

IN THE MATTER OF
THE APPLICATION OF
P.A.S.T. LIMITED PARTNERSHIP
AND STANLEY I. PANITZ, ET AL
FOR SPECIAL HEARING ON PROPERTY
LOCATED ON THE EAST SIDE OF
YORK ROAD, 139' SOUTH OF
THELMA STREET
8th ELECTION DISTRICT

ORDER OF DISMISSAL

Petition of P.A.S.T. Limited Partnership and Stanley I. Panitz,
et al, for Special Hearing on property located on the east side of York Road,
139' south of Thelma Street, in the 8th Election District of Baltimore County,
and,

WHEREAS, the Board of Appeals is in receipt of a letter of
Dismissal of Appeals filed October 21, 1988 (a copy of which is attached hereto
and made a part hereof) from the attorneys representing the Petitioners and
the Protestants in the above entitled matter, and

WHEREAS, the said attorneys for the said Petitioners and
Protestants request that the appeals filed on behalf of said Petitioners and
Protestants be dismissed and withdrawn as of October 21, 1988.

IT IS HEREBY ORDERED this 25th day of October, 1988, that
said appeals be and the same are DISMISSED.

COUNTY BOARD OF APPEALS
OF BALTIMORE COUNTY

Thomas J. Pollinger, Acting Chairman

Henry H. Lewis

Arnold G. Foreman

LAW OFFICES
COOK, HOWARD, DOWNES & TRACY
210 ALLEGHENY AVENUE
P.O. BOX 5517
TOWSON, MARYLAND 21204

JAMES H. COOK
JOHN B. HOWARD
DAVID G. DOWNES
DANIEL O.G. TRACY, JR.
JOHN H. ZIM, II
JOSEPH C. WICK, JR.
HENRY B. PICA, JR.
HERBERT R. CONOR, II
FRANK P. HENTSON
MICHAEL E. LEAF
THOMAS L. HUDSON
C. GARY DELLY, JR.
M. KING HILL, III
GEORGE H. REYNOLDS, III
ROBERT A. HOFFMAN
CYNTHIA M. HARR

TELEPHONE (301) 823-4111
TELECOPIER (301) 821-0147
205 EAST BROADWAY
P.O. BOX 8
BEL AIR, MARYLAND 21014
BEL AIR (301) 636-8664
BALTIMORE (301) 878-1851
DIRECT DIAL NUMBER:
October 21, 1988

JUDITH A. ARMOLD
DEBORAH C. DOPPIN
KATHLEEN GALLAGHER COX
JOHN J. GESSNER
J. MICHAEL BRENNAN
H. MURPHY PETERSON, JR.
JOSEPH F. SNEZ, JR.
KATHRYN L. KOTZ
JAMES R. MACALISTER
JAMES H. MARTIN
REGAN J. R. SMITH
NEWTON B. FOWLER, III
CHARLES R. WELLINGTON
KEVIN J. MAHONEY
ELIZABETH S. RUBIN
MARK E. SMITH
JAMES D. C. DOWNES
(808-1878)

REPLY TO:

Hand Delivery

County Board of Appeals
of Baltimore County
Room 315, County Office Building
Towson, Maryland 21204

Re: Case No.: 88-384-SPH
P.A.S.T. Limited Partnership and
Stanley I. Panitz, et al.

Dear Board:

On behalf of the Pantimonium Limited Partnership,
P.A.S.T. Limited Partnership, Stanley I. Panitz,
("Petitioners"), and the Stratford Community Association,
Inc., ("Protestants"), please dismiss the appeals in the
above-captioned case.

Thank you.

Sincerely,

Robert A. Hoffman,
Attorney for Protestants

William D. Berwick,
Attorney for Protestants

RAH:bw

IN RE: PETITION FOR SPECIAL HEARING * BEFORE THE
E/S York Road, 139' S of * ZONING COMMISSIONER
Thelma Street * OF BALTIMORE COUNTY
8th Election District *
3rd Councilmanic District *
P.A.S.T. Limited Partnership * Case No. 88-384-SPH
and Stanley I. Panitz, et al *
Petitioners *

FINDINGS OF FACT AND CONCLUSIONS OF LAW

The Petitioners herein request a special hearing to approve the permit-
ted, single use of a proposed five (5) story office building as provided for in
the Baltimore County Zoning Regulations (B.C.Z.R.) under the designation M.R.
(Manufacturing Restricted), as more particularly described in Petitioner's Exhi-
bits 1, 2 and 4.

The Petitioners appeared, testified, and were represented by H. John
Bremermann, III, Esquire, Martin J. Storck, Esquire, and Robert A. Hoffman, Es-
quire. Also appearing on behalf of the Petition were: Tim Madden and John C.
Eiser with Kilde Consultants, and Mickey Cornelius with The Traffic Group. Num-
erous persons appeared and testified in opposition (see attached Protestants) Exhi-
bit (in Sheet). In addition, numerous Letters in opposition were received and
recorded in the Case File.

Testimony of the Petitioner's witnesses tends to establish that all of
the requirements of Section 502.1 of the B.C.Z.R. are met by the proposed pro-
ject. The five-story office building is smaller than that permitted as a matter
of right. The subject property was formerly developed by the C & P Telephone
Company as a repair truck terminal.

Testimony indicated that the proposed building will be 79 feet tall with
proper parking provided. The building would be the tallest building on the east
side of York Road for 2000' to the south and 1500' to the north.

PETITION FOR SPECIAL HEARING

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY:

I, or we, Stanley I. Panitz, Inc. legal owner, of the property
situate in Baltimore County and which is described in the description and
plat attached hereto and made a part hereof, hereby petition for a Special
Hearing Under Section 500.7 of the Zoning Regulations of Baltimore County,
to determine whether or not the Zoning Commissioner and/or Deputy Zoning
Commissioner should approve the permitted, single use of a proposed
five (5) story office building as provided for in the Zoning Regulations
of Baltimore County under the designation: M.R. (Manufacturing Restricted).

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

Pantimonium Limited Partnership
c/o Obrecht Management Group, Inc.
Contract Purchaser
Address: 9475 Deereco Road
Timonium, Maryland 21081
Petitioner's Attorney
H. John Bremermann, III 561-5858
Address: (same)

ORDERED By the Zoning Commissioner of Baltimore County, this 7th
day of January, 1988, that the subject matter of this petition be
advertised, as required by the Zoning Law of Baltimore County, in two
newspapers of general circulation throughout Baltimore County, that
property be posted, and that the public hearing be held before the Zoning
Commissioner of Baltimore County in Room 106, County Office Building in
Towson, Baltimore County, on the 14th day of April, 1988, at
11:00 o'clock A.M.

J. Robert Hines
Zoning Commissioner of Baltimore County

(over)

The Protestants believe that the proposed building is too tall and would
block their view of the valley. They also complain of the noise from air condi-
tioning units on top of the building and the outside lighting invading their
neighborhood.

The issue here is not whether or not the five-story office building
should be permitted. Clearly, an office building is permitted at this location.
The issue, however, lies with the height of the proposed building and the inter-
ference the Protestants believe it will have upon their surrounding community.

The proposed project does not create any adverse effect upon the health,
safety and/or general welfare of the community if the restrictions imposed here-
inafter are complied with by the Petitioners. This project may easily be
brought within the spirit and intent of the M.R. zoning regulations. However,
it must be determined whether or not the project complies with Section 240.1 of
the B.C.Z.R. Specifically, is the property being developed in such a manner as
to "...protect the uses in neighboring residential zones."

By providing for proper landscaping and by reducing the exterior light-
ing and noise, there should be no more adverse impact to the area than is nor-
mally associated with any office building in any area of the County. Therefore,
in the opinion of the Zoning Commissioner, the proposed use will not be detri-
mental to the health, safety, or general welfare of the locality, nor tend to
create congestion in roads, streets, or alleys therein, nor be inconsistent with
the purposes of the property's zoning classification, nor in any other way be
inconsistent with the spirit and intent of the B.C.Z.R.

After reviewing all of the testimony and evidence presented, it appears
that the special hearing should be granted with certain restrictions as more
fully described below.

Pursuant to the advertisement, posting of the property, and public hear-
ing on this Petition held, and for the reasons given above, the relief requested
in the special hearing, as hereinafter modified, should be granted.

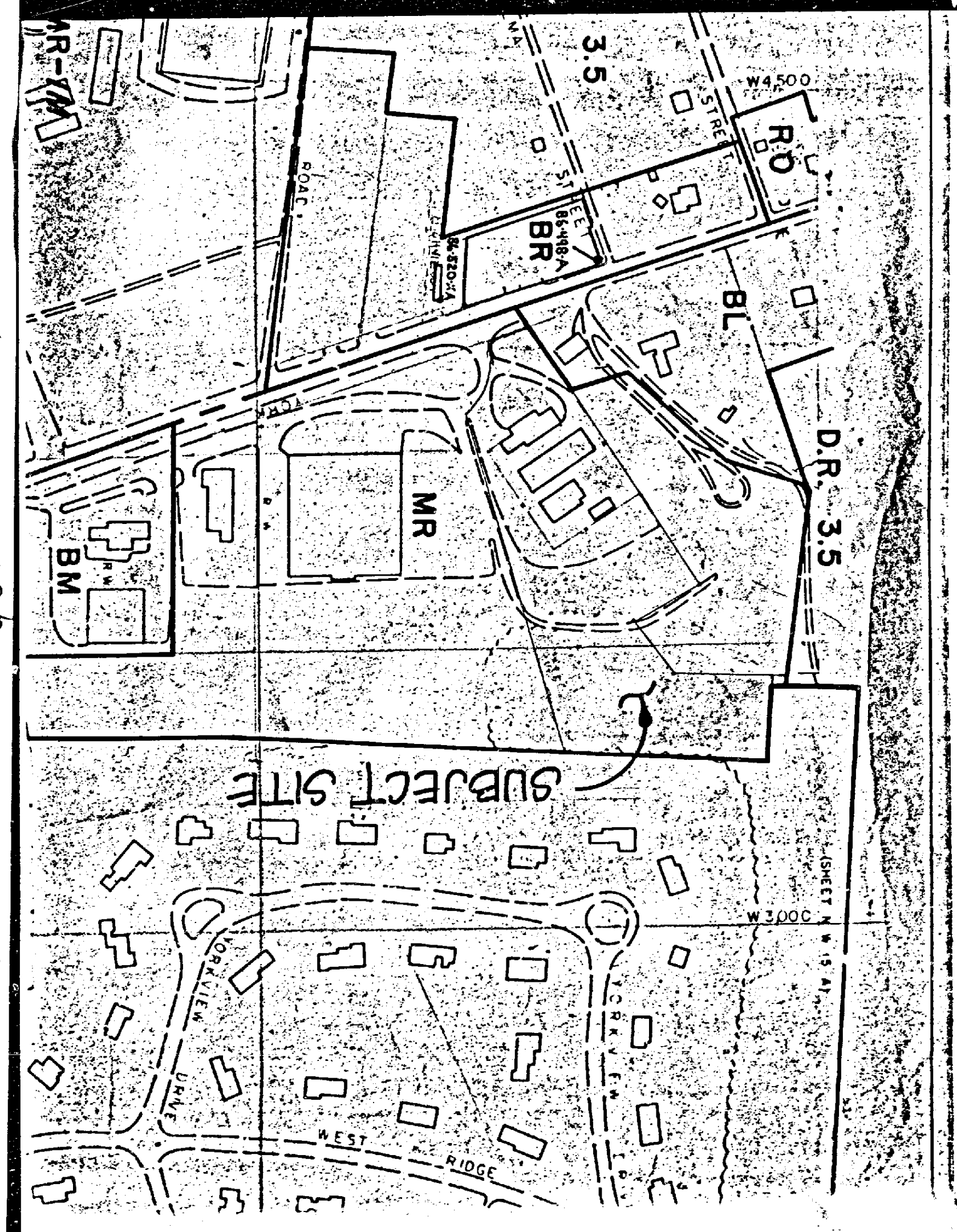
THEREFORE, IT IS ORDERED by the Zoning Commissioner for Baltimore County
this 14th day of May, 1988 that the Petition for Special Hearing to approve
the permitted, single use of a proposed five (5) story office building as pro-
vided for in the Baltimore County Zoning Regulations (B.C.Z.R.) under the desig-
nation M.R. (Manufacturing Restricted), in accordance with Petitioner's Exhibits
1, 2 and 4, be and is hereby GRANTED, subject, however, to the following
restrictions:

- 1) The Petitioner may apply for his building permit and be
granted same upon receipt of this Order; however, Petitioner
is hereby made aware that proceeding at this time is at his
own risk until such time as the applicable appellate process
from this Order has expired. If, for whatever reason, this
Order is reversed, the Petitioner would be required to re-
turn, and be responsible for returning, said property to its
original condition.
- 2) The Petitioner shall not construct any structure or ac-
cessory structure at an elevation above sea level of more
than 484.0 feet. Following substantial completion of the
project, the Petitioner shall provide the Zoning Commis-
sioner with written certification evidencing that no part, sec-
tion or item of any structure is above an elevation of 484.0
feet.
- 3) The Petitioner shall not have any exterior lighting 8
feet above-grade on the sides of the building. All parking
lot lighting shall be no more than 8 feet above-grade. All
exterior lighting shall be directed downward and shall not
defuse onto residential property.
- 4) The Petitioner shall have no building signage except
upon the west face of the building.
- 5) The Petitioner shall provide the landscaping required
by the Baltimore County Landscape Planner in the Office of
Current Planning.
- 6) In addition to the landscaping required above, the Pe-
titioner shall also landscape the area outlined in red on
the attached plat with a 15' wide planting strip. Said
planting strip shall contain three equally distanced rows of
evergreen trees, known as frazier furs, at least 6' tall,

planted on 5' x 15' centers, staggered on each row as shown
in the attached "Planting Typical" drawing. In addition,
the Petitioner shall provide a landscaping strip along the
area outlined in blue on the attached plat which shall con-
sist of a single row of 8' tall blue spruce trees planted on
10' centers. The Petitioner shall subsequently replace all
dead trees each year for the first five years.

JRH:bjs

J. Robert Hines
Zoning Commissioner of
Baltimore County



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
7th day of January, 1988.

J. Robert Haines
J. ROBERT HAINES
ZONING COMMISSIONER

Petitioner Stanley I. Panitz, et al
Petitioner's Attorney H. John Bremermann, III
Received by: James E. Dyer
Chairman, Zoning Plans
Advisory Committee

Baltimore County
Department of Public Works
Bureau of Traffic Engineering
County Office Building, Suite 405
Towson, Maryland 21204
494-3554

February 18, 1988



Mr. J. Robert Haines
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Dear Mr. Haines:

The Bureau of Traffic Engineering has no comments for items number 224,
225, 227, 228, 229, 230 and 231.

Very truly yours,

Michael S. Flanagan
Michael S. Flanagan
Traffic Engineer Associate II

MSF/cml-b

BALTIMORE COUNTY DEPARTMENT OF ENVIRONMENTAL
PROTECTION AND RESOURCE MANAGEMENT12/31/87
Date

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

Zoning Item # 224 Zoning Advisory Committee Meeting of December 29, 1987

Property Owner: Stanley I. Panitz, et al
Location: E/S York Road, 139' S. Thelma Street District 8
Water Supply metro Sewage Disposal metro

COMMENTS ARE AS FOLLOWS:

- () Prior to approval of a Building Permit for construction, renovation and/or installation of equipment for any existing or proposed food service facility, complete plans and specifications must be submitted to the Plans Review Section, Bureau of Regional Community Services, for final review and approval.
- () Prior to new installation of fuel burning equipment, the owner shall contact the Bureau of Air Quality Management, 494-3775, to obtain requirements for such installation before work begins.
- () A permit to construct from the Bureau of Air Quality Management is required for such items as spray paint processes, underground gasoline storage tank/s (5,000 gallons or more) and any other equipment or process which exhausts into the atmosphere.
- () A permit to construct from the Bureau of Air Quality Management is required for any charbroiler operation which has a total cooking surface area of five (5) square feet or more.
- () Prior to approval of a Building Permit Application for renovations to existing or construction of new health care facilities, complete plans and specifications of the building, food service area and type of equipment to be used for the food service operation must be submitted to the Baltimore County Department of Environmental Protection and Resource Management for review and approval. For more complete information, contact the Recreational Hygiene Section, Bureau of Health and Mental Hygiene for review and approval.
- () Prior to any new construction or substantial alteration of public swimming pool, wading pool, bathhouse, saunas, whirlpools, hot tubs, water and sewerage facilities or other appurtenances pertaining to health and safety, two (2) copies of plans and specifications must be submitted to the Baltimore County Department of Environmental Protection and Resource Management for review and approval. For more complete information, contact the Recreational Hygiene Section, Bureau of Health and Mental Hygiene for review and approval.
- () Prior to approval for a nursery school, owner or applicant must comply with all Baltimore County regulations. For more complete information, contact the Division of Maternal and Child Health.
- () If lubrication work and oil changes are performed at this location, the method providing for the elimination of waste oil must be in accordance with the State Department of the Environment.
- () Prior to raising of existing structure/s, petitioner must contact the Division of Waste Management at 494-3765, regarding removal and/or disposal of potentially hazardous materials and solid wastes. Petitioner must contact the Bureau of Air Quality Management regarding removal of asbestos, 494-3775.
- () Any abandoned underground storage tanks containing gasoline, waste oil, solvents, etc., must have the contents removed by a licensed hauler and tank removed from the property or properly backfilled. Prior to removal or abandonment, owner must contact the Division of Waste Management at 494-3765.
- () Soil percolation tests, have been _____ must be _____ conducted.
- () The results are valid until _____
- () Soil percolation test results have expired. Petitioner should contact the Division of Water and Sewer to determine whether additional tests are required.
- () Where water wells are to be used as a source of water supply, a well meeting the minimum Baltimore County Standards must be drilled.
- () In accordance with Section 13-117 of the Baltimore County Code, the water well yield test () shall be valid until _____
- () is not acceptable and must be repeated. This must be accomplished prior to conveyance of property and approval of Building Permit Applications.
- () Prior to occupancy approval, the potability of the water supply must be verified by collection of bacteriological and chemical water samples.
- () If submission of plans to the County Review Group is required, a Hydrogeological Study and an Environmental Effects Report must be submitted.
- () Others _____

Karen M. Murray
BUREAU OF WATER QUALITY AND RESOURCE
MANAGEMENT

BALTIMORE COUNTY ZONING PLANS ADVISORY COMMITTEE
March 23, 1988

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

Mr. H. John Bremermann, III
9475 Deereco Road
Timonium, Maryland 21093

Item No. 224 - Case No. 88-384-SPH
Petitioner: Stanley I. Panitz, et al
Petition for Special Hearing

MEMBERS

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

Dear Mr. Bremermann:

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.

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,

James E. Dyer
JAMES E. DYER
Chairman
Zoning Plans Advisory Committee

JED:cer

Enclosures

cc: Kilde Consultants, Inc.
1020 Cromwell Bridge Road
Baltimore, Maryland 21204

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

J. Robert Haines
TO: Zoning Commissioner

Date: November 30, 1987

Norman E. Gerber, AICP
FROM: Secretary to Baltimore County Planning Board

SUBJECT: The Stratford Office Building

On November 19, 1987 the Baltimore County Planning Board held a regular Planning Board meeting at which time they approved an M.R. Development Plan known as "the Stratford Office Building". This development plan has been revised to comply with the regulations and requirements of the County departments of the State Highway Administration charged with reviewing this plan.

The Planning Board wants to convey to the Zoning Commissioner that the neighbors in the residential area to the east of the site (York View Dr.) were at the time of the original M.R. approval years ago, concerned about preserving the existing view they now enjoy. They are also concerned about encroachment into the residential areas, as well as increased traffic. While no one from the neighborhood spoke at the Planning Board meeting, they asked me to advise you of this concern and request that it be taken into account at your hearing and possibly in your order, if you decide to grant the request.

The Office of Planning and Zoning must approve a final landscape plan for this project prior to the issuance of any building permits. In reviewing the landscape plan, emphasis will be given to screening this building from surrounding properties.

Norman E. Gerber
Norman E. Gerber, AICP

NEG/EJM/sf

cc: Members, Baltimore County Planning Board
Gary L. Kerns, Chief, Current Planning & Dev.

Maryland Department of Transportation
State Highway Administration

Richard H. Trainor
Secretary
Hal Kassoff
Administrator

January 6, 1987

Mr. J. Robert Haines
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Re: ZAC Meeting of 12-29-87
ITEM: #224.
Stratford Office Building
Property Owner: Stanley I. Panitz, et al
Location: E/S York Road, Route 45
139 feet S Thelma Street
Existing Zoning: M.R.
Proposed Zoning: Special Hearing
to approve the permitted, single
use of a proposed 5 story office
building as provided for in the
BCZR under Manufacturing
Restricted
Area: 4,405 acres
District: 8th Election District

Attention: Mr. James Dyer

Dear Mr. Haines:

After reviewing the submittal of the Stratford Office Building, the State Highway Administration - Bureau of Engineering Access Permits finds the site plan generally acceptable with a 40' radius curve at the York Road intersection.

If you have any questions, please contact Larry Brocato of this office.

Very truly yours,

Gregory J. Mills, Jr.
Gregory J. Mills, Jr.
Acting Chief
Bureau of Engineering
Access Permits

LB:maw

cc: Mr. J. Ogle
Kilde Consultants, Inc.

My telephone number is (301) 333-1350

Teletypewriter for Impaired Hearing or Speech:
383-7555 Baltimore Metro - 365-0451 D.C. Metro - 1-800-492-5052 Statewide Toll Free
707 North Calvert St., Baltimore, Maryland 21203-0717

Baltimore County
Fire Department
Towson, Maryland 21204-2586
494-4500

Paul H. Reincke
Chief

January 11, 1988

J. Robert Haines
Zoning Commissioner
Office of Planning and Zoning
Baltimore County Office Building
Towson, MD 21204

Re: Property Owner: Stanley I. Panitz, et al

Location: E/S York Rd., 139' S. Thelma Street

Item No.: 224

Zoning Agenda: Meeting of 12/29/87

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.
- (X) 4. The site shall be made to comply with all applicable parts of the Fire Prevention Code prior to occupancy or beginning of operation. Underground storm water basin shall be designed to support 50,000# apparatus.
- (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: *John F. O'Neill*
Noted and Approved: *John F. O'Neill*
Fire Prevention Bureau
Special Inspection Division

/j1

APPEAL

Petition for Special Hearing
E/S York Road, 139' S of Thelma Street
8th Election District - 3rd Councilmanic District
P.A.S.T. Limited Partnership and Stanley I. Panitz, et al -
Petitioners
Case No. 88-384-SPH

Petition for Special Hearing

Description of Property

Certificate of Posting

Certificate of Publication

Entry of Appearance of People's Counsel

Zoning Plans Advisory Committee Comments

Director of Planning & Zoning Comments (None Submitted)

Petitioner's Exhibits:

1. Site Plan of Office Building
2. Entrance Elevation Drawing
3. Copy of Professional Background of Timothy F. Madden, ASLA, AICP, Kilde Consultants, Inc.
4. Cross Section Drawing
5. Photographic Map of location
6. Four 3" x 5" photographs of location
7. Four Polaroid photographs of area
8. Four Polaroid photographs of area
9. Copy of Professional Background of Mickey A. Cornelius, The Traffic Group, Inc.

Zoning Commissioner's Order dated May 24, 1988 (Granted w/
restrictions)

Notice of Appeal received June 14, 1988 from George W. White, Jr.
and June 16, 1988 from Robert A. Hoffman

APPEAL
Petition for Special Hearing
Case No.: 88-384-SPH
Page 2

Pantimonium Ltd. Partnership
c/o Obrecht Management Group, Inc., Appellant
9475 Deereco Rd. (21093)

*George W. White, Jr. - White, Mindel, Clarke & Hill, 6th Floor, 29 W.
Susquehanna Avenue, Towson, Md. 21204, Counsel for Stratford Comm. Assoc., II

*Robert A. Hoffman - Cook, Howard, Downes, & Tracy, 210 Allegheny
Avenue, Towson, Md. 21204, Counsel for Pantimonium Ltd. Partnership

People's Counsel of Baltimore County, Inc., 223-Old Courthouse, Towson,
Md.-21204 *Aut per S. Wilson 4/23/88*

All Protestants

Request Notification: P. David Fields, Director of Planning & Zoning
James Hoswell, Office of Planning & Zoning
J. Robert Haines, Zoning Commissioner
Ann M. Nastarowicz, Deputy Zoning Commissioner
James E. Dyer, Zoning Supervisor
Docket Clerk
David J. Golan



County Board of Appeals of Baltimore County

COUNTY OFFICE BUILDING
111 W. CHESAPEAKE AVENUE
TOWSON, MARYLAND 21204
(301) 494-3180

October 25, 1988

Robert A. Hoffman, Esq.
Cook, Howard, Downes & Tracy
210 Allegheny Ave.
P. O. Box 5517
Towson, Md. 21204

Re: Case No. 88-384-SPH
P.A.S.T. LTD. PARTNERSHIP &
STANLEY I. PANITZ, ET AL

Dear Mr. Hoffman:

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

Very truly yours,

June Holmen
June Holmen, Secretary

Enc.

cc: William D. Berwick, Esq.
Pantimonium Ltd. Partnership
P.A.S.T. Ltd. Partnership &
Stanley Panitz, Ind.
P. David Fields
J. Robert Haines
Ann Nastarowicz
James Dyer
Docket Clerk
Arnold Jablon, Esq.

8/17/88 - Following notified of hearing set for Wed. Oct. 26, '88, at 10 a.m.:

Pantimonium Ltd. Partnership
Geo. White, Jr., Esq.
Robt. Hoffman, Esq.
People's Counsel
P.A.S.T. Ltd. Part. & Stanley Panitz
David Fields
Robt. Haines, Ann Nastarowicz, J. Dyer, Doc. Clerk

IN RE: PETITION FOR SPECIAL HEARING E/S York Road, 139' S of Thelma Street 8th Election District

P.A.S.T. Limited Partnership and Stanley I. Panitz, et al

Petitioners

ORDER OF APPEAL OF STRATFORD COMMUNITY ASSOCIATION, INC.

Stratford Community Association, Inc., by George W. White, Jr., its attorney, pursuant to section 500.10, Baltimore County Zoning Regulations, hereby notes an appeal from the Order of the Zoning Commissioner dated May 24, 1988. Please note this appeal to the Board of Appeals for Baltimore County.

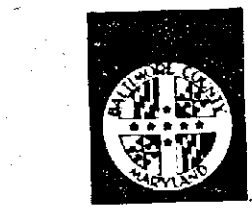
George W. White, Jr.
George W. White, Jr.
29 W. Susquehanna Avenue
Suite 600
Towson, Maryland 21204
(301) 828-1050

Attorney for Petitioners

Baltimore County
Zoning Commissioner
Office of Planning & Zoning
Towson, Maryland 21204
494-3333

J. Robert Haines
Zoning Commissioner

July 6, 1988



Dennis F. Rasmussen
County Executive

Baltimore County Board of Appeals
014 Courthouse, Room #205
Towson, Maryland 21204

RE: Petition for Special Hearing
E/S York Road, 139' S of Thelma Street
8th Election District, 3rd Councilmanic District
P.A.S.T. Limited Partnership and Stanley I. Panitz, et al -
Petitioners
Case No. 88-384-SPH

Dear Board:

Please be advised that an appeal of the above-referenced case was filed in this office on June 14, 1988 by George W. White, Jr., and on June 16, 1988 by Robert A. Hoffman on behalf of the Petitioner. All materials relative to the case are being forwarded herewith.

Please notify all parties to the case of the date and time of the appeal hearing when it has been scheduled. If you have any questions concerning this matter, please do not hesitate to contact this office.

Very truly yours,
J. Robert Haines
J. ROBERT HAINES
Zoning Commissioner

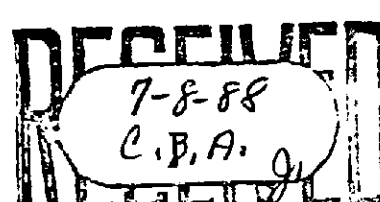
JRH:cer

Enclosures

cc: George W. White, Jr., White Mindel, Clarke & Hill, 6th Floor, 29 W. Susquehanna Avenue, Towson, Md. 21204

Robert A. Hoffman, Cook, Howard, Downes & Tracey, 210 Allegheny Avenue, Towson, Md. 21204

All Protestants
People's Counsel of Baltimore County



County Board of Appeals of Baltimore County

Room 200 Court House
Towson, Maryland 21204
(301) 494-3180

August 17, 1988

NOTICE OF ASSIGNMENT

NO POSTPONEMENTS WILL BE GRANTED WITHOUT GOOD AND SUFFICIENT REASONS. REQUESTS FOR POSTPONEMENTS MUST BE IN WRITING AND IN STRICT COMPLIANCE WITH BOARD RULE 21(b). NO POSTPONEMENTS WILL BE GRANTED WITHIN FIFTEEN (15) DAYS OF SCHEDULED HEARING DATE UNLESS IN FULL COMPLIANCE WITH RULE 2(c), COUNTY COUNCIL BILL NO. 59-79.

CASE NO. 88-384-SPH

P.A.S.T. LTD. PARTNERSHIP and
STANLEY I. PANITZ, ET AL

E/S York Rd., S of Thelma St.

8th District

5/24/88 - Z.C.'s Order-That the Petition for Special Hearing is GRANTED.

ASSIGNED FOR:

cc: Pantimonium Ltd. Partnership

George W. White, Jr., Esq.

Robert A. Hoffman, Esq.

People's Counsel for Balt. Cty. Out you S. Hess 7/23/88

P.A.S.T. Ltd. Partnership &
Stanley Panitz, Ind.

P. David Fields Planning

J. Robert Haines Zoning

Ann Nastarowicz "

James Dyer "

Docket Clerk "

Arnold Jablon, County Attorney

June Holmen, Secy.

LAW OFFICES
COOK, HOWARD, DOWNES & TRACY

210 ALLEGHENY AVENUE
P.O. BOX 5517

TOWSON, MARYLAND 21204

TELEPHONE
(301) 823-4444

TELECOPIER
(301) 823-4444

DIRECT DIAL NUMBER

June 16, 1988

HAND-DELIVERY

JAMES H. COOK
JOHN B. HOWARD
DAVID D. DOWNES
DANIEL O. C. TRACY, JR.
JOHN H. HILL, III
JOSEPH C. WICH, JR.
HENRY B. PECK, JR.
HERBERT B. O'CONNOR, III
THOMAS L. HUDSON
C. CAREY DELEY, JR.
M. KING HILL, III
GEORGE A. RYHOLDS, III
ROBERT A. HOFFMAN
CYNTHIA M. HAINES

J. Robert Haines, Esquire
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Re: Notice of Appeal
Findings of Fact and Conclusions of Law dated
May 24, 1988
Zoning Case No. 88-384-SPH

Dear Mr. Haines:

Please note an appeal to the County Board of Appeals of Baltimore County on behalf of Pantimonium Limited Partnership, c/o Obrecht Management Group, Inc., Appellant, whose address is 9475 Deereco Road, Timonium, Maryland 21093, from the Findings of Fact and Conclusions of Law referenced above.

Enclosed is a check in the amount of \$90.00 to cover the cost of filing.

Thank you.

Very truly yours,

Robert A. Hoffman
Robert A. Hoffman

RAH/jhr
Enclosures
cc: H. John Bremermann, III, Esquire
Martin J. Storck
George W. White, Esquire

CERTIFICATE OF POSTING
ZONING DEPARTMENT OF BALTIMORE COUNTY 88-384-SPH
Towson, Maryland

District: *8th* Date of Posting: *7/12/88*
Posted for: *Appeal*
Petitioner: *Stratford Community Association, Inc.*
Location of property: *E/S York Rd., 139' S of Thelma St.*
Location of Sign: *Front York Rd., 139' S of Thelma St.*
Remarks: *See Petition & P.A.S.T. Ltd. Partnership*
Posted by: *W. White* Date of return: *7/12/88*
Number of Signs: *1*

LAW OFFICES
WHITE, MINDEL, CLARKE & HILL

6TH FLOOR, 29 W. SUSQUEHANNA AVENUE

TOWSON, MARYLAND 21204

(301) 828-1050

June 14, 1988

GEORGE W. WHITE, JR.
CHARLES MINDEL
SAMUEL D. HILL
JOHN F. JOHNSON
JOHN F. POLE, JR.
STANLEY L. HOLMES
PHILIP S. DOWNES
JAMES E. TRACY
EURENE L. HILES, III
ROBERT F. BOWIE, JR.
DENNIS F. O'BRIEN
EUGENE W. CONNINGHAM, JR.
NANCY KASANA DOWLING
MARK T. JENSEN
LINDA E. PEAN
MARICIA A. FETIS
JAY D. MILLER
WILLIAM L. BERVICK

GEORGE L. CLARKE
(301) 828-1050

COUNSEL
MORTON E. BOWE

HARRY DE GRACE, JR. OFFICE
48 GREYS STREET, #202A
(301) 939-3456

Mr. J. Robert Haines
Zoning Commissioner for Baltimore County
County Office Building
Towson, Maryland 21204

RE: Case No. 88-384-SPH
P.A.S.T. Limited Partnership
and Stanley I. Panitz, et al,
Petitioners

Dear Mr. Haines:

Enclosed please find an Order of Appeal on behalf of the Stratford Community Association, Inc. with respect to your Order of May 24, 1988 in the above referenced case. Also enclosed is the required fee of \$90.00.

If there are any problems or questions with the Order, please contact the undersigned.

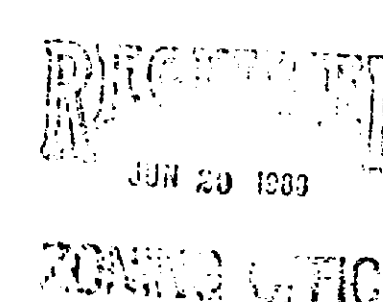
Sincerely,

George W. White, Jr.
George W. White, Jr.

GWJWJr./stk

Enclosure

cc: H. John Bremermann, III, Esquire
Martin J. Storck, Esquire
Robert A. Hoffman, Esquire
People's Counsel for Baltimore County
Mrs. Constantine Van Sakles



May 24, 1988

H. John Bremermann, III, Esquire
Martin J. Storck, Esquire
9475 Deereco Road
Timonium, Maryland 21093

Robert A. Hoffman, Esquire
210 Allegheny Avenue
Towson, Maryland 21204

RE: Petition for Special Hearing
E/S York Road, 139' S of Thelma Street
8th Election District, 3rd Councilmanic District
P.A.S.T. Limited Partnership and Stanley I. Panitz, et al - Petitioners
Case No. 88-384-SPH

Dear Messrs. Bremermann, Storck & Hoffman:

Enclosed please find the decision rendered on the above-referenced case. The Petition for Special Hearing has been Granted, subject to the restriction noted in the attached Order.

In the event the decision rendered is unfavorable to any party, please be advised that any party may file an appeal to the County Board of Appeals. For further information on filing an appeal, please contact this office.

Very truly yours,

J. Robert Haines
J. ROBERT HAINES
Zoning Commissioner
of Baltimore County

JRH:bjs

Enclosures

cc: Messrs. Tim Madden and
John C. Elser, Kluge Consultants
1020 Cromwell Bridge Road, Towson, Md. 21204

Mr. Mickey Cornelius
The Traffic Group
414 E. Joppa Road, Towson, Md. 21204

All Protestants
People's Counsel
File
George W. White, Jr., Esquire
White, Mindel, Clarke & Hill

GEORGE W. WHITE, JR.
CHARLES HINDLE
BRIAN D. HILL
JOSEPH L. JOHNSON
P. BRUCE JOHNSON
JOHN F. POLEY, JR.
BRIAN C. JOHNSON
PHILIP C. JOHNSON
JAMES D. STONE
JAMES E. WHITE, JR.
WILLIAM C. C. BARNES
ROBERT E. BOWEN, JR.
DENNIS F. O'BRIEN
ROBERT W. GORDON, JR.
NANCY KASARI JOHNSON
MARK C. JOSEY
LINDA E. KERN
PATRICIA A. PERIS

LAW OFFICES
WHITE, MINDEL, CLARKE & HILL
6TH FLOOR, 29 W. SUSQUEHANNA AVENUE
TOWSON, MARYLAND 21204
(301) 828-1050

GEORGE L. CLARKE
(300-1878)
COUNSEL
MORTON E. HONE
HARRY DE GRACE, JR. OFFICE
418 GREEN STREET, SUITE
1501 (301) 828-2664

April 18, 1988

Mr. J. Robert Haines
Baltimore County Zoning Commissioner
County Office Building
Room 109
111 West Chesapeake Avenue
Towson, Maryland 21204

Re: Stratford Office Building
Hearing of April 4, 1988

Dear Commissioner Haines:

The Stratford Community Association has asked me for assistance in protecting their interests with regards to the Obrecht proposal to construct a five story office building on the MR zoned property adjacent to their property.

In that regard, kindly provide me with a copy of any decision you may render as to the "Proposed Development Plan" submitted by Obrecht.

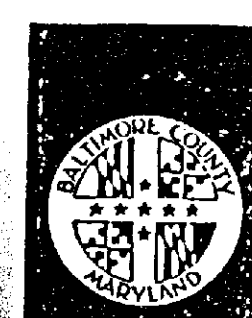
Sincerely,

George W. White, Jr.

GWJr./ch
cc: Robert A. Hoffman, Esquire
Cook, Howard, Downes and Tracy
Mrs. Constantine Sakles
1 Roundridge Road
Timonium, Maryland 21093

APR 19 1988

ZONING OFFICE



BALTIMORE COUNTY
1988 COMPREHENSIVE ZONING MAP PROCESS
COMMENT FORM

Zoning Request
Item No. 88-384-SPH

PLEASE PRINT

☐ Support Requested Zoning
☒ Oppose Requested Zoning

Name CLOVIS E. FALLOT AND ELISE B. FALLOT

Organization (if any) STRATFORD ASSOCIATION

Address 102 WESTDALE CT. TIMONIUM, MD 21093

Phone No. 252-1428

Comment WE ARE OPPOSED TO THE REQUESTED ZONING BE-
CAUSE (1) THE PROPOSED FIVE STORY OFFICE
BUILDING INCREASES THE HEIGHT OF STRUCTURES IN THIS AREA AND
WILL INTERFERE WITH THE PRIVACY OF ADJACENT RESIDENCES.
(2) THE AIR CONDITIONING PLANT PLACED ON THE ROOF OF THE
STRUCTURE WILL INCREASE THE NOISE LEVEL, ESPECIALLY DURING
THE QUIET HOURS OF THE EVENING AND LATE AT NIGHT.
(3) THE PROPOSED LOCATION OF THE STRUCTURE WILL REDUCE
THE BUFFER ZONE BETWEEN COMMERCIAL AND RESIDENTIAL
AREAS.

Signature Elise B. Falloit Date 4/14/88
Elise B. Falloit 4/14/88



For additional information, please contact the Baltimore County Office
of Planning and Zoning, County Court Building (Room 404), Towson,
Maryland 21204, (301) 496-1000.



BALTIMORE COUNTY
1988 COMPREHENSIVE ZONING MAP PROCESS
COMMENT FORM

Zoning Request
Item No. 88-384-SPH
2311 York Rd.
OBrecht

PLEASE PRINT

☐ Support Requested Zoning
☒ Oppose Requested Zoning

Name Margaret B. Voss

Organization (if any) Stratford Community Assoc.

Address 8 Yorkview Drive - Timonium (Stratford)

Phone No. 252-3950

Comment I oppose the height of the building - (5 stories)
since we are on a 5 story hillside in this area.
(2) I oppose the air conditioning and heating units on
the roof of the building, as per the picture into
the yard and homes of the surrounding residential
neighborhood.

Signature Margaret B. Voss Date 4-13-88

of the natural hillside as they plan
create unaddressed problems of erosion
off this extensive slope. Additionally,
it creates a very real hazard - a
precipitous drop wandering children
may encounter! I do not recall
any mention of fencing to preclude
this possibility.

We strongly feel that the privacy
for which we purchased our home
would be largely sacrificed by
breaking precedent with a deeply
set-back construction of a building
higher than any in this corridor.
Clearly, the view of a large roof is
less concern than the continuous
rumbling of the roof-mounted
machinery - as planned, unbuffered.
Prevailing westerly winds will carry
this sound to our patio, porches,
and windows. Finally, evidence
provided failed to truly establish
that the roof would, in fact, be
at the ground level of their eastern
property line. Thus, the blower
heating and cooling machinery
may well be even higher.

Mr. Marty Block, president of
Obrecht and Associates, has recently
rescinded two alterations in plans
submitted to members of this community.
They "cannot" move out of the woods
or N-S easement would be insufficient
due to narrowed building rights - and
they will not reduce building width.
Further, the heating/cooling machinery
"would not work" situated at ground
level.

In conclusion, with the
cooperation and backing of Stratford
Community Association, we will
continue these efforts with new
counsel. Of course, it would be
grand if setback or building
height could be more limited
to satisfy community needs.

Thank you for your concern.

Yours truly,

Marty Block

RECEIVED
APR 15 1988
ZONING OFFICE

JANICE M. MANTZ
2212 Westridge Road
Timonium, Maryland 21093

April 14, 1988

J. Robert Haines, Zoning Commissioner
County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21204

Ref: Item No. 88-384-SPH
2311 York Road

Dear Mr. Haines:

As a resident of the Stratford Community, I wish to express my
opposition to the office building proposed by Obrecht & Associates,
Inc. in the following areas.

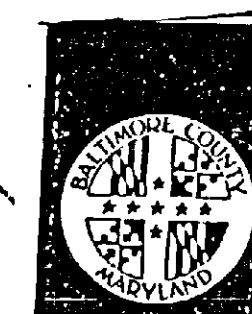
1. The 5th story is not in keeping with other building projects
along this corridor and could well set a precedent for
similar or taller projects on remaining undeveloped parcels.
2. Building is set back too close to the community thereby
encroaching too far into residential area.
3. Placement of HVAC equipment on the roof could very well
create "noise pollution" to the residential community.

I hope you will give substantial consideration to these issues
before giving acceptance to this proposed building project as it
stands now.

Yours truly,

Janice M. Mantz

/jmm



BALTIMORE COUNTY
1988 COMPREHENSIVE ZONING MAP PROCESS
COMMENT FORM

Zoning Request
Item No. MR 88-384-SPH

PLEASE PRINT

☐ Support Requested Zoning
☒ Oppose Requested Zoning

Name Betty G. Lawler

Organization (if any) Stratford Community Association

Address 10 Yorkview Dr, Timonium, Md 21093

Phone No. 252-8460

Comment (1) No 5 story bldg. No more than 4 story to
stay in line with other bldgs already there.
(2) Remove air conditioner generators & heating
elements from top of bldg.
(3) Move bldg. closer to York Road to leave more
of the hillside and a greater buffer zone
for the residential area.

Signature Betty G. Lawler Date 4/13/88

BALTIMORE COUNTY
1988 COMPREHENSIVE ZONING MAP PROCESS
COMMENT FORM

Zoning Request
Item No. 88-384 SPH
4-106

PLEASE PRINT ☐ Support Requested Zoning
☒ Oppose Requested Zoning

Name Frank Greene
Organization (if any) _____
Address 109 Westdale Court Timonium Md 21093
Phone No. 252-0380

Comment My comments are directed at the above
number and esp. property located on York Rd
number 2311.
Zoning for this property should be turned down
for the following reasons
1- no other buildings in this area are over 3 or 4
stories tall. 5 stories is too tall for the
existing neighborhood & may start a bad
precedent
2- the height will equal or exceed the
residential property located directly next
door on the East side
Signature F. Greene Date 4-14-88
3- noise from mechanical equipment on the
roof will make our yards unusable
and depreciate our current property value

For additional information, please contact the Baltimore County Office
of Planning and Zoning, County Court Building (Room 406), Towson,
Maryland 21204, (410) 496-6000.

BALTIMORE COUNTY
1988 COMPREHENSIVE ZONING MAP PROCESS
COMMENT FORM

Zoning Request
Item No. 88-384 SPH
(Obrecht Bldg)

PLEASE PRINT ☐ Support Requested Zoning
☒ Oppose Requested Zoning

Name Nancy E. Ward
Organization (if any) Stratford Community Association
Address 16 Yorkview Drive - Timonium, Md. 21093
Phone No. 252-6512

Comment Eliminate the 5th floor of the building
Keep it at 4 floors only.
Keep the air conditioning off top of the building
Place the building closer to York Rd; thus,
the noise would be prevented as a buffer zone.
If they dig into the woods, the ground
will be leveled down unless they pile up
a retaining wall.
This building will be an eyesore because of
the height and air conditioning thus it will
decrease the value of our homes.
Signature Nancy E. Ward Date 4/14/88

BALTIMORE COUNTY
1988 COMPREHENSIVE ZONING MAP PROCESS
COMMENT FORM

Zoning Request
Item No. 88-384 SPH

PLEASE PRINT ☐ Support Requested Zoning
☒ Oppose Requested Zoning

Name Frances G. Greene
Organization (if any) _____
Address 109 Westdale Ct. Timonium, Md. 21093
Phone No. 252-0380

Comment I am against the proposed Obrecht Bldg.
at 2311 York Rd. for the following reasons:
Height - no other building in area that high
if we get one five story will there be more?
block view - backyard view into top story
of building & roof air conditioners
Noise - sound from roof mounted equipment will
spoil quiet
Depreciation of value of our homes due
to above
Signature Frances G. Greene Date 4/15/88

For additional information, please contact the Baltimore County Office
of Planning and Zoning, County Court Building (Room 406), Towson,
Maryland 21204, (410) 496-6000.

BALTIMORE COUNTY
1988 COMPREHENSIVE ZONING MAP PROCESS
COMMENT FORM

Zoning Request
Item No. 4-106

PLEASE PRINT ☐ Support Requested Zoning
☒ Oppose Requested Zoning

Name Andrew J. Tempel
Organization (if any) MEMBER STRATFORD COMMUNITY ASSOCIATION
Address 2201 WESTRIDGE ROAD TIMONIUM MD
Phone No. 252-0997

Comment A MACHINE SHOP BELONGS IN THE INDUSTRIAL PARK THAT IS ZONED
FOR THIS & NOT IN AN AREA BORDERING A PRIME RESIDENTIAL COMMUNITY.
ALL SHOPS OF THIS TYPE GENERATE NOISE, DUST, DIRT & AIR POLLUTION, THEY MUST
HAVE ON DEMAND: MATERIAL SUCH AS STEEL, ALUMINUM, LUMBER, OIL, CLEANERS, THINWAS, PAINT
ACIDS, ETC IN THE MANUFACTURING OF THEIR PRODUCTS. THESE SUPPLIES ARE USUALLY STORED
OUTSIDE IN THE BACK OF THE YARD.
OIL, WATER, & AIR ARE USED AROUND THE WORKING AREA OF THE TOOLS TO REDUCE
HEAT GENERATED BY THE TOOLS CUTTING. THE PRODUCT & TO WASH AWAY CHIPS IN THE AREA.
OIL & WATER CAN BECOME POLLUTED IN THIS OPERATION & MUST BE DISPOSED OF. IN THE PAST
MUCH OF THESE FLUIDS WERE FLUSHED DOWN STORM DRAINS, INTO SEWAGE SYSTEMS, DUMPED DIRECTLY
INTO THE GROUND, OR PUT IN DRUMS & DUMPED IN LAND FILLS. DUST IS VACUUMED INTO
CONTAINERS OUTSIDE THE BUILDINGS. THESE COLLECTORS DO NOT FILTER OUT THE DUST
COMPLETELY. A VISIT TO THE MACHINE SHOP AREA IN THE INDUSTRIAL PARK
WILL SHOW THESE CONDITIONS OF STORING HAZARDOUS SUPPLIES, TO LUMBER YARD
ON GREEN SPRING ROAD FOR DUST COLLECTORS & AT ONGUNA INVESTIGATING OF
POLLUTED YARD CONDITIONS AT MANUFACTURING AREAS IN THE COUNTY & AT LAND
FILLS.
DURING WARM WEATHER THE OUTSIDE DOORS & WINDOWS ARE OPENED
TO ALLOW COOLING AIR INTO THE SHOP AREA. THIS OPERATION INCREASES
NOISE LEVELS, & LET AIR & DUST POLLUTE THE AREA.
Signature Andrew J. Tempel Date 4-13-88
READ ON THE BACK SIDE
For additional information, please contact the Baltimore County Office
of Planning and Zoning, County Court Building (Room 406), Towson,
Maryland 21204, (301) 496-6000.

BALTIMORE COUNTY
1988 COMPREHENSIVE ZONING MAP PROCESS
COMMENT FORM

Zoning Request
Item No. Obrecht Building
88-384 SPH

PLEASE PRINT ☐ Support Requested Zoning
☒ Oppose Requested Zoning

Name William J. Doyle
Organization (if any) _____
Address 2104 WESTRIDGE RD - TIM, MD 21093
Phone No. _____

Comment I object to the construction of the
proposed construction of the five story office
building at 2311 York Rd
Signature William J. Doyle Date 4/13/88

BALTIMORE COUNTY
1988 COMPREHENSIVE ZONING MAP PROCESS
COMMENT FORM

Zoning Request
Item No. MR 88-384 SPH

PLEASE PRINT ☐ Support Requested Zoning
☒ Oppose Requested Zoning

Name V. J. Lawler
Organization (if any) STRATFORD COMMUNITY ASSOC
Address 10 YORKVIEW DR TIMONIUM, MD 21093
Phone No. 252-8460

Comment TO LIMIT BLDG TO 4 STORIES, IN
KEEPING WITH OTHER OFFICE BUILDINGS
IN THIS AREA.
TO KEEP AIR CONDITIONERS & HEATING
UNITS OFF THE ROOF TO ELIMINATE NOISE
IN SHORT - KEEP BLDG OUT OF
SIGHT & SOUND FROM THE RESIDENTS OF
STRATFORD COMMUNITY.
Signature V. J. Lawler Date 4/13/88

BALTIMORE COUNTY
1988 COMPREHENSIVE ZONING MAP PROCESS
COMMENT FORM

Zoning Request
Item No. 88-384 SPH
Obrecht Bld
2311 York Rd

PLEASE PRINT ☐ Support Requested Zoning
☒ Oppose Requested Zoning

Name Mildred A. Smith
Organization (if any) Stratford Community Assoc.
Address 11 Yorkview Drive Timonium Md 21093
Phone No. 252-0190

Comment The five story building with 8 foot added
air conditioning will be the highest building in our area
They are building with the paper you that
supports the hill side our houses and foundations
are polluted with.
The hill is as high as we will look on to the
roof and air conditioners which will be
8 foot high almost as big as the roof. The foundation
and soil sit on the hillside that also will
create a lot of noise 24 hrs a day in the summer
when our windows are open.
Signature Mildred A. Smith Date 4/14/88
Joseph C. Smith 4/14/88

BALTIMORE COUNTY
1988 COMPREHENSIVE ZONING MAP PROCESS
COMMENT FORM

Zoning Request
Item No. 88-384
5-RT
Obrecht Building

PLEASE PRINT ☐ Support Requested Zoning
☒ Oppose Requested Zoning

Name Lawrence J. Smith
Organization (if any) _____
Address 3 Roundridge Rd Timonium Md 21093
Phone No. _____

Comment Oppose the five story proposed
building and the machinery to be
placed on top of the building.
Would agree with a four story and
AC/heating unit placed other than
top of building.
As a home owner in the Stratford
community I would prefer that this
proposed be the 4 story building
Thank you
Signature Lawrence J. Smith Date 4-13-88

For additional information, please contact the Baltimore County Office
of Planning and Zoning, County Court Building (Room 406), Towson,
Maryland 21204, (301) 496-6000.



KIDDE CONSULTANTS, INC. Subsidiary of Kidde, Inc.

DESCRIPTION OF LOT 6
STRATFORD INDUSTRIAL SITE
YORK ROAD OPPOSITE THELMA STREET
8TH ELECTION DISTRICT
BALTIMORE COUNTY, MARYLAND

BEGINNING FOR A POINT in the northerly line of York Road, 66 feet wide, as shown on a plat of Stratford Industrial Site recorded on June 25, 1957 in Liber GLB 24 Folio 36 of the records of Baltimore County, Maryland, said point being a crows foot in the sidewalk and is measured from the intersection of the centerline of Thelma Street, 40 feet wide, with the centerline of York Road, 66 feet wide, and referring the courses to the meridian as shown on State Roads Commission Right-of-Way Plat 42195 issued March 2, 1973, as station 36+33.17 on the base line of right-of-way of York Road the following three courses and distances: (First), South 18 degrees 17 minutes 43 seconds East 138.94 feet along said baseline of right-of-way to the beginning of a curve and (Second), South 18 degrees 16 minutes 38 seconds East 48.59 feet along the chord of a curve to the right of the baseline of right-of-way, said curve having a radius of 76604.36 feet and (Third), North 71 degrees 44 minutes 28 seconds East 33.07 feet along a radial line to intersect the northeasterly right-of-way line of York Road; thence departing said point of beginning and York Road and running reversely along the South 54 degrees 57 minutes 17 seconds West 557.05 foot line of Lot 6 as shown on the plat of Stratford Industrial Site as now surveyed, and referring the courses hereafter to the meridian as

KIDDE CONSULTANTS, INC. Subsidiary of Kidde, Inc.

Description
Stratford Industrial Site
December 14, 1987
Page 2

established by Baltimore County Metropolitan District, (1) North 54 degrees 58 minutes 38 seconds East 556.31 feet to a concrete monument found, thence continuing reversely with the platted North 35 degrees 02 minutes 43 seconds West 148.00 foot boundary line of Lot 6 as now surveyed, (2) South 35 degrees 02 minutes 14 seconds East 148.00 feet to a concrete monument found, thence continuing reversely with the platted South 59 degrees 39 minutes 50 seconds West 100.14 foot boundary line of Lot 6 as now surveyed (3) North 59 degrees 33 minutes 42 seconds East 99.72 feet to a concrete monument found, thence continuing reversely with the platted South 02 degrees 02 minutes 46 seconds West 211.79 foot boundary line of Lot 6 as now surveyed (4) North 02 degrees 17 minutes 38 seconds East 208.03 feet to a concrete monument found thence continuing reversely with the platted North 83 degrees 52 minutes 36 seconds West 144.64 foot boundary line of Lot 6 as now surveyed (5) North 83 degrees 55 minutes 32 seconds East 144.57 feet to a concrete monument found, thence running reversely with a part of the platted rear line of the aforesaid Stratford Industrial Site and the platted rear or North 02 degrees 02 minutes 46 seconds East 362.59 foot line of Lot 6 as now surveyed (6) South 01 degree 59 minutes 50 seconds West

KIDDE CONSULTANTS, INC. Subsidiary of Kidde, Inc.

Description
Stratford Industrial Site
December 14, 1987
Page 3

358.23 feet to a point, thence running with the platted South 72 degrees 57 minutes 30 seconds West 630.79 foot boundary line of Lot 6 as now surveyed (7) South 72 degrees 57 minutes 30 seconds West 631.07 feet to intersect the curved easterly side of a widening for a service road adjacent to York Road, thence running with the said curved easterly side of the aforesaid widening for a service road the two following curves, viz: (8) northwesterly along the arc of a curve to the left having a radius of 82.00 feet, an arc distance of 130.73 feet, said arc having a chord bearing North 62 degrees 40 minutes 43 seconds West 117.32 feet and (9) northwesterly along the arc of a curve to the right having a radius of 42.00 feet an arc distance of 54.24 feet, said arc having a chord bearing North 71 degrees 22 minutes 14 seconds West 50.55 feet to a point in the northeasterly right-of-way line of York Road, 66 feet wide, thence with the said right-of-way line of York Road as now surveyed (10) North 18 degrees 28 minutes 13 seconds West 33.50 feet to the point of beginning.

CONTAINING 4.4050 acres, more or less.

SAVING AND EXCEPTING that State Roads Commission taking containing 0.0066 acres, more or less, as shown on SRC Plat #42195 and described as follows:

KIDDE CONSULTANTS, INC. Subsidiary of Kidde, Inc.

Description
Stratford Industrial Site
December 14, 1987
Page 4

BEGINNING at the crows foot called out as the point of beginning of the above description, thence with the second line of item #64118 of said State Roads Commission Right-of-Way Plat or the North 54 degrees 41 minutes 00 seconds 7.25 foot line, on said SCR Plat, said line also being a part of the first or North 54 degrees 58 minutes 31 seconds East 556.31 foot line of the above description, the following as now surveyed (1) North 54 degrees 58 minutes 31 seconds East 7.25 feet to a point, thence departing said line and running through the property (2) southeasterly with an arc of a curve to the left having a radius of 76644.36 feet an arc distance of 48.93 feet, said arc having a chord bearing South 17 degrees 59 minutes 59 seconds East 48.93 feet, to intersect the curve described as the ninth line of the above description, thence (3) northwesterly with an arc of a curve to the right having a radius of 42.00 feet an arc distance of 14.88 feet, said arc having a chord bearing North 44 degrees 48 minutes 48 seconds West 14.80 feet, to the easterly right-of-way line of York Road, thence (4) North 18 degrees 28 minutes 13 seconds West 33.50 feet to the point of beginning.

TEP/pek KCI Job Order No. 01-872365 December 14, 1987
Work Order No. 47097C

RE: PETITION FOR SPECIAL HEARING : BEFORE THE ZONING COMMISSIONER
E/S York Rd., 139' S Thelma St. : OF BALTIMORE COUNTY
8th Election District, 3rd :
Councilmanic District :
P.A.S.T. Limited Partnership, : Case No. 88-384-SPH
et al., Petitioners

ENTRY OF APPEARANCE

Please enter the appearance of the People's Counsel in the above-captioned matter. Notices should be sent of any hearing date 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
Room 223, Court House
Towson, Maryland 21204
494-2188

I HEREBY CERTIFY that on this 7th day of March, 1988, a copy of the foregoing Entry of Appearance was mailed to H. John Bremermann, III, Esquire, 9475 Deereco Rd., Timonium, MD 21093, Attorney for Petitioners.

Peter Max Zimmerman
Peter Max Zimmerman

CERTIFICATE OF PUBLICATION

TOWSON, MD., March 16, 1988

THIS IS TO CERTIFY, that the annexed advertisement was published in the TOWSON TIMES, a weekly newspaper printed and published in Towson, Baltimore County, Md., once in each of 1 successive weeks, the first publication appearing on March 16, 1988.

TOWSON TIMES,

Susan Shuler O'Connell
Publisher

58.00

CERTIFICATE OF PUBLICATION

TOWSON, MD., March 17, 1988

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 March 17, 1988.

THE JEFFERSONIAN,

Susan Shuler O'Connell
Publisher

3750

Baltimore County
Zoning Commissioner
Office of Planning & Zoning
Towson, Maryland 21204
494-3353

J. Robert Haines
Zoning Commissioner

Date: 3-30-88

Mr. Stanley I. Panitz
108 St. Johns Road
Baltimore, Maryland 21210

Re: Petition for Special Hearing
Case number: 88-384-SPH
E/S York Road, 139' S Thelma Street
8th Election District - 3rd Councilmanic District
Petitioner(s): Stanley I. Panitz, et al
HEARING SCHEDULED: MONDAY, APRIL 4, 1988 at 11:00 a.m.

Dear Mr. Panitz:

Please be advised that \$10.50 is due for advertising and posting of the above-referenced property. All advertising and posting fees must be paid prior to the hearing. Do not remove the sign(s) from the property from the time it posted by this office until the day of the hearing itself.

THIS FEE MUST BE PAID AND THE ZONING SIGN AND POST RETURNED ON THE DAY OF THE HEARING OR THE ORDER SHALL NOT BE ISSUED.

Please make your check payable to Baltimore County, Maryland and forward to the Zoning Office, County Office Building, Room 113, Towson, Maryland 21204.

Very truly yours,

J. ROBERT HAINES
Zoning Commissioner of
Baltimore County

cc: H. John Bremermann, III, Esq.

File

CERTIFICATE OF POSTING
ZONING DEPARTMENT OF BALTIMORE COUNTY
Towson, Maryland

District: 8th Date of Posting: 3/11/88
Posted for: Special Hearing
Petitioner: Stanley I. Panitz, et al.
Location of property: E/S York Rd, 139' S Thelma Street
Location of Sign: Along York Rd. 1200 ft. S. E. to 1st St.
Remarks: See Petition of Petitioner
Posted by: J. Robert Haines Date of return: 3/18/88
Number of Signs: 4

Baltimore County
Zoning Commissioner
Office of Planning & Zoning
Towson, Maryland 21204
494-3353

J. Robert Haines
Zoning Commissioner

JAN 27 1988

NOTICE OF HEARING

The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County will hold a public hearing on the property identified herein in Room 106 of the County Office Building, located at 111 W. Chesapeake Avenue in Towson, Maryland as follows:

Petition for Special Hearing
Case number: 88-384-SPH
E/S York Road, 139' S Thelma Street
8th Election District - 3rd Councilmanic District
Petitioner(s): Stanley I. Panitz, et al
HEARING SCHEDULED: MONDAY, APRIL 4, 1988 at 11:00 a.m.

Special Hearing: The permitted single use of a proposed five (5) story office building as provided for in the Zoning Regulations of Baltimore County under the designation M-1. (Manufacturing Restricted).

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 in writing and received in this office by the date of the hearing set above or presented at the hearing.

J. Robert Haines

J. ROBERT HAINES
Zoning Commissioner of
Baltimore County
cc: Stanley I. Panitz
Pantimonium Ltd. Partnership
H. John Brenemann, III
File

KIDDE CONSULTANTS, INC.
Subsidiary of Kidde, Inc.

1020 Cromwell Bridge Road
Baltimore, Maryland 21204
(410) 321-5500

RECEIVED
JAN 28 1988

321-5516

ZONING OFFICE

January 25, 1988

Mr. J. Robert Haines
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Attention: Mr. James Dyer

Gentlemen:

Subject: ZAC Meeting of 12/29/87 Item #224
Stratford Office Building
Property Owner: Stanley I. Panitz, et al
Location E/S York Road, Route 45
Existing Zoning: MR
Proposed Zoning: Special Hearing
to approve the permitted, single use of
a proposed 5 story office building as
provided for in the BCR under Manufacturing
Restricted Area: 4.405 Acres
District: 8th Election District

On December 14th, 1987, Kidde Consultants Inc. filed for a special hearing on referenced project with the Baltimore County Zoning Department, under Item #224. As of this date the owner of subject site has not received notice of a scheduled hearing date or case number. It would be appreciated if a hearing date could be scheduled so that our client may anticipate a start up for Building Construction by March 1st, 1988.

Thank you for your cooperation.

Very truly yours,
John C. Eiser
John C. Eiser
Senior Associate

JCE/adw

cc: Thomas F. O'Brecht
Martin J. Storck
File

CONSULTING ENGINEERS

VITA

Timothy F. Madden, ASLA, AICP
Director of Planning
Kidde Consultants, Inc.
1020 Cromwell Bridge Road
Baltimore, MD 21204
(301) 583-1761

**PETITIONER'S
EXHIBIT 3**

PROFESSIONAL BACKGROUND

SUMMARY:

With more than ten years experience in land planning, environmental planning and landscape architecture, Mr. Madden has managed commercial, institutional, industrial, recreational and residential projects. He has provided testimony in many zoning and site plan review hearings and court cases. Mr. Madden has testified as an expert witness in Anne Arundel County Circuit Court as well as testifying before the Planning Commissions of Charles County, Howard County, Calvert County, Anne Arundel County, Baltimore County and Carroll County. Mr. Madden has provided expert witness services to both appellee and appellant in CRG and Zoning appeal cases in Baltimore County. He has also worked for the Maryland Department of Natural Resources and is a past President of the Maryland Chapter, American Society of Landscape Architects.

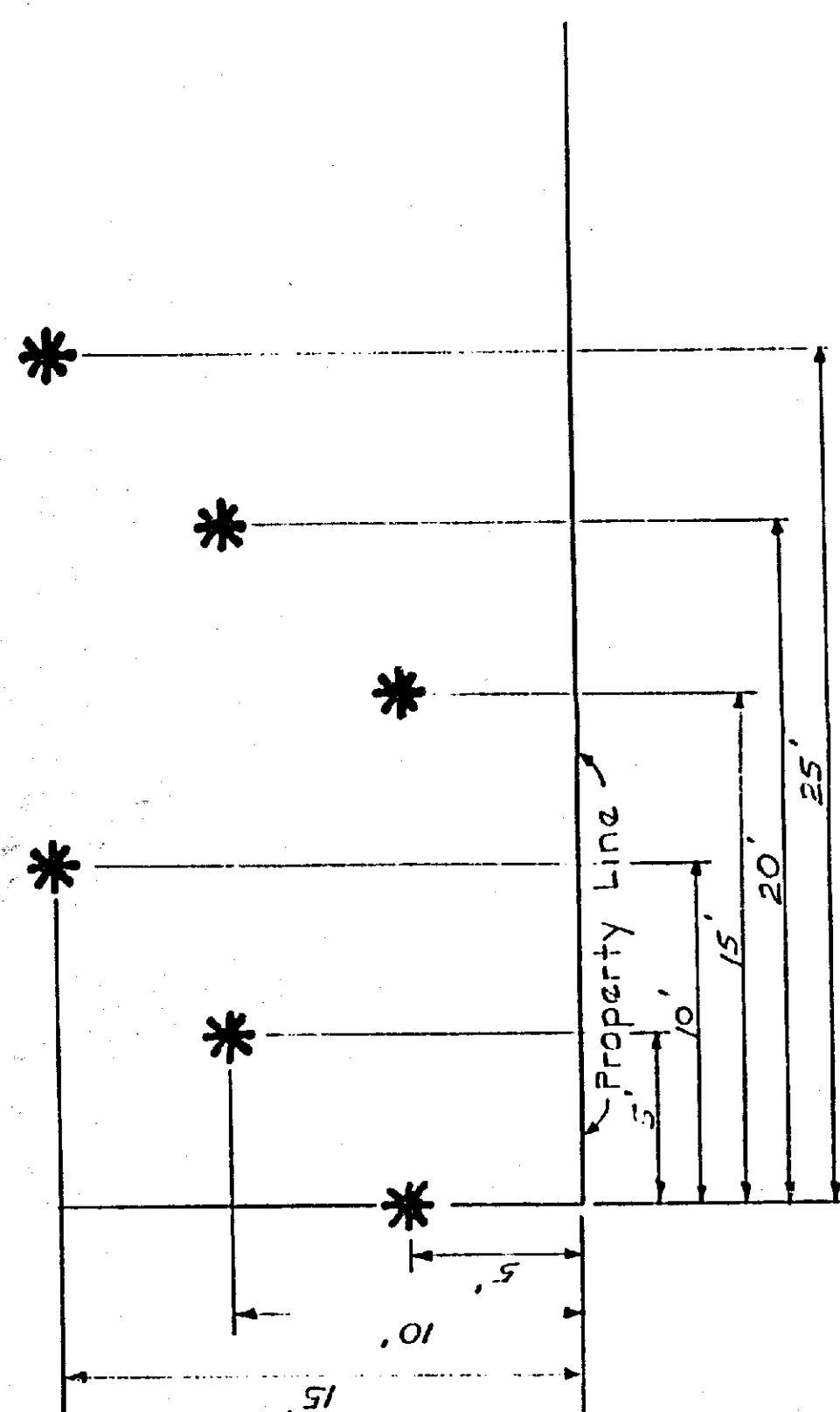
PRESENT POSITION:

Mr. Madden serves Kidde Consultants, Inc. as the Chief of the Planning and Zoning section of the Urban Planning and Development Division of the Eastern Region. In this capacity, Mr. Madden is responsible for the preparation of land use studies, zoning justification reports, concept development and planning, as well as providing expert testimony regarding zoning and site plan review projects.

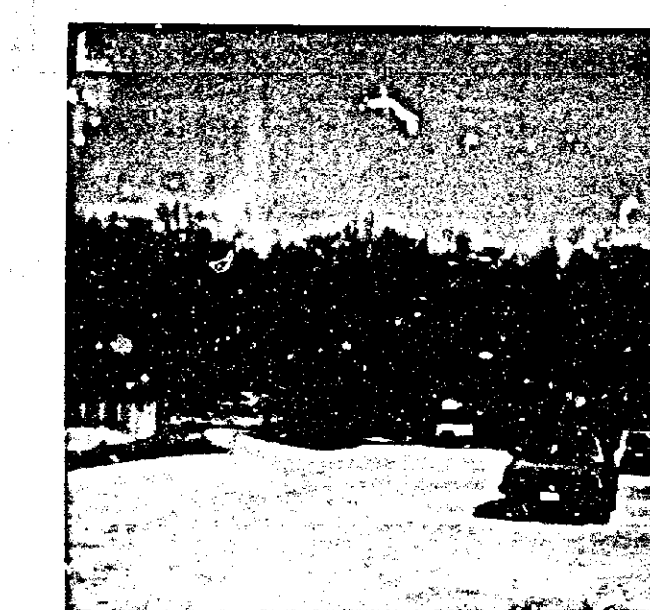
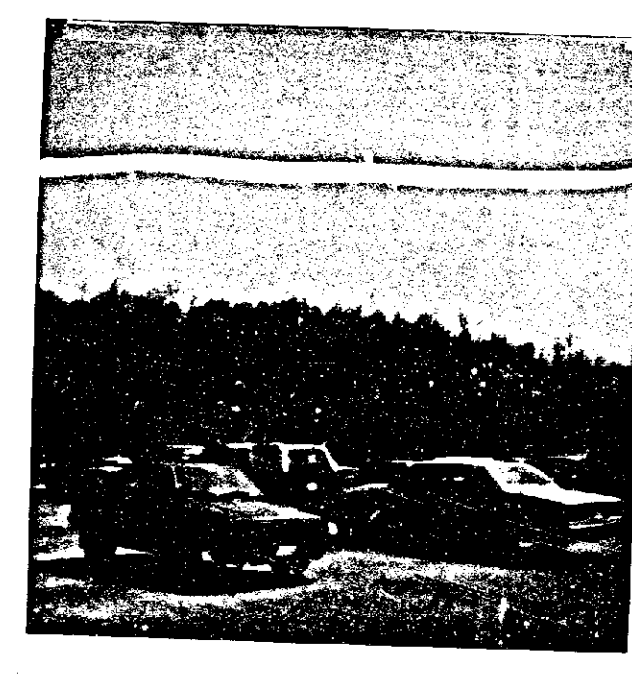
Some of Mr. Madden's recent testimony include:

- o Presentation of comprehensive rezoning proposal and land use study for the Painters Mill Joint Venture, a 200 + acre planned development planned by KCI for high density, mixed use development.

PLANTING TYPICAL

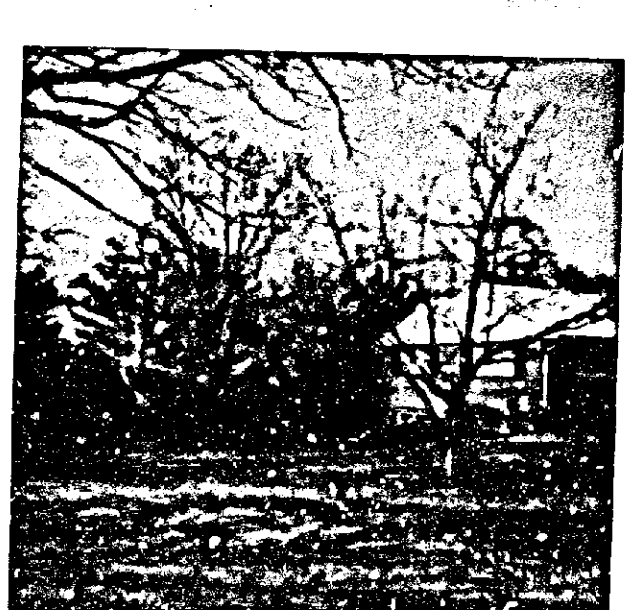


PETITIONER(S) EXHIBIT (7)



PETITIONER(S) EXHIBIT (8)

*Taken
April 1, 1988*



MICKEY A. CORNELIUS
TRAFFIC ENGINEER

Mickey Cornelius has over six years experience in the Highway Transportation and Traffic Engineering profession. He has served as a consulting traffic engineer for more than four years. His experience in both the public and private sectors has provided Mr. Cornelius with a broad range of knowledge.

Mr. Cornelius has conducted numerous Traffic Impact Studies throughout the Baltimore-Washington Metropolitan area, from small residential subdivisions to multi-million square foot, mixed use developments. He has served as a Transportation Planner for the development of Master Plans for both private firms and government agencies. Traffic signal warrant studies, traffic signal design, and traffic control plans are examples of the types of projects Mr. Cornelius has undertaken while practicing as a consulting traffic engineer.

Mr. Cornelius' educational background and subsequent responsibilities have qualified him as an expert in the field of traffic engineering.

Job History

1984 to Present
Traffic Engineering Consultant

1982 - 1984
Civil Engineer, Highway Construction
S. J. Groves and Sons Co.

Educational Background

B.S. in Civil Engineering with
emphasis in Transportation -
The Pennsylvania State University

Traffic Engineering Courses:
Northwestern University Traffic
Institute;
Polytechnic Institute
of New York

Affiliations

Institute of Transportation
Engineers (I.T.E.)
Registered Engineer-In-
Training (E.I.T.)

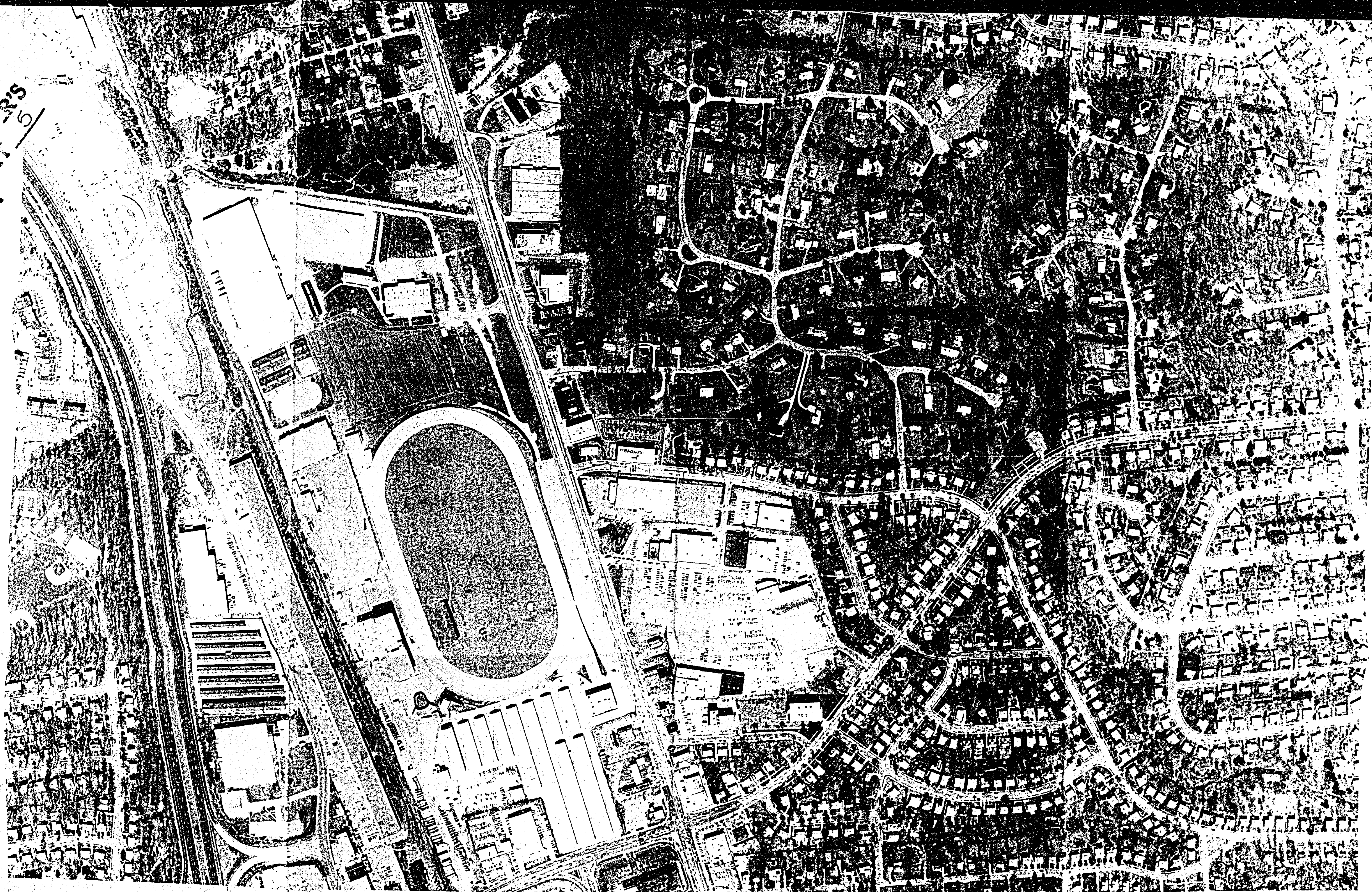
Places Where Mr. Cornelius Has Qualified as an Expert Witness

Board of Appeals - Montgomery County
Zoning Hearing Examiner - Montgomery County
Planning Board - Montgomery County
Zoning Commissioner - Baltimore County
County Review Group (CRG) - Baltimore County

Board of Appeals - Baltimore County
Board of Appeals - Anne Arundel County
Zoning Hearing Examiner - Anne Arundel County
Planning Board - Prince Georges County

PETITIONER'S

PETITIONER'S
EXHIBIT 5

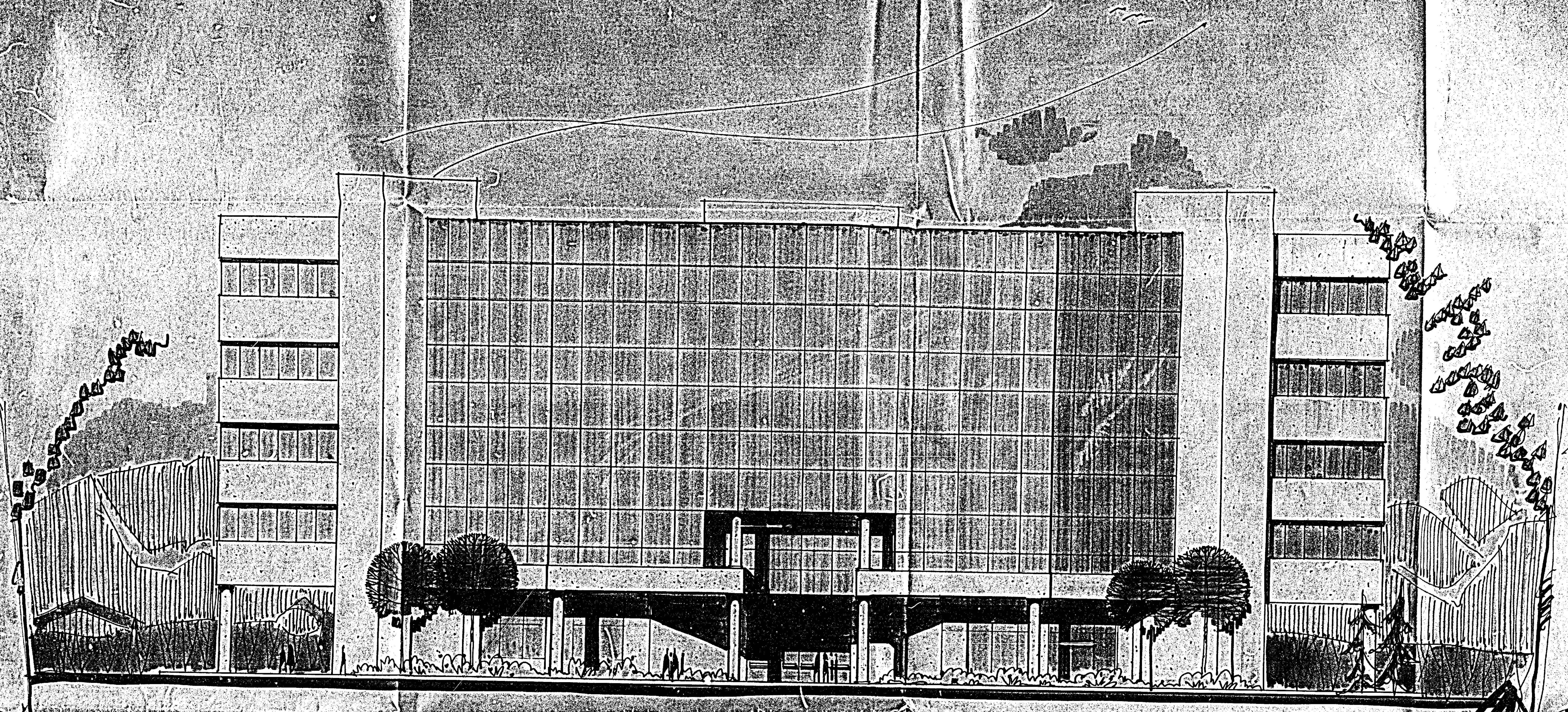


BALTIMORE COUNTY
OFFICE OF PLANNING AND ZONING
PHOTOGRAPHIC MAP

PREPARED BY AIR PHOTOGRAPHICS, INC.
MARTINSBURG, W.V. 25401

SCALE	LOCATION	SHEET
1" = 200' ±	TIMONIUM	N.W.
DATE OF PHOTOGRAPHY JANUARY 1986		14-A

PETER'S
EXHIBIT 2

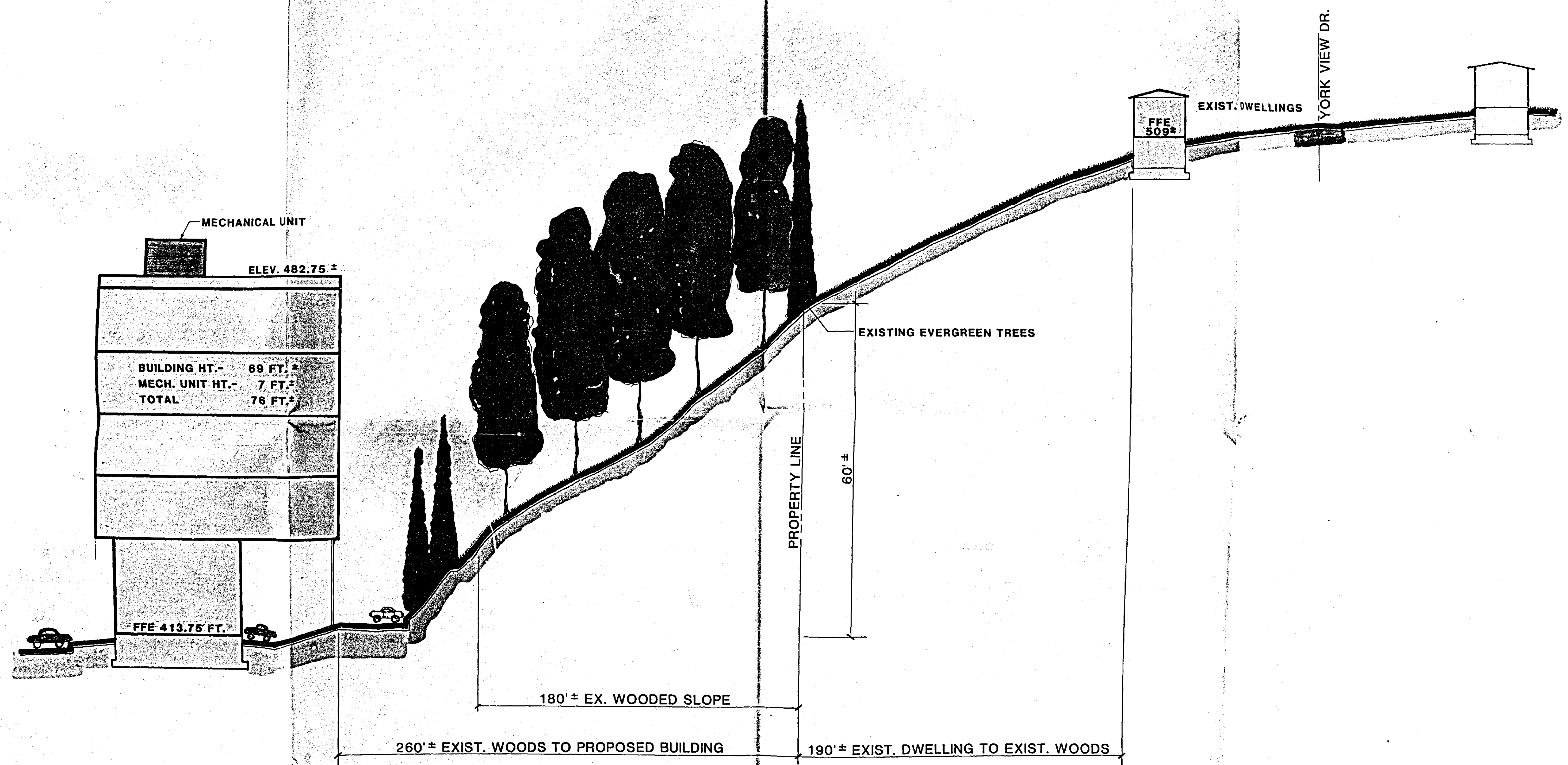


ENTRANCE ELEVATION

YORK ROAD OFFICE BUILDING

DONALD B. RATCLIFFE & ASSOCIATES
ARCHITECTS & PLANNERS

PETITIONER'S
EXHIBIT 4



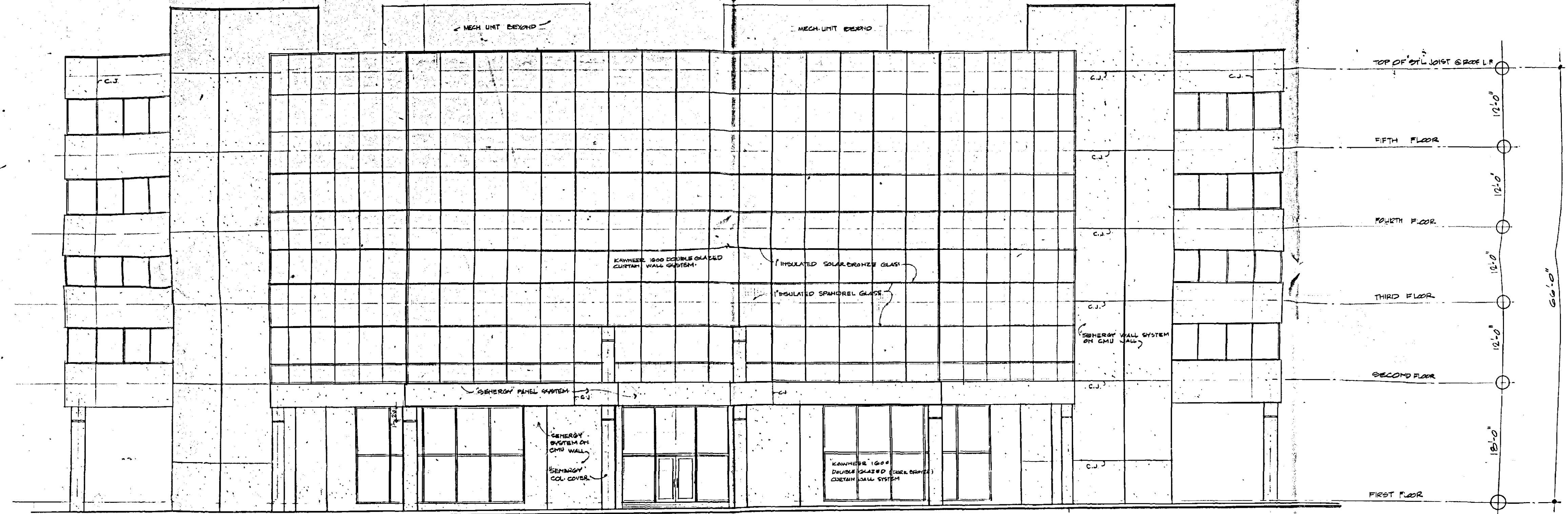
Drafting	DATE	REVISIONS
Check		
Design		
Check		

KIDDE CONSULTANTS, INC.
LAND PLANNERS • ENGINEERS • LANDSCAPE ARCHITECTS
1020 CROMWELL BRIDGE ROAD, TOWSON, MARYLAND 21204. 301-321-5500

CROSS SECTION

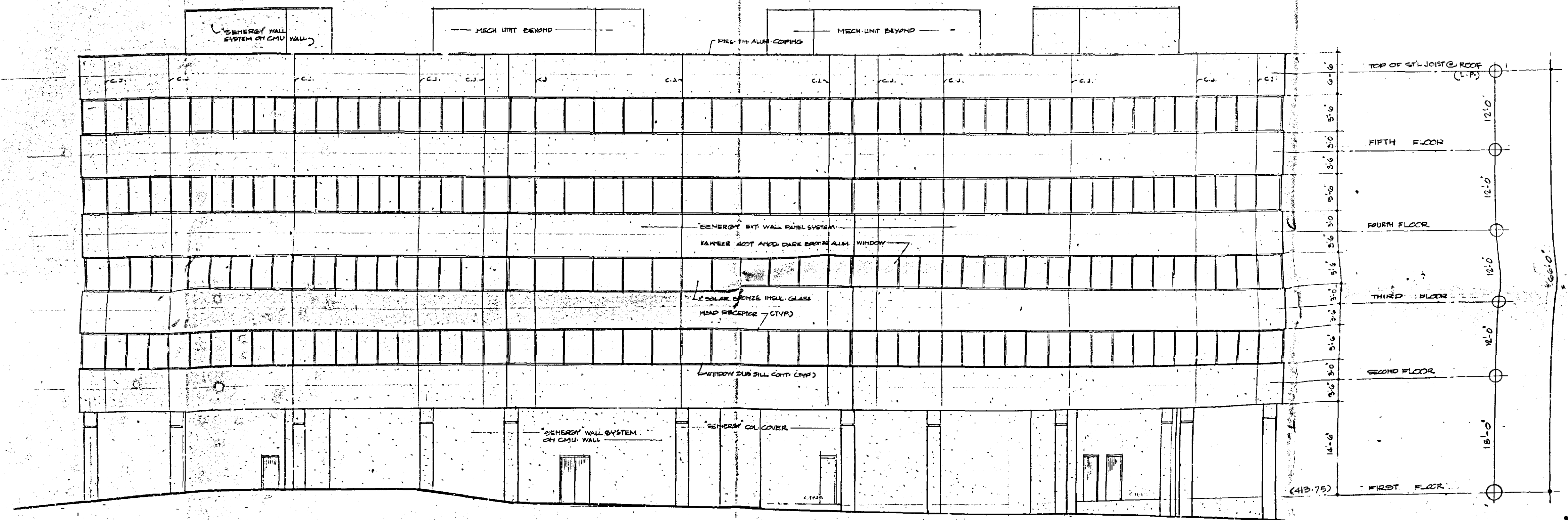
STRATFORD OFFICE BUILDING

SHEET	DATE	JOB NUMBER
OF	APRIL 1, 1988	
	SCALE	
	HOR. 1"=30'	
	VERTICAL 1"=10'	01-87236



1 SOUTH WEST ELEVATION

SCALE: 1/8" = 1'-0"



2 NORTH EAST ELEVATION

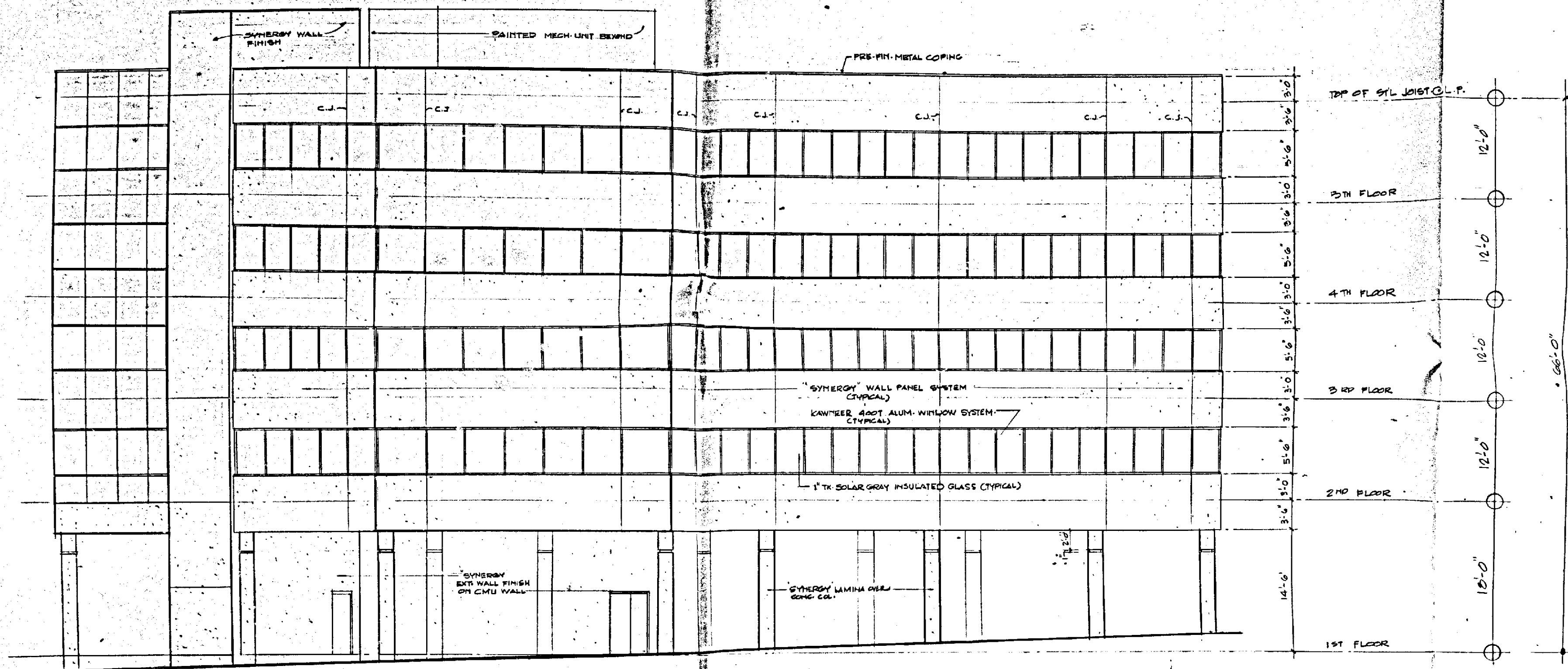
SCALE: 1/8" = 1'-0"

DONALD B. RATCLIFFE & ASSOC.
Architects and Planners
10404 Stevenson Road, Stevenson, Maryland 21153
484 7010

STRATFORD OFFICE BUILDING
YORK ROAD @ PADONIA ROAD
BALTIMORE COUNTY, MARYLAND

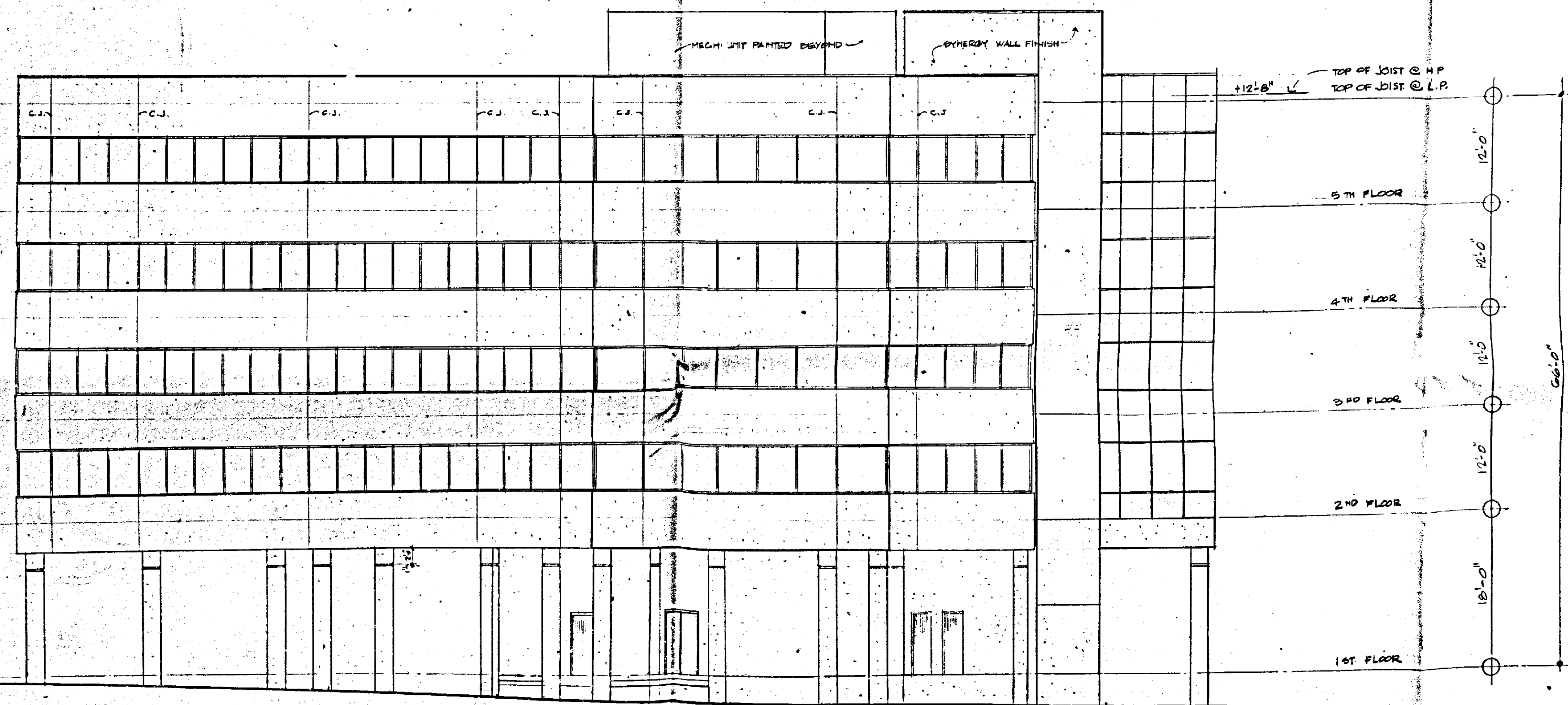
Sheet Title	ELEVATIONS
Drawn by	
Scale	1/8" = 1'-0"
Revised	
Date	2-24-88
Drawn by	
Sheet	27

REVISED PLANS
OFFICE COPY
MR 0888
88-384 SPH
#224



3 SOUTH EAST ELEVATION

SCALE: 1/8" = 1'-0"



4 NORTH WEST ELEVATION

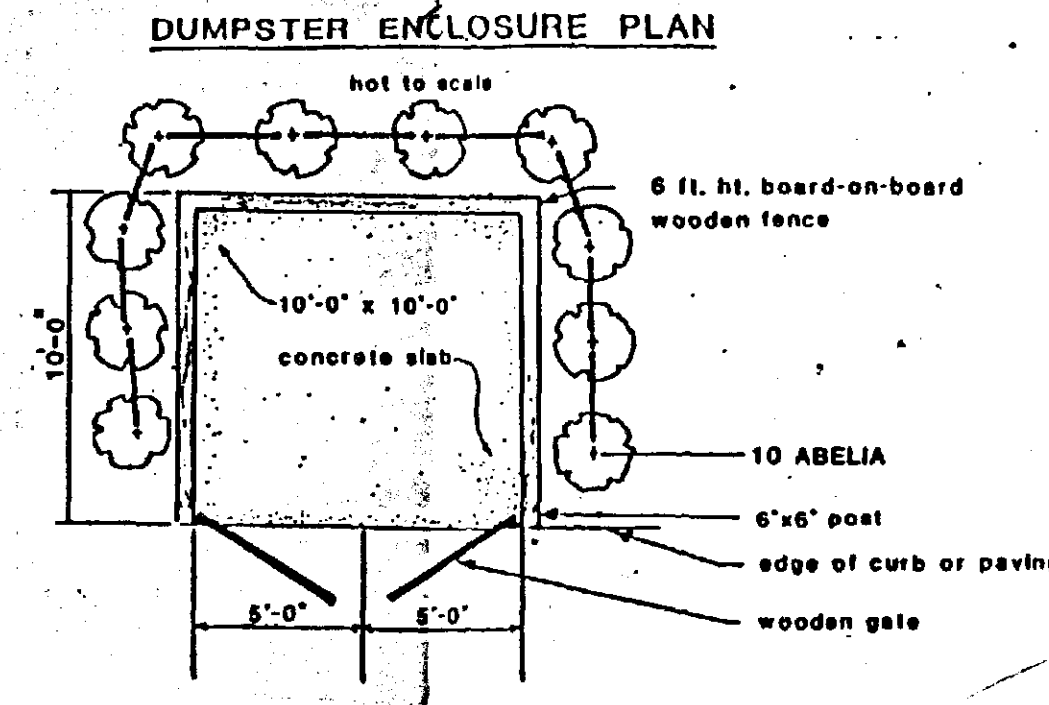
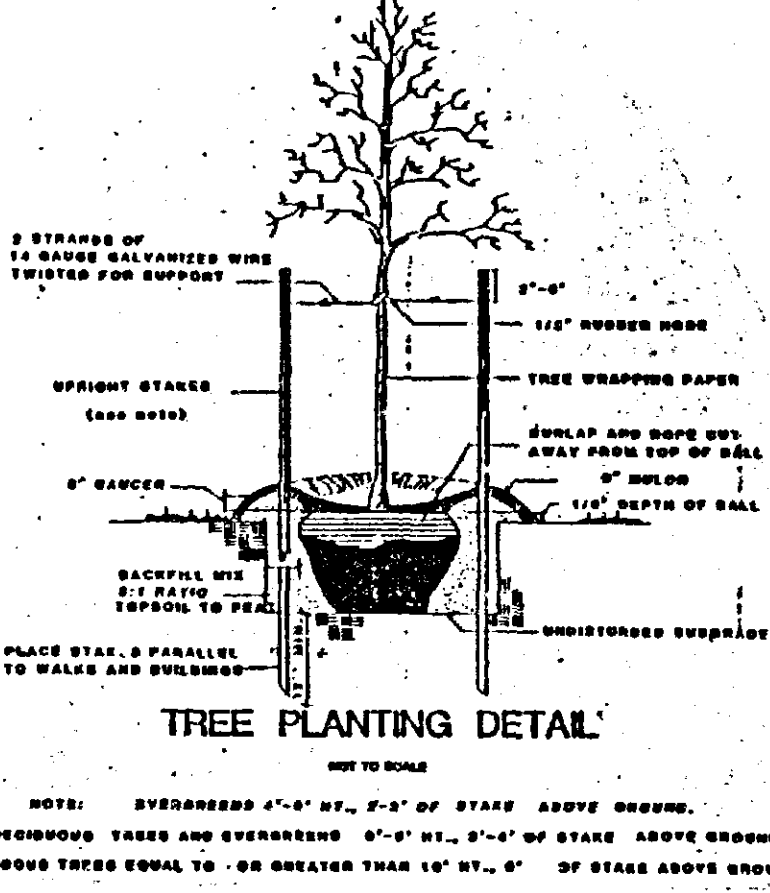
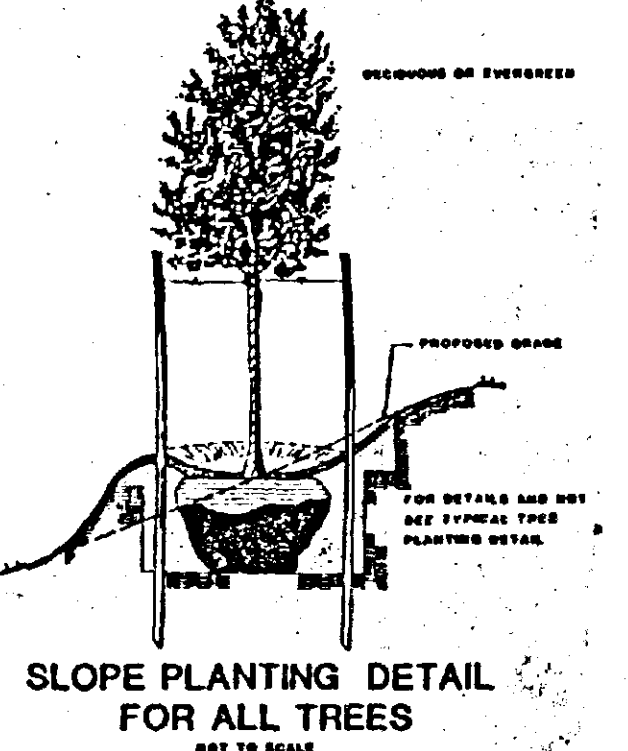
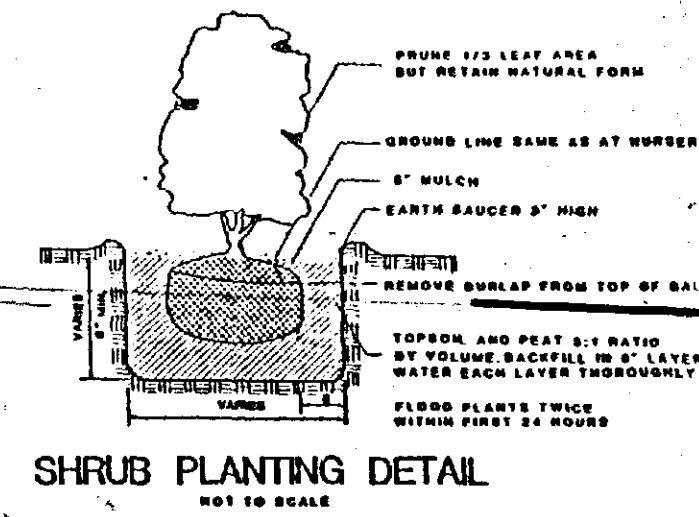
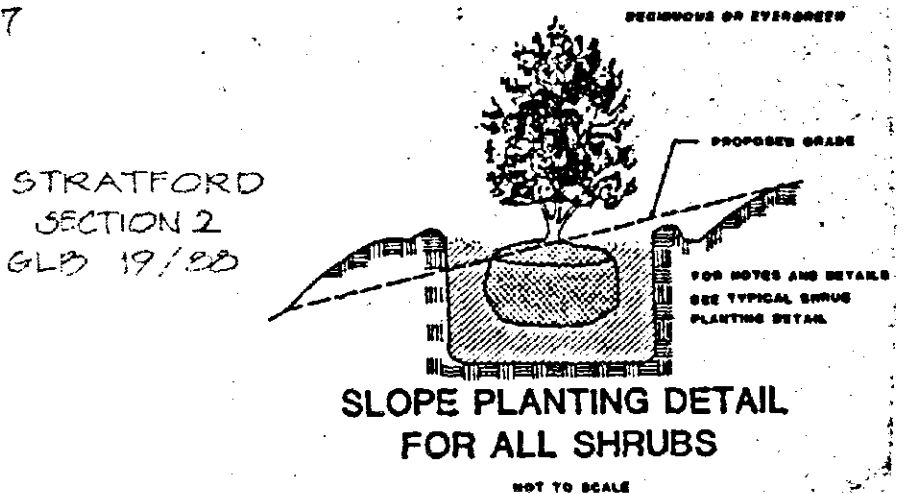
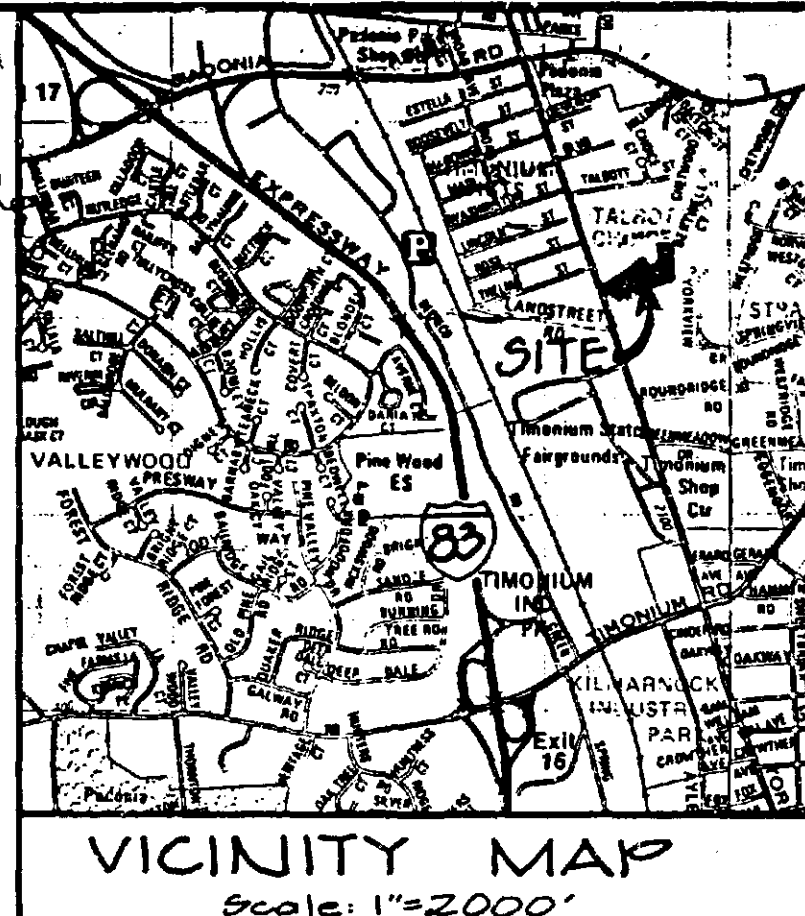
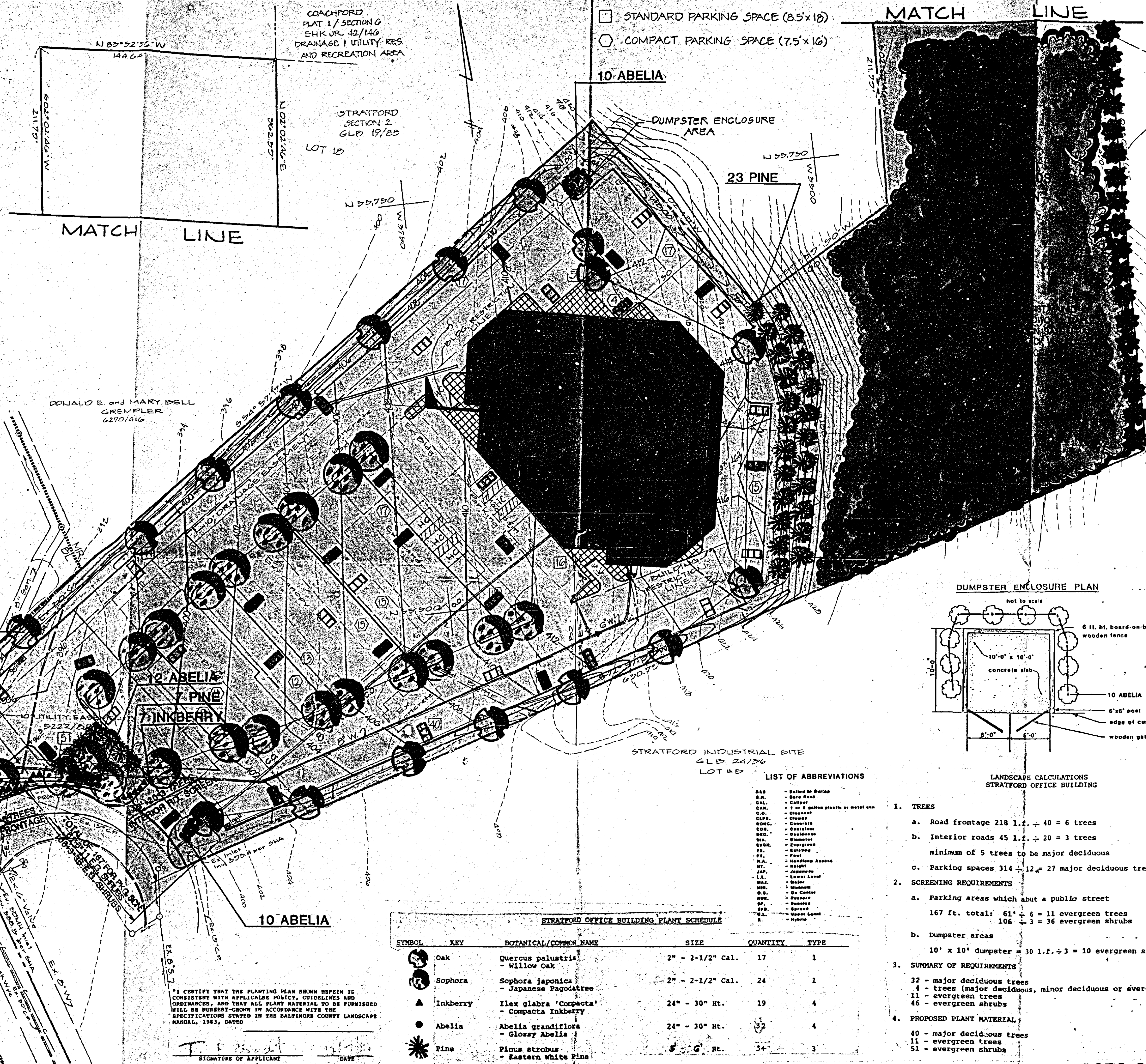
SCALE: 1/8" = 1'-0"

STRATFORD OFFICE BUILDING
YORK ROAD @ PADONIA ROAD
BALTIMORE COUNTY, MARYLAND

DONALD B. RATCLIFFE & ASSOC.
Architects and Planners
10404 Stevenson Road, Stevenson, Maryland 21153
484-7010

Sheet Title	ELEVATIONS
Drawn by	W.S.
Scale	1/8" = 1'-0"
Revised	
Date	2-24-88
Drawing	

PETITIONER'S EXHIBIT 2

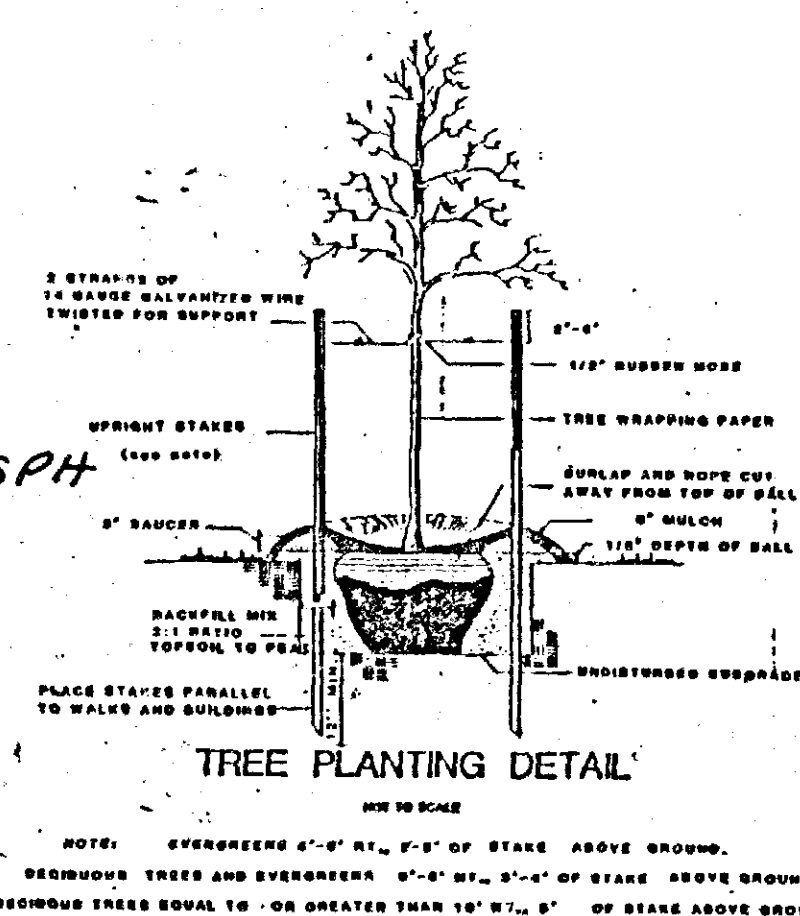
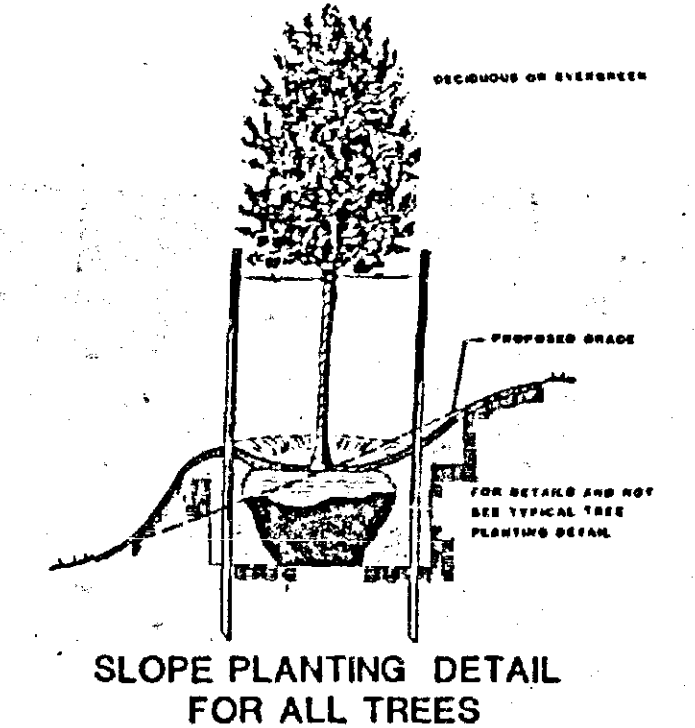
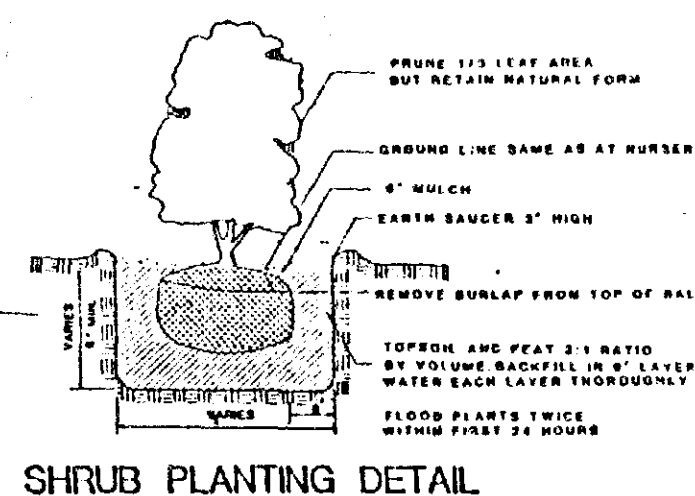
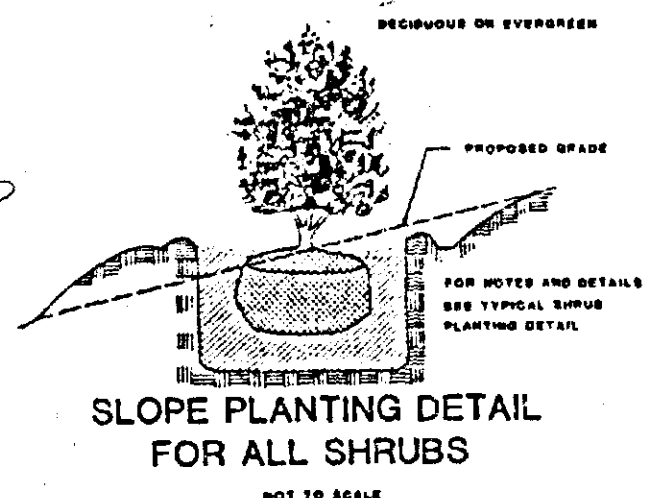
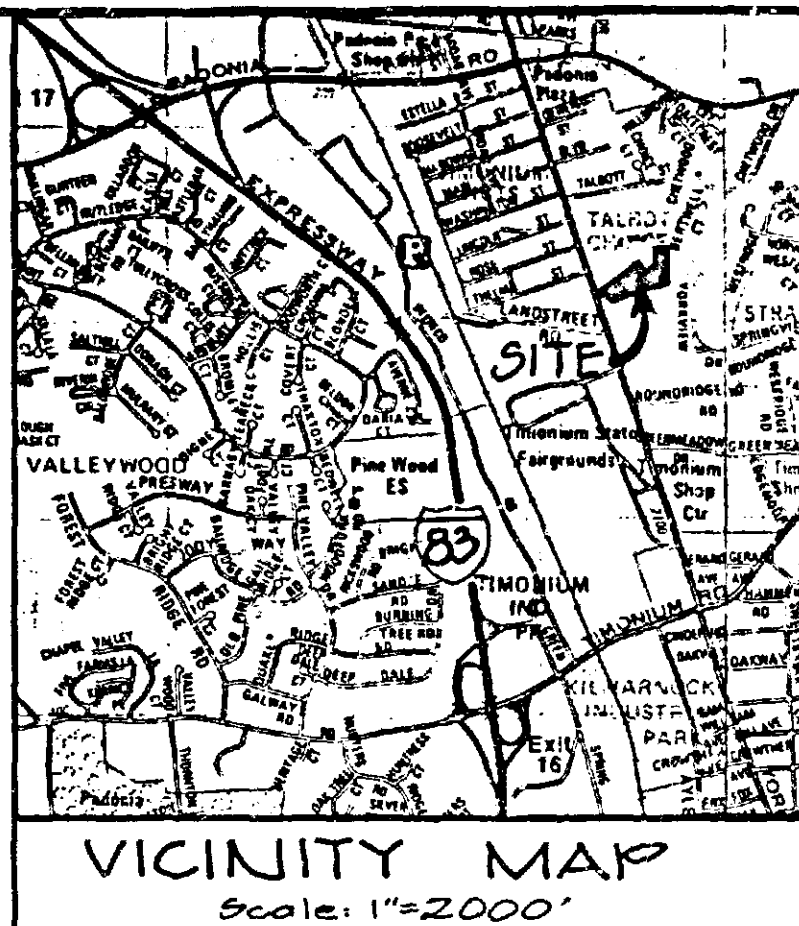


- LANDSCAPE CALCULATIONS
STRATFORD OFFICE BUILDING
- TREES
 - Road frontage $218 \text{ l.f.} \div 40 = 6 \text{ trees}$
 - Interior roads $45 \text{ l.f.} \div 20 = 3 \text{ trees}$
minimum of 5 trees to be major deciduous
 - Parking spaces $314 \div 12 = 27 \text{ major deciduous trees}$
 - SCREENING REQUIREMENTS
 - Parking areas which abut a public street
 $167 \text{ ft. total: } 61' \div 6 = 11 \text{ evergreen trees}$
 $106 \div 3 = 36 \text{ evergreen shrubs}$
 - Dumpster areas
 $10' \times 10' \text{ dumpster} = 30 \text{ l.f.} \div 3 = 10 \text{ evergreen shrubs}$
 - SUMMARY OF REQUIREMENTS
 - 32 - major deciduous trees
 - 11 - evergreen trees
 - 46 - evergreen shrubs
 - PROPOSED PLANT MATERIAL
 - 40 - major deciduous trees
 - 11 - evergreen trees
 - 51 - evergreen shrubs

SYMBOL	KEY	BOTANICAL/COMMON NAME	SIZE	QUANTITY	TYPE
○	Oak	Quercus palustris - Willow Oak	2" - 2-1/2" Cal.	17	1
●	Sophora	Sophora japonica - Japanese Pagodatree	2" - 2-1/2" Cal.	24	1
▲	Inkberry	Ilex glabra 'Compacta' - Compacta Inkberry	24" - 30" Ht.	19	4
●	Abelia	Abelia grandiflora - Glossy Abelia	24" - 30" Ht.	32	4
★	Pine	Pinus strobus - Eastern White Pine	5' - 6' Ht.	34	3

I CERTIFY THAT THE PLANTING PLAN SHOWN HEREIN IS
CONSISTENT WITH APPLICABLE POLICY, GUIDELINES AND
ORDINANCES, AND THAT ALL PLANT MATERIAL TO BE FURNISHED
WILL BE NURSERY-GROWN IN ACCORDANCE WITH THE
SPECIFICATIONS STATED IN THE BALTIMORE COUNTY LANDSCAPE
MANUAL, 1983, DATED

SIGNATURE OF APPLICANT: *T. J. [Signature]* DATE: 12/1/87



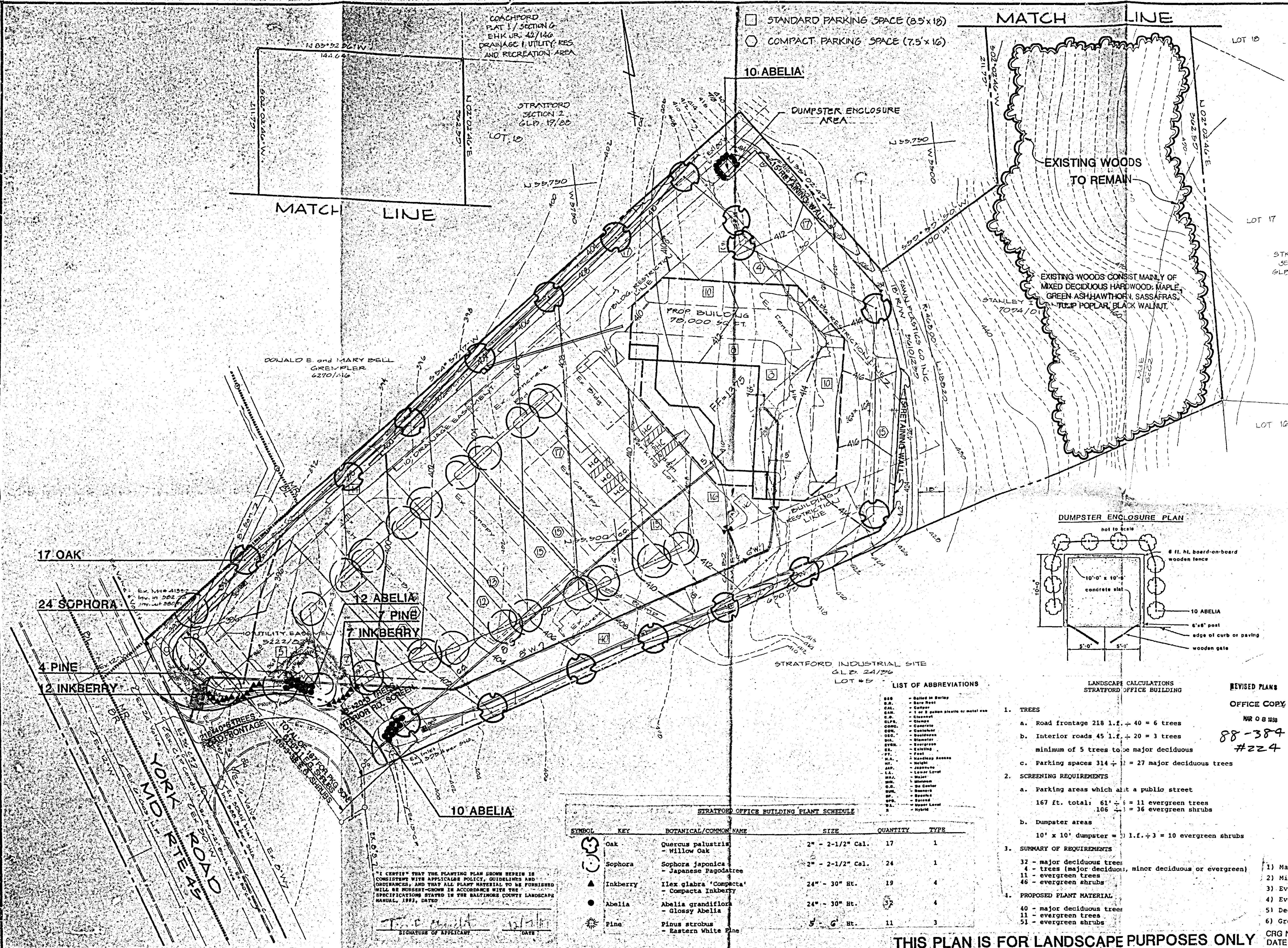
PLANT TYPES

- 1) Major Deciduous Tree
- 2) Minor Deciduous Tree
- 3) Evergreen Tree
- 4) Evergreen Shrub
- 5) Deciduous Shrub
- 6) Groundcover

CRG NO: W-87-294
DATE APPROVED: SEPT 16, 1987

Tim Modden

DATE DEC. 21, 1987	JOB NUMBER
SCALE 1" = 30'	01-872



STRATTON OFFICE BUILDING PLANT SCHEDULE					DA. 8	Upper Level - Hybrid
SYMBOL	KEY	BOTANICAL/COMMON NAME	SIZE	QUANTITY	TYPE	
	Oak	Quercus palustris - Willow Oak	2" - 2-1/2" Cal.	17	1	
	Sophora	Sophora japonica - Japanese Pagodatree	2" - 2-1/2" Cal.	24	1	
	Inkberry	Ilex glabra 'Compacta' - Compacta Inkberry	24" - 30" Ht.	19	4	
	Abelia	Abelia grandiflora - Glossy Abelia	24" - 30" Ht.	32	4	
	Pine	Pinus strobus - Eastern White Pine	5" - 6" Ht.	11	3	