

IN RE: LEISURE HILL SUBDIVISION * BEFORE THE
3rd Election District * BOARD OF APPEALS
3rd Councilmanic District *
Sydney M. Shure * OF BALTIMORE COUNTY
Petitioner *
* * * * *

PETITION FOR APPEAL

Sydney M. Shure, Petitioner, by her undersigned attorneys, Cynthia K. Mitt and Siskind, Grady, Rosen & Hoover, P.A., hereby files this Petition for Appeal with the County Board of Appeals of Baltimore County, Maryland.

Petitioner appeals the Findings of Fact and Conclusions of Law (the "Decision") by Lawrence E. Schmidt, Zoning Commissioner for Baltimore County, dated October 6, 1994.

The grounds for appeal are as follows:

1. Certain facts as enumerated in the Decision are incorrect.

a. The Zoning Commissioner enumerated as protestants in this matter Mr. and Mrs. Larry Jenkins, adjoining property owners. The Zoning Commissioner also mentioned a Mr. and Mrs. Tornillo (Tarola) and other neighboring property owners. The Petitioner challenges the standing of all the persons mentioned as Protestants or as neighboring property owners or as adjoining property owners in the Zoning Commissioner's Decision.

b. On page 2 of the Decision, the Zoning Commissioner states that the "Motion [the preliminary Motion raised by the Petitioner] and reasons therefore are more fully set forth in the

Counsel's letter to this Zoning Commissioner dated September 1, 1994." The Zoning Commissioner failed to mention that twice on the record, Counsel for the Petitioner withdrew all but one aspect of that preliminary motion. (The September 1, 1994 Letter has several parts.)

2. Beginning on page 4 of the Decision, the Zoning Commissioner states, "The Petitioner also requests that this Zoning Commissioner approve a FDP for Lots 4, 5 and 6. For reasons that follow, I am unable to grant the relief requested in that portion of the Petitioner's Motion." What the Zoning Commissioner failed to acknowledge is that twice on the record, Counsel for the Petitioner withdrew that portion of the Petitioner's Motion. Therefore, that portion of the Motion was not before the Zoning Commissioner, and all of the findings of fact and conclusions of law set forth in the Decision on pages 4 through 6 are incorrect. Furthermore, the Zoning Commissioner's Decision denying in part the preliminary Motion filed by the Petitioner is incorrect.

The Petitioner does not challenge that portion of the Zoning Commissioner's Decision that grants the preliminary Motion finding that the initial final development plan and amendments 1 through 5 thereto did not include Lots 4, 5 and 6 and that therefore the Petition for Special Hearing is not required and was therefore, appropriately dismissed.

The relief requested in this Petition of Appeal is a finding by the Board of Appeals that the "second part" of Petitioner's Motion was not before the Zoning Commissioner, and therefore the

Zoning Commissioner's findings of fact and conclusions of law as set forth in his Decision at pages 4 through 6 and in the conclusion on page 7 are invalid and of no force and effect. Petitioner also requests such other and further relief as the nature of this cause may require.

CYNTHIA K. MITT
Siskind, Grady, Rosen & Hoover, P.A.
2 East Fayette Street
Baltimore, Maryland 21202
(410) 539-6606

Attorneys for Petitioner Sydney M. Shure

PROPERTY ADDRESS:

34/3 Park Heights Avenue
at Leisure Hill Drive
3rd Election District
3rd Councilmanic District

IN RE: LEISURE HILL SUBDIVISION * BEFORE THE
3rd Election District * BOARD OF APPEALS
3rd Councilmanic District *
Sydney M. Shure * OF BALTIMORE COUNTY
Petitioner *
* * * * *

PETITION FOR APPEAL

Sydney M. Shure, Petitioner, by her undersigned attorneys, Robert B. Scarlett and Henson & Scarlett, P.A., hereby files this Petition for Appeal with the County Board of Appeals of Baltimore County, Maryland.

Petitioner appeals a letter dated November 9, 1994 by Arnold Jablon, Director of the Office of Zoning Administration and Development Management ("ZADM") to Joseph L. Larson, of Spellman, Larson & Associates, Inc., an engineering firm retained by Sydney M. Shure, the owner of certain property in the Leisure Hill Subdivision, Third Election District, Baltimore County, Maryland (the "November 9, 1994 Letter").

The grounds for appeal include, but are not necessarily limited to, the following:

1. The Director of ZADM incorrectly interprets the provisions of the Baltimore County Code with respect to the application of the current development regulations.

2. The Director of ZADM incorrectly applies the Baltimore County Code, Title 26 and the Baltimore County Zoning Regulations to the facts in the current case.

3. The Director of ZADM incorrectly applies the October 6, 1994 Decision of the Zoning Commissioner to the facts of this case.

4. The Director of ZADM incorrectly concludes that the development process for this property requires the full development process review, contrary to the plain and ordinary language of the Baltimore County Code and the Baltimore County Zoning Regulations.

The relief requested in this Petition of Appeal is a determination by the Board of Appeals as to the following:

a. The effect of the historical development context of the property known as Leisure Hill, specifically the effect on the right to subdivide the remaining property.

b. A correct interpretation in construction of Baltimore County law, including, but not necessarily limited to, Title 26 of the Baltimore County Code and Section 1801 of the Baltimore County Zoning Regulations, as it relates to the subdivision and development of this property.

c. A correct interpretation of other applicable sections of the Baltimore County Code and the Baltimore County Zoning Regulations with respect to the subdivision and development of this property.

d. Such other and further relief as the nature of this cause may require.

Respectfully submitted,

ROBERT B. SCARLETT
Henson & Scarlett, P.A.
201 North Charles Street, Suite 600
Baltimore, Maryland 21201-4110
(410) 539-5505
Attorneys for Petitioner, Sydney M. Shure

Property Address: 34/3 Park Heights Avenue
at Leisure Hill Drive
3rd Election District
3rd Councilmanic District

IN RE: LEISURE HILL SUBDIVISION * BEFORE THE
3rd Election District * BOARD OF APPEALS
3rd Councilmanic District *
Sydney M. Shure * OF BALTIMORE COUNTY
Petitioner *

MOTION TO CONSOLIDATE

Sydney M. Shure, Petitioner, by her undersigned attorneys, Robert B. Scarlett and Henson & Scarlett, P.A., hereby files this Motion to Consolidate as follows:

On or about November 9, 1994, Arnold Jablon, the Director of the Office of Zoning Administration and Development Management ("ZADM") issued a letter to Joseph L. Larson, of Spellman, Larson & Associates, Inc. (the "Engineer"), the engineer for Sydney M. Shure, (the "Owner") of the Leisure Hill Subdivision (the "Property"). In Mr. Jablon's letter (the "November 9, 1994 Jablon Letter") he references a decision by the Zoning Commissioner. That decision is dated October 6, 1994 (the "October 6, 1994 Decision"). Both the Petitioner, Sydney M. Shure, and certain clients of J. Carroll Holtzer, Esquire, namely Richard Rynd, Mr. & Mrs. Larry Jenkins, and Mr. Robert Tarola, have filed an appeal from the Zoning Commissioner's October 6, 1994 Decision. Both the October 6, 1994 Zoning Commissioner's Decision and the November 9, 1994 Jablon Letter concern the same subject, namely, the subdivision of what is commonly known as Lots 4, 5 and 6 of the Leisure Hill Property.

Both the appeal of the October 6, 1994 Zoning Commissioner's Decision and the instant appeal have same or similar legal arguments and the same or similar facts. Therefore, these two cases are ripe for consolidation. In the interests of judicial case management, as well as in the interests of continuity, it is requested that the instant case be consolidated with the Appeal of Zoning Commissioner Case No. 95-10-sph.

WHEREFORE, the Petitioner respectfully requests that the County Board of Appeals consolidate the instant case with the Petitions of Appeal filed by Petitioner and Richard Rynd, Mr. & Mrs. Larry Jenkins, and Mr. Robert Tarola from the October 6, 1994 Zoning Commissioner's Decision.

Respectfully submitted,

ROBERT B. SCARLETT
Henson & Scarlett, P.A.
201 North Charles Street, Suite 600
Baltimore, Maryland 21201-4110
(410) 539-5505
Attorneys for Petitioner, Sydney M. Shure

Property Address: 34/3 Park Heights Avenue
at Leisure Hill Drive
3rd Election District
3rd Councilmanic District

IN RE: PETITION FOR SPECIAL HEARING
S/W Park Heights Avenue at
Leisure Hill Drive
(Final Development Plan of
Leisure Hill - 4th Amendment)
3rd Election District - 3rd Councilmanic District
Sydney M. Shure
Petitioner

* BEFORE THE
* ZONING COMMISSIONER
* OF BALTIMORE COUNTY
* Case No. 95-10-SPH

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This matter comes before the Zoning Commissioner as a Petition for Special Hearing filed by the owner of the property, Sydney M. Shure, to approve a sixth amendment to the previously approved final development plan of Leisure Hill to allow the addition of three (3) vested lots. The subject property and relief sought are more particularly described on the plat filed with the Petition entitled "Final Development Plan of Leisure Hill - 4th Amendment".

Appearing at the public hearing held on this matter were Sydney M. Shure, property owner, Joseph L. Larson, Registered Land Surveyor, Richard E. Katz, Professional Engineer, Marilyn Weiner and Andrew Koplowski, a representative of Sigmet Bank. The Petitioner was represented by Cynthia Hill, Esquire. Appearing as Protestants in the matter were Mr. & Mrs. Larry Jenkins, adjoining property owners. Mr. & Mrs. Jenkins were represented by J. Carroll Holzer, Esquire, who also represented Mr. & Mrs. Turillo and other neighboring property owners who did not appear.

Testimony and evidence offered revealed that the subject property consists of a gross area of 31,490 acres, more or less, zoned R.C. 5, and was approved for development as a single family residential subdivision in 1981. The original development plan for this subdivision, known as Leisure Hill, has undergone a number of revisions since it was initially approved

in March 1981. The Petitioner now comes before me seeking a sixth amendment to the last approved final development plan to permit the addition of three (3) lots which she believes were vested under the original plan.

However, prior to proceeding on the Petition, the Petitioner, through Counsel, raised a preliminary Motion that the Petition was unnecessary and that the relief requested thereunder was available to her by right. The Motion and reasons therefore are more fully set forth in Counsel's letter to this Zoning Commissioner dated September 1, 1994. The following represents a synopsis of the testimony offered and argument presented on said Motion, as well as my findings and ruling thereon.

In the early 1980s, development in Baltimore County was regulated by the Joint Subdivision Planning Committee (JSPC). That Committee was the predecessor to a development review committee, known as the County Review Group (CRG), which itself was replaced by the current development review process found in Title 26 of the Baltimore County Code. Development was originally proposed for this site and same was considered and processed by the JSPC. Pursuant to the site plan submitted into evidence as Petitioner's Exhibit 8, the JSPC approved a development plan for 11 individual lots in 1981. This residential community was known as Leisure Hill. The approval granted by the JSPC was authorized under the development regulations which existed at that time.

Subsequent to the JSPC approval, the Developer submitted to Baltimore County a final development plan (FDP) for this subdivision. FDPs are defined and regulated by Section 1801.3 of the Baltimore County Zoning Regulations (B.C.Z.R.). Essentially, a FDP is required to be submitted by the Developer in order to provide for the disclosure of development plans to prospective residents and to protect those who have made decisions based

on such plans from inappropriate changes therein; and to provide for review of residential development plans to determine whether they comply with the B.C.Z.R. and the standards and policies adopted thereto pursuant to the authority of Section 504 of the B.C.Z.R. A FDP is submitted to the zoning officer after development plan approval is obtained.

The initial FDP submitted by the Developer in this case, pursuant to JSPC approval, is identified herein as Petitioner's Exhibit 1. It is clear that this plan was only a partial final development plan for the development approved by the JSPC. As noted above, the JSPC approved plan contained 11 residential lots. However, the initial FDP included only those lots identified on the plan as Lots 2, 3, 7, 8, 9, 10 and 11. The initial final development plan accepted by the County at that time did not encompass Lots 1, 4, 5 or 6.

This initial final development plan has been amended on five different occasions since March, 1981. On each occasion, the character of the amendment did not include the addition of Lots 1, 4, 5 and 6. It is clear that these lots, although approved by the JSPC, have never been part of any FDP submitted to Baltimore County. This conclusion is further borne out by the fact that, as Counsel for the Petitioner pointed out, Lots 4, 5 and 6 ultimately came before the CRG and obtained development plan approval under that process, as evidenced by Petitioner's Exhibit 9. It should also be noted that Lot 1 was eventually approved for development subsequent to the JSPC approval. Further, the restrictive covenants contained on Petitioner's Exhibit 10 provide that the boundaries of this subdivision do not include Lots 4, 5 and 6. Based upon all of these facts, which are uncontested, I must conclude that Lots 4, 5 and 6 were not part of the original FDP, nor any of the five amendments thereto. In view

of same, the instant Petition for Special Hearing which comes before me at this time is not appropriate, simply because the addition of lots not contained within the original FDP cannot be permitted by amendment.

Based upon this inescapable conclusion, I am persuaded to grant the Petitioner's Motion and hold that the Petition for Special Hearing to approve an amendment to the FDP for Leisure Hill is not required for Lots 4, 5 and 6 in that those lots were never contained in the original FDP. However, in addition to this holding, the Petitioner also requests that this Zoning Commissioner approve a FDP for Lots 4, 5 and 6. For reasons that follow, I am unable to grant the relief requested in that portion of the Petitioner's Motion.

As emphasized above, Lots 4, 5 and 6 were not part of the original approved final development plan or any of the five amendments thereto. Approval for development of these three lots would only be valid if they were vested. As noted above, Lots 4, 5 and 6 were originally approved by the JSPC in 1981. Moreover, as shown on Petitioner's Exhibit 9, Lots 4, 5 and 6 were contained within an approved CRG plan. Apparently, according to the facts proffered by Counsel, this CRG plan was approved in 1982. There were subsequent amendments to the CRG plan, the last of which was filed on January 11, 1991. Under the provisions of the CRG development process, approved plans were valid for a period of three years. Thus, in the opinion of this Zoning Commissioner, absent some vesting of the CRG approval, the Developer's right to develop Lots 4, 5 and 6 is no longer valid in that the JSPC approval has long since lapsed and the CRG approval expired on January 11, 1994.

In addressing this issue at the hearing, Counsel for the Petitioner proffered certain facts and argued that there have been activities on

- 2 -

- 3 -

- 4 -

Lots 4, 5 and 6 which might have vested the CRG plan. Specifically, Counsel proffered testimony that grading permits were issued for the construction of Leisure Hill Drive, that the State Highway Administration (SHA), in connection with the construction of that road, issued a permit to allow access of same to Park Heights Avenue, and that other activity occurred on site which would vest the CRG approval. Although the hearing before me did not specifically address this issue, I must express my serious reservations about the validity of the Petitioner's arguments in this respect. In my opinion, the grading permits issued for the construction of Leisure Hill Drive and the SHA access permits, were all accomplished in furtherance of the original FDP for Lots 2, 3, 7, 8, 9, 10 and 11. These activities were not undertaken to vest development rights on Lots 4, 5 and 6, but to actually develop the balance of the property. It is clear, for example, that Leisure Hill Drive appears on the FDP and the amendments thereto. Leisure Hill Drive would have no doubt been built, irrespective of any contemplated construction on Lots 4, 5 and 6. Thus, I have serious reservations whether there has been any activity on this site which would vest CRG approval.

It is also to be noted that the development regulations currently in place in Baltimore County were enacted by the County Council and signed by the County Executive in 1992. Those regulations provide for a concept plan conference, community input meeting, development plan conference and hearing officer's hearing as a portion of Phase I of the development. As part of those regulations, a new departmental agency was created in Baltimore County, known as the Zoning Administration and Development Management (ZADM) office. Prior to the creation of ZADM, the Zoning Commissioner's Office had not only judicial responsibilities similar to those exercised

in the hearing of this matter, but also administrative functions. The administrative functions have been removed from the responsibilities of the Zoning Commissioner and have been delegated to the Director of ZADM. Specifically, Section 26-3 of the Baltimore County Code (BCC) dictates that the Zoning Commissioner shall administer the Office of the Zoning Commissioner, and that the Director of Zoning Administration and Development Management (ZADM) shall administer the ZADM office, the zoning code and all other administrative matters otherwise assigned in Article 26 of the Baltimore County Code or within the B.C.Z.R. Thus, it is clear that the submission of a FDP for Lots 4, 5 and 6 as is being requested by the Petitioner in her Motion, is not properly before me. Only if a public hearing is required, pursuant to the provisions of Section 1801.3 of the B.C.Z.R. will the Zoning Commissioner convene and conduct the requisite public hearing. Thus, the Petitioner is left to negotiate with the Director of ZADM to determine whether a FDP can now be submitted and accepted by that agency.

As this Zoning Commissioner noted on the record, the Director of ZADM formulated certain guidelines regarding the FDP review process. These guidelines are contained within Memoranda prepared by Arnold Jolion, current Director of ZADM, which bear the dates of September 4, 1992 and February 4, 1994. The Memoranda address those situations when a given development is built out incrementally. The Memoranda suggest that those events which vest a portion of the tract will not vest the entire development. As noted above, the initial FDP covered only a single section of the Leisure Hill Development Plan and the previous FDPs which were submitted were only incremental partial plans.

Thus, for the reasons set forth above, I shall grant in part and deny in part the preliminary Motion filed by the Petitioner, and I will dismiss the Petition for Special Hearing as inappropriate, in that Lots 4, 5 and 6 were not part and parcel of the originally approved FDP of Leisure Hill or the subsequent amendments thereto. However, I decline to issue any order vesting the Petitioner's development rights for Lots 4, 5 and 6, or requiring the ZADM office to accept a FDP for those lots.

WHEREFORE, IT IS ORDERED by the Zoning Commissioner for Baltimore County this 16th day of October, 1994 that the Petition for Special Hearing seeking approval of a sixth amendment to the previously approved final development plan of Leisure Hill to allow the addition of three (3) vested lots, be and is hereby DISMISSED.

Any appeal of this decision must be undertaken within the relevant portions of law.

Lawrence E. Schudt
LAWRENCE E. SCHUDT
Zoning Commissioner
for Baltimore County

LES:bjs

Baltimore County Government
Zoning Commissioner
Office of Planning and Zoning

October 6, 1994

(410) 887-4386

Suite 112 Courthouse
600 Washington Avenue
Towson, MD 21204

Cynthia K. Hill, Esquire
Starkley, Gray, Rosen & Hoover
Jefferson Building
Two East Fayette Street
Baltimore, Maryland 21202

IN RE: PETITION FOR SPECIAL HEARING
S/W Park Heights Avenue at Leisure Hill Drive
(4th Amendment to the Final Dev. Plan for Leisure Hill)
3rd Election District - 3rd Councilmanic District
Sydney M. Shure - Petitioner
Case No. 95-10-SPH

Dear Mr. Hill:

Enclosed please find a copy of the decision rendered in the above-captioned matter. The Petition for Special Hearing has been dismissed in accordance with the attached order.

In the event any party finds the decision rendered is unfavorable, any party may file an appeal to the County Board of Appeals within thirty (30) days of the date of this Order. For further information on filing an appeal, please contact the Zoning Administration and Development Management office at 887-3391.

Very truly yours,

Lawrence E. Schudt
LAWRENCE E. SCHUDT
Zoning Commissioner
for Baltimore County

LES:bjs

cc: J. Carroll Holzer, Esquire
305 Washington Avenue, Suite 502, Towson, Md. 21204

People's Counsel

File

Baltimore County Government
Office of Zoning Administration
and Development Management

111 West Chesapeake Avenue
Towson, MD 21201

(410) 867-3353

AUGUST 9, 1994

NOTICE OF POSTPONEMENT AND REASSIGNMENT

CASE NUMBER: 95-10-SFH (Item 9)
PETITIONER(S): Sydney M. Shure
LOCATION: SM/Intersection Leisure Hill Drive and Park Heights Avenue - Leisure Hill Subdivision

Special hearing to approve an amendment to a final development plan to allow the addition of 3 vested lots.

THE ABOVE MATTER, PREVIOUSLY ASSIGNED TO BE HEARD ON AUGUST 22, 1994 HAS BEEN POSTPONED AT THE REQUEST OF J. CARROLL HOLZER, ATTORNEY FOR PETITIONERS.

THE CASE HAS BEEN REASSIGNED TO BE HEARD AS FOLLOWS:

THURSDAY, SEPTEMBER 1, 1994 at 2:00 p.m. in room 110, Old Courthouse, 400 Washington Avenue, Towson, Maryland.

Carl J. Jaw
Arnold Jablon
Director

cc: Sydney M. Shure
Richard E. Hite
J. Carroll Holzer, Esq.

Baltimore County Government
Office of Zoning Administration
and Development Management

111 West Chesapeake Avenue
Towson, MD 21201

August 12, 1994

(410) 867-3353

Mr. Sydney M. Shure
4 Championship Court
Owings Mills, MD 21117

RE: Item No. 9, Case No. 95-10-SFH
Petitioner: Sydney M. Shure
Petition for Special Hearing

Dear Mr. Shure:

The Zoning Plans Advisory Committee (ZAC) has reviewed the plans submitted with the above referenced petition. The attached comments from each reviewing agency are not intended to indicate the appropriateness of the zoning action requested, but to assure that all parties, i.e., Zoning Commissioner, attorney and/or the petitioner, are made aware of plans or problems with regard to the proposed improvements that may have a bearing on this case.

The following comments are related only to the filing of future zoning petitions and are aimed at expediting the petition filing process with this office.

1) The Director of Zoning Administration and Development Management has instituted a system whereby seasoned zoning attorneys who feel that they are capable of filing petitions that comply with all aspects of the zoning regulations and petitions filing requirements can file their petitions with this office without the necessity of a preliminary review by zoning personnel.

Baltimore County Government
Fire Department

700 East Joppa Road Suite 901
Towson, MD 21286-5500

(410) 867-4500

August 2, 1994

TO: Mr. Arnold Jablon, Director
Zoning Administration and
Development Management

FROM: J. Lawrence Pilon, *JLP*
Development Coordinator, DEPRM

SUBJECT: Zoning Item #9 - Leisure Hill
Leisure Hill Drive & Park Heights Avenue
Zoning Advisory Committee Meeting of July 25, 1994

The Department of Environmental Protection and Resource Management offers the following comments on the above-referenced zoning item.

Ground Water Management

Wells meeting the minimum Baltimore County Standards must be drilled.

JLP:SF:sp

LEISUREH/DEPRM/TX/SLB

Arnold Jablon
Director
Zoning Administration and
Development Management
Baltimore County Office Building
Towson, MD 21204
MAIL STOP-1105

RE: Property Owner: SEE BELOW

LOCATION: SEE BELOW

Item No.: SEE BELOW

Zoning Agenda:

Sentiments:

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

B. The Fire Marshal's Office has no comments at this time.
IN REFERENCE TO THE FOLLOWING ITEM NUMBERS: 7, 9, 10, 12 AND 13.

REVIEWER: LT. ROBERT P. SAUERWALD
Fire Marshal Office, PHONE 867-4601, MS-1106F

cc: File

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Arnold Jablon, Director
Zoning Administration and
Development Management

DATE: July 27, 1994

FROM: Pat Keller, Deputy Director
Office of Planning and Zoning

SUBJECT: Petitions from Zoning Advisory Committee

The Office of Planning and Zoning has no comments on the following petition(s):
Item Nos. 9, 11, 16, 17, 18 and 22.
95-10-SFH - 8-22-94 PP. 2 & 11
If there should be any further questions or if this office can provide additional information, please contact Jeffrey Long in the Office of Planning at 867-3480.

Prepared by: *Jeffrey N. Long*

Division Chief: *Gary L. Kerns*

PK/JLW

ZACN/PZOMN/ZACI

Maryland Department of Transportation
State Highway Administration

Ms. Charlotte Minton
Zoning Administration and
Development Management
County Office Building
Room 109
111 W. Chesapeake Avenue
Towson, Maryland 21204

Re: Baltimore County
Item No. 9 (JCM)

7-20-94

Dear Ms. Minton:
This office has reviewed the referenced item and we have no objection to approval as it does not access a State roadway and is not effected by any State Highway Administration project.

Please contact Bob Small at 410-333-1350 if you have any questions.

Thank you for the opportunity to review this item.

Very truly yours,

Bob Small
for ROYD ALLEN, ACTING CHIEF
John Constable, Chief
Engineering Access Permits
Division

BS/

My telephone number is
Maryland Relay Service for Impaired Hearing or Speech
1-800-735-2288 TDD/VOIP Fax
Mailing Address: P.O. Box 217 - Baltimore, MD 21203-0717
Street Address: 787 North Calvert Street - Baltimore, Maryland 21202

Baltimore County Government
Office of Zoning Administration
and Development Management

111 West Chesapeake Avenue
Towson, MD 21201

January 5, 1995

(410) 867-3353

Cynthia K. Hitt, Esquire
Siskind, Grady, Rosen and Hoover
Jefferson Building
2 East Fayette Street
Baltimore, MD 21202

J. Carroll Holzer, Esquire
Holzer and Lee
305 Washington Avenue
Towson, MD 21204

RE: Appeal to Arnold Jablon letter of November 9, 1994
Leisure Hill Subdivision
SM/S Park Heights Avenue at Leisure Hill Drive
3rd Election District
3rd Councilmanic District
Sydney M. Shure-PETITIONER

Dear Ms. Hitt and Mr. Holzer:

Please be advised that an appeal of the above-referenced case was filed in this office on December 8, 1994 by Robert B. Scarlett on behalf of Sydney M. Shure. All materials relative to the case have been forwarded to the Board of Appeals.

If you have any questions concerning this matter, please do not hesitate to contact Julie Winiarski at 867-3391.

Sincerely,

Carl J. Jaw
ARNOLD JABLON
Director

AJ:jaw

cc: Mr. Joseph L. Larson
People's Counsel

APPEAL
Miscellaneous Appeal (Arnold Jablon Decision)
Leisure Hill Subdivision
SM/S Park Heights Avenue at Leisure Hill Drive
3rd Election District - 3rd Councilmanic District
Sydney M. Shure-PETITIONER

Updated checklist - January 9, 1994

Letter to Joseph L. Larson dated November 9, 1994 from Arnold Jablon
Letter to Arnold Jablon from Joseph L. Larson dated October 18, 1994
Petition for Appeal

Letter and Motion to Consolidate Appeal with 95-10-SFH

Notice of Appeal received on December 8, 1994 from Robert B. Scarlett on behalf of Sydney M. Shure

cc: Robert B. Scarlett, Esquire, Haneson & Scarlett, Suite 600, 201 North Charles Street, Baltimore, MD 21201-4110
Mr. Joseph L. Larson, Spillman, Larson & Associates, Inc., Ste 109, Jefferson Building, 105 West Chesapeake Avenue, 21204
Cynthia K. Hitt, Esquire, Siskind, Grady, Rosen and Hoover, Jefferson Building, 2 E. Fayette Street, Baltimore, MD 21202
J. Carroll Holzer, Esquire, Holzer & Lee, 305 Washington Avenue, Towson, MD 21204
People's Council of Baltimore County, N.S. 2010

Request Notification: Patrick Keller, Director, Planning & Zoning
Docket Clerk
Arnold Jablon, Director of ZAM
Donald T. Rancore, Development Manager

APPEAL

Petition for Special Hearing
 20/8 Park Heights Avenue at Leisure Hill Drive
 (Final Development Plan of Leisure Hill-6th Amendment)
 3rd Election District
 Sydney M. Shure-Petitioner
 Case No. 95-10-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

Petitioners and Protestants (S) Sign-In Sheets

Petitioner's Exhibits: 1 - Final Development Plan

- 1 - Final Development Plan
- 2 - 1st Amended Final Development Plan
- 3 - 2nd Amended Final Development Plan
- 4 - 3rd Amended Final Development Plan
- 5 - 4th Amended Final Development Plan
- 6 - 5th Amended Final Development Plan
- 7 - Letter from Mitchell Kellman to Sydney Shure (January 25, 1994)
- 8 - No exhibit marked B
- 9 - No exhibit marked C
- 10 - Declaration and establishment of Conditions, Reservations, and Restrictions for Leisure Hill

Miscellaneous Correspondence:

- 1 - Letter from Cynthia K. Hitt to Zoning Commissioner (September 1, 1994) with affidavit attached
- 2 - 200 scale zoning map
- 3 - 6th Amended Final Development Plan
- 4 - Photograph map

Zoning Commissioner's Order dated October 6, 1994

Notices of Appeal received on November 4, 1994 from Cynthia K. Hitt and J. Carroll Holzer, Esquire

cc: Sydney M. Shure, 4 Championship Court, Owings Mills, MD 21117
 Cynthia K. Hitt, Esquire, 2 E. Fayette Street, Balto., MD 21202
 Jefferson Building, 2 E. Fayette Street, Balto., MD 21202
 J. Carroll Holzer, Esquire, 305 West Chesapeake Avenue, Towson, MD 21204
 People's Counsel of Baltimore County, M.S. 2010

Request Notification: Patrick Keller, Director, Planning & Zoning
 Lawrence E. Schaidt, Zoning Commissioner
 Timothy M. Kotroco, Deputy Zoning Commissioner
 W. Carl Richards, Jr., Zoning Supervisor
 Docket Clerk
 Arnold Jablon, Director of ZADM



County Board of Appeals of Baltimore County

OLD COURTHOUSE, ROOM 40
 400 WASHINGTON AVENUE
 TOWSON, MARYLAND 21204
 (410) 887-3180

Hearing Room - Room 48
 Old Courthouse, 400 Washington Avenue

January 27, 1995

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 RULE 2(b). NO POSTPONEMENTS WILL BE GRANTED WITHIN FIFTEEN (15) DAYS OF SCHEDULED HEARING DATE UNLESS IN FULL COMPLIANCE WITH RULE 2(c). COUNTY COUNCIL WILL NO. 59-79.

CASE NO. 95-10-SPH
 SYDNEY M. SHURE - Petitioner
 20/8 Park Heights Avenue at Leisure Hill Drive (FDP /Leisure Hill)
 3rd Election District
 3rd Councilmanic District

SPH - 6th Amendment to FDP /Leisure Hill
 Addition of 3 vested lots (Lots 4, 5 and 6)
 10/06/94 - 32' Order in which Petition for Special Hearing was DISMISSED.

AND
 CASE NO. CBA-94-192
 RE: Appeal from letter of ZADM Director / Interpretation of approval process / Lots 4, 5 and 6 (2C's Order 95-10-SPH)
 11/09/94 - Letter to Joseph Larson from Director / ZADM - Lots 4, 5 and 6 must be approved via development process.

ASSIGNED FOR: THURSDAY, APRIL 6, 1995 at 10:00 a.m.

cc: Sydney M. Shure Property Owner /Appellant
 Robert B. Scarlett, Esquire Counsel for Property Owner /Appellant
 Cynthia K. Hitt, Esquire
 Joseph L. Larson

J. Carroll Holzer, Esquire Counsel for Protestants /Appellants
 Mr. & Mrs. B. Larry Jenkins Protestants /Appellants
 Mr. Richard Rynd
 Mr. Robert Tarola

People's Counsel for Baltimore County
 Pat Keller
 Lawrence E. Schaidt
 Timothy M. Kotroco
 W. Carl Richards, Jr. /ZADM
 Donald F. Reasco /ZADM
 Docket Clerk /ZADM
 Arnold Jablon, Director /ZADM

Kathleen C. Weidenhammer
 Administrative Assistant

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Baltimore County Government Office of Zoning Administration and Development Management



111 West Chesapeake Avenue
 Towson, MD 21201

(410) 887-3333

November 10, 1994

Cynthia K. Hitt, Esquire
 Skelton, Grady, Rosen and Hoover
 Jefferson Building
 2 E. Fayette Street
 Baltimore, MD 21202

J. Carroll Holzer, Esquire
 Holzer and Lee
 305 Washington Avenue, Suite 502
 Baltimore, MD 21204

RE: Petition for Special Hearing
 20/8 Park Heights Avenue at
 Leisure Hill Drive
 (Final Development Plan of
 Leisure Hill - 6th Amendment)
 3rd Election District
 3rd Councilmanic District
 Sydney M. Shure-Petitioner
 Case No. 95-10-SPH

Dear Counsel:

Please be advised that an appeal of the above-referenced case was filed in this office on November 4, 1994 by both parties. All materials relative to the case have been forwarded to the Board of Appeals.

If you have any questions concerning this matter, please do not hesitate to contact Ellen O. Hennagan at 887-3333.

Sincerely,

Arnold Jablon
 ARNOLD JABLON
 Director

AJ:roh

cc: People's Counsel

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RE: PETITION FOR SPECIAL HEARING * BEFORE THE
 20/8 Park Heights Avenue at Leisure Hill Drive * ZONING COMMISSIONER
 and Park Heights Avenue Leisure Hill Subdivision, 3rd Election District, 3rd Councilmanic * OF BALTIMORE COUNTY
 Sydney M. Shure * CASE NO. 95-10-SPH
 Petitioner * *

ENTRY OF APPEARANCE

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

Peter Max Zimmerman
 PETER MAX ZIMMERMAN
 People's Counsel for Baltimore County
 (410) 887-3333
 CAROL S. BEMILLO
 Deputy People's Counsel
 Room 41, Courthouse
 400 Washington Avenue
 Towson, MD 21204
 (410) 887-2188

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of August, 1994, a copy of the foregoing Entry of Appearance was mailed to Richard E. Matz, 3723 Old Court Road, Suite 206, Baltimore, MD 21209, representative for Petitioner.

Peter Max Zimmerman
 PETER MAX ZIMMERMAN

IN THE MATTER OF * BEFORE THE ZONING
 Petition of Sydney Shure * COMMISSIONER OF
 Leisure Hill Subdivision * BALTIMORE COUNTY
 * CASE NO. 95-10-SPH

SUBPOENA

Please process in accordance with Zoning Commission Rule IV (c).

TO: Mitch Kellman, ZADM
 County Office Bldg.
 Towson, MD 21204

YOU ARE HEREBY COMMANDED TO: (X) Personally appear: () Produce documents and or objects only: () Personally appear and produce documents or objects:

at Room 118, Old Courthouse

(Place where attendance is required)

on Tuesday the 13th day of September, 1994, at 11:00 a.m. /A.M.

YOU ARE COMMANDED to produce the following documents or objects:
 825-6961

J. Carroll Holzer, 305 Washington Ave., #502, Towson, for Protestants
 (Name of Party or Attorney, Address and Phone Number requesting subpoena)

Date Sept. 7, 1994
Sydney Shure
 Zoning Commissioner

SHERIFF'S RETURN

() Served and copy delivered on date indicated below.

() Unserved, by reason of: Fee: \$

Date: SHERIFF

Baltimore County Government Office of Zoning Administration and Development Management



111 West Chesapeake Avenue
 Towson, MD 21204

November 9, 1994

(410) 887-3333

Joseph L. Larson, President
 Spelman, Larson, & Associates, Inc.
 Suite 108 - Jefferson Building
 105 West Chesapeake Avenue
 Towson, MD 21204

RE: Leisure Hill
 Sydney Shure Property
 3rd Election District

Dear Mr. Larson:

Reference is made to your letter of October 18, 1994 in which you requested a review and interpretation regarding the approval process for Lots 4, 5, and 6 within the Leisure Hill Subdivision. More specifically, you wish to record the lots by submitting a partial development plan and record part or via the minor subdivision process. You disagree with the Zoning Administration and Development Management (ZADM) office's recent decision to require these lots to be approved through the development plan process.

There have been many discussions and meetings between Ms. Sydney Shure, her representatives, and Baltimore County in which these issues were reviewed, in addition to the public hearing before the zoning commissioner. The zoning office always advised Ms. Shure that the Final Development Plan (FDP) for Leisure Hill must be amended since the lots were never shown as provision for three individual building lots. However, those lots were shown, included, and approved on a JSPC plan. Ms. Shure filed for a special hearing for affirmation that the lots were not part of the FDP and should not have to be approved via the amendment process.

The zoning commissioner ruled that the lots were not part of the FDP, but also concluded that they may not be vested. Your argument is that the three lots may be approved as shown or the JSPC plan by simply submitting an individual partial development or minor subdivision of Lots 4, 5, and 6 without proceeding within the development process.

The original approved subdivision plan separated out two parcels, one of which was in fact developed. Permits were issued and development occurred on lots within that parcel, in conformity with the approved JSPC plan. However, the second parcel which contains Lots 4, 5, and 6 was never surveyed. No permits were ever issued; therefore, it was never vested. These two parcels as distinguished on the JSPC plan cannot be treated as one plan. One parcel was vested; the other was not.

Joseph L. Larson, President
 November 9, 1994
 Page 2

Section 26-160, Baltimore County Code (BCC) states that the current regulations will not apply to the following: (1) development which has received tentative approval prior to 8/1/82 of a preliminary plan by the Planning Board (which is not the case here); (2) development for which a valid, unexpired building permit exists (which is not the case here); or (3) a development for which a current executed FWA exists (which is not the case here).

While a partial may be exempt from Division II of the development regulations if it is to be subdivided into three lots or less, Section 26-171, this is not applicable here as the JSPC plan subdivided the property at that time into more than three lots. The purpose of going to the zoning commissioner was to amend the original FDP by adding the three lots. Then you could have moved to amend the JSPC approved plan by a revision or you could have accomplished your goal. But you argued that this wasn't necessary and that the zoning commissioner did not have the authority. He agreed and the zoning commissioner ruled that the lots were not part of the FDP and development of Leisure Hill. These three additional lots were, in his opinion, not vested. Therefore, the lots must be approved via the development process. The approval includes, but is not limited to, a concept plan, community site meetings, development plan conference, and a hearing office hearing.

While I recognize the difficulty to you that this decision causes, this office believes that the only mechanism for you to accomplish the creation of Lots 4, 5, and 6 is to undergo the current development process, as the law requires. ZADM is available to you to provide the help needed to initiate the plan approval process.

If you disagree with this conclusion as set out above, you have 30 days to appeal to the Board of Appeals.

Very truly yours,

Arnold Jablon
 ARNOLD JABLON
 Director

AJ-MJK:scj

Joseph L. Larson, President
 November 9, 1994
 Page 3

cc: Mitchell J. Kellman, Planner II - ZADM
 W. Carl Richards, Jr., Zoning Supervisor - ZADM
 Sydney Shure - 4 Championship Court, Owings Mills 21117
 Cynthia Hitt - 2 East Fayette Street, Baltimore 21201
 Richard Matz - Coburn Engineering, 3723 Old Court Road, Pikesville 21209
 J. Carroll Holzer, Esquire - 305 West Chesapeake Avenue, Towson 21204
 Kristen Forsyth, Assistant Director - Valley Planning Council Inc., 212 Washington Avenue, P.O. Box 5402, Towson 21285-5402

Appearing before the Board and testifying on behalf of Baltimore County was Joseph Maranto, a project manager with 15 years planning and zoning experience. Mr. Maranto was the only witness representing Baltimore County. Appearing for the Appellant /Property Owner was James Stephen Klein, a land planner, engineer and land surveyor. Also appearing and testifying for the Appellant was Norman Gerber, a self-employed planner since 1988 with extensive experience in the Baltimore County Office of Planning & Zoning. No other witnesses testified. The facts as ascertained through the testimony and evidence are as follows.

CKH:kc
1309.03
Enclosures

To provide for the disclosure of development plans to prospective residents and to protect those who have made decisions based on such plans from inappropriate changes therein;

Lot 2 had been sold and a new home constructed.
Lot 7 had been sold and a new home constructed.
Lots 8 and 9B had been sold and a new home constructed.
Lot 9C had been sold and a new home constructed.
Lots 10 and 11 had been sold and a new home constructed.



SUITE 109 - JEFFERSON BUILDING
109 W. CHESAPEAKE AVENUE
TOWSON, MARYLAND 21204
TEL (410) 823-9332
FAX (410) 823-9216

October 18, 1994

Mr Arnold Jablon, Director
Office of Zoning Administration
& Development Management
Baltimore County
County Office Building
Towson MD 21204

Re: Leisure Hill
Sydney Shure Property
JOB NO. 83091

Dear Arnold:

With reference to your decision regarding the final subdivision processing for Lots 4, 5, & 6 of the above-captioned project to follow the Concept Plan process please be advised as follows:

I wish to herein review and document several key issues which speak to the fact that the owner of the subject property is being required to follow a development process that is not consistent with the current Development Regulations, in opposition to a decision rendered by the Zoning Commissioner, and is subjecting her to a serious and dire undue hardship situation.

I will attempt to be as brief as possible in establishing my argument herein but since we will not enjoy the benefit of a meeting with you I will expound on the issues to a certain degree.

It is quite clear in the decision handed down by the Zoning Commissioner that he has unequivocally established the fact that Lots 4, 5 & 6 are not part of the original Final Development Plan for this project and thus stand on their own with regard to their further processing for subdivision approval. Commissioner Schmidt clearly points out this fact in several areas of his Decision issued on October 6, 1994, specifically page 3 paragraph 3. "...Based upon all of these facts, which are uncontradicted, I must conclude that Lots 4, 5 & 6 were not part of the original FDP..."

RECEIVED
OCT 21 1994
ZADM

RESIDENTIAL & COMMERCIAL DEVELOPMENT DESIGN • LAND SURVEYING
LAND PLANNING • SUBDIVISION PLANNING • ENVIRONMENTAL PLANNING
URBAN STUDIES • LOCATION SURVEY • TECHNICAL CONSULTATION

MICROFILMED

Mr Arnold Jablon, Director
Office of Zoning Administration
& Development Management
Baltimore County
County Office Building
Towson MD 21204

SPELLMAN, LARSON & ASSOC
October 18, 1994
Page: 2

In light of the above decision I cite Section 26-171 of the Baltimore County Development Regulations where it is stated that a subdivision of three lots or less is entitled to a "Limited Exemption" and eliminates the need to conform to Division 2 of these Regulations. Referring to Regulations I see no objection to processing this project then through the Minor Subdivision Plan process.

Conversely, after speaking with Mr Mitch Kallman of your office on several occasions regarding your decision to process the subject lots through the Concept Plan process Mr JSPC approval. By way of that approval Mr Kallman continually refers to our being bound by the original move ahead with a Minor Subdivision Plan since we are bound by this JSPC status. Accepting this premise, if we are still three lots at this point should be to allow us to go directly based on the Zoning Decision which stipulates we are not part of an approved Final Development Plan.

In any case, and notwithstanding all of the above, I cite Section 26-169 of the current Development Regulations which stipulates that these Regulations shall apply to all to June 11, 1982. Plans currently on file in your office document our Plan approval well before this date. Thusly, Development Regulations based on Section 26-169 which eliminates any and all arguments for the Concept Plan method of processing.

In summation I think our position is quite clear. The Development Plan as it is proceeded ahead immediately with the Final Plan but nowhere does any Order, evidence or documentation indicate we should be required to go to the Concept Plan method of processing.

MICROFILMED

Mr Arnold Jablon, Director
Office of Zoning Administration
& Development Management
Baltimore County
County Office Building
Towson MD 21204

SPELLMAN, LARSON & ASSOC
October 18, 1994
Page: 3

This decision by you is clearly contrary to the Development Regulations and policies embraced by the Office of Zoning Administration.

As a final point of argument I have to advise you that if you sustain your Concept Plan decision it will be economically disastrous to my client due to her current sensitive status in Bankruptcy Court. The length of time required to either appeal your decision or process by Concept Plan will not be tolerated by her primary lender and will certainly result in foreclosure.

I would appreciate whatever reconsideration that you can afford Ms. Shure at this time. Also I would appreciate a written response to this correspondence at your earliest convenience.

Very truly yours,

Michael P. Tanczyn
Michael P. Tanczyn
President

cc: Sydney Shure
Cynthia Hill
Richard Matz

MICROFILMED

AFFIDAVIT

I hereby certify that on May 16, 1994 I met with Robert Tarola and showed him the 6th Amended Final Development Plan.

I also attended a meeting on June 16, 1994 where the Plan was discussed with the homeowners.

Sydney Shure 9/1/94
Sydney Shure date

I Richard E Matz certify that I hand delivered the above mentioned Plan to Robert M Tarola on May 17, 1994.

Richard E Matz 9/1/94
Richard E Matz date

Law Offices MICHAEL P. TANCZYN, P.A.

Suite 106, 606 Baltimore Avenue
Towson, Maryland 21204
(410) 296-8823 - (410) 296-8824
Fax: (410) 296-8827
Computer Fax: (410) 296-2848

August 8, 1995

Hand Delivery

Arnold Jablon, Director
ZADM
111 West Chesapeake Avenue
Towson, MD 21204

Re: Lots 4, 5, 6 - Leisure Hill

Dear Arnold:

Per my conversation with Carl Richards, I am writing to list the new evidence not available either before the Zoning Commissioner or for presentation to you prior to your November 9, 1994 Decision.

Sydney Shure hired Norman Gerber, Mr. Gerber, who has previously met with you, in his former position as Director of the Office of Planning, in 1982 functioned as Secretary to the Planning Board for its meetings and recalled that this subdivision had received tentative approval, including Lots 4, 5 and 6, by the Planning Board according to its minutes, agenda, and a plat which was recovered from Signet Bank, the mortgage, which bears Mr. Gerber's approving signature following Planning Board approval on February 5, 1982.

Mr. Gerber also has in hand the original tentatively approved plat for this subdivision which shows Lots 4, 5 and 6.

He has spoken not only with Mr. Richards but with an official in current development who kept a card tracking system for properties under development and discovered that the card for this development had been removed from the County's records.

Baltimore County Code, Section 26-169, states that developments which had received approval by the Planning Board under JSPC would be exempt from the current development regulations.

Furthermore, we rely on two policy statements which you authored as Director of ZADM in 1992 and 1994 in which you responsibly dealt with the fact that developments approved under JSPC, such as Ms. Shure's, or under CRG had not been fully built out, and you declared under

Arnold Jablon, Director
Re: Lots 4, 5, 6 - Leisure Hill

August 8, 1995
Page 2

your authority that the County policy would be that those developments would be grandfathered so long as they met the vesting criteria.

I know that this development has a long and winding path by history. On behalf of Ms. Shure we appeal to you in your position as Director of ZADM to find on the new evidence first presented to the County Board of Appeals and previously submitted to you by Mr. Gerber I believe that this development does meet the vesting requirements under the development regulations so as to allow the filing of a final amended development plan for record filing.

Time is not a luxury we are blessed with as Ms. Shure has a hearing on August 31, 1995 on her Exceptions to the foreclosure sale conducted by Signet Bank on this property. Your decision approving these lots as vested is requested and I understand that the final amended development plan has been presented to the County some time ago by either Mr. Larson or Mr. Matz pending your approval.

Thank you very much for your attention to this request.

Very truly yours,

Michael P. Tanczyn
Michael P. Tanczyn

MPT/ed

cc: Mr. J. Larson, President
Mr. Richard Matz
Norman E. Gerber, AICP
Ms. Sydney Shure

MICHAEL P. TANCZYN, P.A.

606 BALTIMORE AVENUE, SUITE 106 TOWSON, MARYLAND 21204
(410) 296-8823 FAX (410) 296-8827

DATE 8/3/95

TO: Mr. Arnold Jablon, DIRECTOR
ZADM
c/o CARL RICHARDS

SUBJECT: LOTS 4-6, LEISURE HILL
HAPP DELIVERED

Dear Arnold:

I enclose a copy of your 1/14/94 to Mr. Larson and the Minutes from the deliberations of the Board of Appeals of July 28, 1995 in Ms. Shure's case. We request a meeting ASP with you to discuss the above and further actions to deal with the current situation on Ms. Shure's property. As a hearing is scheduled 8/31 on Circuit Court on Exceptions to a reported foreclosure sale, it is of the essence. Thank you advance for your consideration of this request.

cc: Sydney Shure
Richard Matz
Norman E. Gerber, AICP

Very truly yours
Michael P. Tanczyn
Michael P. Tanczyn

always advised ME be amended since building lots. However plan. Ms. Shure files the FDP and should in

The zoning also concluded that it be approved as show development or minor development process.

The original plan was issued and development occurred on lots within that parcel, in con with the approved JSPC plan. However, the second parcel which contains Lots 4, 5, and 6 was never pursued. No permits were ever issued, therefore, it was never vested. These two parcels as distinguished on the JSPC plan cannot be treated as one plan. One parcel was vested, the other was not.

FDP for Leisure Hill must be approved on a JSPC. The lots were not part of process.

not part of the FDP, but that the three lots may be an individual parcel proceeding within the

296-8823
296-8823
296-8823

HENSON & SCALET, P.C.
ROBERT B. SCALET, P.C.
JANE E. SCALET
PARALEGAL

ALSO ADMITTED IN DC

December 6, 1994

Arnold Jablon, Director
Office of Zoning Administration
& Development Management
111 West Chesapeake Avenue
Towson, Maryland 21204
RE: Leisure Hill Subdivision
3rd Election District
3rd Councilmanic District
Sydney M. Shure, Petitioner

Dear Mr. Jablon:

Please be advised that this office represents Sydney M. Shure, Petitioner, the owner of property in the Leisure Hill Subdivision. Enclosed please find a Petition for Appeal, appealing your latter dated November 9, 1994. Also please find our check in the amount of \$175.00 to cover the cost of this appeal.

On behalf of the Petitioner, we request that you accept this Appeal and that the County Board of Appeals set this matter in for a hearing at their earliest convenience.

Also please find enclosed a stamped self-addressed envelope for the return of the date-stamped copy for our files.

Thank you for your assistance in this matter.

Very truly yours,

HENSON & SCALET, P.A.
Robert B. Scalet
Robert B. Scalet

RBS/dw
Enclosure

cc: Ms. Sydney M. Shure
Cynthia E. Hill, Register
Mr. Joseph L. Larson
Richard E. Matz, P.E.

F:\mpt\leisure-2.doc

RECEIVED
DEC 8 1994
ZADM

IMPORTANT MESSAGE

TO Harry / Mrs

DATE 11/1/89

M Mr. Harry

OF St. Louis

PHONE Area Code 314 Number 5719 Extention

FAX 035208

TELEPHONED	PLEASE CALL
CAME TO SEE YOU	RETURNED YOUR CALL
WANTS TO SEE YOU	WILL CALL AGAIN
WILL FAX YOU	UNREPLIED

Message: 486-5771

Please write to
Nebraska Department of
Game & Parks 95-10-2
time for a Fox

Signed J. Fox

LIMITATIONS OF SOILS

HOMESITES

SERIES	SYMBOL	WITH BASEMENT	WITHOUT BASEMENT	SOLUTION
Balle	BaB	severe	severe	No houses will be constructed in this area.
Chester	CcB2	slight	slight	N/A
Chester	CcC2	moderate slope	moderate slope	Housing types will be selected to accommodate existing grades where possible.
Manor	MdB2	slight	slight	N/A
Manor	MdB2	moderate slope	moderate slope	Housing types will be selected to accommodate existing grades where possible.
Manor	MdB3	severe slope	severe slope	Housing types will be selected to accommodate existing grades where possible.
Manor	MdB	severe slope	severe slope	Housing types will be selected to accommodate existing grades where possible.
Glenville	GnB	severe: high water table	severe: high water table	No basements will be constructed in this area.

RICHARD D. BIGGS, Jr.
5714/56

ZONED RC-5
U 321 200

LATIMER S. STEWART
1349/122

GnB

EX. SEPTIC AREA
(SEE NOTE BELOW)

2A

EX. SEPTIC AREA
(SEE NOTE BELOW)

LOT 1
LEISURE HILL
46/50
6550

EX. SEPTIC AREA
(SEE NOTE BELOW)

LOT 1
LEISURE HILL
46/50
6550

LOT 1
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ZONED RC-5

C. VANLEUVEN STEWART
5714/56

GnB

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LANDSCAPING CALCULATIONS

NO. OF DWG. UNITS PROPOSED	12
GRADE NO. OF TREES REQUIRED	12
CREDIT FOR EXISTING TREE (50% OF 5000)	5
NET NO. OF TREES REQUIRED	7
NO. OF MAJOR DECIDUOUS TREES REQUIRED (50% OF NET)	4
NO. OF EVERGREEN TREES REQUIRED (50% OF NET)	3

THE UNDERSIGNED IS REQUIRED TO CONSENT TO THE ATTACHMENT OF THIS SUBMITTAL TO THE PLANNING AND ZONING DEPARTMENT. BY SIGNING THIS DOCUMENT, THE UNDERSIGNED BELIEVES THAT THE SIGNATURE IS HIS OWN AND THAT HE IS NOT PROVIDING ANY OTHER INFORMATION.

Richard M. Allen (LTS) DATE 6/1/80
RICHARD M. ALLEN (LTS) DATE 6/1/80
RICHARD M. ALLEN (LTS) DATE 6/1/80

Robert M. Tappala (LTS) DATE 6/1/80
ROBERT M. TAPPALE (LTS) DATE 6/1/80
ROBERT M. TAPPALE (LTS) DATE 6/1/80

* VARIANCE CASE NO. 24-255-3-A
TO PERMIT A SIDEWALK OF 3' IN
WIDTH OF THE REQUIRED 6' TO
TRAVEL A DISTANCE OF 30' IN
LIV OF THE REQUIRED 6'

GRANTED FEB. 18, 1984

GENERAL NOTES

- Councilman District 3.
- Concession District 302.
- Watershed 24.
- Subwatershed 61.
- Gross Site Area: 25.693 Acres; 3.427 Ac. Net Site Area: 22.266 Acres; 21.422 Ac.
- Open Space is not required.
- There will be two paved offstreet parking spaces per lot.
- Existing Zoning RC-5.
- Number of lots permitted: 22.266 / 1.0 = 22.266 lots; 22 lots.
- Number of lots proposed: 12 (for 20).
- There will be no grading of entire lot; only that required for construction of home and drives.
- Only dead or damaged trees and tree in the way of construction will be cut and removed from lots.
- Existing vegetation consists of mature hardwoods and meadow.
- Existing 100-year flood plain is contained within the existing drainage and utility easement. Refer to study prepared by E.F. Raphael and Associates.
- There are no historic buildings on this property.
- Source of title: Sydney M. Shure; Ltr. 5889 Folio 316.
- Leisure Hill Drive is a home owner road.
- The site is in a Residential Transition Area (RTA), but is exempt from RTA requirements under B111 105(b); Section 1.8.1.C.
- Panhandle driveways will be composed of 8" of bituminous concrete and 8" of crusher run stone and will be maintained by the home owners. Driveways will be 10' wide and 10' deep with more than one owner.
- Estimated Average Daily Trips (ADT): 12 Units x 12.4 ADT/Unit = 149 ADT.
- The Balle Silty Loam (BaB) is a wetland soil. The only construction in the vicinity of this soil type will be a driveway and culvert crossing to local roads.
- There are no critical areas, archeological sites, endangered species habitats or hazardous materials; sites on this property.
- This parcel is the same property shown on Plat 2, Leisure Hill, recorded E.H.K., Jr. 48 Folio 135 and on the Re subdivision of Lots 3 and 7 of Plat 2, Leisure Hill, recorded E.H.K., Jr. 48 Folio 135.
- The purpose of this plan is to create and modify lots 2A, 2B, 2C, 2D, 2E, 2F, 2G, 2H, 2I, 2J, 2K, 2L, 2M, 2N, 2O, 2P, 2Q, 2R, 2S, 2T, 2U, 2V, 2W, 2X, 2Y, 2Z, 2AA, 2AB, 2AC, 2AD, 2AE, 2AF, 2AG, 2AH, 2AI, 2AJ, 2AK, 2AL, 2AM, 2AN, 2AO, 2AP, 2AQ, 2AR, 2AS, 2AT, 2AU, 2AV, 2AW, 2AX, 2AY, 2AZ, 2BA, 2BB, 2BC, 2BD, 2BE, 2BF, 2BG, 2BH, 2BI, 2BJ, 2BK, 2BL, 2BM, 2BN, 2BO, 2BP, 2BQ, 2BR, 2BS, 2BT, 2BU, 2BV, 2BW, 2BX, 2BY, 2BZ, 2CA, 2CB, 2CC, 2CD, 2CE, 2CF, 2CG, 2CH, 2CI, 2CJ, 2CK, 2CL, 2CM, 2CN, 2CO, 2CP, 2CQ, 2CR, 2CS, 2CT, 2CU, 2CV, 2CW, 2CX, 2CY, 2CZ, 2DA, 2DB, 2DC, 2DD, 2DE, 2DF, 2DG, 2DH, 2DI, 2DJ, 2DK, 2DL, 2DM, 2DN, 2DO, 2DP, 2DQ, 2DR, 2DS, 2DT, 2DU, 2DV, 2DW, 2DX, 2DY, 2DZ, 2EA, 2EB, 2EC, 2ED, 2EE, 2EF, 2EG, 2EH, 2EI, 2EJ, 2EK, 2EL, 2EM, 2EN, 2EO, 2EP, 2EQ, 2ER, 2ES, 2ET, 2EU, 2EV, 2EW, 2EX, 2EY, 2EZ, 2FA, 2FB, 2FC, 2FD, 2FE, 2FF, 2FG, 2FH, 2FI, 2FJ, 2FK, 2FL, 2FM, 2FN, 2FO, 2FP, 2FQ, 2FR, 2FS, 2FT, 2FU, 2FV, 2FW, 2FX, 2FY, 2FZ, 2GA, 2GB, 2GC, 2GD, 2GE, 2GF, 2GG, 2GH, 2GI, 2GJ, 2GK, 2GL, 2GM, 2GN, 2GO, 2GP, 2GQ, 2GR, 2GS, 2GT, 2GU, 2GV, 2GW, 2GX, 2GY, 2GZ, 2HA, 2HB, 2HC, 2HD, 2HE, 2HF, 2HG, 2HH, 2HI, 2HJ, 2HK, 2HL, 2HM, 2HN, 2HO, 2HP, 2HQ, 2HR, 2HS, 2HT, 2HU, 2HV, 2HW, 2HX, 2HY, 2HZ, 2IA, 2IB, 2IC, 2ID, 2IE, 2IF, 2IG, 2IH, 2II, 2IJ, 2IK, 2IL, 2IM, 2IN, 2IO, 2IP, 2IQ, 2IR, 2IS, 2IT, 2IU, 2IV, 2IW, 2IX, 2IY, 2IZ, 2JA, 2JB, 2JC, 2JD, 2JE, 2JF, 2JG, 2JH, 2JI, 2JJ, 2JK, 2JL, 2JM, 2JN, 2JO, 2JP, 2JQ, 2JR, 2JS, 2JT, 2JU, 2JV, 2JW, 2JX, 2JY, 2JZ, 2KA, 2KB, 2KC, 2KD, 2KE, 2KF, 2KG, 2KH, 2KI, 2KJ, 2KK, 2KL, 2KM, 2KN, 2KO, 2KP, 2KQ, 2KR, 2KS, 2KT, 2KU, 2KV, 2KW, 2KX, 2KY, 2KZ, 2LA, 2LB, 2LC, 2LD, 2LE, 2LF, 2LG, 2LH, 2LI, 2LJ, 2LK, 2LL, 2LM, 2LN, 2LO, 2LP, 2LQ, 2LR, 2LS, 2LT, 2LU, 2LV, 2LW, 2LX, 2LY, 2LZ, 2MA, 2MB, 2MC, 2MD, 2ME, 2MF, 2MG, 2MH, 2MI, 2MJ, 2MK, 2ML, 2MM, 2MN, 2MO, 2MP, 2MQ, 2MR, 2MS, 2MT, 2MU, 2MV, 2MW, 2MX, 2MY, 2MZ, 2NA, 2NB, 2NC, 2ND, 2NE, 2NF, 2NG, 2NH, 2NI, 2NJ, 2NK, 2NL, 2NM, 2NN, 2NO, 2NP, 2NQ, 2NR, 2NS, 2NT, 2NU, 2NV, 2NW, 2NX, 2NY, 2NZ, 2OA, 2OB, 2OC, 2OD, 2OE, 2OF, 2OG, 2OH, 2OI, 2OJ, 2OK, 2OL, 2OM, 2ON, 2OO, 2OP, 2OQ, 2OR, 2OS, 2OT, 2OU, 2OV, 2OW, 2OX, 2OY, 2OZ, 2PA, 2PB, 2PC, 2PD, 2PE, 2PF, 2PG, 2PH, 2PI, 2PJ, 2PK, 2PL, 2PM, 2PN, 2PO, 2PP, 2PQ, 2PR, 2PS, 2PT, 2PU, 2PV, 2PW, 2PX, 2PY, 2PZ, 2QA, 2QB, 2QC, 2QD, 2QE, 2QF, 2QG, 2QH, 2QI, 2QJ, 2QK, 2QL, 2QM, 2QN, 2QO, 2QP, 2QQ, 2QR, 2QS, 2QT, 2QU, 2QV, 2QW, 2QX, 2QY, 2QZ, 2RA, 2RB, 2RC, 2RD, 2RE, 2RF, 2RG, 2RH, 2RI, 2RJ, 2RK, 2RL, 2RM, 2RN, 2RO, 2RP, 2RQ, 2RR, 2RS, 2RT, 2RU, 2RV, 2RW, 2RX, 2RY, 2RZ, 2SA, 2SB, 2SC, 2SD, 2SE, 2SF, 2SG, 2SH, 2SI, 2SJ, 2SK, 2SL, 2SM, 2SN, 2SO, 2SP, 2SQ, 2SR, 2SS, 2ST, 2SU, 2SV, 2SW, 2SX, 2SY, 2SZ, 2TA, 2TB, 2TC, 2TD, 2TE, 2TF, 2TG, 2TH, 2TI, 2TJ, 2TK, 2TL, 2TM, 2TN, 2TO, 2TP, 2TQ, 2TR, 2TS, 2TT, 2TU, 2TV, 2TW, 2TX, 2TY, 2TZ, 2UA, 2UB, 2UC, 2UD, 2UE, 2UF, 2UG, 2UH, 2UI, 2UJ, 2UK, 2UL, 2UM, 2UN, 2UO, 2UP, 2UQ, 2UR, 2US, 2UT, 2UU, 2UV, 2UW, 2UX, 2UY, 2UZ, 2VA, 2VB, 2VC, 2VD, 2VE, 2VF, 2VG, 2VH, 2VI, 2VJ, 2VK, 2VL, 2VM, 2VN, 2VO, 2VP, 2VQ, 2VR, 2VS, 2VT, 2VU, 2VV, 2VW, 2VX, 2VY, 2VZ, 2WA, 2WB, 2WC, 2WD, 2WE, 2WF, 2WG, 2WH, 2WI, 2WJ, 2WK, 2WL, 2WM, 2WN, 2WO, 2WP, 2WQ, 2WR, 2WS, 2WT, 2WU, 2WV, 2WW, 2WX, 2WY, 2WZ, 2XA, 2XB, 2XC, 2XD, 2XE, 2XF, 2XG, 2XH, 2XI, 2XJ, 2XK, 2XL, 2XM, 2XN, 2XO, 2XP, 2XQ, 2XR, 2XS, 2XT, 2XU, 2XV, 2XW, 2XX, 2XY, 2XZ, 2YA, 2YB, 2YC, 2YD, 2YE, 2YF, 2YG, 2YH, 2YI, 2YJ, 2YK, 2YL, 2YM, 2YN, 2YO, 2YP, 2YQ, 2YR, 2YS, 2YT, 2YU, 2YV, 2YW, 2YX, 2YY, 2YZ, 2ZA, 2ZB, 2ZC, 2ZD, 2ZE, 2ZF, 2ZG, 2ZH, 2ZI, 2ZJ, 2ZK, 2ZL, 2ZM, 2ZN, 2ZO, 2ZP, 2ZQ, 2ZR, 2ZS, 2ZT, 2ZU, 2ZV, 2ZW, 2ZX, 2ZY, 2ZZ, 2AA, 2AB, 2AC, 2AD, 2AE, 2AF, 2AG, 2AH, 2AI, 2AJ, 2AK, 2AL, 2AM, 2AN, 2AO, 2AP, 2AQ, 2AR, 2AS, 2AT, 2AU, 2AV, 2AW, 2AX, 2AY, 2AZ, 2BA, 2BB, 2BC, 2BD, 2BE, 2BF, 2BG, 2BH, 2BI, 2BJ, 2BK, 2BL, 2BM, 2BN, 2BO, 2BP, 2BQ, 2BR, 2BS, 2BT, 2BU, 2BV, 2BW, 2BX, 2BY, 2BZ, 2CA, 2CB, 2CC, 2CD, 2CE, 2CF, 2CG, 2CH, 2CI, 2CJ, 2CK, 2CL, 2CM, 2CN, 2CO, 2CP, 2CQ, 2CR, 2CS, 2CT, 2CU, 2CV, 2CW, 2CX, 2CY, 2CZ, 2DA, 2DB, 2DC, 2DD, 2DE, 2DF, 2DG, 2DH, 2DI, 2DJ, 2DK, 2DL, 2DM, 2DN, 2DO, 2DP, 2DQ, 2DR, 2DS, 2DT, 2DU, 2DV, 2DW, 2DX, 2DY, 2DZ, 2EA, 2EB, 2EC, 2ED, 2EE, 2EF, 2EG, 2EH, 2EI, 2EJ, 2EK, 2EL, 2EM, 2EN, 2EO, 2EP, 2EQ, 2ER, 2ES, 2ET, 2EU, 2EV, 2EW, 2EX, 2EY, 2EZ, 2FA, 2FB, 2FC, 2FD, 2FE, 2FF, 2FG, 2FH, 2FI, 2FJ, 2FK, 2FL, 2FM, 2FN, 2FO, 2FP, 2FQ, 2FR, 2FS, 2FT, 2FU, 2FV, 2FW, 2FX, 2FY, 2FZ, 2GA, 2GB, 2GC, 2GD, 2GE, 2GF, 2GG, 2GH, 2GI, 2GJ, 2GK, 2GL, 2GM, 2GN, 2GO, 2GP, 2GQ, 2GR, 2GS, 2GT, 2GU, 2GV, 2GW, 2GX, 2GY, 2GZ, 2HA, 2HB, 2HC, 2HD, 2HE, 2HF, 2HG, 2HH, 2HI, 2HJ, 2HK, 2HL, 2HM, 2HN, 2HO, 2HP, 2HQ, 2HR, 2HS, 2HT, 2HU, 2HV, 2HW, 2HX, 2HY, 2HZ, 2IA, 2IB, 2IC, 2ID, 2IE, 2IF, 2IG, 2IH, 2II, 2IJ, 2IK, 2IL, 2IM, 2IN, 2IO, 2IP, 2IQ, 2IR, 2IS, 2IT, 2IU, 2IV, 2IW, 2IX, 2IY, 2IZ, 2JA, 2JB, 2JC, 2JD, 2JE, 2JF, 2JG, 2JH, 2JI, 2JJ, 2JK, 2JL, 2JM, 2JN, 2JO, 2JP, 2JQ, 2JR, 2JS, 2JT, 2JU, 2JV, 2JW, 2JX, 2JY, 2JZ, 2KA, 2KB, 2KC, 2KD, 2KE, 2KF, 2KG, 2KH, 2KI, 2KJ, 2KL, 2KM, 2KN, 2KO, 2KP, 2KQ, 2KR, 2KS, 2KT, 2KU, 2KV, 2KW, 2KX, 2KY, 2KZ, 2LA, 2LB, 2LC, 2LD, 2LE, 2LF, 2LG, 2LH, 2LI, 2LJ, 2LK, 2LM, 2LN, 2LO, 2LP, 2LQ, 2LR, 2LS, 2LT, 2LU, 2LV, 2LW, 2LX, 2LY, 2LZ, 2MA, 2MB, 2MC, 2MD, 2ME, 2MF, 2MG, 2MH, 2MI, 2MJ, 2MK, 2ML, 2MM, 2MN, 2MO, 2MP, 2MQ, 2MR, 2MS, 2MT, 2MU, 2MV, 2MW, 2MX, 2MY, 2MZ, 2NA, 2NB, 2NC, 2ND, 2NE, 2NF, 2NG, 2NH, 2NI, 2NJ, 2NK, 2NL, 2NM, 2NN, 2NO, 2NP, 2NQ, 2NR, 2NS, 2NT, 2NU, 2NV, 2NW, 2NX, 2NY, 2NZ, 2OA, 2OB, 2OC, 2OD, 2OE, 2OF, 2OG, 2OH, 2OI, 2OJ, 2OK, 2OL, 2OM, 2ON, 2OO, 2OP, 2OQ, 2OR, 2OS, 2OT, 2OU, 2OV, 2OW, 2OX, 2OY, 2OZ, 2PA, 2PB, 2PC, 2PD, 2PE, 2PF, 2PG, 2PH, 2PI, 2PJ, 2PK, 2PL, 2PM, 2PN, 2PO, 2PP, 2PQ, 2PR, 2PS, 2PT, 2PU, 2PV, 2PW, 2PX, 2PY, 2PZ, 2QA, 2QB, 2QC, 2QD, 2QE, 2QF, 2QG, 2QH, 2QI, 2QJ, 2QK, 2QL, 2QM, 2QN, 2QO, 2QP, 2QQ, 2QR, 2QS, 2QT, 2QU, 2QV, 2QW, 2QX, 2QY, 2QZ, 2RA, 2RB, 2RC, 2RD, 2RE, 2RF, 2RG, 2RH, 2RI, 2RJ, 2RK, 2RL, 2RM, 2RN, 2RO, 2RP, 2RQ, 2RR, 2RS, 2RT, 2RU, 2RV, 2RW, 2RX, 2RY, 2RZ, 2SA, 2SB, 2SC, 2SD, 2SE, 2SF, 2SG, 2SH, 2SI, 2SJ, 2SK, 2SL, 2SM, 2SN, 2SO, 2SP, 2SQ, 2SR, 2SS, 2ST, 2SU, 2SV, 2SW, 2SX, 2SY, 2SZ, 2TA, 2TB, 2TC, 2TD, 2TE, 2TF, 2TG, 2TH, 2TI, 2TJ, 2TK, 2TL, 2TM, 2TN, 2TO, 2TP, 2TQ, 2TR, 2TS, 2TT, 2TU, 2TV, 2TW, 2TX, 2TY, 2TZ, 2UA, 2UB, 2UC, 2UD, 2UE, 2UF, 2UG, 2UH, 2UI, 2UJ, 2UK, 2UL, 2UM, 2UN, 2UO, 2UP, 2UQ, 2UR, 2US, 2UT, 2UU, 2UV, 2UW, 2UX, 2UY, 2UZ, 2VA, 2VB, 2VC, 2VD, 2VE, 2VF, 2VG, 2VH, 2VI, 2VJ, 2VK, 2VL, 2VM, 2VN, 2VO, 2VP, 2VQ, 2VR, 2VS, 2VT, 2VU, 2VV, 2VW, 2VX, 2VY, 2VZ, 2WA, 2WB, 2WC, 2WD, 2WE, 2WF, 2WG, 2WH, 2WI, 2WJ, 2WK, 2WL, 2WM, 2WN, 2WO, 2WP, 2WQ, 2WR, 2WS, 2WT, 2WU, 2WV, 2WW, 2WX, 2WY, 2WZ, 2XA, 2XB, 2XC, 2XD, 2XE, 2XF, 2XG, 2XH, 2XI, 2XJ, 2XK, 2XL, 2XM, 2XN, 2XO, 2XP, 2XQ, 2XR, 2XS, 2XT, 2XU, 2XV, 2XW, 2XX, 2XY, 2XZ, 2YA, 2YB, 2YC, 2YD, 2YE, 2YF, 2YG, 2YH, 2YI, 2YJ, 2YK, 2YL, 2YM, 2YN, 2YO, 2YP, 2YQ, 2YR, 2YS, 2YT, 2YU, 2YV, 2YW, 2YX, 2YY, 2YZ, 2ZA, 2ZB, 2ZC, 2ZD, 2ZE, 2ZF, 2ZG, 2ZH, 2ZI, 2ZJ, 2ZK, 2ZL, 2ZM, 2ZN, 2ZO, 2ZP, 2ZQ, 2ZR, 2ZS, 2ZT, 2ZU, 2ZV, 2ZW, 2ZX, 2ZY, 2ZZ, 2AA, 2AB, 2AC, 2AD, 2AE, 2AF, 2AG, 2AH, 2AI, 2AJ, 2AK, 2AL, 2AM, 2AN, 2AO, 2AP, 2AQ, 2AR, 2AS, 2AT, 2AU, 2AV, 2AW, 2AX, 2AY, 2AZ, 2BA, 2BB, 2BC, 2BD, 2BE, 2BF, 2BG, 2BH, 2BI, 2BJ, 2BK, 2BL, 2BM, 2BN, 2BO, 2BP, 2BQ, 2BR, 2BS, 2BT, 2BU, 2BV, 2BW, 2BX, 2BY, 2BZ, 2CA, 2CB, 2CC, 2CD, 2CE, 2CF, 2CG, 2CH, 2CI, 2CJ, 2CK, 2CL, 2CM, 2CN, 2CO, 2CP, 2CQ, 2CR, 2CS, 2CT, 2CU, 2CV, 2CW, 2CX, 2CY, 2CZ, 2DA, 2DB, 2DC, 2DD, 2DE, 2DF, 2DG, 2DH, 2DI, 2DJ, 2DK, 2DL, 2DM, 2DN, 2DO, 2DP, 2DQ, 2DR, 2DS, 2DT, 2DU, 2DV, 2DW, 2DX, 2DY, 2DZ, 2EA, 2EB, 2EC, 2ED, 2EE, 2EF, 2EG, 2EH, 2EI, 2EJ, 2EK, 2EL, 2EM, 2EN, 2EO, 2EP, 2EQ, 2ER, 2ES, 2ET, 2EU, 2EV, 2EW, 2EX, 2EY, 2EZ, 2FA, 2FB, 2FC, 2FD, 2FE, 2FF, 2FG, 2FH, 2FI, 2FJ, 2FK, 2FL, 2FM, 2FN, 2FO, 2FP, 2FQ, 2FR, 2FS, 2FT, 2FU, 2FV, 2FW, 2FX, 2FY, 2FZ, 2GA, 2GB, 2GC, 2GD, 2GE, 2GF, 2GG, 2GH, 2GI, 2GJ, 2GK, 2GL, 2GM, 2GN, 2GO, 2GP, 2GQ, 2GR, 2GS, 2GT, 2GU, 2GV, 2GW, 2GX, 2GY, 2GZ, 2HA, 2HB, 2HC, 2HD, 2HE, 2HF, 2HG, 2HH, 2HI, 2HJ, 2HK, 2HL, 2HM, 2HN, 2HO, 2HP, 2HQ, 2HR, 2HS, 2HT, 2HU, 2HV, 2HW, 2HX, 2HY, 2HZ, 2IA, 2IB, 2IC, 2ID, 2IE, 2IF, 2IG, 2IH, 2II, 2IJ, 2IK, 2IL, 2IM, 2IN, 2IO, 2IP, 2IQ, 2IR, 2IS, 2IT, 2IU, 2IV, 2IW, 2IX, 2IY, 2IZ, 2JA, 2JB, 2JC, 2JD, 2JE, 2JF, 2JG, 2JH, 2JI, 2JJ, 2JK, 2JL, 2JM, 2JN, 2JO, 2JP, 2JQ, 2JR, 2JS, 2JT, 2JU, 2JV, 2JW, 2JX, 2JY, 2JZ, 2KA, 2KB, 2KC, 2KD, 2KE, 2KF, 2KG, 2KH, 2KI, 2KJ, 2KL, 2KM, 2KN, 2KO, 2KP, 2KQ, 2KR, 2KS, 2KT, 2KU, 2KV, 2KW, 2KX, 2KY, 2KZ, 2LA, 2LB, 2LC, 2LD, 2LE, 2LF, 2LG, 2LH, 2LI, 2LJ, 2LK, 2LM, 2LN, 2LO, 2LP, 2LQ, 2LR, 2LS, 2LT, 2LU, 2LV, 2LW, 2LX, 2LY, 2LZ, 2MA, 2MB, 2MC, 2MD, 2ME, 2MF, 2MG, 2MH, 2MI, 2MJ, 2MK, 2ML, 2MM, 2MN, 2MO, 2MP, 2MQ, 2MR, 2MS, 2MT, 2MU, 2MV, 2MW, 2MX, 2MY, 2MZ, 2NA, 2NB, 2NC, 2ND, 2NE, 2NF, 2NG, 2NH, 2NI, 2NJ, 2NK, 2NL, 2NM, 2NN, 2NO, 2NP, 2NQ, 2NR, 2NS, 2NT, 2NU, 2NV, 2NW, 2NX, 2NY, 2NZ, 2OA, 2OB, 2OC, 2OD, 2OE, 2OF, 2OG, 2OH, 2OI, 2OJ, 2OK, 2OL, 2OM, 2ON, 2OO, 2OP, 2OQ, 2OR, 2OS, 2OT, 2OU, 2OV, 2OW, 2OX, 2OY, 2OZ, 2PA, 2PB, 2PC, 2PD, 2PE, 2PF, 2PG, 2PH, 2PI, 2PJ, 2PK, 2PL, 2PM, 2PN, 2PO, 2PP, 2PQ, 2PR, 2PS, 2PT, 2PU, 2PV, 2PW, 2PX, 2PY, 2PZ, 2QA, 2QB, 2QC, 2QD, 2QE, 2QF, 2QG, 2QH, 2QI, 2QJ, 2QK, 2QL, 2QM, 2QN, 2QO, 2QP, 2QQ, 2QR, 2QS, 2QT, 2QU, 2QV, 2QW, 2QX, 2QY, 2QZ, 2RA, 2RB, 2RC, 2RD, 2RE, 2RF, 2RG, 2RH, 2RI, 2RJ, 2RK, 2RL, 2RM, 2RN, 2RO, 2RP, 2RQ, 2RR, 2RS, 2RT, 2RU, 2RV, 2RW, 2RX, 2RY, 2RZ, 2SA, 2SB, 2SC, 2SD, 2SE, 2SF, 2SG, 2SH, 2SI, 2SJ, 2SK, 2SL, 2SM, 2SN, 2SO, 2SP, 2SQ, 2SR, 2SS, 2ST, 2SU, 2SV, 2SW, 2SX, 2SY, 2SZ, 2TA, 2TB, 2TC, 2TD, 2TE, 2TF, 2TG, 2TH, 2TI, 2TJ, 2TK, 2TL, 2TM, 2TN, 2TO, 2TP, 2TQ, 2TR, 2TS, 2TT, 2TU, 2TV, 2TW, 2TX, 2TY, 2TZ, 2UA, 2UB, 2UC, 2UD, 2UE, 2UF, 2UG, 2UH, 2UI, 2UJ, 2UK, 2UL, 2UM, 2UN, 2UO, 2UP, 2UQ, 2UR, 2US, 2UT, 2UU, 2UV, 2UW, 2UX, 2UY, 2UZ, 2VA, 2VB, 2VC, 2VD, 2VE, 2VF, 2VG, 2VH, 2VI, 2VJ, 2VK, 2VL, 2VM, 2VN, 2VO, 2VP, 2VQ, 2VR, 2VS, 2VT, 2VU, 2VV, 2VW, 2VX, 2VY, 2VZ, 2WA, 2WB, 2WC, 2WD, 2WE, 2WF, 2WG, 2WH, 2WI, 2WJ, 2WK, 2WL, 2WM, 2WN, 2WO, 2WP, 2WQ, 2WR, 2WS, 2WT, 2WU, 2WV, 2WW, 2WX, 2WY, 2WZ, 2XA, 2XB, 2XC, 2XD, 2XE, 2XF, 2XG, 2XH, 2XI, 2XJ, 2XK, 2XL, 2XM, 2XN, 2XO, 2XP, 2XQ, 2XR, 2XS, 2XT, 2XU, 2XV, 2XW, 2XX, 2XY, 2XZ, 2YA, 2YB, 2YC, 2YD, 2YE, 2YF, 2YG, 2YH, 2YI, 2YJ, 2YK, 2YL, 2YM, 2YN, 2YO, 2YP, 2YQ, 2YR, 2YS, 2YT, 2YU, 2YV, 2YW, 2YX, 2YY, 2YZ, 2ZA, 2ZB, 2ZC, 2ZD, 2ZE, 2ZF, 2ZG, 2ZH, 2ZI, 2ZJ, 2ZK, 2ZL, 2ZM, 2ZN, 2ZO, 2ZP, 2ZQ, 2ZR, 2ZS, 2ZT, 2ZU, 2ZV, 2ZW, 2ZX, 2ZY, 2ZZ, 2AA, 2AB, 2AC, 2AD, 2AE, 2AF, 2AG, 2AH, 2AI, 2AJ, 2AK, 2AL, 2AM, 2AN, 2AO, 2