

IN RE: PETITIONS FOR SPECIAL HEARING

NE Corner of Lincoln and
Cooper Avenues
15th Election District
7th Councilmanic District
(2400 Lincoln Avenue)

Athena Klosteridis
Petitioner

BEFORE THE

OFFICE OF

ADMINISTRATIVE HEARINGS

FOR BALTIMORE COUNTY

Case No. 2011-0361-SPH

* * * * *

OPINION AND ORDER

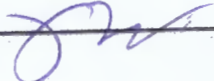
This matter comes before the Office of Administrative Hearings for consideration of a Petition for Special Hearing filed by Athena Klosteridis, the legal owner of the subject property. Petitioner requests Special Hearing relief pursuant to Section 500.7 of the Baltimore County Zoning Regulations ("BCZR.") to approve the existing trailer park as a legal non-conforming use. The subject property and requested relief are more fully described on the site plan, marked and accepted into evidence as Petitioner's Exhibit 1.

At the requisite public hearing in support of the requested relief were John Klosteridis, Nicholas Pistolas and Bruce E. Doak with Gerhold, Cross & Etzel, Ltd., the professional land surveyor who prepared the site plan and is also assisting the Petitioners in the permitting process. The file reveals that the Petition was properly advertised and the property was properly posted as required by the Baltimore County Zoning Regulations. A number of neighbors and other interested persons were in attendance; their names appears on the Citizen's Sign-In Sheet which has been made a part of the official file.

The Zoning Advisory Committee (ZAC) comments were received and are made part of the record of this case. Comments were received from the Department of Environmental Protection and Sustainability on July 8, 2011 and based on this review, they offer the following comments:

ORDER RECEIVED FOR FILING

Date 8-24-11

By 

"The subject property is located within the Chesapeake Bay Critical Area. According to BCZR Section 500.14, no decision shall be rendered on any petition for special exception, zoning variance, or zoning special hearing for a property within the Critical Area until the Department of Environmental Protection and Sustainability (EPS) has provided written recommendations describing how the proposed request would:

1. Minimize adverse impacts on water quality that result from pollutants that are discharged from structures or conveyances or that have run off from surrounding lands;

The subject property is located within a Limited Development Area, and is subject to Critical Area lot coverage requirements. Critical Area lot coverage differs from BCZR lot coverage and is defined in Natural Resources Article §8-1802(a)(17), as follows:

(17) (i) "Lot coverage" means that percentage of total lot or parcel that is:

- 1. Occupied by a structure, parking area, driveway, walkway, or roadway; or*
- 2. Covered with gravel, stone, shell impermeable decking, a paver, permeable pavement, or any manmade material*

(ii) "Lot coverage" includes the ground area covered or occupied by a stairway or impermeable deck.

(iii) "Lot coverage" does not include:

- 1. A fence or wall that is less than 1 foot in width that has not been constructed with a footer;*
- 2. A walkway in the buffer or expanded buffer, including a stairway, that provides direct access to a community or private pier;*
- 3. A wood mulch pathway; or*
- 4. A deck with gaps to allow the water to pass freely.*

In order to minimize impacts on water quality, the applicant should maintain the historical percentage of Critical Area lot coverage that exists on the property. According to the applicant's plan for this review, and according to the purpose of the special hearing requested, being "to permit the existing trailer park as a legal non-conforming use", lot coverage is not proposed to increase, therefore, impacts on water quality will be avoided. However, the applicant's plan also shows "possible locations of additional trailers" and the proposed razing of an existing frame dwelling, resulting in a net increase in lot coverage of approximately 724 square feet. Should an increase in the historical percentage of Critical Area lot coverage be proposed, it would require a Critical Area Administrative Variance, for which there is no guarantee of approval, and if approved would require mitigative measures that would result in avoidance or minimization of water quality impacts.

2. Conserve fish, wildlife, and plant habitat; and

To permit the existing trailer park as a legal non-conforming use will not increase lot coverage within and outside of the 100-foot buffer, therefore, will avoid water quality impacts, maintain buffer functions and conserve fish habitat in Jones Creek.

3. Be consistent with established land use policies for development in the Chesapeake Bay Critical Area which accommodate growth and also address

ORDER RECEIVED FOR FILING

Date

8-24-11

2

By

[Signature]

the fact that, even if pollution is controlled, the number, movement and activities of persons in that area can create adverse environmental impacts. *The applicant's request to permit the existing trailer park as a legal non-conforming use is consistent with this goal. The request, if granted, will avoid environmental impacts.*"

Comments were also received from the Office of Planning, dated July 14, 2011, which indicate as follows:

"... The existing trailer park is an old and crowded facility. The area between the units is limited and is primarily used for vehicle parking. There is a proposed expansion at the current entrance to the park. This area contains the best-maintained structure, a wood frame building, proposed to be razed, and described on the plan as a residence. Behind it is an accumulation of furniture and an above ground pool (this area should be cleared of the outdoor storage, and debris). The Office of Planning recommends the following:

1. Granting of the requested non-conforming status to the existing facility.
2. Provide vegetative evergreen screening along the edge of the property at Lincoln and Cooper Avenues.
3. The Office of Planning defers to Environmental Protection and Sustainability for the limits of expanding the non-conforming use as the subject property falls within the Chesapeake Bay Critical Area."

As with all nonconforming use cases, the burden is on the Petitioner to produce evidence that a legal nonconforming use existed on the subject property prior to the year in which a change in the zoning regulations rendered it an unpermitted use. The controlling year in this case is 1945. The evaluation of nonconformity must include a determination of whether there has been a change in the use of the subject property, breaking the continued nature of the nonconforming use. If the use of the subject property has changed to a different use, the current use of the property cannot be considered as nonconforming. *See, B.C.Z.R. Section 104; McKemy v. Baltimore County, Maryland, 39 Md. App. 257 (1978).*

Mr. Doak presented a proffer on behalf of the Petitioner. He stated that the trailer park had been opened some time in the 1930s. In support of that proffer, he offered an affidavit of Carl W. Schaffer, a long time resident of the area (Petitioner's Exhibits 5 and 6), attesting to the longevity

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By 

and uninterrupted use of the subject site as a trailer park since that time. He also offered that had they been called to testify, Mr. Klosteridis and Mr. Pistolas would testify that based on their understanding from other residents, that the site had been in use as a trailer park for many years predating the imposition of zoning regulations. It should also be noted that the citizens present at the hearing did not contest the age of the trailer park nor the unbroken use of the site for that purpose since its inception.

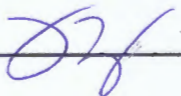
Mr. Doak's proffer, as well as the Plat to Accompany the request for special hearing, set out Petitioner's ultimate desire to raze a frame dwelling on the property and then to utilize that space for two additional trailers (the plat indicates three new trailers, but the proffer reduced it to two).

It should be noted that much of Petitioner's proffered testimony as well as that presented by the interested citizens present at the hearing concerned the razing of the frame dwelling presently on the property and the placement of some number of new trailers on the site. The comments of the Department of Environmental Protection and Sustainability (DEPS) points out that any proposed change in the trailer park would require the granting of a Critical Area Administrative Variance and possible mitigation on the part of the Petitioner. Likewise, the Office of Planning describes the subject site as an "old and crowded facility." Planning does not object to the instant special hearing request to confirm the existing nonconforming use, although they do call for vegetative evergreen screening at the edge of the subject site along Lincoln and Cooper Avenues. In addition, they defer to DEPS to set limits of change and/or expansion to the nonconforming use, presuming it is confirmed.

The present matter is limited only to the question presented by Petitioner; that of whether or not the subject trailer park is a continuing, legal nonconforming use. All of the above issues

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Date 8-24-11

By 

and questions as to change or expansion of the trailer park are subjects to be resolved by those agencies or at future hearings. Accordingly, based upon the testimony, proffers and evidence received in this matter, I find that the nonconforming use on the subject property has not changed since the 1930s; and that it therefore was in existence years before the modification of the zoning regulations made the use unpermitted in the zoning classification presently applied to the subject property. Moreover, the uncontroverted testimony established that the trailer park has continued to operate over the many years since without interruption.

Pursuant to the advertisement, posting of the property and public hearing held, and after considering the testimony and evidence offered, I find that Petitioner's request for special hearing should be granted.

THEREFORE, IT IS ORDERED, by the Administrative Law Judge for Baltimore County this 24th day of August, 2011 that the Petition for Special Hearing pursuant to Section 500.7 of the Baltimore County Zoning Regulations ("BCZR.") to approve the existing trailer park as a legal non-conforming use, be and is hereby GRANTED;

The relief granted herein is subject to the following conditions:

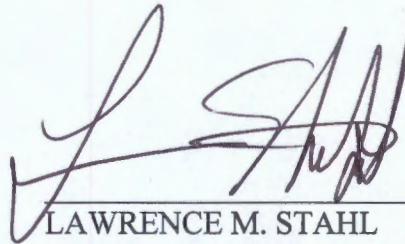
1. Petitioner is advised that she may apply for any required building or other permits and be granted same upon receipt of this Order; however, Petitioner is hereby made aware that proceeding at this time is at her own risk until the 30-day appeal period from the date of this Order has expired. If for whatever reason, this Order is reversed, Petitioner would be required to return, and be responsible for returning, said property to its original condition.
2. Petitioner is to provide vegetative evergreen screening along the edge of the subject property at Lincoln and Cooper Avenues; screening shall be subject to the approval of Avery Harden, Baltimore County Landscape Architect.
3. Petitioner is to comply with the Zoning Advisory Committee (ZAC) comments received from the Department of Environmental Protection and Sustainability dated July 8, 2011 and the Office of Planning, dated July 18, 2011; copies of which are attached hereto and made a part hereof.

ORDER RECEIVED FOR FILING

Date 8-24-11

By [Signature]

Any appeal of this decision must be made within thirty (30) days of the date of this Order.



LAWRENCE M. STAHL
Managing Administrative Law Judge
for Baltimore County

Attachment

LMS:pz

ORDER RECEIVED FOR FILING

Date 8-24-11

By [Signature]

BALTIMORE COUNTY, MARYLAND

Inter-Office Correspondence

RECEIVED

JUL 08 2011

OFFICE OF ADMINISTRATIVE HEARINGS



TO: Lawrence M. Stahl; Managing Administrative Law Judge
Office of Administrative Hearings

FROM: David Lykens, Department of Environmental Protection and Sustainability
(DEPS) - Development Coordination

DATE: July 8, 2011

SUBJECT: DEPS Comment for Zoning Item # 11-361-SPH
Address Lincoln and Cooper Avenue
(Klosteridis Property)

Zoning Advisory Committee Meeting of June 27, 2011.

The subject property is located within the Chesapeake Bay Critical Area. According to BCZR Section 500.14, no decision shall be rendered on any petition for special exception, zoning variance, or zoning special hearing for a property within the Critical Area until the Department of Environmental Protection and Sustainability (EPS) has provided written recommendations describing how the proposed request would:

1. Minimize adverse impacts on water quality that result from pollutants that are discharged from structures or conveyances or that have run off from surrounding lands;

The subject property is located within a Limited Development Area, and is subject to Critical Area lot coverage requirements. Critical Area lot coverage differs from BCZR lot coverage and is defined in Natural Resources Article §8-1802(a)(17), as follows:

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(ii) "Lot coverage" includes the ground area covered or occupied by a stairway or impermeable deck.

(iii) "Lot coverage" does not include:

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ORDER RECEIVED FOR FILING

Date

By

1. A fence or wall that is less than 1 foot in width that has not been constructed with a footer;
2. A walkway in the buffer or expanded buffer, including a stairway, that provides direct access to a community or private pier;
3. A wood mulch pathway; or
4. A deck with gaps to allow the water to pass freely.

In order to minimize impacts on water quality, the applicant should maintain the historical percentage of Critical Area lot coverage that exists on the property. According to the applicant's plan for this review, and according to the purpose of the special hearing requested, being "to permit the existing trailer park as a legal non-conforming use", lot coverage is not proposed to increase, therefore, impacts on water quality will be avoided. However, the applicant's plan also shows "possible locations of additional trailers" and the proposed razing of an existing frame dwelling, resulting in a net increase in lot coverage of approximately 724 square feet. Should an increase in the historical percentage of Critical Area lot coverage be proposed, it would require a Critical Area Administrative Variance, for which there is no guarantee of approval, and if approved would require mitigative measures that would result in avoidance or minimization of water quality impacts.

2. Conserve fish, wildlife, and plant habitat; and

To permit the existing trailer park as a legal non-conforming use will not increase lot coverage within and outside of the 100-foot buffer, therefore, will avoid water quality impacts, maintain buffer functions and conserve fish habitat in Jones Creek.

3. Be consistent with established land use policies for development in the Chesapeake Bay Critical Area which accommodate growth and also address the fact that, even if pollution is controlled, the number, movement and activities of persons in that area can create adverse environmental impacts.

The applicant's request to permit the existing trailer park as a legal non-conforming use is consistent with this goal. The request, if granted, will avoid environmental impacts.

Reviewer: Thomas Panzarella; Environmental Impact Review

ORDER RECEIVED FOR FILING

Date 8-24-11

By 



KEVIN KAMENETZ
County Executive

LAWRENCE M. STAHL
Managing Administrative Law Judge
JOHN E. BEVERUNGEN
TIMOTHY M. KOTROCO
Administrative Law Judges

August 31, 2011

ATHENA AND JOHN KLOSTERIDIS
1502 POT SPRING ROAD
TIMONIUM MD 21093

Re: Petition for Special Hearing
Case No. 2011-0361-SPH
Property: 2400 Lincoln Avenue

Dear Mr. and Mrs. Klosteridis:

It has been brought to my attention that the attachment referenced in Condition No. 3 was not attached to the Order. This attachment concerns compliance with the Zoning Advisory Committee (ZAC) comments received from the Department of Environmental Protection and Sustainability dated July 8, 2011 and the Office of Planning, dated July 14, 2011. Therefore, this letter will serve as a CORRECTIVE ORDER regarding the decision rendered in the above-captioned case.

This correction merely resolves the oversight in not attaching the ZAC comments, and does not materially alter the effect of the Order.

Sincerely,

LAWRENCE M. STAHL
Managing Administrative Law Judge
for Baltimore County

LMS/pz

Enclosure

- c: Bruce Doak, Gerhold, Cross & Etzel, Ltd., 320 East Towsontown Blvd., Suite 100,
Towson, MD 21286
Nicholas Pistolas, 608 Baltimore Avenue, Towson MD 21204
Delores Curbram, 2415 Lincoln Avenue, Sparrows Point MD 21219
Gloria Lewis, 2419 Lincoln Avenue, Sparrows Point MD 21219
Robert Lewis and John Barkon, 2400 Lincoln Avenue, Sparrows Point MD 21219

Office of Administrative Hearings

105 West Chesapeake Avenue, Suite 103 | Towson, Maryland 21204 | Phone 410-887-3868 | Fax 410-887-3468

www.baltimorecountymd.gov

ORDER RECEIVED FOR FILING

8-24-11

Date

By

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Arnold Jablon, Director
Department of Permits,
Approvals and Inspections

DATE: July 14, 2011

FROM: Andrea Van Arsdale
Director, Office of Planning

SUBJECT: Lincoln and Cooper Avenue

INFORMATION:

Item Number: 11-361

Petitioner: Athena Klosteridis

Zoning: DR 5.5

Requested Action: Special Hearing

RECEIVED

JUL 18 2011

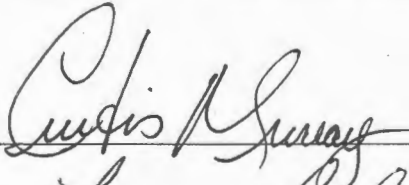
OFFICE OF ADMINISTRATIVE HEARINGS

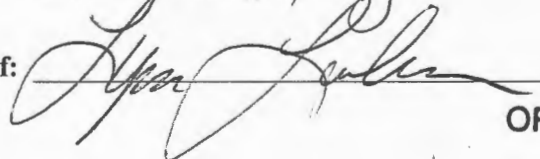
SUMMARY OF RECOMMENDATIONS:

The Office of Planning has reviewed the petitioner's request and accompanying site plan. The existing trailer park is an old and crowded facility. The area between the units is limited and is primarily used for vehicle parking. There is a proposed expansion at the current entrance to the park. This area contains the best-maintained structure, a wood frame building, proposed to be razed, and described on the plan as a residence. Behind it is an accumulation of furniture and an above ground pool (this area should be cleared of the outdoor storage, and debris). The Office of Planning recommends the following:

1. Granting of the requested non-conforming status to the existing facility.
2. Provide vegetative evergreen screening along the edge of the property at Lincoln and Cooper Avenues.
3. The Office of Planning defers to Environmental Protection and Sustainability for the limits of expanding the non-conforming use as the subject property falls within the Chesapeake Bay Critical Area.

For further information concerning the matters stated here in, please contact John Alexander at 410-887-3480.

Prepared by: 

Division Chief: 
JM/LL: CM

ORDER RECEIVED FOR FILING

Date: 8-24-11

By: 



KEVIN KAMENETZ
County Executive

LAWRENCE M. STAHL
Managing Administrative Law Judge
JOHN E. BEVERUNGEN
TIMOTHY M. KOTROCO
Administrative Law Judges

August 22, 2011

ATHENA AND JOHN KLOSTERIDIS
1502 POT SPRING ROAD
TIMONIUM MD 21093

Re: Petition for Special Hearing
Case No. 2011-0361-SPH
Property: 2400 Lincoln Avenue

Dear Mr. and Mrs. Klosteridis:

Enclosed please find the decision rendered in the above-captioned case.

In the event the decision rendered is unfavorable to any party, please be advised that any party may file with the Department of Permits, Applications and Inspections an appeal within thirty (30) days from the date of this Order. If you require additional information concerning filing an appeal, please feel free to contact our appeals clerk at 410-887-3391.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Stahl", is written over a horizontal line.

LAWRENCE M. STAHL
Managing Administrative Law Judge
for Baltimore County

LMS/pz

Enclosure

c: Bruce Doak, Gerhold, Cross & Etzel, Ltd., 320 East Towsontown Blvd., Suite 100,
Towson, MD 21286
Nicholas Pistolas, 608 Baltimore Avenue, Towson MD 21204
Delores Curbram, 2415 Lincoln Avenue, Sparrows Point MD 21219
Gloria Lewis, 2419 Lincoln Avenue, Sparrows Point MD 21219
Robert Lewis and John Barkon, 2400 Lincoln Avenue, Sparrows Point MD 21219

CBC A/Flood Plans



Petition for Special Hearing

to the Zoning Commissioner of Baltimore County

for the property located at LINCOLN AVENUE
which is presently zoned DR 5.5

(This petition **must** be filed in person, in the zoning office, in triplicate, with original signatures.)

This Petition shall be filed with the Department of Permits and Development Management. The undersigned, legal owner(s) 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 should approve
(This box to be completed by planner)

THE EXISTING TRAILER PARK AS A LEGAL NON-CONFORMING USE

Property is to be posted and advertised as prescribed by the zoning regulations.

I, or we, agree to pay expenses of above Special Hearing, advertising, posting, etc. and further agree to and are to be bounded by the zoning regulations and restrictions of Baltimore County adopted pursuant to the zoning law for Baltimore County.

I/We do solemnly declare and affirm, under the penalties of perjury, that I/we are the legal owner(s) of the property which is the subject of this Petition.

Contract Purchaser/Lessee:

Name - Type or Print

Signature

Address

Telephone No.

City

State

Zip Code

Attorney For Petitioner:

Name - Type or Print

Signature

COMP

ORDER RECEIVED FOR FILING

Address

Date

Telephone No.

City

State

Zip Code

By

Legal Owner(s):

ATHENA KLOSTERIDIS

Name - Type or Print

Signature

Name - Type or Print

Signature

1502 POT SPRING ROAD 410-686-5696

Address

Telephone No.

LUTHERVILLE/TIMONIUM MO

City

State

Zip Code

Representative to be Contacted:

BRUCE E. DOAK

GERHOLD CROSS & ETZEL, LTD.

Name

320 E. TOWSONTOWN BLVD 410-823-4470

Address

Telephone No.

TOWSON

City

State

Zip Code

410-823-4473

OFFICE USE ONLY

ESTIMATED LENGTH OF HEARING

Case No. *2011-361-45PH*

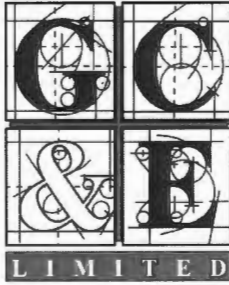
REV 9/15/98

UNAVAILABLE FOR HEARING

Reviewed By

Date

7/11/11 - 7/22/11



Gerhold, Cross & Etzel, Ltd.

Registered Professional Land Surveyors • Established 1906

Suite 100 • 320 East Towsontown Boulevard • Towson, Maryland 21286
Phone: (410) 823-4470 • Fax: (410) 823-4473 • www.gcelimited.com

June 9, 2011

ZONING DESCRIPTION

1.6 Acre Lincoln Avenue

Tax ID: 15-03-001016

Lincoln Avenue & Cooper Avenue
Baltimore County, Maryland

All that piece or parcel of land situate, lying and being in the Fifteenth Election District, Seventh Councilmanic District of Baltimore County, Maryland and described as follows to wit:

Beginning at a point at the intersection of the northwest side of Lincoln Avenue and the east side of Cooper Avenue, thence binding on the northeast side of Lincoln Avenue,

- 1) Northeasterly 36.4 feet, more or less,
- 2) Northeasterly 299.6 feet, more or less,
- 3) Northeasterly 3.7 feet, more or less, thence leaving Lincoln Avenue and running
- 4) Northwesterly 48.4 feet, more or less,
- 5) Northeasterly 167.7 feet, more or less,
- 6) Northeasterly 13.0 feet, more or less,
- 7) Northeasterly 12.5 feet, more or less,
- 8) Southwesterly 104.3 feet, more or less,
- 9) Southwesterly 12.5 feet, more or less,
- 10) Southwesterly 88.2 feet, more or less,
- 11) Southwesterly 73.8 feet, more or less, and
- 12) Southwesterly, in part running on the east side of Cooper Avenue, 437.4 feet, more or less, to the point of beginning

Containing 1.6 Acres of land, more or less.



Note: This description only satisfies the requirements of the Office of Zoning and is not to be used for the purposes of conveyance.

361
2011-001-ASP4

BALTIMORE COUNTY, MARYLAND
OFFICE OF BUDGET AND FINANCE
MISCELLANEOUS CASH RECEIPT

No. **70340**

Date: **6/16/11**

Fund	Dept	Unit	Sub Unit	Rev Source/ Obj	Sub Rev/ Obj	Dept	Obj	BS Acct	Amount

Total: **383.00**

Rec From: **A. K. LUTER, MD**

For: **2011 - 0081 - 3TH**

DISTRIBUTION

WHITE - CASHIER PINK - AGENCY YELLOW - CUSTOMER GOLD - ACCOUNTING
PLEASE PRESS HARD!!!!

**CASHIER'S
 VALIDATION**

**NOTICE OF ZONING
HEARING**

The Administrative Law Judges of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County will hold a public hearing in Towson, Maryland on the property identified herein as follows:

Case: # 2011-0361-SPH
Lincoln Avenue
N/east corner of Lincoln Avenue and Cooper Avenue
15th Election District
7th Councilmanic District
Legal Owner(s): Athena Klosteridis
Spelcal Hearing: to permit the existing trailer park as a legal non-conforming use.
Hearing: Tuesday, August 2, 2011 at 1:30 p.m. In Room 205, Jefferson Building, 105 West Chesapeake Avenue, Towson 21204.

ARNOLD JABLON, DIRECTOR
OF PERMITS, APPROVALS
AND INSPECTIONS FOR
BALTIMORE COUNTY.

NOTES: (1) Hearings are Handicapped Accessible; for special accommodations Please Contact the Administrative Hearings Office at (410) 887-3868.

(2) For information concerning the File and/or Hearing, Contact the Zoning Review Office at (410) 887-3391.

JT 07/659 July 19 281570

CERTIFICATE OF PUBLICATION

7/21, 2011

THIS IS TO CERTIFY, that the annexed advertisement was published in the following weekly newspaper published in Baltimore County, Md., once in each of 1 successive weeks, the first publication appearing on 7/19, 2011.

- ☒ The Jeffersonian
- ☐ Arbutus Times
- ☐ Catonsville Times
- ☐ Towson Times
- ☐ Owings Mills Times
- ☐ NE Booster/Reporter
- ☐ North County News

S. Wilkinson

LEGAL ADVERTISING



Gerhold, Cross & Etzel, Ltd.

Registered Professional Land Surveyors • Established 1906

Suite 100 • 320 East Towsontown Boulevard • Towson, Maryland 21286
Phone: (410) 823-4470 • Fax: (410) 823-4473 • www.gcelimited.com

8/2/11

CERTIFICATE OF POSTING

RE: Case#2011-0361-SPH

PETITIONER: Athena Klosteridis

DATE OF HEARING: August 2, 2011

BALTIMORE COUNTY DEPARTMENT OF
PERMITS AND DEVELOPMENT MANAGEMENT
COUNTY OFFICE BUILDING, ROOM 111
111 WEST CHESAPEAKE AVE.
TOWSON, MARYLAND 21204

ATTENTION: KRISTEN LEWIS

LADIES AND GENTLEMEN:

THIS LETTER IS TO CERTIFY UNDER THE PENALTIES OF PERJURY THAT THE NECESSARY
SIGN(S) REQUIRED BY LAW WERE POSTED CONSPICUOUSLY ON THE PROPERTY LOCATED AT

(see page 2 for full size photo)

LOCATION:

Northeast corner of Lincoln Avenue & Cooper Avenue

SIGNATURE OF SIGN POSTER

Bruce E. Doak

GERHOLD, CROSS & ETZEL, LTD
SUITE 100
320 EAST TOWSONTOWN BLVD
TOWSON, MARYLAND 21286
410-823-4470 PHONE
410-823-4473 FAX

POSTED ON: July 15, 2011

ZONING NOTICE

CASE # :2011-0361-SPH

**A PUBLIC HEARING WILL BE HELD BY
THE ZONING COMMISSIONER
IN TOWSON, MD.**

PLACE: Room 205 Jefferson Building
105 W. Chesapeake Avenue, Towson 21204

TIME: Tuesday August 2, 2011
at 1:30 pm

Special Hearing to permit the existing trailer
park as a legal non-conforming use.

POSTPONEMENTS DUE TO WEATHER OR OTHER CONDITIONS ARE SOMETIMES
NECESSARY TO CONFIRM HEARING.
CALL 410-887-3391 THE DAY BEFORE THE SCHEDULED HEARING DATE.
DO NOT REMOVE THIS SIGN AND POST UNTIL DAY OF HEARING, UNDER PENALTY OF LAW
HEARINGS ARE HANDICAPPED ACCESSIBLE

07.15.2011 11:48



07.15.2011 11:48

TO: PATUXENT PUBLISHING COMPANY
Tuesday, July 19, 2011 Issue - Jeffersonian

Please forward billing to:
Nicholas Pistolis
608 Baltimore Avenue
Towson, MD 21204

410-686-5696

NOTICE OF ZONING HEARING

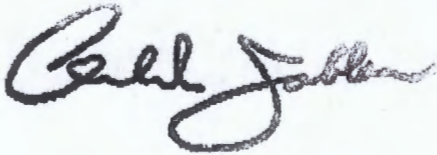
The Administrative Law Judges of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County, will hold a public hearing in Towson, Maryland on the property identified herein as follows:

CASE NUMBER: 2011-0361-SPH

Lincoln Avenue
N/east corner of Lincoln Avenue and Cooper Avenue
15th Election District – 7th Councilmanic District
Legal Owners: Athena Klosteridis

Special Hearing to permit the existing trailer park as a legal non-conforming use.

Hearing: Tuesday, August 2, 2011 at 1:30 p.m. in Room 205, Jefferson Building,
105 West Chesapeake Avenue, Towson 21204



Arnold Jablon
Director of Permits, Approvals and Inspections for Baltimore County

- NOTES: (1) HEARINGS ARE HANDICAPPED ACCESSIBLE; FOR SPECIAL ACCOMODATIONS, PLEASE CONTACT THE ADMINISTRATIVE HEARINGS OFFICE AT 410-887-3868.
- (2) FOR INFORMATION CONCERNING THE FILE AND/OR HEARING, CONTACT THE ZONING REVIEW OFFICE AT 410-887-3391.



KEVIN KAMENETZ
County Executive

ARNOLD JABLON
Deputy Administrative Officer
Director, Department of Permits,
Approvals & Inspections

July 13, 2011

NOTICE OF ZONING HEARING

The Administrative Law Judges of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County, will hold a public hearing in Towson, Maryland on the property identified herein as follows:

CASE NUMBER: 2011-0361-SPH

Lincoln Avenue

N/east corner of Lincoln Avenue and Cooper Avenue

15th Election District – 7th Councilmanic District

Legal Owners: Athena Klosteridis

Special Hearing to permit the existing trailer park as a legal non-conforming use.

Hearing: Tuesday, August 2, 2011 at 1:30 p.m. in Room 205, Jefferson Building,
105 West Chesapeake Avenue, Towson 21204

A handwritten signature in black ink, appearing to read "Arnold Jablon".

Arnold Jablon
Director

AJ:kl

C: Bruce Doak, GC&E, 320 E. Towsontown Blvd., Towson 21204
Athena Klosteridis, 1502 Pot Spring Road, Lutherville 21093

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY MONDAY, JULY 18, 2011.**
- (2) HEARINGS ARE HANDICAPPED ACCESSIBLE; FOR SPECIAL ACCOMMODATIONS PLEASE CALL THE ADMINISTRATIVE HEARINGS OFFICE AT 410-887-3868.
- (3) FOR INFORMATION CONCERNING THE FILE AND/OR HEARING, CONTACT THE ZONING REVIEW OFFICE AT 410-887-3391.

**DEPARTMENT OF PERMITS AND DEVELOPMENT MANAGEMENT
ZONING REVIEW**

ADVERTISING REQUIREMENTS AND PROCEDURES FOR ZONING HEARINGS

The Baltimore County Zoning Regulations (BCZR) require that notice be given to the general public/neighboring property owners relative to property which is the subject of an upcoming zoning hearing. For those petitions which require a public hearing, this notice is accomplished by posting a sign on the property (responsibility of the petitioner) and placement of a notice in a newspaper of general circulation in the County, both at least fifteen (15) days before the hearing.

Zoning Review will ensure that the legal requirements for advertising are satisfied. However, the petitioner is responsible for the costs associated with these requirements. The newspaper will bill the person listed below for the advertising. This advertising is due upon receipt and should be remitted directly to the newspaper.

OPINIONS MAY NOT BE ISSUED UNTIL ALL ADVERTISING COSTS ARE PAID.

For Newspaper Advertising:

Item Number or Case Number: 2011-361-4 SPH

Petitioner: ATHENA KLOSTERIDIS

Address or Location: LINCOLN AVENUE

PLEASE FORWARD ADVERTISING BILL TO:

Name: NICHOLAS J. PISTOLIS

Address: 608 BALTIMORE AVENUE
TOWSON, MD 21204

Telephone Number: 410-686-5696



KEVIN KAMENETZ
County Executive

ARNOLD JABLON
Deputy Administrative Officer
Director, Department of Permits,
Approvals & Inspections

July 27, 2011

Athena Klosteridis
1502 Pot Spring Road
Lutherville, MD 21093

RE: Case Number 2011-0361- SPH, Lincoln Avenue

Dear Athena Klosteridis,

The above referenced petition was accepted for processing **ONLY** by the Bureau of Zoning Review, Department of Permits and Development Management (PDM) on June 16, 2011. This letter is not an approval, but only a **NOTIFICATION**.

The Zoning Advisory Committee (ZAC), which consists of representatives from several approval agencies, has reviewed the plans that were submitted with your petition. All comments submitted thus far from the members of the ZAC are attached. These comments are not intended to indicate the appropriateness of the zoning action requested, but to ensure that all parties (zoning commissioner, attorney, petitioner, etc.) are made aware of plans or problems with regard to the proposed improvements that may have a bearing on this case. All comments will be placed in the permanent case file.

If you need further information or have any questions, please do not hesitate to contact the commenting agency.

Very truly yours,

A handwritten signature in black ink, reading "W. Carl Richards, Jr." in a cursive style.

W. Carl Richards, Jr.
Supervisor, Zoning Review

WCR:mcn

Enclosures

c: People's Counsel
Bruce Doak, Gerhold, Cross & Etzel, Ltd., 320 E. Towsontown Blvd., Towson, MD 21286

BALTIMORE COUNTY, MARYLAND
INTEROFFICE CORRESPONDENCE

TO: Arnold Jablon, Director
Department of Permits, Approvals
And Inspections

DATE: July06, 2011

FROM: ^{DAK} Dennis A. Kennedy, Supervisor
Bureau of Development Plans
Review

SUBJECT: Zoning Advisory Committee Meeting
For July 11, 2011
Item Nos. 2011-359, 361, 362, 363, 364, 365, 367, 368
And 369.

The Bureau of Development Plans Review has reviewed the subject-zoning items, and we have no comments.

DAK:CEN

cc: File

G:\DevPlanRev\ZAC -No Comments\ZAC-07112011 -NO COMMENTS.doc

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Arnold Jablon, Director
Department of Permits,
Approvals and Inspections

DATE: July 14, 2011

FROM: Andrea Van Arsdale
Director, Office of Planning

SUBJECT: Lincoln and Cooper Avenue

INFORMATION:

Item Number: 11-361

Petitioner: Athena Klosteridis

Zoning: DR 5.5

Requested Action: Special Hearing

RECEIVED

JUL 18 2011

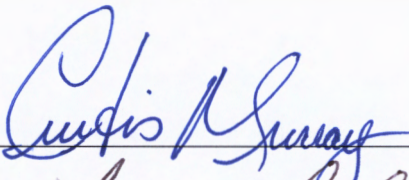
OFFICE OF ADMINISTRATIVE HEARINGS

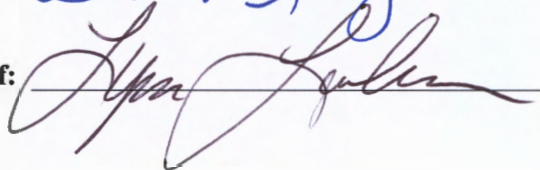
SUMMARY OF RECOMMENDATIONS:

The Office of Planning has reviewed the petitioner's request and accompanying site plan. The existing trailer park is an old and crowded facility. The area between the units is limited and is primarily used for vehicle parking. There is a proposed expansion at the current entrance to the park. This area contains the best-maintained structure, a wood frame building, proposed to be razed, and described on the plan as a residence. Behind it is an accumulation of furniture and an above ground pool (this area should be cleared of the outdoor storage, and debris). The Office of Planning recommends the following:

1. Granting of the requested non-conforming status to the existing facility.
2. Provide vegetative evergreen screening along the edge of the property at Lincoln and Cooper Avenues.
3. The Office of Planning defers to Environmental Protection and Sustainability for the limits of expanding the non-conforming use as the subject property falls within the Chesapeake Bay Critical Area.

For further information concerning the matters stated here in, please contact John Alexander at 410-887-3480.

Prepared by: 

Division Chief: 
JM/LL: CM

BALTIMORE COUNTY, MARYLAND

Inter-Office Correspondence

RECEIVED

JUL 08 2011

OFFICE OF ADMINISTRATIVE HEARINGS



TO: Lawrence M. Stahl; Managing Administrative Law Judge
Office of Administrative Hearings

FROM: David Lykens, Department of Environmental Protection and Sustainability
(DEPS) - Development Coordination

DATE: July 8, 2011

SUBJECT: DEPS Comment for Zoning Item # 11-361-SPH
Address Lincoln and Cooper Avenue
(Klosteridis Property)

Zoning Advisory Committee Meeting of June 27, 2011.

The subject property is located within the Chesapeake Bay Critical Area. According to BCZR Section 500.14, no decision shall be rendered on any petition for special exception, zoning variance, or zoning special hearing for a property within the Critical Area until the Department of Environmental Protection and Sustainability (EPS) has provided written recommendations describing how the proposed request would:

1. Minimize adverse impacts on water quality that result from pollutants that are discharged from structures or conveyances or that have run off from surrounding lands;

The subject property is located within a Limited Development Area, and is subject to Critical Area lot coverage requirements. Critical Area lot coverage differs from BCZR lot coverage and is defined in Natural Resources Article §8-1802(a)(17), as follows:

(17) (i) "Lot coverage" means that percentage of total lot or parcel that is:

- 1. Occupied by a structure, parking area, driveway, walkway, or roadway; or*
- 2. Covered with gravel, stone, shell impermeable decking, a paver, permeable pavement, or any manmade material*

(ii) "Lot coverage" includes the ground area covered or occupied by a stairway or impermeable deck.

(iii) "Lot coverage" does not include:

1. A fence or wall that is less than 1 foot in width that has not been constructed with a footer;
2. A walkway in the buffer or expanded buffer, including a stairway, that provides direct access to a community or private pier;
3. A wood mulch pathway; or
4. A deck with gaps to allow the water to pass freely.

In order to minimize impacts on water quality, the applicant should maintain the historical percentage of Critical Area lot coverage that exists on the property. According to the applicant's plan for this review, and according to the purpose of the special hearing requested, being "to permit the existing trailer park as a legal non-conforming use", lot coverage is not proposed to increase, therefore, impacts on water quality will be avoided. However, the applicant's plan also shows "possible locations of additional trailers" and the proposed razing of an existing frame dwelling, resulting in a net increase in lot coverage of approximately 724 square feet. Should an increase in the historical percentage of Critical Area lot coverage be proposed, it would require a Critical Area Administrative Variance, for which there is no guarantee of approval, and if approved would require mitigative measures that would result in avoidance or minimization of water quality impacts.

2. Conserve fish, wildlife, and plant habitat; and

To permit the existing trailer park as a legal non-conforming use will not increase lot coverage within and outside of the 100-foot buffer, therefore, will avoid water quality impacts, maintain buffer functions and conserve fish habitat in Jones Creek.

3. Be consistent with established land use policies for development in the Chesapeake Bay Critical Area which accommodate growth and also address the fact that, even if pollution is controlled, the number, movement and activities of persons in that area can create adverse environmental impacts.

The applicant's request to permit the existing trailer park as a legal non-conforming use is consistent with this goal. The request, if granted, will avoid environmental impacts.

Reviewer: Thomas Panzarella; Environmental Impact Review



KEVIN KAMENETZ
County Executive

JOHN J. HOHMAN, *Chief*
Fire Department

June 28, 2011

County Office Building, Room 111
111 West Chesapeake Avenue
Towson, Maryland 21204

ATTENTION: Zoning Review

Distribution Meeting of: **June 27, 2011**

Item No.:

Special Hearing: 2011-0359-SPHA, 2011-0361-SPH, 2011-0364-SPH, 2011-0368-SPH

Administrative Variance: 2011-0363A, 2011-0365A, 2011-0367A, 2011-0369A

Variance: 2011-0360A, 2011-0366-ASA

Special Variance: 2011-0366-ASA

Comments:

The Baltimore County Fire Marshal's Office has no comments on the above case numbers at this time.

Don W. Muddiman, Inspector
Baltimore County Fire Marshal's Office
700 E. Joppa Road, 3RD Floor
Towson, Maryland 21286
Office: 410-887-4880
dmuddiman@baltimorecountymd.gov
cc: File



Martin O'Malley, Governor
Anthony G. Brown, Lt. Governor

State Highway
Administration

Beverly K. Swaim-Staley, Secretary
Neil J. Pedersen, Administrator

Maryland Department of Transportation

Date: 6-28-2011

Ms. Kristen Matthews
Baltimore County Department of
Permits, Approvals and Inspections
County Office Building, Room 109
Towson, Maryland 21204

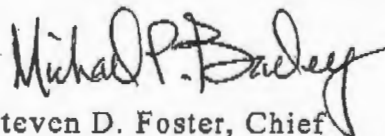
RE: Baltimore County
Item No. 2011-0361-SPH
LINCOLN & COOPER LN.
KLOSTERBOS PROPERTY
SPECIAL HEARING

Dear Ms. Matthews:

Thank you for the opportunity to review your referral request on the subject of the above captioned. We have determined that the subject property does not access a State roadway and is not affected by any State Highway Administration projects. Therefore, based upon available information this office has no objection to Baltimore County Zoning Advisory Committee approval of Item No. 2011-0361-SPH,

Should you have any questions regarding this matter, please contact Richard Zeller at 410-545-5598 or 1-800-876-4742 extension 5598. Also, you may E-mail him at (rzeller@sha.state.md.us). Thank you for your cooperation.

Sincerely,


for Steven D. Foster, Chief
Access Management Division

SDF/rz

RE: PETITION FOR SPECIAL HEARING
Lincoln & Cooper Avenue; NE corner of
Lincoln & Cooper Avenues
15th Election & 7th Councilmanic Districts
Legal Owner(s): Athena Klosteriois
Petitioner(s)

* BEFORE THE
* ADMINISTRATIVE LAW
* JUDGE FOR
* BALTIMORE COUNTY
* 2011-361-SPH

* * * * *

ENTRY OF APPEARANCE

Pursuant to Baltimore County Charter § 524.1, please enter the appearance of People's Counsel for Baltimore County as an interested party in the above-captioned matter. Notice should be sent of any hearing dates or other proceedings in this matter and the passage of any preliminary or final Order. All parties should copy People's Counsel on all correspondence sent and all documentation filed in the case.

Peter Max Zimmerman

PETER MAX ZIMMERMAN
People's Counsel for Baltimore County

Carole S. Demilio

CAROLE S. DEMILIO
Deputy People's Counsel
Jefferson Building, Room 204
105 West Chesapeake Avenue
Towson, MD 21204
(410) 887-2188

RECEIVED

JUL 06 2011

F.....

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of July, 2011, a copy of the foregoing Entry of Appearance was mailed to Bruce Doak, Gerhold, Cross & Etzel, 320 E Towsontowne Boulevard, Suite 100, Towson, Maryland 21286, Representative for Petitioner(s).

Peter Max Zimmerman

PETER MAX ZIMMERMAN
People's Counsel for Baltimore County

Debra Wiley - ZAC Comments

From: Debra Wiley
To: Kennedy, Dennis; Lanham, Lynn; Livingston, Jeffrey; Lykens, David; M...
Date: 7/12/2011 3:04 PM
Subject: ZAC Comments

Good Afternoon,

Please see the cases listed below and the hearing date, if assigned. If you wish to submit a ZAC comment, please be advised that you must do so before the hearing date. If it's not received by the hearing date, it will not be considered in our decision.

Thanks and feel free to contact me should you have any questions or concerns.

2011-0359-SPH - 110 Forest Avenue (No Hearing Date reflected in data base as of today)

2011-0360-A - 1512 Denton Road (Hearing Date: 8/1/11) [DEPS comment rec'd]

2011-0361-SPH - Lincoln and Cooper Avenue (No Hearing Date reflected in data base as of today) - [DEPS comment rec'd]

2011-0362-SPH - 164 Wesley Avenue (Hearing: 8/1/11)

2011-0363-A (Administrative Variance) - 606 Hollow Road (Closing Date Per ZAC Agenda - 7/11/11; Closing Date Per data base - 7/25/11 - not sure which is correct)

2011-0364-SPH - Gilroy, Map 51, Parcel 360 Rd. (Hearing Date: 8/2/11) - [DEPS comment rec'd]

2011-0365-A (Administrative Variance) - 750 Chapel Ridge Road (Closing Date 7/18/11)

2011-0366-ASA (Variance Special Variance) - 1402 East Joppa Road (No Hearing Date reflected in data base as of today)

2011-0367-A (Administrative Variance) - 5 Ivy Brook Farm Ct. (Closing Date 7/18/11) - [DEPS comment rec'd]

2011-0368-SPH - 2464 East Ruhl Road (No Hearing Date reflected in data base as of today)

2011-0369-A - (Administrative Variance) 2627 Brannan Avenue (Closing Date 7/18/11)

Debbie Wiley
 Legal Administrative Secretary
 Office of Administrative Hearings
 105 West Chesapeake Avenue, Suite 103
 Towson, Md. 21204
 410-887-3868
 410-887-3468 (fax)
 dwiley@baltimorecountymd.gov

Maryland Department of Assessments and Taxation
Real Property Data Search (vw4.2A)
BALTIMORE COUNTY

[Go Back](#)
[View Map](#)
[New Search](#)
[GroundRent](#)
[Redemption](#)
[GroundRent](#)
[Registration](#)

Account Identifier: District - 15 Account Number - 1503001016

Owner Information

Owner Name: KLOSTERIDIS ATHENA **Use:** COMMERCIAL
Mailing Address: 1502 POT SPRING RD **Principal Residence:** NO
LUTH-TIMONIUM MD 21093-5908 **Deed Reference:** 1)/15360/ 00566
2)

Location & Structure Information

Premises Address **Legal Description**
2400 LINCOLN AVE LT97THRU100 PTLT103
0-0000 NE COR COOPER AVE
CHESAPEAKE TERRACE

Map	Grid	Parcel	Sub District	Subdivision	Section	Block	Lot	Assessment Area	Plat No:
0111	0016	0128		0000	B		97	3	Plat Ref: 0005/ 0036

Special Tax Areas **Town** NONE
Ad Valorem Tax Class

Primary Structure Built	Enclosed Area	Property Land Area	County Use
		1.0100 AC	19

Stories **Basement** **Type** **Exterior**

Value Information

	Base Value	Value	Phase-in Assessments	
		As Of	As Of	As Of
		01/01/2009	07/01/2010	07/01/2011
Land	60,300	66,300		
Improvements:	365,000	400,100		
Total:	425,300	466,400	452,700	466,400
Preferential Land:	0			0

Transfer Information

Seller: KLOSTERIDIS ATHENA	Date: 06/29/2001	Price: \$180,000
Type: NON-ARMS LENGTH OTHER	Deed1: /15360/ 00566	Deed2:
Seller: KLOSTERIDIS ATHENA	Date: 06/18/1991	Price: \$0
Type: NON-ARMS LENGTH OTHER	Deed1: /08825/ 00762	Deed2:
Seller:	Date:	Price:
Type:	Deed1:	Deed2:

Exemption Information

Partial Exempt Assessments	Class	07/01/2011	07/01/2012
County			0.00
State			0.00
Municipal			0.00
Tax Exempt:	Special Tax Recapture:		
Exempt Class:	* NONE *		

PLEASE PRINT CLEARLY

CASE NAME LINCOLN TRANCE PARK

CASE NUMBER 241-0361-5PH

DATE 8/02/11

CITIZEN'S SIGN-IN SHEET

[illegible]

PLEASE PRINT CLEARLY

CASE NAME LINCOLN TRAILER PARK
CASE NUMBER 2011-0361-SP4
DATE 8/02/11

PETITIONER'S SIGN-IN SHEET

[illegible]

Case No.:

2011-0361 SH

Exhibit Sheet

Petitioner/Developer

Protestants

No. 1	Plot to Accompany Petition for Sp. Hearing	
No. 2	Plot of photo locations → Photos	
No. 3	Plot of photo locations	
No. 4	Aerial photo of site	
No. 5	Affidavit as to non conf. use	
No. 6	Affidavit	
No. 7		
No. 8		
No. 9		
No. 10		
No. 11		
No. 12		



PETITIONER' S

EXHIBIT NO. 2











F





































PETITIONER'S

EXHIBIT NO. 4

AFFIDAVIT

The undersigned hereby affirms under the penalty of perjury to the Director of Department of Permits and Development Management (PDM), as follows:

That the information herein given is within the personal knowledge of the affiant and the affiant is competent to testify thereto in the event that a public hearing is scheduled in the future with regard thereto.

Carl W. Schaffer
7343 Walman Avenue
Edgemere, Maryland 21219

CARL W. SCHAFER

Telephone: 410-477-1010

BASED UPON YOUR PERSONAL KNOWLEDGE, PLEASE ANSWER THE FOLLOWING:

1. Can you verify by this Affidavit and/or testify in court, if necessary, that the property located known as 2400 Lincoln Avenue - Edgemere, Maryland 21219 has been used and occupied as a mobile home park (trailer park) prior to 1945?

Answer: YES

2. Can you also verify and testify, if necessary, that the said property has been in continuous use as a mobile home park (trailer park) by renters ever since 1945?

Answer: YES

3. Will you realize any gain from the sale of this property?

Answer: NO

STATE OF MARYLAND, COUNTY OF BALTIMORE, to wit:

I HEREBY CERTIFY that on this 27 day of April, 2011, before me, a Notary Public of the State of Maryland, in and for the County of Baltimore aforesaid, personally appeared Carl S. Schaffer, the Affiant herein, personally known or satisfactorily identified to me as such Affiant.

AS WITNESS my hand and Notarial Seal.



Barbara Frank
NOTARY PUBLIC

My Commission expires: 9/8/12

PETITIONER'S

EXHIBIT NO. 5

AFFIDAVIT

The undersigned hereby affirms under the penalty of perjury to the Director of Department of Permits and Development Management (PDM), as follows:

That the information herein given is within the personal knowledge of the affiant and the affiant is competent to testify thereto in the event that a public hearing is scheduled in the future with regard thereto.


7343 Walman Avenue
Edgemere, Maryland 21219

CARL W. SCHAFFER

Telephone: 410-477-1010

BASED UPON YOUR PERSONAL KNOWLEDGE, PLEASE ANSWER THE FOLLOWING:

1. Can you verify by this Affidavit and/or testify in court, if necessary, that the property located known as 2400 Lincoln Avenue - Edgemere, Maryland 21219 has been used and occupied as a mobile home park (trailer park) prior to 1945?

Answer: YES

2. Can you also verify and testify, if necessary, that the said property has been in continuous use as a mobile home park (trailer park) by renters ever since 1945?

Answer: YES

3. Will you realize any gain from the sale of this property?

Answer: NO

4. That I was born on the Gaddis Farm in Edgemere, Maryland on November 24, 1940 and resided at 7213 Walman Avenue - Edgemere, Maryland with my parents and siblings. I have specific memory of playing with siblings and friends around the trailer park which abuts the headwaters of Jones Creek.

5. I have been a lifelong resident of Edgemere and attended the public schools in the neighborhood. After my schooling, I became employed by Bethlehem Steel Corporation and then the National Brewing Company in Baltimore City.

6. I recall the streetcar named the Red Rocket No. 26 ran from Dundalk passed Jones Creek and then ran on to Bethlehem Steel. I can still recall throwing snow balls at the Red Rocket as it passed through Edgemere.

PETITIONER'S

EXHIBIT NO.

6

7. Jones Creek behind the trailer park was mostly marsh land and my friends and I would go there to hunt snapping turtle, frogs and snakes.

8. I do remember that the roads in the trailer park were made of stones and mostly oyster shells.

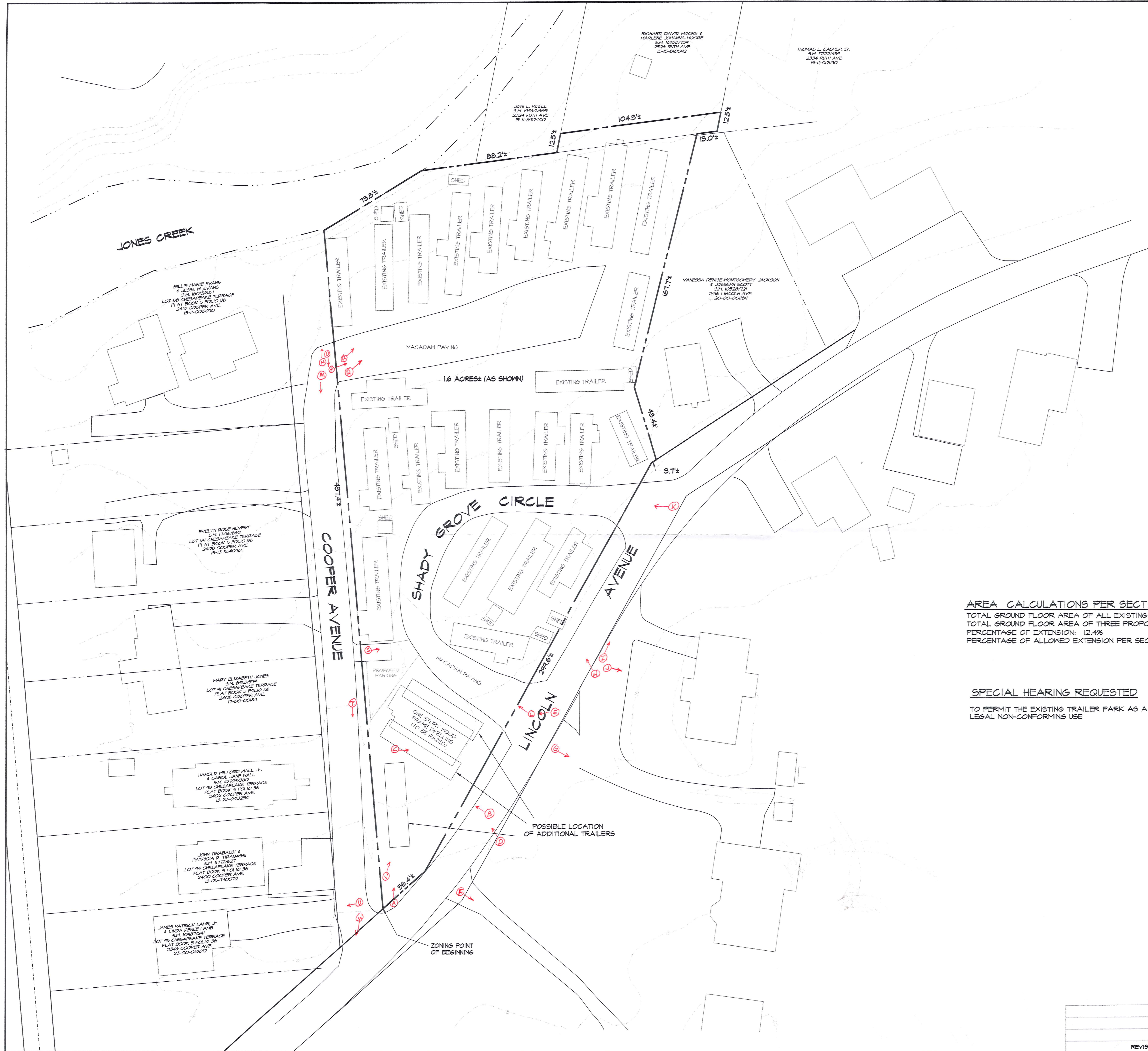
STATE OF MARYLAND, COUNTY OF BALTIMORE, to wit:

I HEREBY CERTIFY that on this 27 day of April, 2011, before me, a Notary Public of the State of Maryland, in and for the County of Baltimore aforesaid, personally appeared Carl S. Schaffer, the Affiant herein, personally known or satisfactorily identified to me as such Affiant.

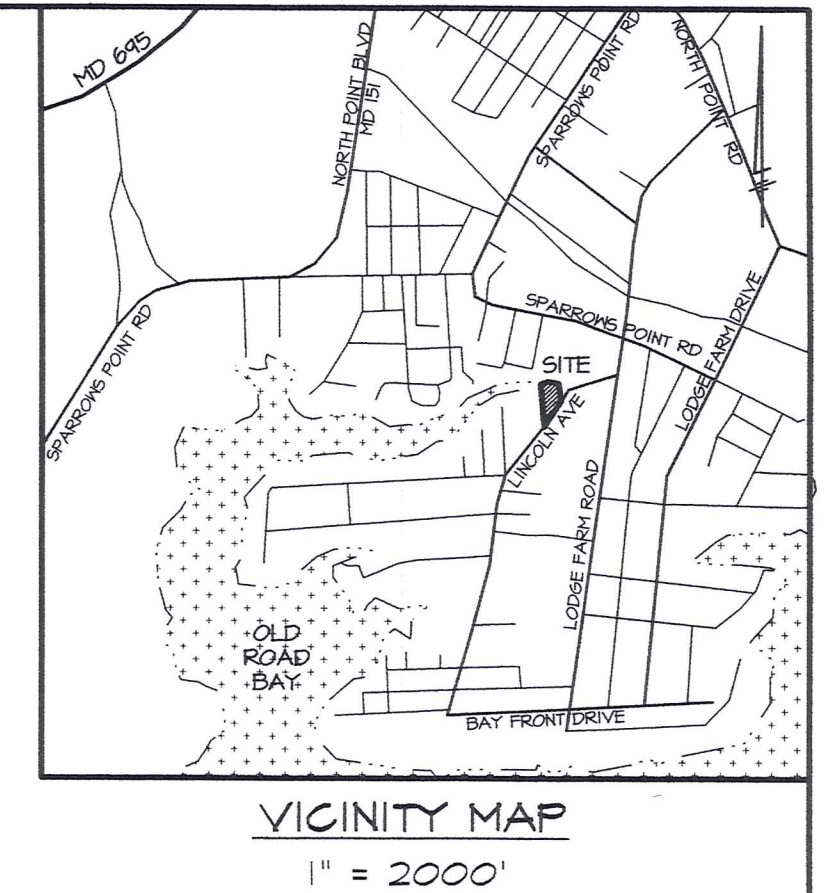
AS WITNESS my hand and Notarial Seal.



Barbara Frank
NOTARY PUBLIC
My Commission expires: 9/8/12



MARYLAND COORDINATE SYSTEM
NAD83(1981)



GENERAL NOTES

1. THE BOUNDARY SHOWN HEREON IS COMPILED FROM DEEDS AND PLATS OF RECORD.
2. THE TOPOGRAPHY SHOWN HEREON WAS TAKEN FROM BALTIMORE COUNTY GIS TILES 111B2 & 111C2
3. CENSUS TRACT 452100 REGIONAL PLANNING DISTRICT 331
WATERSHED BALTIMORE HARBOR SEWERSHED 43 WATER SERVICE AREA: FIRST ZONE
SCHOOL DISTRICT: ELEMENTARY - CHEASPEAKE TERRACE ES; MIDDLE - SPARROWS POINT M.S.;
HIGH - SPARROWS POINT H.S.
A.D.C. MAP # GRID 45 611
4. THERE ARE NO KNOWN PRIOR ZONING CASES ON THE SUBJECT PROPERTY.
5. THE SUBJECT PROPERTY IS NEITHER HISTORIC NOR WITHIN A HISTORIC DISTRICT.
6. THERE ARE NO KNOWN UNDERGROUND FUEL STORAGE TANKS ON THE SUBJECT PROPERTY.
7. THE SUBJECT PROPERTY IS LOCATED IN THE CHEASPEAKE BAY CRITICAL AREA.
8. THE SUBJECT PROPERTY IS WITHIN A 100 YEAR FLOOD PLAIN.

AREA CALCULATIONS PER SECTION 104.3 BCZR

TOTAL GROUND FLOOR AREA OF ALL EXISTING TRAILERS: 17024 SQ. FT.
TOTAL GROUND FLOOR AREA OF THREE PROPOSED TRAILERS: 2106 SQ. FT.
PERCENTAGE OF EXTENSION: 12.4%
PERCENTAGE OF ALLOWED EXTENSION PER SECTION 104.3: 25%

SPECIAL HEARING REQUESTED

TO PERMIT THE EXISTING TRAILER PARK AS A
LEGAL NON-CONFORMING USE

OWNER
ATHENA KLOSTERIDIS
1502 POT SPRING ROAD
LUTHERVILLE-TIMONIUM, MARYLAND 21093-5908

OWNER'S REPRESENTATIVE
NICHOLAS J. PISTOLIS
608 BALTIMORE AVENUE
TOWNSON, MD 21204
410-686-5696

*PLAN TO ACCOMPANY PHOTOGRAPHS
CASE No. 2011-0361 - SPH*

**PLAN TO ACCOMPANY A PETITION
FOR A SPECIAL HEARING
ON THE**

LINCOLN TRAILER PARK

LINCOLN AVENUE
Deed Ref: S.M. No. 15360 folio 566
Tax Account No.: 15-03-001016
Zoned D.R.- 5.5; GIS Tile 111B2 & 111C2
Tax Map III; Grid 16; Parcel 128
15th ELECTION DISTRICT
7th COUNCILMANIC DISTRICT
BALTIMORE COUNTY, MARYLAND

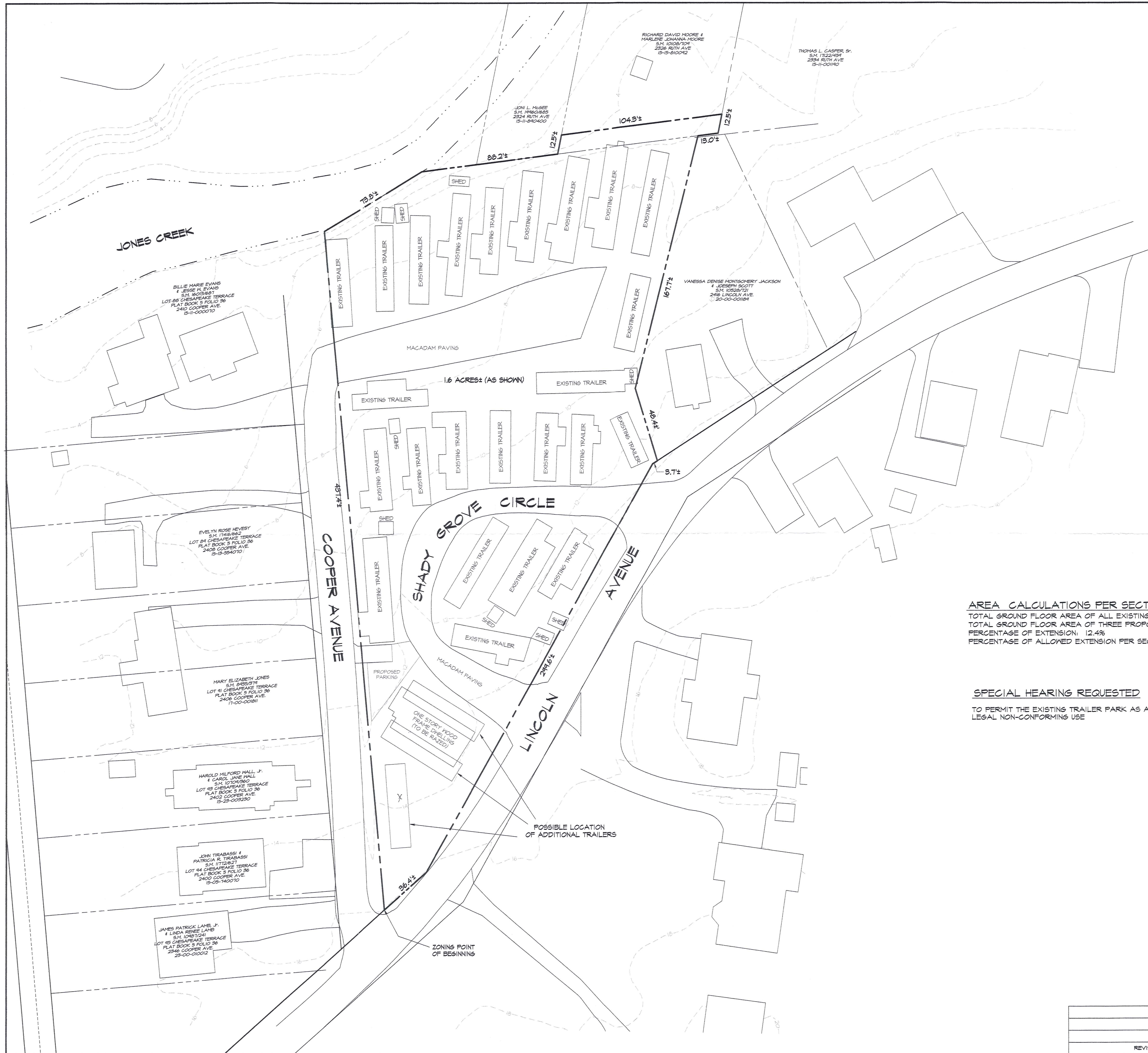


Scale: 1"=30' Date: MAY 12, 2011

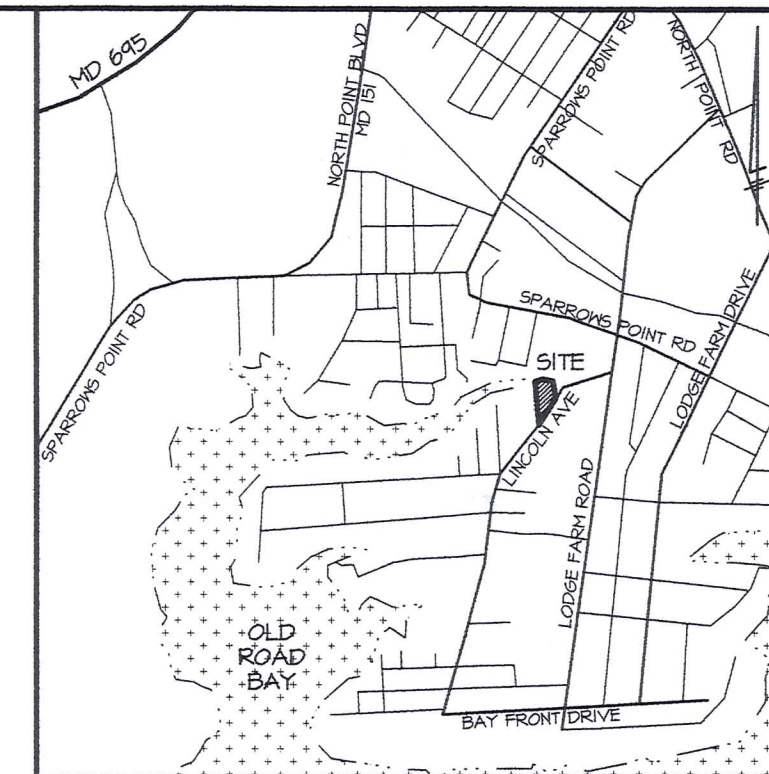
GERHOLD, CROSS & ETZEL, LTD.

REGISTERED PROFESSIONAL LAND SURVEYORS
Suite 100
320 East Townsontown Boulevard
Towson, Maryland 21286
(410) 823-4470

REVISION	DATE	COMPUTED:	DRAWN:	CHECKED:	FILE: X:\V\Pistolis Lincoln\SpecialHearing\05_12_11.pro



MARYLAND COORDINATE SYSTEM
NAD83(1991)



VICINITY MAP
1" = 2000'

GENERAL NOTES

1. THE BOUNDARY SHOWN HEREON IS COMPILED FROM DEEDS AND PLATS OF RECORD.
2. THE TOPOGRAPHY SHOWN HEREON WAS TAKEN FROM BALTIMORE COUNTY GIS TILES 11IB2 & 11IC2
3. CENSUS TRACT 452100 REGIONAL PLANNING DISTRICT 331
WATERSHED BALTIMORE HARBOR SEWERSHED 43 WATER SERVICE AREA: FIRST ZONE
SCHOOL DISTRICT: ELEMENTARY - CHEASPEAKE TERRACE E.S.; MIDDLE - SPARROWS POINT M.S.;
HIGH - SPARROWS POINT H.S.
A.D.C. MAP & GRID 45 611
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6. THERE ARE NO KNOWN UNDERGROUND FUEL STORAGE TANKS ON THE SUBJECT PROPERTY.
7. THE SUBJECT PROPERTY IS LOCATED IN THE CHEASPEAKE BAY CRITICAL AREA.
8. THE SUBJECT PROPERTY IS WITHIN A 100 YEAR FLOOD PLAIN.

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TOTAL GROUND FLOOR AREA OF ALL EXISTING TRAILERS: 17024 SQ. FT.
TOTAL GROUND FLOOR AREA OF THREE PROPOSED TRAILERS: 2108 SQ. FT.
PERCENTAGE OF EXTENSION: 12.4%
PERCENTAGE OF ALLOWED EXTENSION PER SECTION 104.3: 25%

SPECIAL HEARING REQUESTED

TO PERMIT THE EXISTING TRAILER PARK AS A
LEGAL NON-CONFORMING USE

OWNER

ATHENA KLOSTERIDIS
1502 POT SPRING ROAD
LUTHERVILLE-TIMONIUM, MARYLAND 21093-5908

OWNER'S REPRESENTATIVE

NICHOLAS J. PISTOLIS
6008 BALTIMORE AVENUE
TOWSON, MD 21204
410-686-5696

Case No. 2011-~~001~~³⁶¹-SPH
PLAN TO ACCOMPANY A PETITION
FOR A SPECIAL HEARING
ON THE
LINCOLN TRAILER PARK

LINCOLN AVENUE

Deed Ref: S.M. No. 15360 folio 566
Tax Account No.: 15-03-001016
Zoned D.R.- 5.5 ; GIS Tile 11IB2 & 11IC2
Tax Map III; Grid 16; Parcel 128
15th ELECTION DISTRICT
7th COUNCILMANIC DISTRICT
BALTIMORE COUNTY, MARYLAND

Scale: 1"=30'

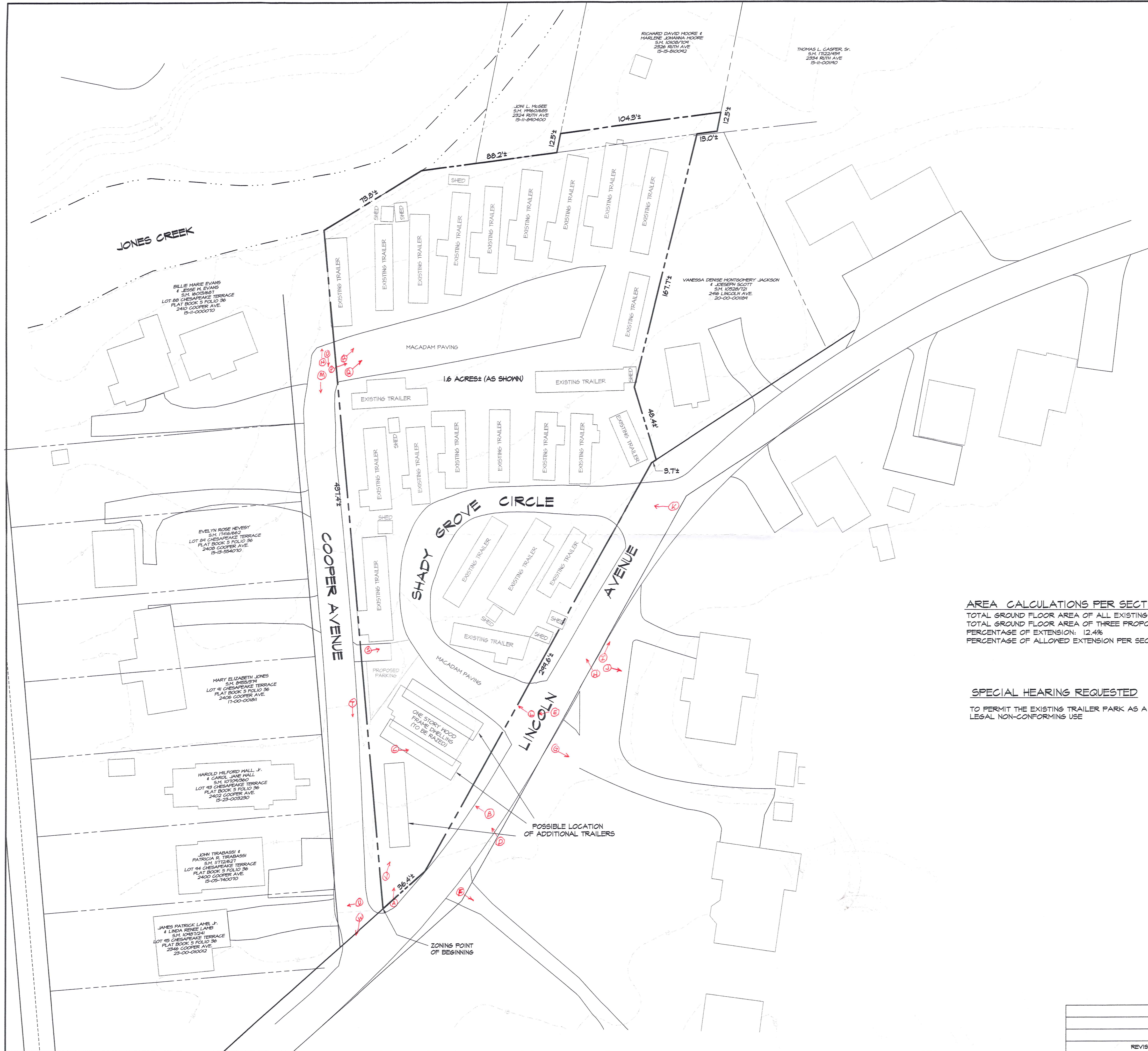
Date: MAY 12, 2011

GERHOLD, CROSS & ETZEL, LTD.
REGISTERED PROFESSIONAL LAND SURVEYORS

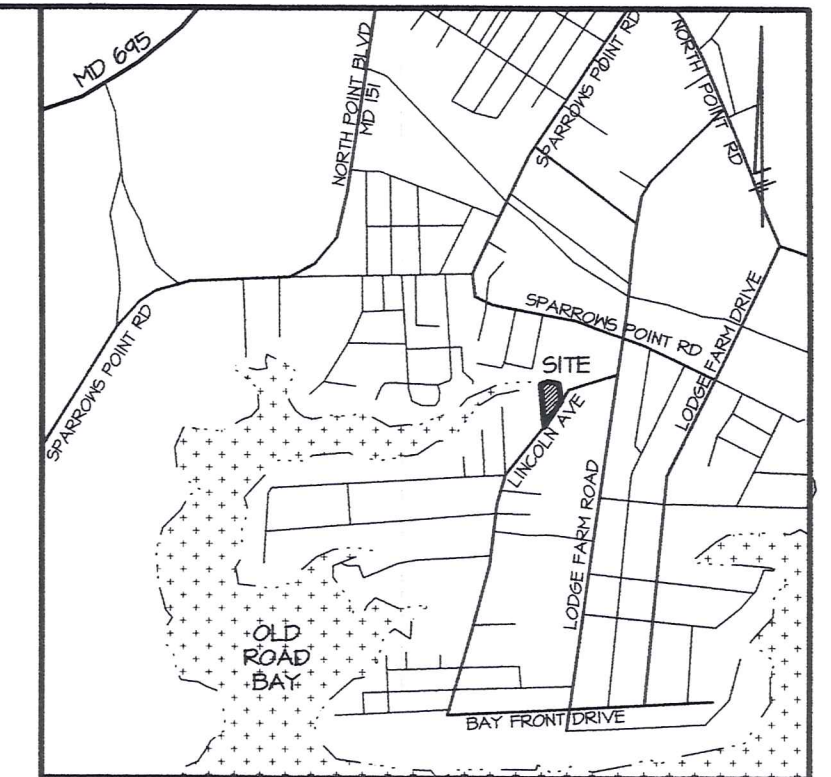
Suite 100
320 East Towsontown Boulevard
Towson, Maryland 21286
(410) 823-4470



REVISION	DATE	COMPUTED	DRAWN	CHECKED	FILE: X:\VP\Pistolis\LincolnSpecialHearing05_12_11.pro



MARYLAND COORDINATE SYSTEM
NAD83(1981)



VICINITY MAP
1" = 2000'

GENERAL NOTES

1. THE BOUNDARY SHOWN HEREON IS COMPILED FROM DEEDS AND PLATS OF RECORD.
2. THE TOPOGRAPHY SHOWN HEREON WAS TAKEN FROM BALTIMORE COUNTY GIS TILES 11IB2 & 11IC2
3. CENSUS TRACT 452100 REGIONAL PLANNING DISTRICT 331
WATERSHED BALTIMORE HARBOR SEWERSHED 43 WATER SERVICE AREA: FIRST ZONE
SCHOOL DISTRICT: ELEMENTARY - CHEASPEAKE TERRACE ES; MIDDLE - SPARROWS POINT M.S.;
HIGH - SPARROWS POINT H.S.
A.D.C. MAP # GRID 45 611
4. THERE ARE NO KNOWN PRIOR ZONING CASES ON THE SUBJECT PROPERTY.
5. THE SUBJECT PROPERTY IS NEITHER HISTORIC NOR WITHIN A HISTORIC DISTRICT.
6. THERE ARE NO KNOWN UNDERGROUND FUEL STORAGE TANKS ON THE SUBJECT PROPERTY.
7. THE SUBJECT PROPERTY IS LOCATED IN THE CHESAPEAKE BAY CRITICAL AREA.
8. THE SUBJECT PROPERTY IS WITHIN A 100 YEAR FLOOD PLAIN.

AREA CALCULATIONS PER SECTION 104.3 BCZR

TOTAL GROUND FLOOR AREA OF ALL EXISTING TRAILERS: 17024 SQ. FT.
TOTAL GROUND FLOOR AREA OF THREE PROPOSED TRAILERS: 2106 SQ. FT.
PERCENTAGE OF EXTENSION: 12.4%
PERCENTAGE OF ALLOWED EXTENSION PER SECTION 104.3: 25%

SPECIAL HEARING REQUESTED

TO PERMIT THE EXISTING TRAILER PARK AS A
LEGAL NON-CONFORMING USE

OWNER

ATHENA KLOSTERIDIS
1502 POT SPRING ROAD
LUTHERVILLE-TIMONIUM, MARYLAND 21093-5908

OWNER'S REPRESENTATIVE

NICHOLAS J. PISTOLIS
608 BALTIMORE AVENUE
TOWNSON, MD 21204
410-686-5696

PLAN TO ACCOMPANY PHOTOGRAPHS
CASE No. 2011-0361 - SPH

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ON THE

LINCOLN TRAILER PARK

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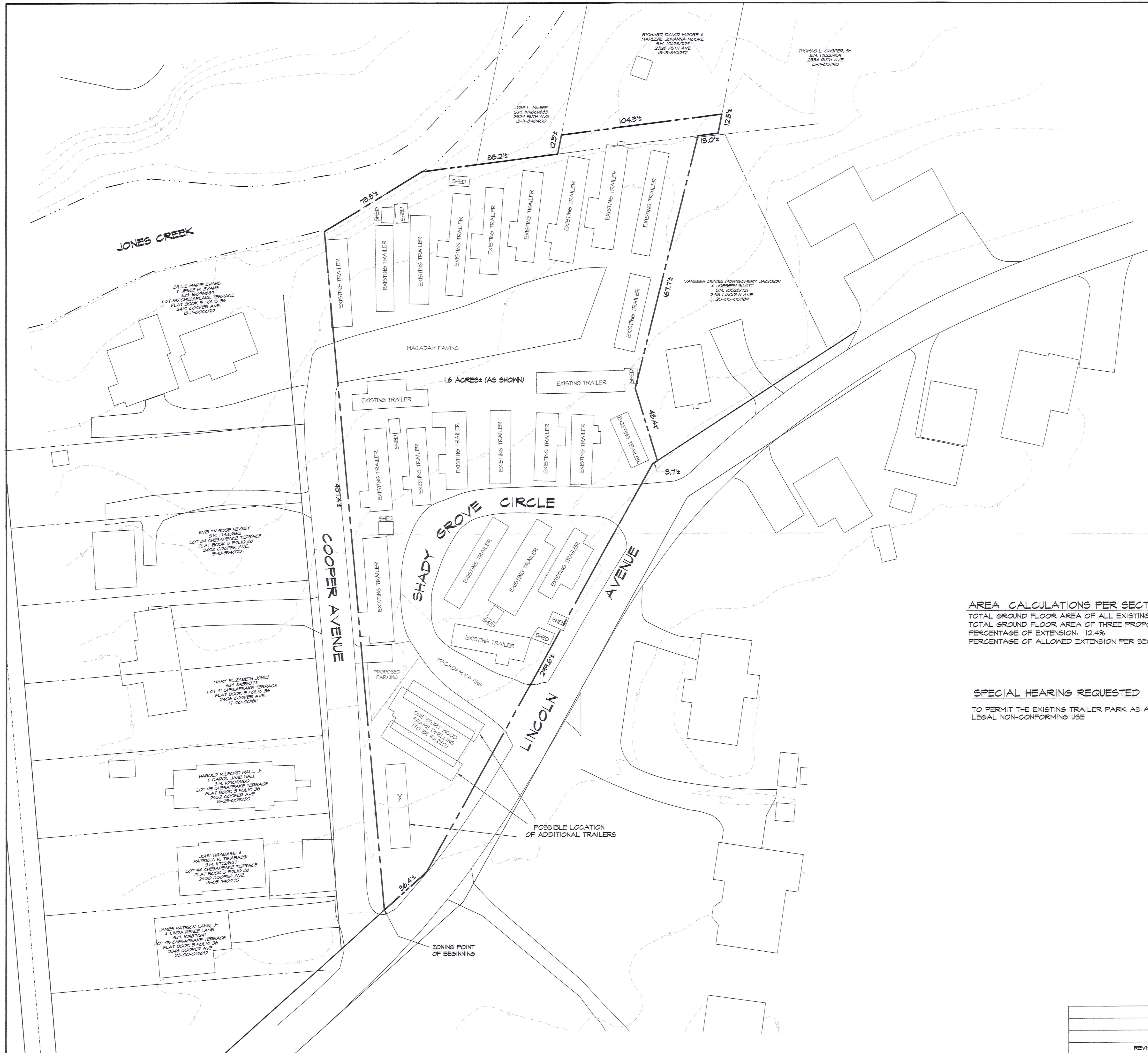


Scale: 1"=30' Date: MAY 12, 2011

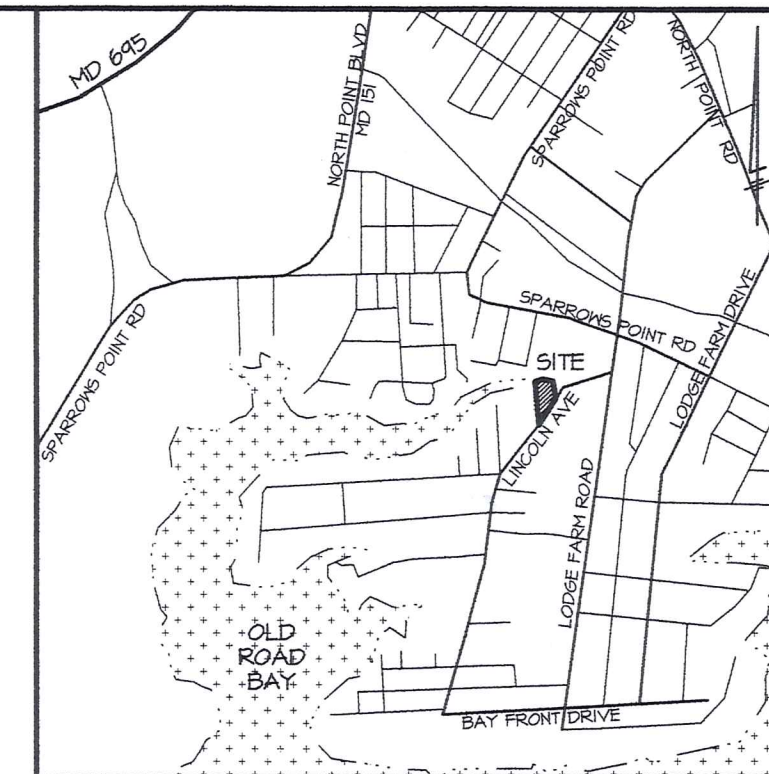
GERHOLD, CROSS & ETZEL, LTD.

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(410) 823-4470

REVISION	DATE	COMPUTED	DRAWN	CHECKED	FILE: X:\V\Pistolis Lincoln\SpecialHearing\05_12_11.pro



MARYLAND COORDINATE SYSTEM
NAD83(1991)



VICINITY MAP
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