for Patchwork Farms subdivision was
arbitrary, capricious, illegal, not supported by the evidence, and not in
accordance with the applicable regulations and sound planning policies and
practice.

LAW OFFICES
NOLAN, PLUMHOFF
& WILLIAMS,
CHARTERED

Stephen J. Nolan
STEPHEN J. NOLAN

LAW OFFICES
NOLAN, PLUMHOFF
& WILLIAMS,
CHARTERED

Nolan, Plumhoff & Williams
NOLAN, PLUMHOFF & WILLIAMS
204 W. Pennsylvania Avenue
Towson, Maryland 21204
(301) 823-7800
Attorneys for Appellant,
Richard A. Moore

DATED: June 3, 1985

-2-

BALTIMORE COUNTY
OFFICE OF PLANNING AND ZONING
TOWSON, MARYLAND 21204
494-3211
NORMAN E. GERBER
DIRECTOR

EXHIBIT "A"

May 24, 1985

Mr. Richard A. Moore
P.O. Box 193
Phoenix, Maryland 21131

Re: Proposed 2nd Amended Final Development
Plan For Patchwork Farms Subdivision X-147

Dear Mr. Moore:

This is to advise you, the Baltimore County Planning Board at its
regular scheduled meeting on Thursday, May 16, 1985, failed to approve
the proposal of the 2nd Amended Final Development Plan For Patchwork
Farms subdivision.

Presentations were made, first by Mr. Ronald Baldwin, representing
the current eleven (11) property owners residing in Patchwork Farms
and then by your attorney Mr. Stephen J. Nolan. After testimony the
Board by an eight (8) to two (2) vote disapproved the amendment.

Sincerely yours,

Norman E. Gerber
Norman E. Gerber
Secretary to the Planning Board

NEG:rh

cc: Arnold Jablon
Stephen J. Nolan

PATCHWORK HOMEOWNERS
ASSOCIATION

July 17, 1985

Mr. Arnold Jablon, Zoning Commissioner
Baltimore County Office Building, Room 109
111 West Chesapeake Avenue
Towson, Maryland 21204

Dear Mr. Jablon:

Per your request during the recent special zoning hearing
(86-20-SPH), I am forwarding a copy of the Patchwork Homeowners
Association Annual Meeting Minutes of January 16, 1985. On page
two, you will find the recorded results of our yearly election of
officers.

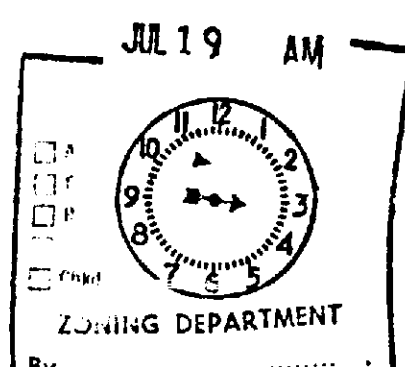
Please let me know if you need any additional information. Thank
you for your attention.

Sincerely yours,

Ronald L. Baldwin
Ronald L. Baldwin, President
Patchwork Homeowners Assn.

Enclosure

*4 Patchwork Ct
Morton Md
31111*



PATCHWORK HOMEOWNERS' ASSOCIATION
ANNUAL MEETING

January 16, 1985

Brice Dowell opened the meeting with a summary of the discussion
he had had earlier in the week with Dick Moore. At that time, Dick
had indicated that there is only a "remote" chance of the County's
taking over our roadway because of the County's requirements of a
three-inch overlay (we have only about 2 inches) and an 18-foot width
(we have 16 feet).

Brice then proceeded to outline the three issues which Dick, in
his absence, wished brought up at this meeting. First, Dick offered
to deed to the Association a small parcel of land fronting Monoton Road.
Discussion centered around the potential value or liabilities of owning
the land, and Ron Baldwin moved to table the issue until some determina-
tion can be made with the Salvation Army regarding a possible trade of
the frontage piece for the portion of our roadway owned by that organi-
zation. The motion carried.

Second, Dick has sold the building lot located roughly where the
paper Hillside Lane existed and requests that Association membership
be granted to the lot so that the builder may have driveway access to
Patchwork Court. While an additional membership would result in addi-
tional funds for the Association, questions arose regarding the size
and style of the new house, and, in particular, the affect the new house
would have on the view from the Baldwin's home. The members voted to
table any decision on this matter until further information could be
gathered regarding the aesthetics of the proposed house and property
grading.

Third, Dick Moore offered to deed to the Association the drainage
ditch easement, which would give the Association the right to clean or
repair that pipeline. Ron Baldwin moved that the Association accept
the deed, and the motion passed.

Additional information which Brice reported from his meeting with
Dick Moore was that Dick plans to build "modest" speculation homes on
the remaining two lots.

A question arose regarding whether the horse farm adjoining our
lots was sold without any covenant protecting its farm status. Sheila
Haskell noted that their contract of sale on their lot includes a
requirement that Moore honor such a covenant. Brice will check out
this matter and report back to the members.

Jim Davis then asked about the Salvation Army land, and it was
reported that while the land is for sale, the land is zoned so that
only one house per 50 acres is permitted, and the selling price is
nearly \$500,000 for those 171 acres.

COPY

Page Two

The Treasurer's report showed that we have \$187.65 in a checking
account for annual dues, and \$362.30 in a savings account for road funds.
We also have a C.D. of \$624 for road funds.

This report spurred a discussion of the road condition. Martha
Young moved that the Association obtain estimates to repair the immediate
and long-term problems of the roadway. The motion passed. Ron Baldwin
indicated that he would ask his subcontractor for estimates, and Nancy
Rinehimer would request estimates from Jeff Rodgers' subcontractor.

Election of officers for 1985 was held. Ron Baldwin was elected
President, and Karen Fornoff will serve as Secretary-Treasurer.

In the ensuing discussion of new issues, Brice moved that our current
\$20.00 annual dues remain the same. The motion was adopted, and the 1985
dues are payable by March. The determination of the amount of the road
fund assessment was postponed until we have further information on the
need for any road repairs.

Karen Fornoff expressed concern about the need for a sign to encourage
drivers in the Court to slow down for the sake of the children. John
Dillon stated that he could obtain the sign at a wholesale price. Karen
moved that a sign be posted stating, "Slow Children at Play." The motion
was accepted.

The meeting was then adjourned.

DEC 22 1985

PATCHWORK HOMEOWNERS ASSOCIATION

July 19, 1985

Mr. Arnold Jablon, Zoning Commissioner
Baltimore County Office Building, Room 109
111 West Chesapeake Avenue
Towson, Maryland 21204

Dear Mr. Jablon:

Per your request during the recent special zoning hearing (86-20-SPH), I am forwarding copies of (a) the Haskell's contract of sale for Lot number 3 including the "SPECIAL COVENANT" restricting the development of the adjacent farm and (b) the Declaration of Restrictions which includes Lots 1 through 11 but makes no reference to TRACT 'A'.

I am sure these documents will be helpful to you in making your decision. Please let me know if you need any additional information. Thank you for your attention.

Sincerely yours,

Ronald L. Baldwin
Ronald L. Baldwin, President
Patchwork Homeowners Assn.

Enclosures

LAW OFFICES
NOLAN, PLUMHOFF & WILLIAMS
CHARTERED

204 WEST PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204
(301) 823-7800

OF COUNSEL
RALPH E. DEITE
5028 LIBERTY ROAD
RANDALLSTOWN, MARYLAND 21133
(301) 822-2181
RUSSELL J. WHITE

*ALSO ADMITTED IN D.C.

HAND-DELIVERY

July 22, 1985

Honorable Arnold Jablon
Zoning Commissioner for
Baltimore County
County Office Building
Towson, Maryland 21204

Re: Case No. 86-20-SPH, Item No. 307
Petitioner: Richard A. Moore
Proposed Second Amended Final Development Plan for
"Patchwork Farms", Lot 12
Hearing Date: July 15, 1985

Dear Commissioner Jablon:

As counsel for the Petitioner in the above-entitled case, I am writing to submit certain additional documentation with regard to the hearing you held on July 15, 1985 concerning Lot 12 of Patchwork Farms.

At that hearing, Mrs. Sheila Haskell testified concerning representations she contends were made to her by Mr. Moore or his agent with regard to restrictions on the development of "Tract A", which is the subject of the July 15th hearing. The Petitioner testified and he continues to assert that there was never any agreement that "Tract A" would not be improved with a house. In support of this contention, we submit the following documents which were obtained by Mr. Moore at our office after the July 15th hearing:

1. Contract of Sale for Lot 3 of Patchwork Farms dated February 6, 1979 between Mr. Moore and Mr. and Mrs. Haskell. The handwritten notation at the bottom of page one which refers to the restricted development of the "adjacent property" has been ~~stricken~~ and initialed by all parties.
2. A typewritten addendum with a provision entitled "Special Covenant" discloses that Mr. Moore agreed that he would "not

Honorable Arnold Jablon
Zoning Commissioner for
Baltimore County

July 22, 1985
Page 2

subdivide the 60 acre farm adjoining the eastern boundary of 'Patchwork Farms' into more than three building lots....[and that this] covenant shall not apply to any other land of the grantor herein.... [Emphasis added].

3. Deed dated May 7, 1979 for Lot 3 and recorded among the Land Records of Baltimore County in Liber 6018, folio 612 which does not refer to any restrictions on remaining lands of grantor. A copy of this last document was obtained by our office.

In view of the fact that the "Special Covenant" appended to the Contract of Sale is directed to the "farm adjoining the eastern boundary of 'Patchwork Farms'" and Tract A is not by definition within the scope of the Special Covenant, we respectfully contend that no agreement exists which would limit Mr. Moore's right to construct a building on Tract A, now called Lot 12.

Inasmuch as these documents were only obtained by Mr. Moore immediately following last Monday's hearing, his review of documents concerning other Patchwork lots is continuing. We will promptly provide the Commissioner with any other relevant documentation when it is obtained.

Thank you for your consideration of these supplemental materials which are clearly responsive to the issues raised at the recent hearing.

Very truly yours,

Stephen J. Nolan
Stephen J. Nolan

SJN:md
Enclosures

c.c.s. Mr. Ronald Baldwin

Peter Max Zimmerman, Esquire
Deputy People's Counsel

Mr. and Mrs. Donald F. Haskell

Mr. Richard A. Moore

Mr. Eugene F. Raphael, P.L.S.

LAW OFFICES
NOLAN, PLUMHOFF & WILLIAMS
CHARTERED

204 WEST PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204
(301) 823-7800

OF COUNSEL
RALPH E. DEITE
5028 LIBERTY ROAD
RANDALLSTOWN, MARYLAND 21133
(301) 822-2181
RUSSELL J. WHITE

*ALSO ADMITTED IN D.C.

HAND DELIVERY

December 24, 1985

Edith T. Eisenhart,
Administrative Secretary to the
County Board of Appeals of
Baltimore County
Court House
Towson, Maryland 21204

Re: Case No. CBA-85-114
In the matter of RICHARD A. MOORE
Re: Second Amended Final Development
Plan of Patchwork Farms Subdivision,
X-147, Tract A
10th District

Dear Madam Secretary:

As counsel for the Appellant, Richard A. Moore, I am filing herewith a Motion for Voluntary Dismissal and proposed Order in the above-entitled case.

As the result of an Agreement which was reached with Patchwork Farms Homeowners Association, Inc., we have obtained the signatures of all homeowners in the subdivision on the subject Second Amended Final Development Plan of Patchwork Farms Subdivision and will proceed to record the same after the requisite approvals by the Office of Planning and Zoning and the Zoning Commissioner have been obtained.

Pursuant to Board Rule 3(b), we are requesting that the dismissal be entered without prejudice to our client's right to proceed with the recording of the subject plan.

Richard A. Moore
December 24, 1985
Page 2

Thank you for your kind assistance.

Very truly yours,

Stephen J. Nolan
Stephen J. Nolan

SJN/jmg

cc: Arnold Jablon
Zoning Commission for
Baltimore County
Norman E. Gerber
Secretary to the Planning Board
Thomas J. Bollinger, Esquire
Counsel to the Board of Appeals
Susan S. Carrell
Office of Current Planning
Mr. Ronald L. Baldwin, President
Patchwork Farms Homeowners Association, Inc.
Mr. Richard A. Moore
Mr. Eugene F. Raphael

IN THE MATTER OF * BEFORE
RICHARD A. MOORE * COUNTY BOARD OF APPEALS
Re: Second Amended Final * OF
Development Plan- * BALTIMORE COUNTY
Patchwork Farms Subdivision, * No. CBA-85-114
X-147, Tract A *
10th District * * * * *

MOTION FOR VOLUNTARY DISMISSAL OF APPEAL

MADAM SECRETARY:

The Appellant, RICHARD A. MOORE, by his attorneys, Stephen J. Nolan, and Nolan, Plumhoff & Williams, Chartered, voluntarily moves for dismissal of his Notice of Appeal which was filed in this case on June 3, 1985, without prejudice.

Dated: December 24, 1985

Stephen J. Nolan
STEPHEN J. NOLAN
Nolan, Plumhoff & Williams
NOLAN, PLUMHOFF & WILLIAMS,
CHARTERED
204 W. PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204
(301) 823-7800
Attorneys for the Appellant,
Richard A. Moore

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of December, 1985, copies of the foregoing Motion for Voluntary Dismissal of Appeal and proposed Order were mailed or hand delivered to:

Thomas J. Bollinger, Esquire
Assistant County Attorney
Office of Law
Court House - Mezzanine
Towson, Maryland 21204

Norman E. Gerber, Director
Office of Planning & Zoning
Courts Building, Fourth Floor
Towson, Maryland 21204

Arnold Jablon
Zoning Commissioner for
Baltimore County
County Office Building
Towson, Maryland 21204
(Case No. 86-20-SPH)

Mr. Ronald L. Baldwin, President
Patchwork Farms Homeowners Association, Inc.
4 Patchwork Court
Monkton, Maryland 21111

Susan S. Carrell
Office of Current Planning
County Office Building
Towson, Maryland 21204

Stephen J. Nolan
Stephen J. Nolan

SJN-12/24/85

IN THE MATTER OF * BEFORE
RICHARD A. MOORE * COUNTY BOARD OF APPEALS
Re: Second Amended Final * OF
Development Plan- * BALTIMORE COUNTY
Patchwork Farms Subdivision, * No. CBA-85-114
X-147, Tract A *
10th District * * * * *

ORDER OF DISMISSAL

Appeal of RICHARD A. MOORE from the decision of the Baltimore County Planning Board which was filed on May 16, 1985, regarding property located on the northeast side of Monkton Road, northwest of Carroll Road, in the Tenth Election District of Baltimore County.

WHEREAS, the Board of Appeals is in receipt of a Motion for Voluntary Dismissal of Appeal filed on December 24, 1985, a copy of which is attached hereto and made a part hereof, from the attorney representing the Appellant in the above entitled matter; and
WHEREAS, the said attorney for the Appellant requests that the appeal filed by them be dismissed without prejudice and withdrawn as of December 24, 1985.

IT IS HEREBY ORDERED this ___ day of ___, 1985, that said appeal be and the same is DISMISSED WITHOUT PREJUDICE.

COUNTY BOARD OF APPEALS OF
BALTIMORE COUNTY

WILLIAM T. HACKETT, Chairman

SJN-12/24/85-2

County Board of Appeals of Baltimore County
New 200 Court House
Towson, Maryland 21204
(301) 494-3180
January 10, 1986

Re: Case No. CBA-85-114
Richard A. Moore

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

Very truly yours,
June Holmen, Secretary

Encl. Richard A. Moore
Ron Baldwin
Brice G. Dowell, Esq.
Gene Raphael
Thomas J. Bollinger, Esq.
Arnold Jablon
Norman Gerber
James Hoswell
Susan Carrell

IN THE MATTER OF * BEFORE
RICHARD A. MOORE * COUNTY BOARD OF APPEALS

Re: Second Amended Final * OF
Development Plan- * BALTIMORE COUNTY
Patchwork Farms Subdivision, *
X-147, Tract A * No. CBA-85-114
10th District * * * * *

ORDER OF DISMISSAL

Appeal of RICHARD A. MOORE from the decision of the Baltimore County Planning Board which was filed on May 16, 1985, regarding property located on the northeast side of Monkton Road, northwest of Carroll Road, in the Tenth Election District of Baltimore County.

WHEREAS, the Board of Appeals is in receipt of a Motion for Voluntary Dismissal of Appeal filed on December 24, 1985, a copy of which is attached hereto and made a part hereof, from the attorney representing the Appellant in the above entitled matter; and

WHEREAS, the said attorney for the Appellant requests that the appeal filed by them be dismissed without prejudice and withdrawn as of December 24, 1985.

IT IS HEREBY ORDERED this 10th day of January, 1986, that said appeal be and the same is DISMISSED WITHOUT PREJUDICE.

COUNTY BOARD OF APPEALS OF BALTIMORE COUNTY
William T. Hackett, Chairman
Lawrence E. Schlicht
LeRoy V. Spurrier

SJN-12/24/85-2

IN THE MATTER OF * BEFORE
RICHARD A. MOORE * COUNTY BOARD OF APPEALS

Re: Second Amended Final * OF
Development Plan- * BALTIMORE COUNTY
Patchwork Farms Subdivision, *
X-147, Tract A * No. CBA-85-114
10th District * * * * *

MOTION FOR VOLUNTARY DISMISSAL OF APPEAL

MADAM SECRETARY:

The Appellant, RICHARD A. MOORE, by his attorneys, Stephen J. Nolan, and Nolan, Plunhoff & Williams, Chartered, voluntarily moves for dismissal of his Notice of Appeal which was filed in this case on June 3, 1985, without prejudice.

Dated: December 24, 1985

Stephen J. Nolan
STEPHEN J. NOLAN
Nolan, Plunhoff & Williams, Chartered
204 W. Pennsylvania Avenue
Towson, Maryland 21204
(301) 823-7800

Attorneys for the Appellant,
Richard A. Moore

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of December, 1985, copies of the foregoing Motion for Voluntary Dismissal of Appeal and proposed Order were mailed or hand delivered to:

Thomas J. Bollinger, Esquire
Assistant County Attorney
Office of Law
Court House - Mezzanine
Towson, Maryland 21204

Norman E. Gerber, Director
Office of Planning & Zoning
Courts Building, Fourth Floor
Towson, Maryland 21204

Arnold Jablon
Zoning Commissioner for
Baltimore County
County Office Building
Towson, Maryland 21204
(Case No. 86-20-SPH)

Susan S. Carrell
Office of Current Planning
County Office Building
Towson, Maryland 21204

Mr. Ronald L. Baldwin, President
Patchwork Farms Homeowners Association, Inc.
4 Patchwork Court
Monkton, Maryland 21111

Stephen J. Nolan
Stephen J. Nolan

COUNTY BOARD OF APPEALS
RIS DEC 26 A 0 12

SJN-12/24/85

2

CERTIFICATE OF PUBLICATION

Towson, Md. 7/9 1985

THIS IS TO CERTIFY, that the annexed advertisement was published in THE TOWSON TIMES, a weekly newspaper distributed in Towson, Baltimore County, Md., once a week for 1 consecutive weeks, the first publication appearing on the 7th day of June 1985.

The TOWSON TIMES
Cost of Advertisement: \$27.77

86-20-SPH
CERTIFICATE OF PUBLICATION

TOWSON, MD. June 27 1985

THIS IS TO CERTIFY, that the annexed advertisement was published in THE JEFFERSONIAN, a weekly newspaper printed and published in Towson, Baltimore County, Md., appearing on June 27 85 1985.

THE JEFFERSONIAN,
Publisher
Cost of Advertising
24.75

CERTIFICATE OF POSTING
ZONING DEPARTMENT OF BALTIMORE COUNTY
Towson, Maryland

District 10TH Date of Posting 6/27/85

Posted for: Special Hearing

Petitioner: Richard A. Moore

Location of property: N.E.S., Monkton Rd., 700' N.W. Carroll Rd.

Location of Sign: Facing Monkton Rd. across 15' E. to 2nd St., 82' property of G. H. Wilson

Remarks: [Signature]

Posted by: [Signature] Date of return: 6/28/85

Number of Signs: 1

Case No. 86-20-SPH

BALTIMORE COUNTY OFFICE OF PLANNING & ZONING
County Office Building
111 W. Chesapeake Avenue
Towson, Maryland 21204

Your petition has been received and accepted for filing this 10th day of June, 1985.

Arnold Jablon
Zoning Commissioner

Petitioner Richard A. Moore
Petitioner's Attorney Stephen J. Nolan, Esquire
cc: E. P. Raphael & Associates

Received by: [Signature]
Nicholas B. Commodore
Chairman, Zoning Plans Advisory Committee

PETITIONER'S
EXHIBIT A

GENERAL NOTES

AREA OF PROPERTY 74.559 Acres
EXISTING ZONE R-2
NO. OF LOTS PERMITTED 14-9 Lots
NO. OF LOTS PROPOSED 12 LOTS

1. Private water and septic systems to be installed in accordance with Baltimore County Health Department Regulation.
2. There shall be two (2) off street parking spaces (9 x 20) provided for each lot constructed with macadam surface.
3. Location of drives and parking to be determined by location of residence.
4. No grading of the entire site.
5. There shall be no clear cutting of trees and shrubs from any lot, only dead, damaged or trees necessary for the safety of homes and drives are to be removed.
6. Minimum grading shall be performed as required for the owner.
7. Planting on each lot to be provided by the owner of the lot.
8. The building height of any structure shall be 35 feet.
9. Water vegetation - grassland.
10. No open space required.
11. Contours shown hereon are Baltimore County Photogrammetric Min. building setbacks required - 75' from centerline of line street, and 25' from both side lot lines or a minimum of 50' from any rear lot line.
12. The owner reserves the right to create and realign all drainage easements prior to the sale of the lots.
13. Lot dimensions and acreage as shown are approximate and are substantially in accordance with the Plat of Section 11.
14. The owner and maintenance rights for individual lots prior to sale.
15. Fresh removable by Baltimore County.
16. Envelopes shown hereon are for the location of all principal buildings only, accessory structures, fences and projections into yards may be constructed outside the envelopes shown hereon, subject to convenient & applicable building regulations.
17. Front of house to be 50' from property line.
18. Access road shown hereon is for the use of the lots.
19. The majority of the soils contained in the lots is class I or II.

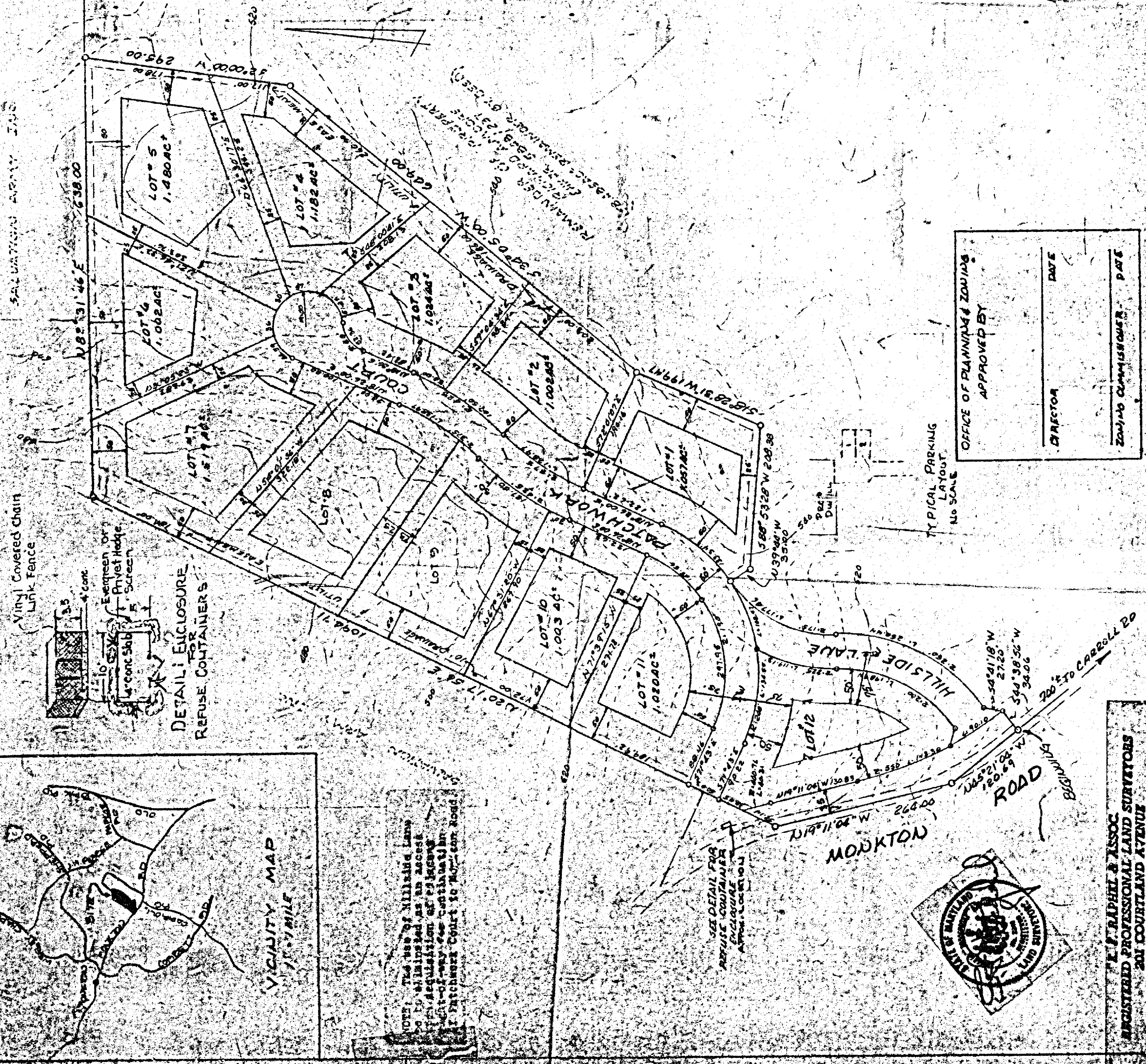
MAY 10, 1985

REASON FOR 2nd AMENDED FINAL DEVELOPMENT PLAN
1) TO RECALL TRACT A TO LOT 12
2) TO SHOW 50 ENVELOPES ON LOT 12
3) LOTS HAVE BEEN SOLD WITHIN 300' OF THE ABOVE CURVE
4) PUBLIC HEARING IS REQUIRED AND HAS BEEN FILED
FOR ITEM # 307

2nd AMENDED
FINAL DEVELOPMENT PLAN
PATCHWORK FARMS
10th ELECT. DIST
SCALE 1" = 100'

OWNER: RICHARD A. MOORE
B. MOORE & MATTHEWS CONSULTANT CO.
20,400 PHOENIX MD. 21151

1985



PETITIONER'S
EXHIBIT A

GENERAL NOTES
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EXISTING ZONE R-2
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NO. OF LOTS PROPOSED 12 LOTS & TRACT A

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1) TO SHOW 50 ENVELOPES ON TRACT A

2nd AMENDED
FINAL DEVELOPMENT PLAN
PATCHWORK FARMS
10th ELECT. DIST
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