

9/10/14

IN THE MATTER OF

* BEFORE THE

TWENTY SEVEN HOOKS LANE, LLC
- LEGAL OWNERS /PETITIONER FOR
SPECIAL HEARING, SPECIAL EXCEPTION
AND VARIANCE FOR THE PROPERTY
LOCATED AT 27 HOOKS LANE
3RD ELECTION DISTRICT
2ND COUNCILMANIC DISTRICT

* BOARD OF APPEALS
* OF
* BALTIMORE COUNTY
* CASE NO.: 12-135-SPHXA

* * * * *

ORDER OF DISMISSAL

This matter comes to the Board of Appeals by way of an appeal filed by Alan Zukerberg, Esquire on behalf of Reservoir Ltd Partnership and Cynthia Hitt Kent, Esquire on behalf of Greene Tree Homeowners Association, Inc, Michael Simons, Loren Staples, Alan Zukerberg, and Pikesville Communities Corporation, from a decision of the Administrative Law Judge dated January 25, 2012 in which the requested Petition for Special Hearing was granted, the requested Petition for Special Exception was granted and the requested Petition for Variance was denied. The Motion for Reconsideration was denied by the Administrative Law Judge on February 24, 2012.

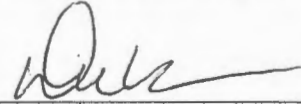
WHEREAS, the Board is in receipt of a voluntary letter of withdrawal of the Petitions for Special Hearing, Special Exception, and Variance, filed August 29, 2014 and signed by Christopher D. Mudd, Esquire, Counsel for Twenty Seven Hooks Lane, LLC, Petitioners, (a copy of which is attached hereto and made a part hereof); and

WHEREAS, said Counsel for Petitioners requests that the Petitions for Special Hearing, Special Exception, and Variance, taken in this matter be withdrawn as of August 29, 2014,

IT IS THEREFORE ORDERED this 10th day of September, 20 14
by the Board of Appeals of Baltimore County that the Petitions for Special Hearing, Special Exception, and Variance taken in Case No. 12-135-SPHXA be and the same are hereby

DISMISSED without prejudice, thereby rendering the January 25, 2012 Opinion and Order of the Administrative Law Judge as **null and void** in this matter.

**BOARD OF APPEALS
OF BALTIMORE COUNTY**



David L. Thurston, Chairman

August 29, 2014

Christopher D. Mudd
Counsel
T 410.494.6365
F 410.821.0147
cdmudd@venable.com

HAND DELIVERED

David L. Thurston, Chairman
County Board of Appeals of
Baltimore County
The Jefferson Building, Suite 203
105 West Chesapeake Avenue
Towson, Maryland 21204

RECEIVED

AUG 29 2014

BALTIMORE COUNTY
BOARD OF APPEALS

Re: Twenty Seven Hooks Lane, LLC
Case No. 12-135-SPHXA

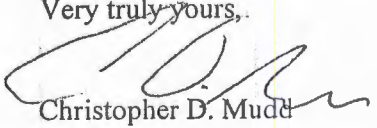
Dear Chairman Thurston:

This firm represents the Applicant/Petitioner Twenty Seven Hooks Lane, LLC in the above-referenced matter. At issue is zoning relief the Applicant/Petitioner obtained for a new office building on property it owns in the Pikesville area of Baltimore County. Appeals were filed, and, at the time of the appeal, a request was pending before the County Planning Board and County Council to rezone the subject property, during the 2012 Comprehensive Zoning Map Process (CZMP), to a zone that would potentially eliminate the need for the zoning relief at issue. For this reason, the Board agreed to refrain from setting the matter in for hearing until the conclusion of the CZMP. Although the County Council ultimately rezoned the subject property, as this Board may be aware, the results of the CZMP in the Second Councilmanic District (in which the property is located) were subjected to potential challenge by referendum. That challenge was just recently resolved, leaving the new zoning in place, which, as indicated, will likely eliminate the need for need for all of the zoning relief at issue in this matter. At the very least, some of the requested relief is no longer required, and the new zoning classification may ultimately result in the reconfiguration of the proposed improvements that may or may not require zoning relief.

Because of the implementation of the new zoning on the subject property, the Applicant/Petitioner is hereby withdrawing its Petitions for Special Hearing, Special Exception, and Variance, **without prejudice**, in accordance with Rule 3.b.2 of the Board's Rules of Practice and Procedure.

If you have any questions or require any additional information, please contact me.

Very truly yours,


Christopher D. Mudd

CDM

cc: Cynthia Hitt Kent, Esquire
Alan Zukerberg, Esquire

#8510406v1



County Board of Appeals of Baltimore County

JEFFERSON BUILDING
SECOND FLOOR, SUITE 203
105 WEST CHESAPEAKE AVENUE
TOWSON, MARYLAND, 21204
410-887-3180
FAX: 410-887-3182

September 10, 2014

Christopher D. Mudd, Esquire
Venable LLP
210 W. Pennsylvania Avenue
Suite 500
Towson, Maryland 21204

Alan P. Zukerburg, Esquire
7919 Long Meadow Road
Baltimore, Maryland 21208-3023

Cynthia Hitt Kent, Esquire
10 Crossroads Drive, Suite 107
Owings Mills, Maryland 21117

RE: In the Matter of: Twenty Seven Hooks Lane, LLC
Case No: 12-135-SPHXA

Dear Counsel:

Enclosed please find a copy of the Order of Dismissal issued this date by the Board of Appeals of Baltimore County in the above subject matter.

Any petition for judicial review from this decision must be made in accordance with Rule 7-201 through Rule 7-210 of the *Maryland Rules*, **WITH A PHOTOCOPY PROVIDED TO THIS OFFICE CONCURRENT WITH FILING IN CIRCUIT COURT.** Please note that all **Petitions for Judicial Review filed from this decision should be noted under the same civil action number.** If no such petition is filed within 30 days from the date of the enclosed Order, the subject file will be closed.

Very truly yours,

Krysundra "Sunny" Cannington
Administrator

KLC/tam
Enclosure
Multiple Original Cover Letters

c: Richard Hoffman/Twenty Seven Hooks Lane, LLC
Bruce Doak
Kenneth Schmidt/Traffic Concepts, Inc.
Office of People's Counsel
Lawrence M. Stahl, Managing Administrative Law Judge
Arnold Jablon, Director/PAI
Andrea Van Arsdale, Director/Department of Planning

Greene Tree Homeowners Association, Inc.
Michael Simons
Loren Staples
Pikesville Communities Corporation
Reservoir Ltd. Partnership
Nancy West, Assistant County Attorney
Michael Field, County Attorney/Office of Law

2/15/12
IN RE: PETITIONS FOR SPECIAL HEARING, *
SPECIAL EXCEPTION AND VARIANCE *

BEFORE THE OFFICE OF
ADMINISTRATIVE HEARINGS
FOR BALTIMORE COUNTY
CASE NO. 2012-0135-SPHXA

SE/S Hooks lane; 1,050 feet NE of
c/l of Reisterstown Rd
(27 Hooks Lane)
3rd Election District
2nd Council District

RECEIVED

FEB 15 2012

Twenty Seven Hooks Lane, LLC
Petitioner

OFFICE OF ADMINISTRATIVE HEARINGS

MOTION FOR RECONSIDERATION AND MEMORANDUM IN SUPPORT THEREOF

Now comes Protestants, Pikesville Communities Corporation, a Maryland Corporation ("PCC"), and Alan P. Zukerberg, in his individual capacity, and seek a reconsideration of the Order and Opinion dated January 25, 2012, by Timothy M. Kotroco, the Administrative Law Judge, pursuant to Rule K, Appendix G of the Code of Baltimore County Regulations, Chapter 1- Zoning Commissioner, Part 1- Rules of Practice and Procedure Before the Zoning Commisissioner/Hearing Officer of Baltimore County. In support thereof, Protestants state:

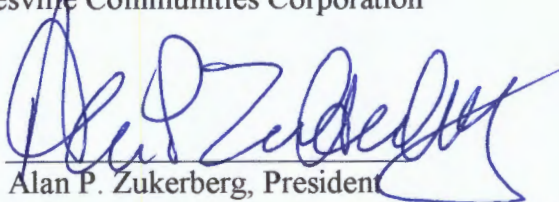
1. The Order granting the Petition for Special Hearing seeking Relief from Section 500.7 of the Baltimore County Zoning Regulations ("B.C.Z.R.") to approve an amendment to the site plan approved in Case No. 95-312-A, should be reversed and the Petition denied.
2. That the Order granting the Petition for Special Exception to permit a Class B office building, including a finding of compatibility pursuant to Baltimore County Code ("B.C.C.") Section 32-4-402, should be reversed and the Petition denied.
3. That the Order granting Petitioner five years from the date of the Order granting Special Exception to utilize and vest the approval granted should be reversed and denied.
4. That the Order granting all variances should be reversed and denied.
5. That all of the relief sought by Petitioner's that was granted should be reversed and denied and that Petitioner, if it wants to pursue such relief, must post the requisite sign, for the requisite period of time, and advertise in two newspapers of general circulation for the requisite period of time.
6. That all relief requested by Petitioner be denied.
7. That the ALJ convene a hearing to receive testimony and/or argument on this Motion.
8. That incorporated into this Motion is the accompanying Memorandum in Support of this Motion, setting forth relevant facts and law.

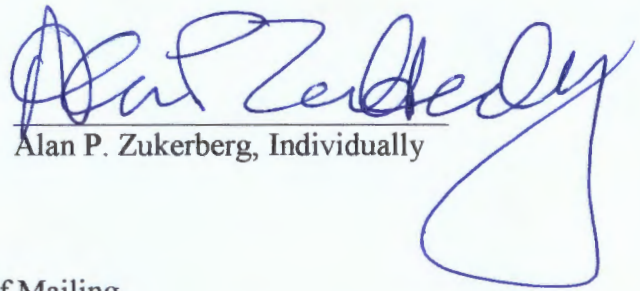
And, for such other and further relief as the nature of their cause may warrant.

Protestants:

Pikesville Communities Corporation

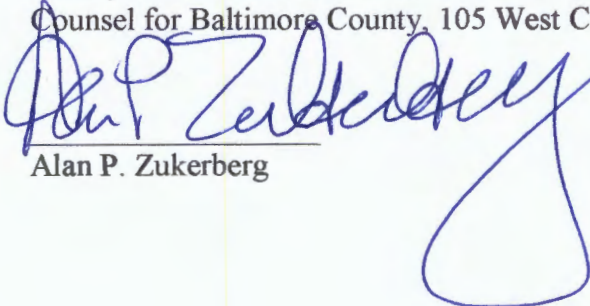
By:


Alan P. Zukerberg, President


Alan P. Zukerberg, Individually

Certification of Mailing

The undersigned, hereby certifies that on this 15th day of February, 2012, he mailed at copy of the foregoing Motion for Reconsideration to Christopher Mudd, Esq., Venable, LLP, 210 West Pennsylvania Ave., Ste 500, Towson, MD 21204, and to Peter Max Zimmerman, People's Counsel for Baltimore County, 105 West Chesapeake Ave., 2nd Floor, Towson, Maryland 21204


Alan P. Zukerberg

IN RE: PETITIONS FOR SPECIAL HEARING, *
SPECIAL EXCEPTION AND VARIANCE *

BEFORE THE OFFICE OF
ADMINISTRATIVE HEARINGS
FOR BALTIMORE COUNTY
CASE NO. 2012-0135-SPHXA

SE/S Hooks lane; 1,050 feet NE of
c/l of Reisterstown Rd
(27 Hooks Lane)
3rd Election District
2nd Council District

Twenty Seven Hooks Lane, LLC
Petitioner

RECEIVED

FEB 15 2012

OFFICE OF ADMINISTRATIVE HEARINGS

MEMORANDUM IN SUPPORT OF MOTION FOR RECONSIDERATION

NOW COMES THE PROTESTANTS, Pikesville Communities Corporation, a Maryland Corporation by Alan P. Zukerberg, its President, and Alan P. Zukerberg, individually and in support of their Motion for Reconsideration in the above-captioned matter say:

1. **The Posting of the sign was for less than the requisite period of time and therefore the hearing should have been postponed and the sign placed for the requisite period of time.**

The Protestants made a preliminary motion objecting to fact that the signage was not posted for the requisite 15 *continuous* days and seeking a postponement. This was denied:

- a. B.C.Z.R. § 500.7 states in part,

“If the petition relates to a specific property, notice of the time and place of the hearing shall be conspicuously posted on the property for a period of *at least 15 days* before the time of the hearing.” [emphasis supplied].

- b. The undisputed proffer showed that from about 10:35 a.m. on January 3, 2012 the sign was not conspicuously placed. Further, Petitioner’s testimony (by Mr. Doak) was that it was not until about 4:45a.m. January 4, 2012, that the requisite sign was finally posted. These facts are noted in the Administrative Law Judge’s (ALJ’s) Order and Opinion (“O&O”) at p.3. The ALJ should have concluded that *the sign was not posted for the required minimum 15 day period.*

Additionally Mr. Doak for the Petitioner testified that the sign was flat on the ground yet, Petitioner did not introduce any testimony, once there was a showing that the sign was down on January 3, 2012, that the sign was in fact, properly upright and placed *before* 10:35 a.m., January 3, 2012. Once it was shown and admitted that the

sign was down for such a period of time (10:35 a.m. January 3 through 4:45 a.m. January 4), it became the burden of Petitioner to show the sign was otherwise properly posted. Absence of the sign for such a long period of time and without a showing that the sign was up prior to January 3, 2012 should have required a postponement of the case, new advertising, and a rescheduling to allow others who may be protestants to appear at the hearing on the date scheduled. As it was, Mr. Zukerberg was the only person in the room on the Protestant side.

c. Further, the facts also showed that the LLC owner's representative, Mr. Hoffman had a financial arrangement (in addition to being the member of the Petitioner's LLC (the Lessor) with the occupants of the property, yet he did not have them testify as to what days the sign was posted. Jeffrey Ring, one of the occupants of the property was in the hearing room. Further, Mr. Ring actually saw and spoke with Mr. Zukerberg while the later was taking photographs of the absence of the sign, and was probably the person who contacted the Petitioner to say the sign was not placed. (This later fact was not in testimony, however Mr. Zukerberg would testify to same if necessary).

2. **Petitioner should have advertised in two newspapers of general circulation instead of only one. The ALJ committed error in refusing to allow Protestants' preliminary objection and postponement of the hearing to require re-advertising in two such newspapers.**

a. The ALJ denied the objection stated above, stating at page 4 of the O&O, that:

"... as Mr. Mudd correctly pointed out, Section 32-3-302 of the Baltimore County Code requires that the advertising for zoning hearings before this Court only appear in one newspaper of general circulation within the County. It is standard practice and procedure by the Zoning Office to follow this Section of the B.C.C. and require that the Applicant advertise their hearing in only one newspaper of general circulation. Therefore, I find that the Applicant has in fact met his posting and advertising obligations for the hearing before me. The preliminary motion raised by Mr. Zukerberg shall be denied."

b. B.C.Z.R. 500.7 states, in part:

"Whether or not a specific property is involved, notice shall be given for the same period of time in *at least two newspapers* of general circulation in the county." [emphasis supplied].

c. Regardless of what Sec. 32-3-302 of the Baltimore County Code states, or what the ALJ advanced, B.C.Z.R. § 600.1 states:

"In their interpretation and application, these regulations shall be held to be the minimum requirements for the promotion of the public health, safety, convenience and general welfare. *Where these regulations impose a greater restriction* on the use of buildings or land or on the height of buildings, or require larger yards, courts or other open spaces, *or*

impose other higher standards than are imposed by the provisions of any law, ordinance, regulation or private agreement, these regulations shall control. When greater restrictions are imposed by any law, ordinance, regulation or private agreement than are required by these regulations, such greater restrictions shall not be affected by these regulations.” [emphasis supplied].

The ALJ acknowledged that the County Zoning does not follow the law, rather instead they (Zoning/ALJ) follow Section 32-3-302 of the Baltimore County Code:

“It is standard practice and procedure by the Zoning Office to follow this Section of the B.C.C. and require that the Applicant advertise their hearing in only one newspaper of general circulation.” (O&O p. 4)

3. The ALJ’s opinion fails to state facts warranting a finding that the property is “unique,” thus, no relief should have been granted. Petitioner sought a Special Exception to allow “A class B office building, including a finding of compatibility pursuant to Baltimore County Code Section 32-4-402.” Also, Petitioner sought to obtain a special exception (and variances) to allow for 100% of the total adjusted gross floor area, instead of the 25% conditional use, within the RO zone to be used as medical offices.

- a. Due Process requires findings of fact sufficient to show that the property is unique in order to obtain a “Special Exception and variances that follow. “Trinity Assembly of God of Baltimore City, Inc. v. People’s Counsel for Baltimore County, et al 407 Md. 53, 962 A.2d 404 (2008).

- i. On cross examination by Protestants, Petitioner’s witnesses confirmed that the property in question is a standard type of relatively flat, rectangular lot about 155.75’ x 62.50’. The ALJ failed to mention this in his opinion.
- ii. The O&O at p. 4 presents the ALJ’s summary of the Petitioner’s testimony (Mr. Hoffman). Nowhere in that characterization are there any facts presented to show that the property is unique.
- iii. The second witness called by Petitioner was Mr. Bruce Doak. The ALJ characterized Mr. Doak’s on the issue of uniqueness as follows:

“First, Mr. Doak testified regarding the uniqueness of the subject property. He stated that the property itself is very small and consists of 0.24 acres. At this time it is zoned RO and is surrounded for the most part on all sides with exception of its frontage along Hooks Lane with much larger commercial office and medical office complexes. It is surprising that this small parcel was not purchased by the developers of the surrounding complexes. It stands alone at this time as a converted single family dwelling and functions at this time as office space. It does benefit, however, from open areas around its borders which allows for and provides some nice natural screening, vegetation and buffers around its perimeter. These factors lead to the conclusion and finding that this property is in fact *unique as compared to other properties* in the

area for purposes of entertaining the variance request made by the Applicant herein.” O&O, p.6-7. [emphasis supplied].

Uniqueness, as compared to other properties is not the test as the property itself must be unique. Thus, the ALJ’s conclusion that the property is “very small” means nothing. That does not make it unique. In fact, it is roughly one-quarter of an acre. The fact that it is surrounded by larger properties, does not make this property unique; nor does the fact that, as the ALJ states, it stands alone. In fact, there was testimony by Petitioner’s witnesses on cross-examination that there are *other single family structures nearby similar to Petitioner’s*. [Photographs that Protestants entered into evidence *via* Petitioner’s witnesses confirmed other house-like structures in the area. In fact, many residence type structures are in sight of 27 Hooks Lane. There was nothing unique about the property being a house-like structure.]

Thus, the fact that the ALJ writes that it stands alone as a converted single family dwelling does not make it unique, nor the fact that the ALJ concludes that the property benefits from open areas around its borders.

The above are the “factors” that led the ALJ to conclude that the property is unique. (O&O, p. 4). Thereafter, in remaining parts of his opinion the ALJ attempts to pull himself up by his own bootstrap findings and says since the property is unique he therefore reasons that the extreme variances requested are warranted. Upon Petitioner’s failure to show uniqueness, all else fails and the variances are not to be granted.

In *Trinity*, supra at (962 A2d 419) J. Harrell, writing for the Court stated:

“The general rule is that the authority to grant a variance should be exercised sparingly and only under exceptional circumstances.” *Cromwell v. Ward*, 102 Md.App. 691, 703, 651 A.2d 424, 430 (1995)

In relevant part, the Zoning Code's variance provision provides:

[T]he power to grant variances ... [exists] only in cases where special circumstances or conditions exist that are peculiar to the land or structure which is the subject of the variance request and where strict compliance with the [Zoning Code] would result in practical difficulty or unreasonable hardship.¹¹

J. Harrell went on to say (Id at p.420):

“More than a decade ago, Judge Dale R. Cathell, now retired from this Court and while a member of the Court of Special Appeals, noted that the Zoning Code's general variance provision essentially requires a petitioner to demonstrate two things: (1) uniqueness of the property and (2) practical difficulty or unreasonable hardship. *Cromwell*, 102 Md.App. at 698-99, 651 A.2d at 427-28. He elaborated:

The first step requires a finding that the property whereon structures are to be placed (or uses conducted) is in and of itself unique and unusual in a manner different from the nature or surrounding properties such that the uniqueness and peculiarity of the subject property causes the

zoning provision to impact disproportionately upon the property. Unless there is a finding that the property is unique, unusual or different, the process stops here and the variance is denied without any consideration of practical difficulty or unreasonable hardship. If that first step results in a supportable finding of uniqueness or unusualness, then a second step is taken in the process, i.e., a determination of whether practical difficulty and/or unreasonable hardship, resulting from a disproportionate impact of the ordinance caused by the property's uniqueness, exists. Further consideration must then be given to the general purposes of the zoning ordinance.

Id. at 694-95, 651 A.2d at 426 (*italics omitted*). Similarly, this Court, interpreting Baltimore City's zoning code, said generally that a variance requires "proof of 'urgent necessity, hardship peculiar to the particular property, and a burden upon the owner not justified by the public health, safety and welfare.'" Kennerly v. Mayor of Balt., 247 Md. 601, 606-07, 233 A.2d 800, 804 (1967) (quoting Mayor of Balt. v. Polakoff, 233 Md. 1, 9, 194 A.2d 819, 824 (1963))

To be "unique," a property must "have an inherent characteristic not shared by other properties in the area, i.e., its shape, topography, sub-surface condition, environmental factors, historical significance, access or non-access to navigable waters, practical restrictions imposed by abutting properties (such as obstructions) or other similar restrictions." Lewis v. Dept. of Natural Resources, 377 Md. 382, 434, 833 A.2d 563, 594 (2003) (*italics omitted*) (quoting North v. St. Mary's County, 99 Md.App. 502, 514, 638 A.2d 1175, 1181 (1994)). In its July 2004 written decision in the present case, the Board articulated correctly the legal test with which it was tasked to administer with respect to uniqueness. Relying on *Cromwell*, the Board expressed its understanding that "'uniqueness' requires that the 'subject property have an inherent characteristic not shared by other properties in the area.'" To that end, the Board credited the testimony of People's Counsel's expert, Jeffery Long, over that of Trinity's expert, William Monk. The Board gave cogent reasons for why it found Long more convincing, including his familiarity with the local community and knowledge of the physical characteristics of similarly situated properties. The Board also noted that Trinity's other witnesses offered little in persuasive terms regarding how the Property is unique. Although Trinity contends that the Board did not give due regard to the Beltway as a factor contributing to the Property's uniqueness, Long testified that other institutions abutting I-83 provide an equally useful comparison. The Board was permitted to credit his testimony. Perhaps the evidence presented by Trinity might have sustained a finding that the Property is unique; however, on this record, it was the Board's province to reconcile the competing or conflicting testimony. We agree with the Court of Special Appeals that substantial evidence supported the Board's finding of lack of uniqueness." [962 A.2d 420-421]

Photographs submitted into evidence that Protestants entered into evidence via Petitioner's witnesses confirmed other house-like residential like structures in the area. In fact, many residence type structures are in sight of 27 Hooks Lane.

27 Hooks Lane has no unique "...inherent characteristic not shared by other properties in the area, i.e its shape, topography, sub-surface condition, environmental factors, historical significance, access or non-access to navigable waters, practical restrictions imposed by abutting properties (such as obstructions) or other similar restrictions." In fact, the best the ALJ could do was to say that the characteristics of certain of the abutting properties are – used for offices and

commercial [but the ALJ failed to emphasize the residential zone contiguous to the property] and the resulting "open areas around its borders..." (O&O, p. 7).

The testimony from the Petitioner was clear as to the *non-urgency* for getting the relief – "...there are no traffic issues or parking problems associated with the property." (O&O p. 5) Petitioner's Mr. Hoffman further "speculated" that he thinks a medical office building would be successful in the area, because there are other medical offices in the area. (O&O p.5). His testimony showed there is not urgency because he has no immediate plans to build a new structure, has not solicited and does not know of medical tenants who would occupy any new structure and had no market studies performed to confirm that this would be a successful use. Yet, he asks for a variance of the conditional use from 25% floor space to a full 100% floor space. By this testimony, Petitioner did not show practical difficulty or unreasonable hardship. Petitioner just wants to make more money by having more than a 25% conditional use of the property would allow, if, as and when Petitioner ever decides to use the building for medical office purposes.

4. The ALJ incorrectly applied the law as to whether the property abuts a residential property and thus should have found a 20' landscape buffer as opposed to the 10' buffer requested in the Petition.

At O&O p.11, the ALJ, states:

"Mr. Zukerberg questioned the Applicant's witnesses as to the fact that the property which is the subject of this Petition request abuts property that is residentially zoned. On the north side of Hooks Lane is property zoned DR 10.5 and is the location of the Green Tree residential subdivision. Because of this, Mr. Zukerberg argued that the buffering requirements for this property would be up to a 20 foot landscape buffer as opposed to the 10 feet requested in the Petition. However, I find that the subject property is not abutted by a residential zone and in fact is completely surrounded by commercial zoning. The RO zone line does in fact run down the center of Hooks Lane which causes the area in front of the subject property to be zoned RO. It is noted that on the opposite side of Hooks Lane there is residentially zoned land; however, that does not impact the subject property so as to require a 20 foot landscape buffering requirement."

By his own finding the ALJ concludes that the property opposite the subject property is zoned residential but concludes that the subject property does not abut a residential zone because there is a street-Greene Tree Road between the properties.

In Swarthmore Co. V. Kaestner, 258 Md. 517, 266 A2d 341 (1970), the Court noted on the issue of zones abutting or contiguous:

"In any event, Bill No. 40 does not require that the two districts 'abut' each other, merely that they be 'contiguous.' In Black's Law Dictionary, 'contiguous' is defined to mean 'in close proximity; near though not in contact; neighboring; adjoining; near in succession; an actual close contact; touching; bounded or traversed by.' See Grand Union Company v. Laurel Plaza, Incorporated, 256 F.Supp. 78, 81-82 (D.Md.1966). Cf. Gruver-Cooley Jade Corporation v. Perlis, 252 Md. 684, 695-96, 251 A.2d 589 (1969). On any theory, the C.S.A. District is 'near' the

C.C.C. District and hence is 'contiguous' to it even if it be assumed, for the argument, that it did not 'abut' it. We find no invalidity in Bill No. 23 because of any failure to comply with the requirement that the C.S.A. District be contiguous to a C.C.C. District." Swarthmore, supra at p. 530.

- 5. The ALJ should not have granted a five year term for the Special Exception to utilize and vest the approval he granted since the Petition did not ask for this relief and therefore there was no notice that same was an issue to be presented at the hearing.**

Petitioner not only failed to have the sign up for the 15 day continuous period, and to only publish notice in one newspaper, but he also failed to ask for the relief giving the five year period that the ALJ granted. Thus, due process was not followed by the late request and grant of this relief.

Respectfully Submitted,

Protestants:

Pikesville Communities Corporation

By:

Alan P. Zukerberg, President

Alan P. Zukerberg, Individually

Certification of Mailing

The undersigned, hereby certifies that on this 15th day of February, 2012, he mailed at copy of the foregoing Motion for Reconsideration to Christopher Mudd, Esq., Venable, LLP, 210 West Pennsylvania Ave., Ste 500, Towson, MD 21204, and to Peter Max Zimmerman, People's Counsel for Baltimore County, 105 West Chesapeake Ave., 2nd Floor, Towson, Maryland 21204

Alan P. Zukerberg



KEVIN KAMENETZ
County Executive

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

February 24, 2012

Alan P. Zukerberg
President
Pikesville Communities Corporation
7919 Long Meadow Road
Pikesville, Maryland 21208

Christopher D. Mudd, Esquire
Venable, LLP
210 W. Pennsylvania Avenue
Suite 500
Towson, Maryland 21204

RE: Motion for Reconsideration - Petitions for Special Hearing,
Special Exception and Variance
Case No. 2012-0135-SPHXA
27 Hooks Lane

Dear Messrs. Zukerberg and Mr. Mudd:

I am in receipt of Mr. Zukerberg's Motion for Reconsideration (dated February 15, 2012), and Mr. Mudd's opposition thereto, which was dated February 17, 2012.

As you will recall, the hearing in the above matter explored the legal issues in some detail, and I issued a 14-page Order and Opinion on January 25, 2012 that addressed each of the issues raised by the parties. Both counsel did an admirable job in presenting the case, and for that reason my Order was more detailed than would normally be the case in a "run of the mill" zoning hearing.

After reviewing Mr. Zukerberg's Motion, I believe that the points raised therein are, for the most part, the same one's advanced at the hearing in the above case. As such, I will deny the Motion for Reconsideration, and it will be up to the Board of Appeals (assuming an appeal is noted) to conduct a de novo review of this matter and the legal conclusions I reached. *See, e.g., Attorney Grievance Commission vs. Lee*, 393 Md. 546 (2005) (proper motion for reconsideration should allege new facts material to the matter that were not, or could not have been, adduced at the hearing).

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Kotroco".

TIMOTHY M. KOTROCO
Administrative Law Judge
for Baltimore County

TMK:dlw

t 410.494.6365
f 410.821.0147
cdmudd@venable.com

February 17, 2012

VIA HAND DELIVERY

Office of Administrative Hearings
The Jefferson Building
105 West Chesapeake Avenue, Suite 103
Towson, Maryland 21204

Re: 27 Hooks Lane
Case No. 2012-0135-SPHXA

RECEIVED
FEB 17 2012
OFFICE OF ADMINISTRATIVE HEARINGS

Dear Administrative Law Judges:

I am writing on behalf of the petitioner in the above-referenced matter, 27 Hooks Lane, LLC, in response to the Motion for Reconsideration filed by Alan P. Zukerberg and the Pikesville Communities Corporation. The Motion and accompanying Memorandum raise issues that either have already been addressed by this Office, or otherwise represent an impermissible attempt to introduce new facts and argument after the record has been closed. This is merely an attempt by the protestants to delay the proceedings, and I request that you expeditiously deny the Motion.

Thank you for your attention to this matter.

Very truly yours,

Christopher D. Mudd

CDM

cc: Alan P. Zukerberg
Peter Max Zimmerman, Esquire

Pikesville Communities Corporation

7919 Long Meadow Road
Pikesville, Maryland 21208

apzuk@msn.com

410 484-5047

www.Pikesvillecc.org

February 15, 2012

RECEIVED

FEB 15 2012

Officers

Alan P. Zukerberg,
President
Howard Cohen,
Vice-President
Howard Moffett,
Treasurer
Revanne Aronoff,
Secretary
Rona Barrash,
Exec. Director

Directors

Revanne Aronoff
Howard Cohen
Charlie Levine
Jay Levy, Esq.
Howard Moffett
Barry Norwitz, Esq.
Rob Rike.
Barbara Sindler
Loren Staples
Alan P.
Zukerberg, Esq.

Office of Administrative Hearings
105 West Chesapeake Ave
Ste 103
Towson, Md 21204

OFFICE OF ADMINISTRATIVE HEARINGS

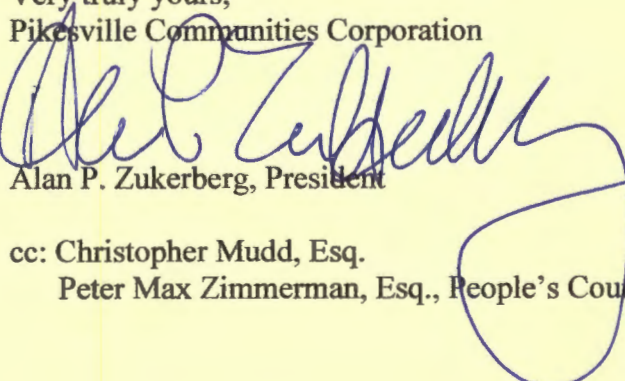
Re: Case NO. 2012-0135-SPHXA
27 Hooks Lane

Dear Sir/Madame:

Please file the enclosed Motion for Reconsideration and Memorandum in support thereof. Additionally, please time-stamp receipt the additional enclosed copy and return to me.

Thank you

Very truly yours,
Pikesville Communities Corporation


Alan P. Zukerberg, President

cc: Christopher Mudd, Esq.
Peter Max Zimmerman, Esq., People's Counsel

1/25/12

**IN RE: PETITIONS FOR SPECIAL HEARING,*
SPECIAL EXCEPTION AND VARIANCE**

SE/S Hooks Lane; 1,050 feet NE of
c/l of Reisterstown Road

(27 Hooks Lane)
3rd Election District
2nd Council District

Twenty Seven Hooks Lane, LLC
Petitioner

BEFORE THE

OFFICE OF ADMINISTRATIVE

HEARINGS FOR

BALTIMORE COUNTY

CASE NO. 2012-0135-SPHXA

* * * * *

ORDER AND OPINION

This matter comes before the Administrative Law Judge as Petitions for Special Hearing, Special Exception and Variance filed by the legal owners of the property, Twenty Seven Hooks Lane, LLC (Petitioners). The Petitioners are requesting Special Hearing relief pursuant to Section 500.7 of the Baltimore County Zoning Regulations ("B.C.Z.R.") to determine whether or not the Administrative Law Judge should approve an amendment to the site plan approved in Case No. 95-312-A, including confirmation that the Variance granted in that case may be utilized for the current site plan, or, in the alternative, a new Variance for the same purpose on the site plan filed in support of this request. The Petitioner is also requesting Special Exception relief to permit a Class B office building, including a finding of compatibility pursuant to Baltimore County Code ("B.C.C.") Section 32-4-402. Variance relief is also being sought pursuant to the B.C.Z.R. as follows:

- From Section 204.3.B.2.a - To permit up to 100% of the total adjusted gross floor area of a Class B office building within the RO zone to be occupied by medical offices; and
- From Section 204.4.C.6 - To permit 0% amenity open space, in lieu of the required 7%; and
- From Section 204.4.C.9.c.(2) - To permit landscape buffers as small as 0 feet, in lieu of the required 10 feet; and
- From Section 409.6.A.2 - To permit 14 off-street parking spaces, in lieu of the 18 required spaces.

ORDER RECEIVED FOR FILING

Date 1-25-12

By PB

In the alternative to the special hearing request, a Variance from Section 409.4.A of the B.C.Z.R. to permit a driveway for a two way movement to have a width of 10 feet, in lieu of the required 20 feet and a vehicular travelway with direct access to parking spaces. The subject property and requested relief is more fully depicted on the site plan that was marked and accepted into evidence as Petitioners' Exhibit 1.

Appearing at the requisite public hearing held for this case were Richard Hoffman and Stacy Hoffman, on behalf of 27 Hooks Lane, LLC, the owner of the property, David Benn, AIA, with Cho Benn Holback + Associates, Kenneth W. Schmid, Vice President of Traffic Concepts, Inc., Jeffrey Ring, and Bruce E. Doak with Gerhold, Cross & Etzel, Ltd., the professional land surveyor who prepared the site plan for the Petitioners. The Petitioners were represented by Christopher Mudd, Esquire with Venable, LLP. Alan Zukerberg, President, Pikesville Communities Corporation, appeared in opposition to the request, both as an individual Protestant as well as a representative of the Pikesville Communities Corporation.

The ZAC comments were received and made a part of the file. A comment was received from the Bureau of Development Plans Review ("D.P.R."), dated December 9, 2011 which states:

"Widen the mouth and the first 30 feet of the entrance to 16 feet so that at least one car can turn in off of Hook's Lane while another waits to turn out. Build a County standard concrete apron, curb and gutter, and sidewalk along the frontage."

Comments were received from the Department of Planning dated January 10, 2012, which states:

"The petitioner proposes to redevelop a property that has been improved with a 2 story, 1782 sq. ft. frame and masonry Class A Office Building known as 27 Hooks Lane. The subjects of this petition are a Special Hearing to amend a previously approved plan, a Special Exception for a 2-story 4,000 sq. ft. Class B Medical Office Building and associated Variances. The Department of Planning has reviewed the prior order Case No. 95-132a; the site plan and compatibility report that addresses the compatibility objectives as set forth in Section 32-4-402(c) of the Baltimore County Code. Note that a request to rezone the property from RO to OR2, known as 2012 CZMP Map Issue 2-005 has been filed; however this issue should not have any bearing on the subject case. The Department of Planning finds

ORDER RECEIVED FOR FILING

Date 1-25-12

the site layout and building's conceptual design to be compatible with other uses within the neighborhood. Should the Administrative Law Judge grant the petitioner's requests the Department of Planning requests the following: Submit full-scale architectural elevation drawings, sign and lighting details to the Department of Planning staff for review and approval prior to application for any building permits."

Mr. Zukerberg, by way of a preliminary motion, objected to the manner in which the property was posted for the hearing before me. On January 3, 2012, at 10:35 a.m., Mr. Zukerberg visited the subject property on Hooks Lane and noticed that the sign which was posted on the property had fallen down and was lying flat on the ground. A photograph marked as Protestant's Exhibit 1A was submitted into evidence showing the sign lying flat on the ground. Mr. Zukerberg argued that this fact violates the requirement that a sign be posted for a continuous 15 day period prior to the hearing before me. He argues that the hearing should be postponed and reset after a new sign is posted on the property for a continuous 15 days.

Testifying on behalf of the Applicant was Mr. Bruce Doak. Mr. Doak appeared as a expert professional land surveyor as well as the individual who posted the sign on the subject property. Mr. Doak received a phone call from Counsel for the Applicant advising him that the sign had in fact fallen over. Mr. Doak testified that he believed that a strong wind may have blown the sign over causing it to fall flat on the ground. The very next morning Mr. Doak testified that at 4:45 a.m. he traveled to the subject property and once again stood the sign back in its upright position. The sign remained properly posted since that time.

Mr. Zukerberg also objected to the fact that the sign was posted in a position that is parallel to Hooks Lane and not perpendicular thereto. He argued that this makes it difficult to read the sign for motorists traveling along Hooks Lane in that they would have to slow or stop their vehicles in order to read the language on the sign. Mr. Doak testified that he posts all his signs in this fashion and that this is the standard within the industry. These signs are not double sided. If

ORDER RECEIVED FOR FILING

Date 1-25-12 3

By ps

it were posted perpendicular to Hooks Lane, it could only be read from one direction of travel as the back side of the sign is blank.

After considering the testimony offered by Mr. Zukerberg and the responses given by Mr. Doak, I find that the posting requirement was satisfied and that the Applicant has met its burden of posting. It is very common for signs to either be knocked down or blown over in certain instances. The key fact is that the very next morning at 4:45 a.m., the Applicant re-erected the sign which clearly met the spirit and intent of the posting requirement. In addition, I find that given that the signs are one-sided, it is appropriate to situate the sign parallel to Hooks Lane.

Mr. Zukerberg also objected that the advertising for the hearing before me was only placed in one newspaper of general circulation in Baltimore County. He cited the section of the B.C.Z.R. which requires advertising in two newspapers of general circulation. However, as Mr. Mudd correctly pointed out, Section 32-3-302 of the Baltimore County Code requires that the advertising for zoning hearings before this Court only appear in one newspaper of general circulation within the County. It is standard practice and procedure by the Zoning Office to follow this Section of the B.C.C. and require that the Applicant advertise their hearing in only one newspaper of general circulation. Therefore, I find that the Applicant has in fact met his posting and advertising obligations for the hearing before me. The preliminary motion raised by Mr. Zukerberg shall be denied.

Moving on to the requested relief before me, the Applicant proceeded with a presentation of his case. First called to testify was Richard Hoffman, the 100% owner of 27 Hooks Lane LLC. Mr. Hoffman testified that he acquired the property in 1994 and located his CPA business within the small two story Dutch Colonial frame and masonry building located on the property. The subject property as stated previously is located on the south side of Hooks Lane, just west of its intersection with Reservoir Road. The property at this time is improved with an old two story

ORDER RECEIVED FOR FILING

Date 1-25-12 4

By [Signature]

frame masonry single family structure which has long since been converted to office use. The property also has a small parking area located to the rear of the property and a driveway coming off of Hooks Lane. At this time, Mr. Hoffman rents the subject property to four individuals who are in the financial planning business. Mr. Hoffman also maintains a small office and visits the property usually once a week. Mr. Hoffman stated that he merged his CPA practice with another firm and that office is located at another location.

He stated during his weekly visits he has noticed no traffic issues or parking problems associated with the property. He has also noticed that the property has become somewhat deteriorated over the years and capital improvements are needed in order for the subject building to continue to function as office space. He consulted an architect to discuss renovations to the building, but found that the subject building, which was originally constructed as a dwelling, would be too expensive to renovate. It is simply no longer functional as an office building. Therefore, Mr. Hoffman made the decision to raze the old converted dwelling and construct a brand new two story office building in its place. The details of the building footprint, driveway entrance, and parking area are clearly depicted on the site plan which was submitted into evidence as Petitioner's Exhibit 1.

Mr. Hoffman also stated that he speculates that medical office use may be a potential tenant of the newly constructed two story building. This area of Hooks Lane has become very popular for doctors and physicians, and therefore Mr. Hoffman has requested that the building be approved for medical offices. Therefore, as part of his application process, he has requested approval that up to 100% of the office building to be constructed on site be used a medical offices. He also has requested special exception relief for a Class B office building as well as a finding of compatibility in accordance with Section 32-4-402 of the B.C.C.

ORDER RECEIVED FOR FILING

Date

1-25-12

By



On cross examination by Mr. Zukerberg, Mr. Hoffman stated that he has also filed a Petition to have the zoning of the property reclassified from RO, Residential Office, to OR 2. This application is pending before the County Council at this time and will not be voted upon for many months to come. Therefore, the Applicant has chosen to proceed by way of a hearing before this Administrative Law Judge to seek approval to construct this 4,000 square foot medical office building on the subject site.

The next called to testify was Bruce Doak, a professional land surveyor, with the firm of Gerhold, Cross & Etzel, Ltd. Mr. Doak was accepted as an expert in zoning and land development and for the purposes of the hearing before me specifically Sections 502.1 and 307 of the B.C.Z.R. Mr. Doak prepared Petitioner's Exhibit 1 which was the site plan of the property. Mr. Doak testified that an amendment was made to Petitioner's Exhibit 1 and is shown in red-line ink on the site plan. In accordance with comments issued by Dennis Kennedy of the Development Plans Review Section of the Department of Permits, Approvals and Inspections, he has modified the site plan to allow an entrance driveway to be 16 feet in width for approximately 20 feet into the subject site. The amendments also show a sidewalk along the front of the subject property adjacent to Hooks Lane. These modifications met with the approval of Mr. Kennedy who indicated he had no objection to the design of the parking and driveway for the subject medical office building. Mr. Kennedy's revised comment dated January 11, 2011, was submitted into evidence as Petitioner's Exhibit 3.

Mr. Doak went on further to testify regarding the relief requested by the Applicant. In order to raze the old converted single family dwelling and construct a two story medical office building in its place, certain relief is necessary from the B.C.Z.R. First, Mr. Doak testified regarding the uniqueness of the subject property. He stated that the property itself is very small and consists of 0.24 acres. At this time it is zoned RO and is surrounded for the most part on all

ORDER RECEIVED FOR FILING

Date 1-25-12

sides with exception of its frontage along Hooks Lane with much larger commercial office and medical office complexes. It is surprising that this small parcel was not purchased by the developers of the surrounding complexes. It stands alone at this time as a converted single family dwelling and functions at this time as office space. It does benefit, however, from open areas around its borders which allows for and provides some nice natural screening, vegetation and buffers around its perimeter. These factors lead to the conclusion and finding that this property is in fact unique as compared to other properties in the area for purposes of entertaining the variance request made by the Applicant herein.

In order to construct the two story office building on the subject property, several variances are necessary. Mr. Doak testified regarding each of those variance requests. The first variance request was to allow up to 100% of the adjusted gross floor area of the subject office building to be occupied by medical offices. Mr. Hoffman testified that he has no tenants scheduled to rent medical offices within the building at this time. However, given the popularity of medical offices along Hooks Lane, he makes this request to keep his options open in the event a suitable tenant comes along.

In addition, a second variance is requested from Section 204.4.C.6 of the B.C.Z.R. to allow 0% amenity open space in lieu of the required 7%. Mr. Doak testified that this requirement imposes traffic islands or some green space to be situated within the drive aisle areas of the subject site. It is not possible or practical for the Applicant to provide this amenity open space given the small size of the property, its uniqueness and limited area for parking. Any attempt to provide amenity open space would interfere with the proper flow of traffic and parking on the subject site.

The Applicant is also requesting pursuant to Section 204.4.C.9.C.2 of the B.C.Z.R. to allow landscape buffers of 0 feet in lieu of the required 10 feet. As stated previously, there are natural vegetative buffers around three sides of the subject property as was depicted on the

ORDER RECEIVED FOR FILING

Date 1-25-12

7

By [Signature]

photographs that were submitted into evidence of the subject site. This unique property does benefit from the surrounding property owners having previously installed berms and vegetation around the perimeter of the site. Accordingly, the Applicant herein is able to meet its visual landscaping requirements by taking advantage of these natural buffers and does not need to provide landscaping buffers on site.

Additionally, the Petitioner is requesting approval to allow 14 off-street parking spaces in lieu of the required 18 parking spaces. Again, taking into consideration the uniqueness of the property and the small area of the site the Applicant has provided as many parking spaces as is possible on the subject property. It is not possible to add any additional parking on site and the Applicant has calculated their parking requirements on a worst case scenario basis speculating that the entire building will be rented as medical office use. It remains to be seen how this building will lease in the future so the parking requirements may be reduced. Given the quick turn around time for parking for medical offices, the amount of parking will be sufficient for the uses proposed.

The last variance request is made in the alternative should the special hearing request not be granted. The special hearing request was to allow the continuation of a driveway with a two way movement to have a width of 10 feet in lieu of the required 20 feet. It should be noted that there was a previous zoning hearing on the subject property which approved a variance request for a driveway width of 10 feet in lieu of the required 20 feet. That particular decision was rendered in Case No. 95-312-A and was issued by Lawrence E. Schmidt, the Zoning Commissioner at the time. The Applicant in the case before me asked pursuant to their special hearing request that that variance carry forward to this new proposed two story medical office building. However, given that the building for which that variance was approved back in 1995 is being razed and a new two story building constructed in its place, I find it is a better practice to require a new variance to be

ORDER RECEIVED FOR FILING

Date 1-25-12 8

By ps

issued for a driveway width of 10 feet in lieu of the required 20 feet and that variance shall be entertained as the fifth variance request pursuant to the Petition filed herein.

In addition to the variance relief as described above, the Applicant is also requesting special exception relief to allow a Class B office building including a finding of compatibility pursuant to B.C.C. 32-4-402. Mr. Doak testified that in his expert opinion, the construction of a Class B office building at this location satisfies all of the requirements of Section 502.1, specifically subsections A, C, D, E, F and G. In addition, the Applicant is requesting approval that the utilization of this special exception for a Class B office building be extended for a full five year period as opposed to the two year period normally associated with the vesting of a special exception.

Mr. Doak also testified concerning the special hearing relief to amend the site plan which was previously approved in Case No. 95-312-A and furthermore to allow the variance for a driveway aisle width to carry over to the new office building which is proposed to be constructed pursuant to this case. It is certainly necessary to entertain the special hearing request to amend the previously approved site plan in Case No. 95-312-A, but for the reasons stated previously, I find that the second part of the special hearing request should not be entertained believing that a new variance should be granted pursuant to this request for the driveway aisle width. Since this is an entirely new office building being constructed on the property and not simply a renovation to the previous office building, I find it to be the better practice to consider that variance request anew.

Next called to testify on behalf of the Petition was Ken Schmid, owner and vice president of Traffic Concepts, Inc. Mr. Schmid was offered and accepted as an expert in traffic engineering. His curriculum vitae was accepted into evidence as Petitioner's Exhibit 9. Mr. Schmid prepared for the Applicant as Petitioner's Exhibit 10 a trip generation report and also measured the sight lines along Hooks Lane in both directions. Mr. Schmid concluded that the construction of the

ORDER RECEIVED FOR FILING

Date 1-25-12

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office building in question would impose no adverse impacts on traffic along Hooks Lane and that the special exception request to approve this Class B office building satisfied Section 502.1.B of the B.C.Z.R. This particular subsection of Section 502.1 deals with adverse impacts involving traffic.

Last called to testify on behalf of the Applicant was David Benn, architect. Submitted into evidence as Petitioner's Exhibit 11 was the curriculum vitae of Mr. Benn. He testified that he prepared the conceptual drawings of the office building to be constructed on the property which were marked and submitted into evidence as Petitioner's Exhibit 8. Mr. Benn specifically testified regarding the compatibility requirements as contained within Section 32-4-402 of the B.C.C. He stated that in his expert opinion the building to be constructed on the subject property along Hooks Lane satisfies all the compatibility requirements contained within that provision. He also assisted in the preparation of an exhibit identifying the neighborhood which was utilized in the analysis resulting in a finding of compatibility. Lastly he did testify that he was retained approximately two years ago to determine whether the office building that exists on the property at this time could be renovated and made more functional. His opinion was that it was too costly to renovate the existing structure and that his client would be better served to raze the old house and construct a new modern office building in its place.

As to compatibility, it is noted that the Office of Planning has issued a comment dated January 10, 2012, which was submitted into evidence as Petitioner's Exhibit 13. The Planning Office, having reviewed the compatibility report prepared by Architect Benn and submitted through Counsel for the Applicant, has concluded pursuant to their summary of recommendations that the site layout and the building's conceptual design is in fact compatible with the uses within this particular neighborhood. Having considered the testimony offered by Mr. Benn and the exhibit submitted into evidence by the Office of Planning, I find that the request to construct a two

ORDER RECEIVED FOR FILING

Date 1-25-12

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story building on this property is in fact compatible and the Applicant has satisfied Section 32-4-402 of the B.C.C. as to compatibility. I also find that the second part of the special exception request to approve a Class B office building on the subject property should also be approved. The Applicant produced ample testimony offered by Mr. Doak, Mr. Schmid and Mr. Benn, all offered in their expert capacity, that the requirements of Section 502.1 have been clearly met. Accordingly, the special exception request shall be approved. Furthermore, it is noted and as requested at the hearing, that the special exception request shall have five years to vest.

As stated previously, Alan Zukerberg appeared and offered very limited testimony in opposition to the Petitioner's request. However, Mr. Zukerberg was effective in his cross examination in bringing out what he believed to be some deficiencies in Petitioner's case. Mr. Zukerberg questioned the Applicant's witnesses as to the fact that the property which is the subject of this Petition request abuts property that is residentially zoned. On the north side of Hooks Lane is property zoned DR 10.5 and is the location of the Green Tree residential subdivision. Because of this, Mr. Zukerberg argued that the buffering requirements for this property would be up to a 20 foot landscape buffer as opposed to the 10 feet requested in the Petition. However, I find that the subject property is not abutted by a residential zone and in fact is completely surrounded by commercial zoning. The RO zone line does in fact run down the center of Hooks Lane which causes the area in front of the subject property to be zoned RO. It is noted that on the opposite side of Hooks Lane there is residentially zoned land; however, that does not impact the subject property so as to require a 20 foot landscape buffering requirement.

Mr. Zukerberg also argued that the subject property is not unique. However, for the reasons previously stated and based on the testimony offered by the Petitioner, I find that the property is unique for purposes of entertaining the variance request.

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Date 1-25-12

By 

After considering the testimony and evidence offered by the expert witnesses and the limited testimony from Mr. Zukerberg, I find that the variance request should be granted. I find special circumstances or conditions exist that are peculiar to the land or structure which is the subject of the variance request. I also find that strict compliance with the B.C.Z.R. would result in practical difficulty or unreasonable hardship upon Petitioner. Finally, I find that the variance can be granted in harmony with the spirit and intent of the B.C.Z.R., and in such manner as to grant relief without injury to the public health, safety, and general welfare.

In addition to the variance relief, the Applicant also requested special hearing relief. The first part of the special hearing relief was to amend to previously approved site plan in Case No. 95-312-A. I hereby find that it is appropriate to amend the previously approved site plan to show a proposed two story 4,000 square feet office building and associated parking in place of the old converted single family dwelling which is now used as office space. That special hearing request shall be approved. However, the second part of the special hearing request to allow the utilization of a previously approved variance in Case No. 95-312-A to carry forward and continue with this newly constructed two story office building shall not be approved. As previously concluded, I have approved the fifth variance request to allow a drive aisle width of 10 feet in lieu of the required 20 feet for the construction of this new building and did not believe it was appropriate to carry forward the old variance approval given that this is entirely new structure being built on the subject site.

Lastly, as to the special exception request, I have previously found that the Applicant has met and satisfied all the requirements of Section 502.1 of the B.C.Z.R. as well as the compatibility requirements as contained in Section 32-4-402 of the B.C.C. Accordingly, the special exception request shall be granted as well as an extension for the utilization of the special exception request to a full five year period as opposed to the normal two year period.

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Date

1-25-12

Pursuant to the advertisement, posting of the property and public hearing on this Petition held and for the reasons set forth above, the relief requested shall be granted in part and denied in part.

THEREFORE, IT IS ORDERED, this 25th day of January, 2012 by the Administrative Law Judge for Baltimore County, that the Petition for Special Hearing seeking relief from Section 500.7 of the Baltimore County Zoning Regulations ("B.C.Z.R.") to approve an amendment to the site plan approved in Case No. 95-312-A, shall be GRANTED.

IT IS FURTHER ORDERED, that the confirmation that the Variance granted in Case No. 95-312-A may be re-utilized for the current site plan, be and is hereby DENIED.

IT IS FURTHER ORDERED that the Petition for Special Exception to permit a Class B office building, including a finding of compatibility pursuant to Baltimore County Code ("B.C.C.") Section 32-4-402, be and is hereby GRANTED.

IT IS FURTHER ORDERED that the Petitioner shall have five years from the date of the final Order granting this Special Exception to utilize and vest the approval granted herein.

IT IS FURTHER ORDERED that the Petition for Variance pursuant to the B.C.Z.R. as follows:

- From Section 204.3.B.2.a - To permit up to 100% of the total adjusted gross floor area of a Class B office building within the RO zone to be occupied by medical offices; and
- From Section 204.4.C.6 - To permit 0% amenity open space, in lieu of the required 7%; and
- From Section 204.4.C.9.c.(2) - To permit landscape buffers as small as 0 feet, in lieu of the required 10 feet; and
- From Section 409.6.A.2 - To permit 14 off-street parking spaces, in lieu of the 18 required spaces;
- From Section 409.4.A to permit a driveway for a two way movement to have a width of 10 feet, in lieu of the required 20 feet and a vehicular travelway with direct access to parking spaces,

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Date

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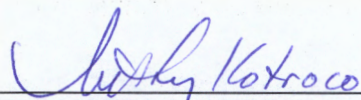
By

[Signature]

be and are hereby GRANTED.

The relief granted herein shall be subject to the following:

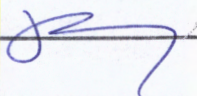
1. The Petitioners may apply for their building permit and may be granted same upon receipt of this Order, however the Petitioners are hereby made aware that proceeding at this time is at their own risk until such time as the thirty (30) day appellate process from this Order has expired. If for whatever reason, this Order is reversed, the Petitioners will be required to return and be responsible for returning said property to its original condition.
2. Submit full-scale architectural elevation drawings, sign and lighting details to the Department of Planning staff for review and approval prior to application for any building permits.


TIMOTHY M. KOTROCO
Administrative Law Judge for
Baltimore County

TMK:pz

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Date 1-25-12

By 



KEVIN KAMENETZ
County Executive

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

January 25, 2011

CHRISTOPHER MUDD, ESQUIRE
VENABLE, LLP
210 WEST PENNSYLVANIA AVENUE
SUITE 500
TOWSON, MD 21204

Re: Petition for Special Hearing, Special Exception and Variance
Case No. 2012-0135-SPHXA
Property: 27 Hooks Lane

Dear Mr. Mudd:

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. For further information on filing an appeal, please contact the Office of Administrative Hearings at 410-887-3868.

Sincerely,

A handwritten signature in black ink, reading "Timothy Kotroco".

TIMOTHY M. KOTROCO
Administrative Law Judge
for Baltimore County

TMK/pz

Enclosure

c: Alan Zuckerberg, President, Pikesville Communities Corporation, 7919 Long Meadow Road,
Pikesville MD 21208



PETITION FOR ZONING HEARING(S)

To be filed with the Department of Permits, Approvals and Inspections

To the Office of Administrative Law of Baltimore County for the property located at:

Address 27 Hooks Lane

which is presently zoned RO

Deed References: 10838/323

10 Digit Tax Account # 0 3 0 1 0 3 6 2 4 0

Property Owner(s) Printed Name(s) Twenty Seven Hooks Lane, LLC

(SELECT THE HEARING(S) BY MARKING **X** AT THE APPROPRIATE SELECTION AND PRINT OR TYPE THE PETITION REQUEST)

The undersigned legal owner(s) of the property situate in Baltimore County and which is described in the description and plan attached hereto and made a part hereof, hereby petition for:

1. **X** a **Special Hearing** under Section 500.7 of the Zoning Regulations of Baltimore County, to determine whether or not the Zoning Commissioner should approve

AN AMENDMENT TO THE SITE PLAN APPROVED IN CASE NO. 95-312-A, INCLUDING CONFIRMATION THAT THE VARIANCE GRANTED IN THAT CASE MAY BE UTILIZED FOR THE CURRENT SITE PLAN, OR IN THE ALTERNATIVE A NEW VARIANCE FOR THE SAME PURPOSE ON THE SITE PLAN FILED IN SUPPORT OF THIS REQUEST

2. **X** a **Special Exception** under the Zoning Regulations of Baltimore County to use the herein described property for

A CLASS B OFFICE BUILDING, INCLUDING A FINDING OF COMPATIBILITY PURSUANT TO BALTIMORE COUNTY CODE SECTION 32-4-402

3. **X** a **Variance** from Section(s)

SEE ATTACHED PAGE

of the zoning regulations of Baltimore County, to the zoning law of Baltimore County, for the following reasons:
(Indicate below your hardship or practical difficulty or indicate below "TO BE PRESENTED AT HEARING". If you need additional space, you may add an attachment to this petition)

TO BE PRESENTED AT HEARING

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

I, or we, agree to pay expenses of above petition(s), 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.

Legal Owner(s) Affirmation: I / we do so 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 / these Petition(s).

Contract Purchaser/Lessee:

Name- Type or Print

Signature

Mailing Address City State

Zip Code Telephone # Email Address

Attorney for Petitioner:

Christopher Mudd

Name- Type or Print

Signature

210 W. Pennsylvania Ave Towson MD
Mailing Address City State

21204 / 410-494-6200 / cdmudd@venable.com
Zip Code Telephone # Email Address

Legal Owners (Petitioners):

SEE ATTACHED PAGE

Name #1 - Type or Print

Name #2 - Type or Print

Signature #1

Signature #2

Mailing Address City State

Zip Code Telephone # Email Address

Representative to be contacted:

Christopher Mudd

Name - Type or Print

Signature

210 W. Pennsylvania Ave Towson MD
Mailing Address City State

21204 / 410-494-6200 / cdmudd@venable.com
Zip Code Telephone # Email Address

CASE NUMBER 2012-0135-SPHXA Filing Date 11/23/11 Do Not Schedule Dates: _____ Reviewer BJK

REV. 10/4/11

ORDER RECEIVED FOR FILING

Date

1-25-12 RZ



Gerhold, Cross & Etzel, Ltd.

Registered Professional Land Surveyors • Established 1906

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

November 10, 2011

**Zoning Description
Twenty Seven Hooks Lane LLC
0.241 Acres Property
Hooks Lane
Baltimore County, Maryland**

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

Beginning for the same at a point in the southeastern right of way line of Hooks Lane, said point being measured approximately 1050 feet northeasterly along the southeastern right of way line of said Hooks Lane from the centerline of Reisterstown Road, and running thence along said right of way, the following course and distance, viz: 1) North 55 degrees 45 minutes East 67.50 feet, thence leaving said right of way and running and binding on the outlines of the herein described property, the following three courses and distances, viz: 2) South 34 degrees 15 minutes East 155.75 feet, 3) South 55 degrees 45 minutes West 67.50 feet, and, 4) North 34 degrees 15 minutes West 155.75 feet, to the place of beginning.

Containing 0.241 Acres of land, more or less.

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





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

CERTIFICATE OF POSTING

RE: Case# 2012-0135-SPHXA

PETITIONER: Twenty Seven Hooks
Lane, LLC

DATE OF HEARING: 1/12/12

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

ATTENTION: KRISTEN MATTHEWS

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:
27 Hooks Lane

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: December 26, 2011

ZONING NOTICE

CASE #2012-0135-SPHXA

**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:

DATE : Thursday January 12, 2012 at 1:30 PM

Special Hearing to determine whether or not the Administration Law Judge should approve an amendment to the site plan in Case 95-312-A, including confirmation that the variance granted in that case may be utilized for the current site plan or in the alternative a new variance for the same purpose on the site plan filed in support of this request. Special Exception to permit a Class B office building, including a finding of compatibility pursuant to Baltimore County Code Section 32-4-402.

Variance to permit up to 100% of the total adjusted gross floor area of a Class B office Building within the RO zone to be occupied by medical offices; to permit 0% amenity open space, in lieu of the required 7%; to permit landscape buffers as small as 0 feet, in lieu of the required 10 feet, to permit 14 off-street parking spaces, in lieu of the 18 required spaces. In the alternative to the special hearing request, a variance from Section 409.4.A to permit a driveway for a two way movement to have a width of 10 feet, in lieu of the required 20 feet and a vehicular travelway with direct access to parking spaces.

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 THE DAY OF HEARING. UNDER PENALTY OF LAW

HEARINGS ARE HANDICAPPED ACCESSIBLE

ZONING NOTICE

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

DATE: Monday, January 11, 2021 at 7:00 PM
TIME: 7:00 PM - 8:00 PM
LOCATION: 11111 Greenway Avenue, Towson 21204

PROJECT: 11111 Greenway Avenue, Towson 21204
OWNER: [Name Redacted]
APPLICANT: [Name Redacted]
PROPOSED: [Details Redacted]
COMMISSIONER'S DECISION: [Details Redacted]
APPEAL: [Details Redacted]
CONTACT: [Details Redacted]
NOTICE: [Details Redacted]
ADDITIONAL INFORMATION: [Details Redacted]

27

**The
Sterling
Building**

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

No. 77206

Date: 11/23/11

Fund	Dept	Unit	Sub Unit	Rev Source/ Obj	Sub Rev/ Sub Obj	Dept	Obj	BS Acct	Amount
001	806	0000		6150					\$ 950.00

Total: \$ 950.00

Rec From: Venable LLP

For: Variance, Special Hearing, Special Exception

BRR

DISTRIBUTION

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

GOLD - ACCOUNTING

Item # 0135

CASHIER'S
VALIDATION

 **M&T Bank**
Baltimore, MD 21201

VENABLE^{LLP}
Towson Operating Account
210 West Pennsylvania Ave.
Suite 500
Towson, MD 21204

T 600621

7-11
520

DATE
11/17/11

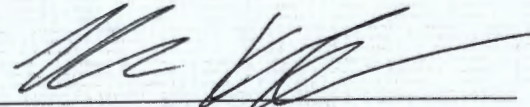
CHECK NO.
600621

AMOUNT
\$950.00

Nine hundred fifty dollars and no cents -----

PAY
TO THE
ORDER
OF

Baltimore County, MD



AUTHORIZED SIGNATURE

VOID AFTER 180 DAYS

AUTHORIZED SIGNATURE
(TWO SIGNATURES REQUIRED OVER \$25,000)

⑈600621⑈ ⑆052000113⑆

9851847187⑈

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

No.

80805

Date:

3/23/2012

Fund	Dept	Unit	Sub Unit	Rev Source/ Obj	Sub Rev/ Sub Obj	Dept Obj	BS Acct	Amount
001	806	0000		6170				915.00

Total:

915.00

Rec
From:

Cynthia Hitt Kent LLC

For:

Administrative Hearing Officer
20
Bd Appeal Case# 2012 0135 SPHXA
27 Hooks Lane
CR# 10231

DISTRIBUTION

WHITE - CASHIER

PINK - AGENCY

YELLOW - CUSTOMER

GOLD - ACCOUNTING

PLEASE PRESS HARD!!!!

CASHIER'S
VALIDATION

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

No. **77206**

Date: **11/23/11**

Fund	Dept	Unit	Sub Unit	Rev	Sub	Obj	Sub Obj	Dept Obj	BS Acct	Amount
				Source/	Rev/					
001	806	0000		6150						\$ 950.00

Total: **\$ 950.00**

Rec From: **Variable LLP**

For: **Variable, Special Hearing, Special Executive**

BAR

DISTRIBUTION

WHITE - CASHIER PINK - AGENCY YELLOW - CUSTOMER GOLD - ACCOUNTING

PLEASE PRESS HARD!!!!

PAID RECEIPT

DATE: 11/23/2011 TIME: 15:03:37
 RECEIPT NO: 500007 DATE: 11/25/2011
 OFLN

Receipt Tot: \$950.00
 1050.00 CA
 Baltimore County, Maryland

**CASHIER'S
 VALIDATION**

Item # 0135

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: # 2012-0135-SPHXA

27 Hooks Lane

S/east side of Hooks Lane, 1,050 N/east of centerline of Reisterstown Road

3rd Election District - 2nd Councilmanic District

Legal Owner(s): Twenty Seven Hooks Lane, LLC

Special Hearing: to determine whether or not the Administrative Law Judge should approve an amendment to the site plan approved in case 95-312-A, including confirmation that the variance granted in that case may be utilized for the current site plan or in the alternative a new variance for the same purpose on the site plan filed in support of this request. **Special Exception:** to permit a class B office building, including a finding of compatibility pursuant to Baltimore County Code Section 32-4-402. **Variance:** to permit up to 100% of the total adjusted gross floor area of a Class B office building within the RO zone to be occupied by medical offices; to permit 0% amenity open space, in lieu of the required 7%; to permit landscape buffers as small as 0 feet, in lieu of the required 10 feet; to permit 14 off-street parking spaces, in lieu of the 18 required spaces. In the alternative to the special hearing request, a variance from Section 409.4.A to permit a driveway for a two way movement to have a width of 10 feet, in lieu of the required 20 feet and a vehicular travelway with direct access to parking spaces.

Hearing: Thursday, January 12, 2012 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/12/740 Dec. 27

293594

CERTIFICATE OF PUBLICATION

12/29/2011

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 12/27/, 2011.

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

S. Wilkinson

LEGAL ADVERTISING

**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: 2012-0135-SPHXA
Petitioner: 27 HOOKS LANE, LLC
Address or Location: 27 HOOKS LANE

PLEASE FORWARD ADVERTISING BILL TO:

Name: BANK LUKASEVICH
Address: 210 W. PENNSYLVANIA AVE.
SUITE 500
TOWSON, MD 21204
Telephone Number: 410-494-6200

TO: PATUXENT PUBLISHING COMPANY
Thursday, December 22, 2011 Issue - Jeffersonian

Please forward billing to:

Barb Lukasevich
Venable, LLP
210 W. Pennsylvania Avenue
Towson, MD 21204

410-494-6200

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: 2012-0135-SPHXA

27 Hooks Lane

S/east side of Hooks Lane, 1,050 N/east of centerline of Reisterstown Road

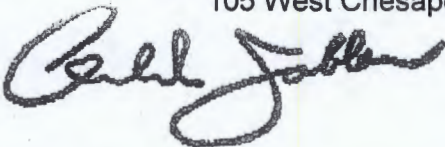
3rd Election District – 2nd Councilmanic District

Legal Owners: Twenty Seven Hooks Lane, LLC

Special Hearing to determine whether or not the Administrative Law Judge should approve an amendment to the site plan approved in case 95-312-A, including confirmation that the variance granted in that case may be utilized for the current site plan or in the alternative a new variance for the same purpose on the site plan filed in support of this request. Special Exception to permit a class B office building, including a finding of compatibility pursuant to Baltimore County Code Section 32-4-402.

Variance to permit up to 100% of the total adjusted gross floor area of a Class B office building within the RO zone to be occupied by medical offices; to permit 0% amenity open space, in lieu of the required 7%; to permit landscape buffers as small as 0 feet, in lieu of the required 10 feet; to permit 14 off-street parking spaces, in lieu of the 18 required spaces. In the alternative to the special hearing request, a variance from Section 409.4.A to permit a driveway for a two way movement to have a width of 10 feet, in lieu of the required 20 feet and a vehicular travelway with direct access to parking spaces.

Hearing: Friday, January 6, 2012 at 10:00 a.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

December 12, 2011

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

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: 2012-0135-SPHXA

27 Hooks Lane

S/east side of Hooks Lane, 1,050 N/east of centerline of Reisterstown Road

3rd Election District – 2nd Councilmanic District

Legal Owners: Twenty Seven Hooks Lane, LLC

Special Hearing to determine whether or not the Administrative Law Judge should approve an amendment to the site plan approved in case 95-312-A, including confirmation that the variance granted in that case may be utilized for the current site plan or in the alternative a new variance for the same purpose on the site plan filed in support of this request. Special Exception to permit a class B office building, including a finding of compatibility pursuant to Baltimore County Code Section 32-4-402. Variance to permit up to 100% of the total adjusted gross floor area of a Class B office building within the RO zone to be occupied by medical offices; to permit 0% amenity open space, in lieu of the required 7%; to permit landscape buffers as small as 0 feet, in lieu of the required 10 feet; to permit 14 off-street parking spaces, in lieu of the 18 required spaces. In the alternative to the special hearing request, a variance from Section 409.4.A to permit a driveway for a two way movement to have a width of 10 feet, in lieu of the required 20 feet and a vehicular travelway with direct access to parking spaces.

Hearing: Friday, January 6, 2012 at 10:00 a.m. in Room 205, Jefferson Building,
105 West Chesapeake Avenue, Towson 21204

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

Arnold Jablon
Director

AJ:kl

C: Christopher Mudd, Venable, 210 W. Pennsylvania Avenue, Towson 21204
Richard Hoffman, 2115 Knox Avenue, Reisterstown 21136

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY THURSDAY, DECEMBER 22, 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.

TO: PATUXENT PUBLISHING COMPANY
Wednesday, December 28, 2011 Issue - Jeffersonian

Please forward billing to:

Barb Lukasevich
Venable, LLP
210 W. Pennsylvania Avenue
Towson, MD 21204

410-494-6200

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: 2012-0135-SPHXA

27 Hooks Lane

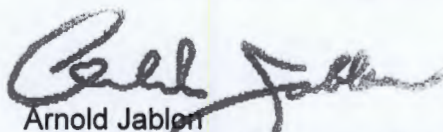
S/east side of Hooks Lane, 1,050 N/east of centerline of Reisterstown Road

3rd Election District – 2nd Councilmanic District

Legal Owners: Twenty Seven Hooks Lane, LLC

Special Hearing to determine whether or not the Administrative Law Judge should approve an amendment to the site plan approved in case 95-312-A, including confirmation that the variance granted in that case may be utilized for the current site plan or in the alternative a new variance for the same purpose on the site plan filed in support of this request. Special Exception to permit a class B office building, including a finding of compatibility pursuant to Baltimore County Code Section 32-4-402. Variance to permit up to 100% of the total adjusted gross floor area of a Class B office building within the RO zone to be occupied by medical offices; to permit 0% amenity open space, in lieu of the required 7%; to permit landscape buffers as small as 0 feet, in lieu of the required 10 feet; to permit 14 off-street parking spaces, in lieu of the 18 required spaces. In the alternative to the special hearing request, a variance from Section 409.4.A to permit a driveway for a two way movement to have a width of 10 feet, in lieu of the required 20 feet and a vehicular travelway with direct access to parking spaces.

Hearing: Thursday, January 12, 2012 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

December 19, 2011

NEW 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: 2012-0135-SPHXA

27 Hooks Lane

S/east side of Hooks Lane, 1,050 N/east of centerline of Reisterstown Road

3rd Election District – 2nd Councilmanic District

Legal Owners: Twenty Seven Hooks Lane, LLC

Special Hearing to determine whether or not the Administrative Law Judge should approve an amendment to the site plan approved in case 95-312-A, including confirmation that the variance granted in that case may be utilized for the current site plan or in the alternative a new variance for the same purpose on the site plan filed in support of this request. Special Exception to permit a class B office building, including a finding of compatibility pursuant to Baltimore County Code Section 32-4-402.

Variance to permit up to 100% of the total adjusted gross floor area of a Class B office building within the RO zone to be occupied by medical offices; to permit 0% amenity open space, in lieu of the required 7%; to permit landscape buffers as small as 0 feet, in lieu of the required 10 feet; to permit 14 off-street parking spaces, in lieu of the 18 required spaces. In the alternative to the special hearing request, a variance from Section 409.4.A to permit a driveway for a two way movement to have a width of 10 feet, in lieu of the required 20 feet and a vehicular travelway with direct access to parking spaces.

Hearing: Thursday, January 12, 2012 at 1:30 p.m. in Room 205, Jefferson Building,
105 West Chesapeake Avenue, Towson 21204

A handwritten signature in dark ink, appearing to read "Arnold Jablon", is written over a horizontal line.

Arnold Jablon
Director

AJ:kl

C: Christopher Mudd, Venable, 210 W. Pennsylvania Avenue, Towson 21204
Richard Hoffman, 2115 Knox Avenue, Reisterstown 21136

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY TUESDAY, DECEMBER 27, 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.**



Board of Appeals of Baltimore County

JEFFERSON BUILDING
SECOND FLOOR, SUITE 203
105 WEST CHESAPEAKE AVENUE
TOWSON, MARYLAND, 21204
410-887-3180
FAX: 410-887-3182

March 28, 2010

NOTICE OF ASSIGNMENT

CASE #: 12-135-SPHXA IN THE MATTER OF: Twenty Seven Hooks Lane, LLC
Legal Owner /Petitioner
27 Hooks Lane / 3rd Election District; 2nd Councilmanic District

Re: Petition for Special Hearing to approve an amendment to the site plan previously approved in 95-312-A, including variance previously granted can be used in current site plan or alternative grant new variance;
 Petition for Special Exception for a Class B office building; and
 Petition for Variance to permit up to 100% of the total adjusted gross floor area of a Class B office building within the RO zone to be occupied by medical offices; to permit 0% amenity open space ilo req'd 7%, to permit landscape buffers as small as 0 ft ilo req'd 10 ft, to permit 14 off-street parking spaces ilo req'd 18, and/or in alternative to SPH to permit a driveway for a two way movement with width of 10 ft ilo req'd 20 ft and vehicular travel way with direct access to parking spaces

1/25/12 Opinion and Order of the Administrative Law Judge GRANTING the requested Special Hearing relief; DENYING the confirmation that the Variance granted in Case no 95-312-A be re-utilized for the current site plan; GRANTING the requested Special Exception and ordering that Petitioner has 5 years to utilize and vest the granted special exception; and GRANTING the Variances requested with conditions.

ASSIGNED FOR: TUESDAY, JUNE 5, 2012, AT 10:00 A.M. AND
WEDNESDAY, JUNE 6, 2012, AT 10:00 A.M (Day #2, if needed)

LOCATION: Hearing Room #2, Second Floor, Suite 206
 Jefferson Building, 105 W. Chesapeake Avenue, Towson

NOTICE: This appeal is an evidentiary hearing; therefore, parties should consider the advisability of retaining an attorney.

Please refer to the Board's Rules of Practice & Procedure, Appendix B, Baltimore County Code.

IMPORTANT: No postponements will be granted without sufficient reasons; said requests must be in writing and in compliance with Rule 2(b) of the Board's Rules. No postponements will be granted within 15 days of scheduled hearing date unless in full compliance with Rule 2(c).

If you have a disability requiring special accommodations, please contact this office at least one week prior to hearing date.

Theresa R. Shelton, Administrator

Page 2

Distribution List

c:	Counsel for Applicant/Petitioner/Owner	:	Christopher Mudd, Esquire Venable, LLP
	Applicant/Petitioner/Owner	:	Twenty Seven Hooks Lane, LLC c/o Richard Hoffman
	Counsel for Appellants	:	Cynthia Hitt Kent, Esquire
	Appellants	:	Greene Tree Homeowners Assoc'n, Inc. c/o Cynthia Hitt Kent, Esquire
		:	Michael Simons
		:	Loren Staples
		:	Alan P. Zukerberg, Esquire , Individually
		:	Pikesville Communities Corporation
	Counsel for Appellant	:	Alan P. Zukerberg, Esquire
	Appellant	:	Reservoir Ltd Partnership Leonard Attman, Member
		:	Pikesville Communities Corporation Alan P. Zukerberg, President

Office of People's Counsel
Lawrence M. Stahl, Managing Administrative Law Judge
Timothy M. Kotroco, Administrative Law Judge
Arnold Jablon, Director/PAI
Andrea Van Arsdale, Director/Department of Planning
Nancy West, Assistant County Attorney
Michael Field, County Attorney, Office of Law

RE: Twenty-Seven Hooks Lane / PP request

Wendell:

Both People's Counsel and the Petitioner's Counsel suggest that the Board wait until after the outcome of the 2012 CZMP before hearing this appeal.

Pete's letter is in the file and marked with a red tag.

Please advise.

✓ postpone until October *W.H.G.*

 go ahead with June hearing and deny pp request

Thank you,

T



Board of Appeals of Baltimore County

JEFFERSON BUILDING
SECOND FLOOR, SUITE 203
105 WEST CHESAPEAKE AVENUE
TOWSON, MARYLAND, 21204
410-887-3180
FAX: 410-887-3182

*to be assigned
PP
10/1/12*

March 28, 2010

NOTICE OF ASSIGNMENT

CASE #: 12-135-SPHXA **IN THE MATTER OF: Twenty Seven Hooks Lane, LLC**
Legal Owner /Petitioner
27 Hooks Lane / 3rd Election District; 2nd Councilmanic District

Re: Petition for Special Hearing to approve an amendment to the site plan previously approved in 95-312-A, including variance previously granted can be used in current site plan or alternative grant new variance;
 Petition for Special Exception for a Class B office building; and
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1/25/12 Opinion and Order of the Administrative Law Judge GRANTING the requested Special Hearing relief; DENYING the confirmation that the Variance granted in Case no 95-312-A be re-utilized for the current site plan; GRANTING the requested Special Exception and ordering that Petitioner has 5 years to utilize and vest the granted special exception; and GRANTING the Variances requested with conditions.

ASSIGNED FOR: TUESDAY, JUNE 5, 2012, AT 10:00 A.M. AND
WEDNESDAY, JUNE 6, 2012, AT 10:00 A.M (Day #2, if needed)

LOCATION: Hearing Room #2, Second Floor, Suite 206
 Jefferson Building, 105 W. Chesapeake Avenue, Towson

NOTICE: This appeal is an evidentiary hearing; therefore, parties should consider the advisability of retaining an attorney.

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If you have a disability requiring special accommodations, please contact this office at least one week prior to hearing date.

Theresa R. Shelton, Administrator

Page 2

Distribution List

c:	Counsel for Applicant/Petitioner/Owner	:	Christopher Mudd, Esquire Venable, LLP
	Applicant/Petitioner/Owner	:	Twenty Seven Hooks Lane, LLC c/o Richard Hoffman
	Counsel for Appellants	:	Cynthia Hitt Kent, Esquire
	Appellants	:	Greene Tree Homeowners Assoc'n, Inc. c/o Cynthia Hitt Kent, Esquire
		:	Michael Simons
		:	Loren Staples
		:	Alan P. Zukerberg, Esquire , Individually
		:	Pikesville Communities Corporation
	Counsel for Appellant	:	Alan P. Zukerberg, Esquire
	Appellant	:	Reservoir Ltd Partnership Leonard Attman, Member
		:	Pikesville Communities Corporation Alan P. Zukerberg, President

Office of People's Counsel
Lawrence M. Stahl, Managing Administrative Law Judge
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Arnold Jablon, Director/PAI
Andrea Van Arsdale, Director/Department of Planning
Nancy West, Assistant County Attorney
Michael Field, County Attorney, Office of Law



Board of Appeals of Baltimore County

JEFFERSON BUILDING
SECOND FLOOR, SUITE 203
105 WEST CHESAPEAKE AVENUE
TOWSON, MARYLAND, 21204
410-887-3180
FAX: 410-887-3182

May 14, 2012

NOTICE OF POSTPONEMENT

CASE #: 12-135-SPHXA IN THE MATTER OF: Twenty Seven Hooks Lane, LLC
Legal Owner /Petitioner
27 Hooks Lane / 3rd Election District; 2nd Councilmanic District

Re: Petition for Special Hearing to approve an amendment to the site plan previously approved in 95-312-A, including variance previously granted can be used in current site plan or alternative grant new variance;
 Petition for Special Exception for a Class B office building; and
 Petition for Variance to permit up to 100% of the total adjusted gross floor area of a Class B office building within the RO zone to be occupied by medical offices; to permit 0% amenity open space ilo req'd 7%, to permit landscape buffers as small as 0 ft ilo req'd 10 ft, to permit 14 off-street parking spaces ilo req'd 18, and/or in alternative to SPH to permit a driveway for a two way movement with width of 10 ft ilo req'd 20 ft and vehicular travel way with direct access to parking spaces

1/25/12 Opinion and Order of the Administrative Law Judge GRANTING the requested Special Hearing relief; DENYING the confirmation that the Variance granted in Case no 95-312-A be re-utilized for the current site plan; GRANTING the requested Special Exception and ordering that Petitioner has 5 years to utilize and vest the granted special exception; and GRANTING the Variances requested with conditions.

*This matter was assigned to be heard on June 5-6, 2012 and has been postponed by agreement of Counsel. The matter is to be re-assigned to a date after October 1, 2012. A Notice of Re-assignment will be issued to all parties when this matter is re-assigned. **TO BE RE-ASSIGNED.***

NOTICE: This appeal is an evidentiary hearing; therefore, parties should consider the advisability of retaining an attorney.

Please refer to the Board's Rules of Practice & Procedure, Appendix B, Baltimore County Code.

IMPORTANT: No postponements will be granted without sufficient reasons; said requests must be in writing and in compliance with Rule 2(b) of the Board's Rules. No postponements will be granted within 15 days of scheduled hearing date unless in full compliance with Rule 2(c).

If you have a disability requiring special accommodations, please contact this office at least one week prior to hearing date.

Theresa R. Shelton, Administrator

Page 2

Distribution List

c:	Counsel for Applicant/Petitioner/Owner	:	Christopher Mudd, Esquire Venable, LLP
	Applicant/Petitioner/Owner	:	Twenty Seven Hooks Lane, LLC c/o Richard Hoffman
	Counsel for Appellants	:	Cynthia Hitt Kent, Esquire
	Appellants	:	Greene Tree Homeowners Assoc'n, Inc. c/o Cynthia Hitt Kent, Esquire
		:	Michael Simons
		:	Loren Staples
		:	Alan P. Zukerberg, Esquire , Individually
		:	Pikesville Communities Corporation
	Counsel for Appellant	:	Alan P. Zukerberg, Esquire
	Appellant	:	Reservoir Ltd Partnership Leonard Attman, Member
		:	Pikesville Communities Corporation Alan P. Zukerberg, President

Office of People's Counsel
Lawrence M. Stahl, Managing Administrative Law Judge
Arnold Jablon, Director/PAI
Andrea Van Arsdale, Director/Department of Planning
Nancy West, Assistant County Attorney
Michael Field, County Attorney, Office of Law



KEVIN KAMENETZ
County Executive

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

December 23, 2011

Richard Hoffman
2115 Knox Avenue
Reisterstown, MD 21136

RE: Case Number 2012-0135-SPHXA, 27 Hooks Lane

Dear Mr. Hoffman,

The above referenced petition was accepted for processing **ONLY** by the Bureau of Zoning Review, Department of Permits and Development Management (PDM) on November 11, 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 that reads "W. Carl Richards, Jr." in a cursive style.

W. Carl Richards, Jr.
Supervisor, Zoning Review

WCR:mcn

Enclosures

c: People's Counsel
Christopher Mudd, 210 W. Pennsylvania Avenue, Towson, MD 21204

TK 1/12
1:30 pm

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Arnold Jablon
Deputy Administrative Officer and
Director of Permits, Approvals and Inspections

DATE: January 10, 2012

FROM: Andrea Van Arsdale
Director, Department of Planning

RECEIVED

SUBJECT: 27 Hooks Lane

JAN 11 2011

INFORMATION:

OFFICE OF ADMINISTRATIVE HEARINGS

Item Number: 12-135

Petitioner: 27 Hooks Lane LLC

Zoning: RO

Requested Action: Special Hearing, Special Exception and Variance

The petitioner proposes to redevelop a property that has been improved with a 2 story, 1782 sq. ft. frame and masonry Class A Office Building known as 27 Hooks Lane.

The subjects of this petition are a Special Hearing to amend a previously approved plan, a Special Exception for a 2-story 4,000 sq. ft. Class B Medical Office Building and associated Variances.

The Department of Planning has reviewed the prior order Case No. 95-132a; the site plan and compatibility report that addresses the compatibility objectives as set forth in Section 32-4-402(c) of the Baltimore County Code.

Note that a request to rezone the property from RO to OR2, known as 2012 CZMP Map Issue 2-005 has been filed; however this issue should not have any bearing on the subject case.

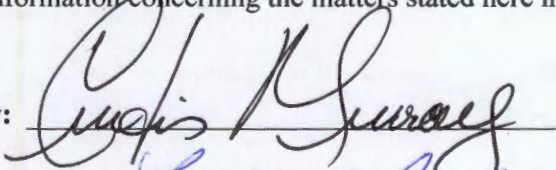
SUMMARY OF RECOMMENDATIONS:

The Department of Planning finds the site layout and building's conceptual design to be compatible with other uses within the neighborhood. Should the Administrative Law Judge grant the petitioner's requests the Department of Planning requests the following:

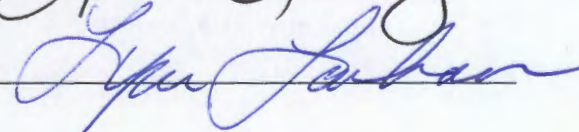
Submit full-scale architectural elevation drawings, sign and lighting details to the Department of Planning staff for review and approval prior to application for any building permits.

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

Prepared by:



Division Chief:
AVA/LL: CM



BALTIMORE COUNTY, MARYLAND
INTEROFFICE CORRESPONDENCE

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

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

SUBJECT: Zoning Advisory Committee Meeting
For December 19, 2011
Item No. 2012-0135

DATE: December 9, 2011

The Bureau of Development Plans Review has reviewed the subject zoning item and we have the following comment.

Widen the mouth and the first 30 feet of the entrance to 16 feet so that at least one car can turn in off of Hook's Lane while another waits to turn out. Build a County standard concrete apron, curb and gutter, and sidewalk along the frontage.

DAK:CEN
cc:file
ZAC-ITEM NO 12-0135-12192011.doc

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



Beverley K. Swaim-Staley, Secretary
Darrell B. Mobley, Acting Administrator

MARYLAND DEPARTMENT OF TRANSPORTATION

Date: 12-2-11

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

RE: Baltimore County

Item No. 2012-0135-SPHXA

Twenty Seven Hooks Lane, LLC

27 Hooks Lane

Special Hearing Special Exception
Variance

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. 2012-0135-SPHXA

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,

A handwritten signature in blue ink that reads "Steven D. Foster".

Steven D. Foster, Chief
Access Management Division

SDF/rz

My telephone number/toll-free number is _____

Maryland Relay Service for Impaired Hearing or Speech 1.800.735.2258 Statewide Toll Free

Street Address: 707 North Calvert Street • Baltimore, Maryland 21202 • Phone 410.545.0300 • www.roads.maryland.gov

RE: PETITION FOR SPECIAL HEARING	*	BEFORE THE OFFICE
SPECIAL EXCEPTION AND VARIANCE		
27 Hooks Lane; SE/S Hooks Lane, 1,050'	*	OF ADMINSTRATIVE
NE of c/line Reisterstown Road		
3 rd Election & 2 nd Councilmanic Districts	*	HEARINGS FOR
Legal Owners: Twenty Seven Hooks Lane, LLC		
Petitioner(s)	*	BALTIMORE COUNTY
	*	2012-135-SPHXA

* * * * *

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.

RECEIVED

DEC 14 2011

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of December, 2011, a copy of the foregoing Entry of Appearance was mailed to Christopher Mudd, Esquire, Venable, LLP, 210 W. Pennsylvania Avenue, Suite 500, Towson, MD 21204 , Attorney for Petitioner(s).

Peter Max Zimmerman

PETER MAX ZIMMERMAN
People's Counsel for Baltimore County



KEVIN KAMENETZ
County Executive

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

March 28, 2012

Christopher D. Mudd, Esquire
Venable, LLP
210 W. Pennsylvania Avenue
Suite 500
Towson, Maryland 21204

RECEIVED

MAR 28 2012

BALTIMORE COUNTY
BOARD OF APPEALS

RE: APPEAL TO BOARD OF APPEALS

Petitions for Special Hearing, Special Exception and Variance
Case No. 2012-0135-SPHXA
27 Hooks Lane

Dear Mr. Mudd:

Please be advised that an appeal of the above-referenced case was filed in this Office on March 23, 2012. All materials relative to the case have been forwarded to the Baltimore County Board of Appeals ("Board").

If you are the person or party taking the appeal, you should notify other similarly interested parties or persons known to you of the appeal. If you are an attorney of record, it is your responsibility to notify your client.

If you have any questions concerning this matter, please do not hesitate to contact the Board at 410-887-3180.

Sincerely,

LAWRENCE M. STAHL
Managing Administrative Law Judge
for Baltimore County

LMS:dlw

c: ✓ Board of Appeals

Peter Max Zimmerman, People's Counsel for Baltimore County
Arnold Jablon, Director, Department of Permits, Approvals, and Inspections
Cynthia Hitt Kent, Esq., 10 Crossroads Drive, Suite 107, Owings Mills, MD 21117
Alan P. Zukerberg, Esq., 7919 Long Meadow Road, Baltimore, Maryland 21208
Case File
Office of Administrative Hearings
105 West Chesapeake Avenue, Suite 103 | Towson, Maryland 21204 | Phone 410-887-3868 | Fax 410-887-3468
www.baltimorecountymd.gov

APPEAL

Petitions for Special Exception, Special Hearing and Variance
27 Hooks Lane
SE side of Hooks Lane, 1,050' NE of c/line of Reisterstown Road
3rd Election District – 2nd Councilmanic District
Legal Owner: Twenty Seven Hooks Lane, LLC
Case No.: 2012-0135-SPHXA

Petitions for Special Exception, Special Hearing and Variance (November 23, 2011) reviewed by Bruno Rudaitis - (3 Pages)

Zoning Description of Property (November 10, 2011)

Notice of Zoning Hearing (December 19, 2011)

Certification of Publication – (The Jeffersonian – December 27, 2011)

Certification of Posting (Bruce E. Doak – December 26, 2011) – (4 Pages)

Entry of Appearance by People's Counsel – (December 14, 2011)

Petitioner(s) Sign-In Sheet – (1 Page)

Protestant(s) / Citizen(s) Sign-In Sheet – (1 Page)

Zoning Advisory Committee (ZAC) Comments:

- 1 – Department of Planning – January 10, 2012
- 2 – Bureau of Development Plans Review – December 9, 2011
- 3 – State Highway Administration – December 2, 2011

Petitioner's Exhibits:

- 1 – Amended Site Plan - Gerhold, Cross & Etzel, Ltd. (1 Page)
- 2 – Resume – Bruce E. Doak (1 Page)
- 3 – Revised Email from Dennis Kennedy re: Bureau of Development Plans Review
ZAC comment - (1 Page)
- 4 – Aerial Map of property zoning (1 Page)
- 5 – Aerial Map of property zoning (w/zoning designations) - (1 Page)
- 6 – Photos (A-Z) – to go along with the site plan (26 Pages)
- 7 – Plat showing vantage point of photos (1 Page)
- 8 – Architect's rendering of the building – (3 Pages)
- 9 – Resume – Kenneth W. Schmid – (4 Pages)
- 10- Trip Generation Report – (2 Pages)
- 11-Resume – David W. Benn, AIA, LEED-AP – (3 Pages)
- 12- Compatibility Report (including photos & resume) – (13 Pages)
- 13- Department of Planning ZAC comment – - January 10, 2012 - (1 Page)

Protestant's Exhibits:

- 1 – Photos of the Posting - (1A thru 1C)
- 2 – Photo of subject property (1 Photo)
- 3 – Photo of house down the street (1 Photo)
- 4 – Photo of white clapboard house (1 Photo)
- 5 – My Neighborhood Map (2 Pages)
- 6 – Photo of Structure (1830 Reisterstown – house like structure) - (1 Photo)
- 7 – Planning Board Report of 5/19/88 – (18 Pages)

Miscellaneous: N/A

Cover Letter and Administrative Law Judge's Opinion and Order – (GRANTED with Conditions
– January 25, 2012 – (15 Pages)

Letter and Motion for Reconsideration and Memorandum filed by Alan P. Zukerberg, President,
Pikesville Communities Corporation dated February 15, 2012 – (10 Pages)

Letter to Office of Administrative Hearings from Christopher D. Mudd, Esq. dated February 17,
2012 in response to Alan P. Zukerberg's Motion for Reconsideration (Requests Denial)

Letter/Response from Timothy Kotroco to Alan P. Zukerberg and Christopher Mudd, Esq. dated
February 24, 2012 - re: Motion for Reconsideration (DENIED)

Notice of Appeal received on March 23, 2012. Filed by Cynthia Hitt Kent, Esq. (on behalf of
Greene Tree HOA, Michael Simons, Loren Staples, Alan P. Zukerberg & Pikesville
Communities Corporation) **AND (UNDER SEPARATE COVER) CONCURRENTLY AND
JOINED BY** Alan P. Zukerberg, Esq. (on behalf of Reservoir Limited Partnership.

c: People's Counsel for Baltimore County
Baltimore County Board of Appeals
Lawrence M. Stahl, Managing Administrative Law Judge
Arnold Jablon, Director of Permits, Approvals and Inspections
Peter Max Zimmerman, People's Counsel for Baltimore County

Date Sent: March 28, 2012

Address List

Petitioner/Legal Owner:

Christopher Mudd, Esquire
Venable, LLP
210 W. Pennsylvania Ave, Ste 500
Towson, MD 21204

Twenty Seven Hooks Lane, LLC
c/o Richard Hoffman
2115 Knox Avenue
Reisterstown, MD 21136

Bruce Doak
Gerhold, Cross & Etzel, Ltd
320 E. Towsontown Blvd
Towson, MD 21286

David Benn
100 N. Charles Street
Baltimore, MD 21201

*mail
returned*

Kenneth Schmid, Vice President
Traffic Concepts, Inc.
325 Gambrills Road, Ste B
Gambrills, MD 21054

Protestant/Appellant:

Cynthia Hitt Kent, Esquire
10 Crossroads Drive, Ste 107
Owings Mills, MD 21117

Greene Tree Homeowners Assoc'n, Inc.
c/o Cynthia Hitt Kent, Esquire
10 Crossroads Drive, Ste 107
Owings Mills, MD 21117

Michael Simons
10 Raisin Tree Circle
Pikesville, MD 21208

Loren Staples
109 River Oaks Circle
Pikesville, MD 21208

Alan P. Zukerberg, Esquire
7919 Long Meadow Road
Pikesville, MD 21208
*(individually and on behalf of Pikesville
Communities Corp as President, and
Reservoir Lt Partnership, his client)*

Pikesville Communities Corporation
Alan P. Zukerberg, President
7919 Long Meadow Road
Pikesville, MD 21208

Reservoir Ltd Partnership
Leonard Attman, Member
c/o BBC
36 S. Charles Street
Baltimore, MD 21202

Interoffice:

Office of People's Counsel
Lawrence M. Stahl, Managing Administrative Judge
Arnold Jablon, Director/PAI
Andrea Van Arsdale, Director/Department of Planning
Nancy West, Assistant County Attorney
Michael Field, County Attorney, Office of Law

Law

*and Kottro (for time
being
until he
leaves)*

*4/1/12
3/28/12*



Board of Appeals of Baltimore County

JEFFERSON BUILDING
SECOND FLOOR, SUITE 203
105 WEST CHESAPEAKE AVENUE
TOWSON, MARYLAND, 21204
410-887-3180
FAX: 410-887-3182

February 12, 2014

Christopher D. Mudd, Esquire
Venable, LLP
210 W. Pennsylvania Avenue, Suite 500
Towson, MD 21204

Alan Zukerberg, Esquire
7919 Long Meadow Road
Baltimore, MD 21208

Re: Twenty Seven Hooks Lane, LLC
Case No.: 12-135-SPHXA

Dear Counsel:

In November I assumed the role of Administrator for the Board of Appeals. I am currently in the process of reviewing all the files which still remain open on the docket.

Please be advised that the last activity that I have noted in this file is that on May 14, 2012 a postponement was granted as requested by all Counsel until after the completion of the 2012 CZMP.

To date, the Board of Appeals has not been contacted with regards to re-scheduling this matter, nor has a Petition to Withdrawal the Appeal/Petition been received. This matter is still pending before the Board. Please contact this office upon receipt of this letter to discuss this matter; or in the alternative, provide the documentation required to bring to a close this appeal.

Thank you for your time and assistance. I remain,

Very truly yours,

A handwritten signature in cursive script that reads "Sunny Cannington".

Krysundra "Sunny" Cannington
Administrator

Duplicate Original

cc: People's Counsel for Baltimore County



Board of Appeals of Baltimore County

JEFFERSON BUILDING
SECOND FLOOR, SUITE 203
105 WEST CHESAPEAKE AVENUE
TOWSON, MARYLAND, 21204
410-887-3180
FAX: 410-887-3182

August 5, 2014

J. Neil Lanzi, Esquire
210 W. Pennsylvania Avenue, Suite 500
Towson, MD 21204

Alan Zukerberg, Esquire
7919 Long Meadow Road
Baltimore, MD 21208

Re: Twenty Seven Hooks Lane, LLC
Case No.: 12-135-SPHXA

Dear Counsel:

The above referenced matter has been on hold since May 14, 2012.

To date, the Board of Appeals has not been contacted with regards to rescheduling the matter, nor has a Petition to Withdrawal the Appeal/Petition been received. This matter is still pending before the Board. Please contact this office upon receipt of this letter if you intend to proceed. If there is no response filed to this letter after the expiration of 30 days from the date of this Notice, an Order of Dismissal of Petition for lack of prosecution will be entered in the above-captioned matter. Upon receipt of a request filed at any time before 30 days after date of this Notice, the Board, for good cause, may defer entry of the Order of Dismissal for the period and on the terms it deems proper.

Thank you for your time and assistance. I remain,

Very truly yours,

Krysundra "Sunny" Cannington
Administrator

Duplicate Original

cc: People's Counsel for Baltimore County



Board of Appeals of Baltimore County

JEFFERSON BUILDING
SECOND FLOOR, SUITE 203
105 WEST CHESAPEAKE AVENUE
TOWSON, MARYLAND, 21204
410-887-3180
FAX: 410-887-3182

August 21, 2014

Christopher Mudd, Esquire
Venable, LLP
210 W. Pennsylvania Ave, Ste 500
Towson, MD 21204

Alan Zukerberg, Esquire
7919 Long Meadow Road
Baltimore, MD 21208

Cynthia Hitt Kent, Esquire
10 Crossroads Drive, Ste 107
Owings Mills, MD 21117

Re: Twenty Seven Hooks Lane, LLC
Case No.: 12-135-SPHXA

Dear Counsel:

My last letter dated August 5, 2014 was inadvertently addressed to J. Neil Lanzi, Esquire instead of Christopher Mudd, Esquire and Cynthia Hitt Kent, Esquire was inadvertently omitted. I apologize for these errors. I have enclosed a copy for clarity.

The above referenced matter has been on hold since May 14, 2012.

To date, the Board of Appeals has not been contacted with regards to rescheduling the matter, nor has a Petition to Withdrawal the Appeal/Petition been received. This matter is still pending before the Board. Please contact this office upon receipt of this letter if you intend to proceed. If there is no response filed to this letter after the expiration of 30 days from the date of this Notice, an Order of Dismissal of Petition for lack of prosecution will be entered in the above-captioned matter. Upon receipt of a request filed at any time before 30 days after date of this Notice, the Board, for good cause, may defer entry of the Order of Dismissal for the period and on the terms it deems proper.

Thank you for your time and assistance. I remain,

Very truly yours,

A handwritten signature in cursive script that reads "Sunny Cannington".

Krysundra "Sunny" Cannington
Administrator

Duplicate Original

cc: People's Counsel for Baltimore County



Baltimore County, Maryland

OFFICE OF PEOPLE'S COUNSEL

Jefferson Building
105 West Chesapeake Avenue, Room 204
Towson, Maryland 21204

410-887-2188
Fax: 410-823-4236

PETER MAX ZIMMERMAN
People's Counsel

CAROLE S. DEMILIO
Deputy People's Counsel

April 27, 2012

Hand-delivered

Wendell H. Grier, Chairman
County Board of Appeals
105 West Chesapeake Avenue, Suite 203
Towson, MD 21204

RECEIVED
APR 27 2012

BALTIMORE COUNTY
BOARD OF APPEALS

Re: PETITION FOR SPECIAL HEARING, SPECIAL
EXCEPTION AND VARIANCE

Legal Owners: Twenty Seven Hooks Lane, LLC
27 Hooks Lane; SE/S Hooks Lane, 1,050' NE of c/line Reisterstown Road
Case No.: 2012-135-SPHXA, CBA Hearing assigned for June 5-6, 2012

Dear Chairman Grier:

This case involves the proposal for a new Class B office building, potentially for 100% medical office use, at 27 Hooks Lane, on the south side of Hooks Lane in the Pikesville area. This area is just outside the Beltway and northeast of Reisterstown Road.

The property comprises approximately one-quarter of an acre, and sits between larger commercial/office properties on the same side of Hooks Lane. There is, however, a mix of zones and uses along Hooks Lane in this area. The large Commerce Centre is just to the west, and a commercial development to the east. But there are residential zones and uses across Hooks Lane to the east of the Woodholme shopping center, medical office building, and Lifebridge fitness facility complex. The Greentree development is among the residential developments across Hooks Lane.

The nub of the present case is that 27 Hooks Lane is zoned Residential-Office (R.O.) a transitional residential zone which, among other things, limits medical office use to 25% of the office use. BCZR Section 204.3.B.2. The current proposal would replace the existing office building with a new larger building. This entails a special exception, a variance to provide 100% medical offices, and significant variances to the BCZR Section 204.4.C Bulk Regulations for amenity open space and landscape buffer standards (zero vs. the required 7% and 10/ 20 feet respectively), along with an offstreet parking variance. There also appears to be a deviation from the building side yard setback requirements.

Perhaps recognizing the incongruity of the medical office proposal in the R.O. Zone, the property owner has applied for reclassification to the Office Building-Residential (OR-2) Zone in the 2012 Comprehensive Zoning Map process. (CZMP) See attached Issue 2-005. The O.R. 2 Zone is one of many office and business zones which does not have such a specific limitation on medical office

use. BCZR Section 206.3.A.1. The proposed Class B office building would be permitted by right but would still have to satisfy performance standards under BCZR Section 206.4.C and compatibility standards under BCZR Section 208 and County Code Section 32-4-402. Indeed, the existence of many office and business zones which would allow 100% medical office use reinforces the point that the R.O. Zone 25% limitation must stand fast.

It may be prudent for the Board and the parties to await the outcome of the 2012 CZMP before the trial of this case. If the property is rezoned to O.R. 2 or some other zone, then the case could be remanded to the Hearing Officer to provide the opportunity for an amended petition.

* * *

Meanwhile, our office has taken the position in the past and maintains the position that the legislative limitation of 25% medical office use in the R.O. Zone amounts to a use variance and/or is not susceptible to variance under the standards elucidated in BCZR Section 307.1 and applied in such cases as Trinity Assembly of God v. People's Counsel 406 Md. 54 (2008). There is simply nothing unique about a property which relates to the choice of the type of offices. Indeed, in the present case, the desire for 100% medical offices appears to be a marketing strategy, and does not involve any genuine difficulty or hardship in the use of the property.

We have cited the legislative purposes of enclosed Bills 37-88, 151-88 and Planning Board Report on Residential-Office Zones dated May 19, 1988, preceding the latter Bill. The Planning Board stated in the last introductory paragraph on Page 2 and in its Page 5 Summary:

"The proposed amendments to the R.O. zone, together with County Council Bill No. 26-88 which establishes higher standards for off-street parking and County Council Bill NO, 37-88 which restricts medical offices to no more than 25% of the total build floor space should ensure that the original intent of the R.O. zoning is effectively met.

* * *

"SUMMARY

It is hoped that these revisions to the regulations for development in Residential/Office zones, when taken together with the new standards for parking and the 25% maximum limit for medical offices will effectively address the problems which have arisen in the development of Class B office buildings in the past and will enable Baltimore County to retain the R.O. zone as an effective, useful and generally "fair" form of development in areas of transition between residential and commercial uses."

As to the remaining issues involving amenity open space, landscaping, parking, and compatibility, those would have to be looked at under the variance and compatibility standards. The site is relatively small compared to the nearby commercial and office properties. On the other hand, as a practical matter, the proposal does squeeze virtually every inch of the property for the office use and parking, with the consequence of zero amenity open space and landscape buffer.

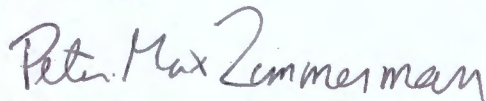
The Planning Board Report also provides insight, with respect to Class B office buildings, as to the purpose of the amenity open space, landscaping requirements, and compatibility on pages 3 and 4. The gist is that these are serious requirements, not to be varied lightly.

Furthermore, in the R.O. Zone, because the variances accompany a special exception, there is the concern that the initial "presumption" in favor of a special exception may fall by the wayside. The special exception is conceptually and descriptively a conditional use. Schultz v. Pritts 291 Md. 1 (1981). The failure to satisfy specific additional standards translates as a failure to satisfy the applicable conditions. Chester Haven Beach Partnership v. Board of Appeals for Queen Anne's County 103 Md. App. 324 (1995); Umereley v. People's Counsel 108 Md. App. 497, cert. denied 342 Md. 584 (1995).

It is worth repeating and emphasizing, in light of all of the above, that it may be prudent to await the outcome of the 2012 CZMP before litigating this case. The proposal really does not fit in the R.O. Zone. The County Council CZMP legislation is now scheduled to be enacted on or before September 16, 2012.

Thank you for your consideration in this matter.

Sincerely,



Peter Max Zimmerman
People's Counsel for Baltimore County

PMZ/rmw

cc: Christopher Mudd, Esquire
Cynthia Hitt Kent, Esquire
Alan P. Zukerberg, Esquire

Baltimore County 2012 Comprehensive Zoning Map Process
Log of Issues For District 2
March 28, 2012

Issue Number	Petitioner	Fuchs North America, Inc.	Location	9740 Reisterstown Rd		
2-004	Existing Zoning and Acres	Requested Zoning and Acres	Preliminary Staff Recommendation	Planning Board Recommendations	Final County Council Decision	
	BM 0.43	BM IM 5.39	BM IM 5.39			
	BM IM 0.03	5.39	5.39			
	BR IM 0.18					
	ML IM 1.79					
	MLR IM 2.96					
	5.39					
Comments	Need site plan.					

Issue Number	Petitioner	Twenty Seven Hooks Lane, LLC	Location	27 Hooks Ln		
2-005	Existing Zoning and Acres	Requested Zoning and Acres	Preliminary Staff Recommendation	Planning Board Recommendations	Final County Council Decision	
	RO 0.30	OR 2 0.30	OR 2 0.30			
	0.30	0.30	0.30			
Comments						

Issue Number	Petitioner	Michael Dopkin	Location	99 Painters Mill Rd		
2-006	Existing Zoning and Acres	Requested Zoning and Acres	Preliminary Staff Recommendation	Planning Board Recommendations	Final County Council Decision	
	ML IM 3.01	BL 3.01	BL 3.01			
	3.01	3.01	3.01			
Comments	See 2-023. Need site plan.					

Issue Number	Petitioner	Sarah Sartipy	Location	9925 Reisterstown Road		
2-007	Existing Zoning and Acres	Requested Zoning and Acres	Preliminary Staff Recommendation	Planning Board Recommendations	Final County Council Decision	
	DR 1 0.19	BR 0.97	DR 1 0.31			
	DR 16 0.16	0.97	DR 16 0.01			
	RO 0.62		RO 0.65			
	0.97		0.97			
Comments	See 2-001, 2-023, 2-029					

(Total acreages may not equal due to rounding.)

COUNTY COUNCIL OF BALTIMORE COUNTY, MARYLAND
LEGISLATIVE SESSION 1988, LEGISLATIVE DAY NO. 6
BILL NO. 37-88

MS. BARBARA F. BACHUR, COUNCILWOMAN

BY THE COUNTY COUNCIL, MARCH 21, 1988

A BILL ENTITLED

AN ACT concerning

Zoning Regulations - Hospitals and Nursing Homes

FOR the purpose of revising the definitions of certain types of health care facilities; permitting nursing homes in all types of Planned Unit Developments; exempting the reconstruction of certain nursing homes from RTA requirements; providing a definition of a medical office and of a medical clinic; authorizing the location of a medical office in certain zones and under certain conditions; authorizing the location of a medical clinic in business and manufacturing zones; prohibiting their location in residential or residential office zones; permitting an ambulatory surgical facility by Special Exception; and generally relating to the regulation of health care facilities in Baltimore County.

BY repealing

Section 101 - Definitions, the definition of "Hospital" and "Convalescent Home" and Section 407
Baltimore County Zoning Regulations, as amended

BY adding

Section 101 - Definitions, the definition of
"Ambulatory Surgical Facility (or Center)",
"Hospital", "Nursing Home", "Medical Clinic",
"Medical Office", and "Medical Practitioner"
and Section 408A

BY repealing and re-enacting, with amendments,

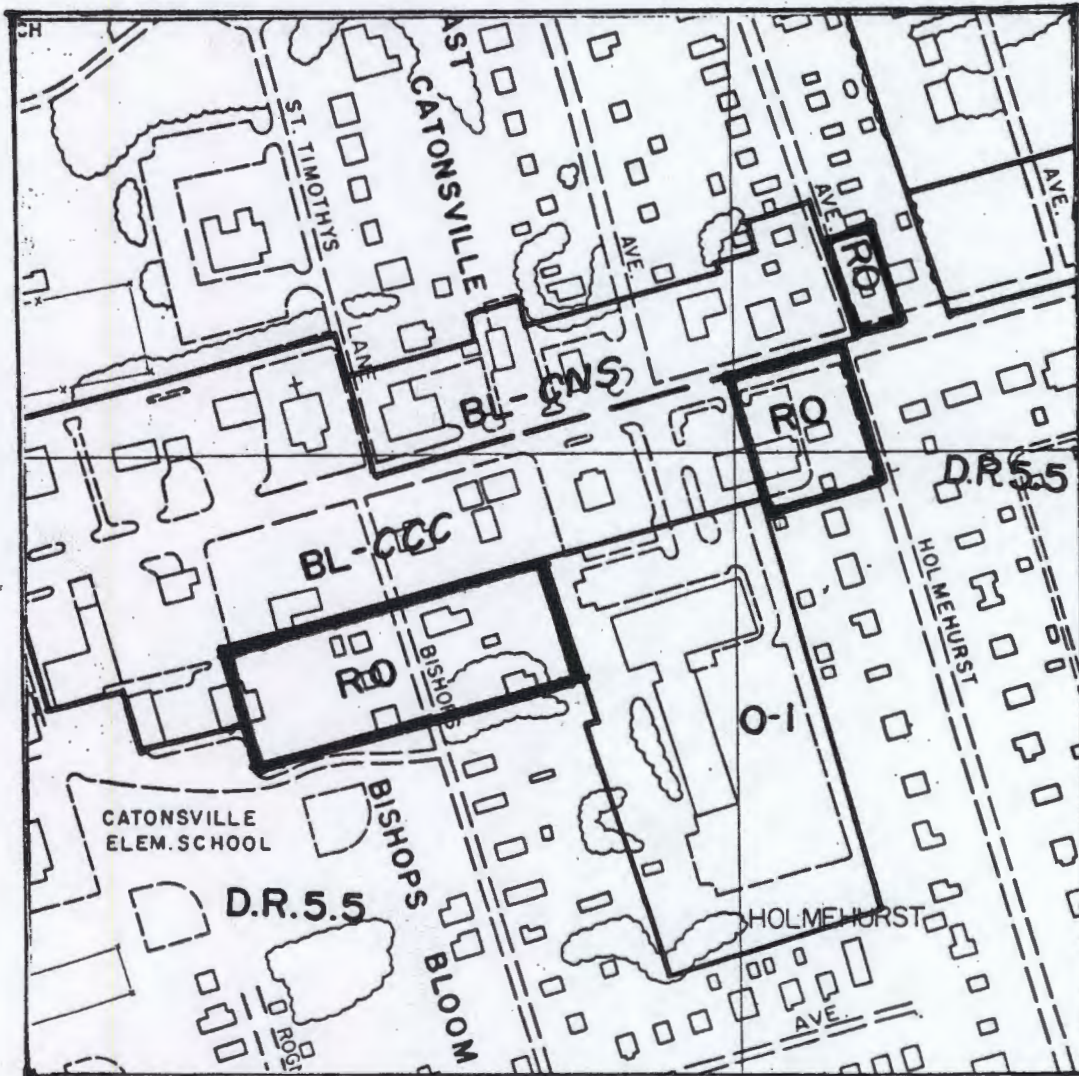
Section 101 - Definitions, the definition of "office" and
"Office Building, Class B", and

Sections 1A01.2.C.12., 1A02.2.B.16., 1A02.2.B.17., 1A04.2.A.5.,

EXPLANATION: CAPITALS INDICATE MATTER ADDED TO EXISTING LAW.
[Brackets] indicate matter stricken from existing law.
~~Strike-out~~ indicates matter stricken from bill.
Underlining indicates amendments to bill.

RESIDENTIAL-OFFICE ZONES

MAY 19, 1988



FINAL REPORT OF THE BALTIMORE COUNTY PLANNING BOARD
REGARDING THE RESIDENTIAL-OFFICE ZONE

BALTIMORE COUNTY OFFICE OF PLANNING AND ZONING

COUNTY COUNCIL OF BALTIMORE COUNTY, MARYLAND
Legislative Session 1988, Legislative Day No. 18

BILL NO. 151-88

MS. BARBARA F. BACHUR, COUNCILWOMAN

BY THE COUNTY COUNCIL, OCTOBER 3, 1988

ad. pl. 11-27-88
effective



A BILL ENTITLED

AN ACT concerning

Residential - Office Zone

FOR the purpose of amending the Baltimore County Zoning Regulations and the Baltimore County Development Regulations in order to generally revise the R-O Zoning classification relating to the conditions and requirements imposed upon the conversion of certain types of buildings, and generally relating to the permitted uses, conditions, restrictions, limitations, and requirements imposed upon uses in R-O Zones in Baltimore County.

BY repealing and re-enacting, with amendments,

Section 101 - the definitions of "Building Height" and "Office Building, Class B"

Baltimore County Zoning Regulations, as amended.

BY adding

Section 101 - alphabetically, the definition of "Principal Arterial"

Baltimore County Zoning Regulations, as amended.

BY repealing and re-enacting, with amendments,

Sections 203.2, 203.3, 203.4, 203.6, 204.4.B., 205.4.C., and 409.7B

Baltimore County Zoning Regulations, as amended.

BY adding

Section 502.8

Baltimore County Zoning Regulations, as amended.

BY repealing and re-enacting, with amendments,

Section 22-104(a)

Title 22 - Planning, Zoning and Subdivision Control

Baltimore County Code, 1978, 1986 Supplement

EXPLANATION: CAPITALS INDICATE MATTER ADDED TO EXISTING LAW.
[Brackets] indicate matter stricken from existing law.
~~Strike-out~~ indicates matter stricken from bill.
Underlining indicates amendments to bill.

1/6
10am
205

Debra Wiley - ZAC Comments - ZAC Agenda - Distribution Mtg. of 12/5/11

From: Debra Wiley
To: Kennedy, Dennis; Lanham, Lynn; Livingston, Jeffrey; Lykens, David; M...
Date: 12/7/2011 10:17 AM
Subject: ZAC Comments - ZAC Agenda - Distribution Mtg. of 12/5/11

Good Morning,

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.

2012-0135-SPHXA - 27 Hooks Lane
No hearing date in data base as of 12/7

2012-0136-A - 6830 Loch Raven Blvd.
No hearing date in data base as of 12/7

2012-0137-SPH - 7349 Geise Ave. - (CBCA)
No hearing date in data base as of 12/7

2012-0139-A - 11116 Bird River Grove Rd. - (Floodplain)
Administrative Variance - Closing Date: 12/16/11

2012-0140-SPH - 9202 Avondale Rd.
No hearing date in data base as of 12/7

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

Law Office
of
Alan Zukerberg, Esq.

7919 Long Meadow Road
Baltimore, Maryland 21208-3023
410.484.3738
apzuk@msn.com

March 23, 2012

Hand Delivered by Cynthia Hitt Kent, Esq.

Lawrence Stahl,
Managing Judge, Baltimore County Administrative
Law Judge
Jefferson Building
Suite 103
105 W. Chesapeake Ave.
Towson, MD 21204

Baltimore County Department of Permits,
Applications and Inspections
Attn: Arnold Jablon
County Office Building
111 West Chesapeake Avenue, Suite 105
Towson, Maryland, 21204

RECEIVED

MAR 23 2012

OFFICE OF ADMINISTRATIVE HEARINGS

Re: Appeal to the County Board of Appeals
of Petition for Special Hearing, Special Exception and Variance
Case No. 2012-0135-SPHXA
Property: 27 Hooks Lane

Dear Judge Stahl and Director Jablon:

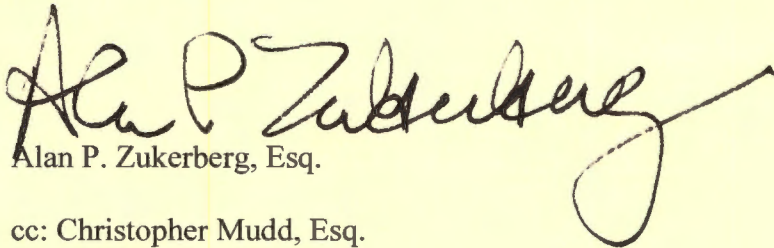
I am sending this letter to you jointly as I understand that appeals to the Board of Appeals are to be filed with Mr. Jablon's office, in accordance with correspondence from ALJ Kotroco. However according to Debby Wiley, in Mr. Jablon's office, that procedure has been changed to require filing of this appeal with Managing Judge Stahl.

Please note the appeal to the County Board of Appeals from the decision of the Administrative Law Judge in the above-captioned case. This appeal is on behalf of my client, Reservoir Ltd Partnership, whose member is Leonard Attman, c/o BBC 36 S. Charles St., Baltimore, MD 21202.

Please note that this appeal is filed concurrently with the appeal of the same matter by Cynthia Hitt Kent, Esq., on behalf of her clients Greene Tree HOA, et al. The appeal includes Pikesville Communities Corporation, and Alan P. Zukerberg, and thus the filing fee paid by her acts as the filing fee for my client as well.

Pursuant to Board of Appeals Rule, please note that I am an attorney licensed to practice before the Court of Appeals of Maryland and my name, address and telephone number are located on the letterhead of this correspondence. Please date stamp and return the attached copy of this letter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Alan P. Zukerberg". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alan P. Zukerberg, Esq.

cc: Christopher Mudd, Esq.

Cynthia Hitt Kent, Esq.

Client

Encl: copy to be date stamped

Law Office
of
Alan Zukerberg, Esq.
7919 Long Meadow Road
Baltimore, Maryland 21208-3023
410.484.3738
apzuk@msn.com

RECEIVED

MAY 11 2012

BALTIMORE COUNTY
BOARD OF APPEALS

May 10, 2012

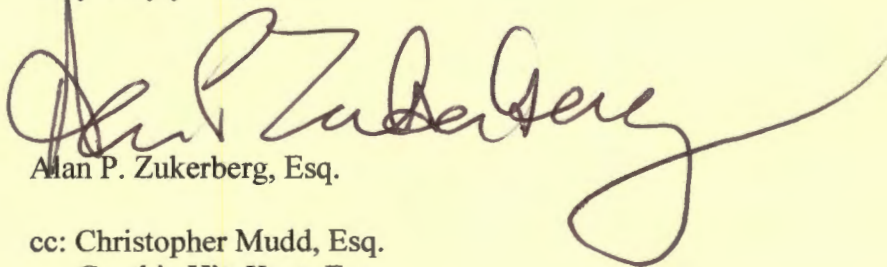
Wendell H. Grier, Chairman
County Board of Appeals
105 W. Chesapeake Ave. Suite 203
Towson, MD 21204

Re: Petition for Special Hearing, Special Exception and Variance
Twenty-Seven Hooks Lane
Case No. 2012-135-SPHXA

Dear Chairman Grier:

On behalf of my client Reservoir Limited Partnership, we agree with a postponement of the matter to await the outcome of the 2012 CZMP decision before hearing the appeal.

Very truly yours,



Alan P. Zukerberg, Esq.

cc: Christopher Mudd, Esq.
Cynthia Hitt Kent, Esq.
Client
Peter Max Zimmerman, Esq.

Law Office
of
Alan Zukerberg, Esq.
7919 Long Meadow Road
Baltimore, Maryland 21208-3023
410.484.3738
apzuk@msn.com

RECEIVED

SEP 04 2014

BALTIMORE COUNTY
BOARD OF APPEALS

September 3, 2014

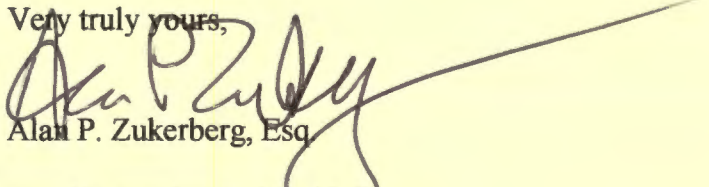
David L. Thurston, Chairman
County Board of Appeals of
Baltimore County
The Jefferson Building, Suite 203
105 West Chesapeake Avenue
Towson, MD 21204

Re: Twenty-Seven Hooks Lane, LLC
Case No. 12-135-SPHXA

Dear Chairman Thurston:

I am in receipt of Mr. Mudd's letter dated August 29, 2014 asking for withdrawal of his client's petition in this matter without prejudice. My client, Reservoir Limited Partnership, would like the record to reflect that while we are not consenting to Mr. Mudd's request, we are not opposing the request. However, and as suggested by Mr. Mudd, regardless of the zoning change resulting from the last Comprehensive Zoning Map Process, my client's position is that there may still be relief needed by Mr. Mudd's client to pursue the building represented by the Petitioner to the Administrative Law Judge.

Very truly yours,



Alan P. Zukerberg, Esq.

cc: Christopher D. Mudd, Esq.
Cynthia Hitt Kent, Esq.
Peter Max Zimmerman, Esq. People's Counsel

LAW OFFICE OF CYNTHIA HITT KENT, LLC

10 Crossroads Drive, Suite 107 • Owings Mills, Maryland 21117
Telephone 410 363 9600 Facsimile 410 363 9601

March 23, 2012

HAND DELIVERY

Office of Administrative Hearings
105 West Chesapeake Avenue, Suite 103
Towson, Maryland 21204

RECEIVED
MAR 23 2012
OFFICE OF ADMINISTRATIVE HEARINGS

RE: **NOTICE OF APPEAL**
Petitions for Special Hearing, Special Exception and Variance
Case No. 2012-0135-SPHXA, 27 Hooks Lane

Dear Sir/Madam:

On behalf of the persons/entities named below, please note an appeal in the above referenced case. The person/entities noting this appeal are:

Greene Tree Homeowners Association, Inc. (The "Association"), c/o Law Office of Cynthia Hitt Kent, LLC, 10 Crossroads Drive, Suite 107, Owings Mills, Maryland 21117. The Association is located off of Hooks Lane and consists of River Oaks Circle, Willow Oak Circle, Raisin Tree Circle and Red Cedar Court.

Michael Simons, 10 Raisin Tree Circle, Pikesville, Maryland 21208.

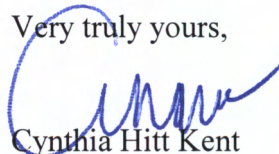
Loren Staples, 109 River Oaks Circle, Pikesville, Maryland 21208.

Alan P. Zuckerberg, 7919 Long Meadow Road, Pikesville, Maryland 21208.

Pikesville Communities Corporation, 7919 Long Meadow Road, Pikesville, Maryland 21208.

This appeal is being filed concurrently with and is joined by Reservoir Limited Partnership under separate cover. Enclosed is our check in the amount of \$915.00 for the filing fee for the appeal. Should you have any questions, please do not hesitate to contact this office.

Very truly yours,



Cynthia Hitt Kent

CHK

cc: Residential Realty Group, Inc.

LAW OFFICE OF CYNTHIA HITT KENT, LLC

10 Crossroads Drive, Suite 107 • Owings Mills, Maryland 21117

Telephone 410 363 9600

Facsimile 410 363 9601

September 9, 2014

RECEIVED
SEP 09 2014

BALTIMORE COUNTY
BOARD OF APPEALS

David L. Thurston, Chairman
County Board of Appeals of
Baltimore County
The Jefferson Building, Suite 203
105 West Chesapeake Avenue
Towson, MD 21204

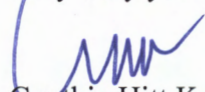
Re: Our client: Greene Tree Homeowners Association, Inc.
BOA case: Twenty-Seven Hooks Lane, LLC
Case No. 12-135-SPHXA

Dear Chairman Thurston:

This office represents Greene Tree Homeowners Association, Inc. in the above referenced matter. We are in receipt of the Board's letter dated August 5, 2014, received August 25, 2014, requesting the status of the case, Mr. Mudd's letter dated August 29, 2014, indicating his client's withdrawal of the Petition without prejudice and Mr. Zukerberg's letter dated September 3, 2014 indicating no opposition to the withdrawal.

My client, Greene Tree Homeowners Association, Inc. also will not oppose the withdrawal of the Petition and believes that the withdrawal should dispose of the current action. However, should Mr. Mudd's client (or other owner of the property) amend, renew, revise, or otherwise revive or file any zoning/development action with respect to 27 Hooks Lane, my client reserves any and all rights with respect to same.

Very truly yours,



Cynthia Hitt Kent

cc: Alan Zukerberg
Christopher D. Mudd
Peter Max Zimmerman, People's Counsel

T 410.494.6365
F 410.821.0147
cdmudd@venable.com

December 15, 2011

HAND-DELIVERED

Arnold Jablon, Director
Department of Permits, Approvals and Inspections
County Office Building
111 West Chesapeake Avenue, Room 105
Towson, MD 21204

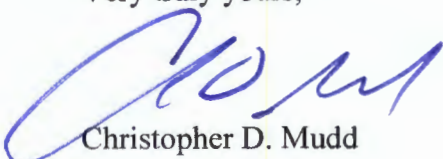
Re: 27 Hooks Lane
Case No. 2012-0135-SPHXA

Dear Mr. Jablon:

By way of this letter, our client 27 Hooks Lane, LLC, owner of the above-referenced property, is requesting that the hearing in Case No. 2012-0135-SPHXA scheduled for January 6, 2012, be postponed. We are available for a hearing the afternoon of January 12, 2012, if that date/time is available. If not, I would request that Ms. Kristen Lewis contact me to discuss available dates so that I can be sure they work for my witnesses.

I appreciate your consideration of this request.

Very truly yours,


Christopher D. Mudd

cc: Kristen Lewis

January 4, 2012

Ms. Diana Itter, 2nd District Area Planner
Baltimore County Department of Planning
The Jefferson Building, Suite 101
105 West Chesapeake Avenue
Towson, Maryland 21204

Re: Zoning Case No. 2012-0135-SPHXA

Dear Ms. Itter:

I am writing on behalf of Twenty Seven Hooks Lane, LLC, owner of property located at 27 Hooks Lane in the Pikesville area of Baltimore County (the "Property"), which is 0.241± acre and is zoned R-O (Residential – Office, 5.5 dwelling units per acre). The Property is currently occupied by a 2 story, frame and masonry Class A office building. The owner proposes to raze the existing structure and construct a new Class B office building on the Property, which requires a special exception and other relief. The necessary petitions have been filed, and the hearing is scheduled for January 12, 2012.

The Baltimore County Code (BCC) Section 32-4-402(c), as further outlined in the Comprehensive Manual of Development Policies (CDMP), requires the Director of the Department of Planning to make a compatibility recommendation to the Administrative Law Judge for a development in the RO zone. After consultation with my client's architect, David Benn of Cho Benn Holback, we have prepared this letter and the enclosed materials to assist your office in making the necessary recommendation.

Please note that the enclosed sketch represents a conceptual design for the project. The information below helps to demonstrate how this concept is compatible with other uses in the neighborhood. Notwithstanding the contents of this letter and the conceptual sketches, we reserve the right to make modifications to the design, subject to subsequent review by your Department prior to building permit issuance, without the need to attend a public hearing.

Defining the Neighborhood:

In addressing the compatibility objectives, the development must be judged in relation to the "neighborhood." Section 32-4-402(a) defines "neighborhood" to include existing buildings adjacent to and extending from the proposed development to a definable boundary, such as a primary collector or arterial street, an area with a significant change in character or land use, or a major natural feature.

Ms. Diane Itter
Page 2
January 4, 2012

Applying this definition, we would define the relevant neighborhood to extend to I-695 to the South and East, Reisterstown Road to the South and West, Hooks Lane and Greene Tree Road to the North, including the entirety of Hooks Lane Executive Park, Festival at Woodholme, and the adjacent office buildings on Greene Tree Road and Woodholme Center Circle (see enclosed aerial). The area includes a combination of commercial, office, and retail uses that have been constructed over the last 30 years. The buildings generally range from 1 to 3 stories in height, and are finished with masonry materials. The layout of most of the properties in the neighborhood follows the same pattern: the building occupies a majority of the property, and it is surrounded by parking lots and modest landscape buffers. Most of the buildings in the neighborhood are set back from the road frontages, with parking situated between the building and the road. Sidewalks are prevalent throughout the neighborhood.

Compatibility Objectives:

- 1. The arrangement and orientation of the proposed buildings and site improvements are patterned in a similar manner to those in the neighborhood.**

The neighborhood, as defined above, contains primarily office and commercial uses. The road patterns define the limits of the neighborhood and result in an irregularly-shaped focus area. In this area, the majority of the structures are 2-3 story office buildings. Many of these buildings are situated on separately developed parcels, which share no common elements in terms of orientation or design. However, closer to the Property, a pattern is more evident with the two adjacent parcels having building fronts oriented towards Hooks Lane, sidewalks and landscape buffers spanning their respective Hooks Lane frontages, a row of parking between the landscaping and building, with most parking being situated on the sides of and behind the building. The proposed site layout for the Property continues this pattern with the front building elevation facing Hooks Lane and the installation of a sidewalk and landscaping along the road frontage. However, there is no parking proposed between Hooks Lane and the building, which is an improvement over the other properties in the neighborhood.

- 2. The building and parking lot layouts reinforce existing building and streetscape patterns assure that the placement of buildings and parking lots have no adverse impact on the neighborhood.**

The site design proposes placement of the office building with the front elevation oriented towards Hooks Lane, similar to the office uses on either side. The proposed design improves upon the model of the adjacent properties in a number of ways. First, by orienting the building

T 410.494.6365
F 410.821.0147
cdmudd@venable.com

May 4, 2012

Wendell H. Grier, Chairman
County Board of Appeals
105 W. Chesapeake Ave., Suite 203
Towson, MD 21204

Re: PETITION FOR SPECIAL HEARING, SPECIAL EXCEPTION AND VARIANCE
Legal Owners: Twenty Seven Hooks Lane, LLC
27 Hooks Lane; SE/S Hooks Lane, 1,050' NE of c/line Reisterstown Road
Case No.: 2012-135-SPHXA

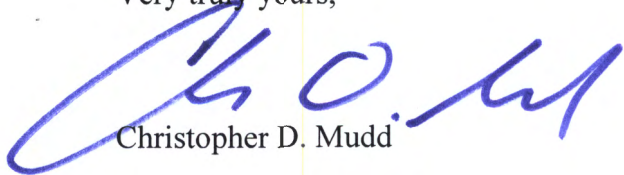
Chairman Grier:

I am writing on behalf of Twenty Seven Hooks Lane, LLC, the Petitioner in the above-referenced case, in response to a letter from People's Counsel for Baltimore County, dated April 27, 2012. While I disagree with, and object to, Mr. Zimmerman's overall assessment of the matter, he is correct that there is a rezoning Issue currently pending in the 2012 CZMP. The outcome of that rezoning request could affect the nature of the requested zoning relief. Therefore, I agree that it would be prudent for the Board to await the outcome of the 2012 CZMP before hearing this appeal.

The County Council must act on all CZMP Issues on or before September 16, 2012. Accordingly, I request a hearing date be set for some date after October 1, 2012.

Thank you for your consideration in this matter.

Very truly yours,



Christopher D. Mudd

cc: Cynthia Hitt Kent, Esq.
Alan P. Zuckerberg, Esq.
Peter Max Zimmerman, Esq.

RECEIVED

MAY 4 2012

BALTIMORE COUNTY
BOARD OF APPEALS

Christopher D. Mudd
Counsel
T 410.494.6365
F 410.821.0147
cdmudd@venable.com

August 29, 2014

HAND DELIVERED

David L. Thurston, Chairman
County Board of Appeals of
Baltimore County
The Jefferson Building, Suite 203
105 West Chesapeake Avenue
Towson, Maryland 21204

RECEIVED

AUG 29 2014

BALTIMORE COUNTY
BOARD OF APPEALS

Re: Twenty Seven Hooks Lane, LLC
Case No. 12-135-SPHXA

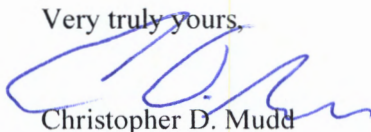
Dear Chairman Thurston:

This firm represents the Applicant/Petitioner Twenty Seven Hooks Lane, LLC in the above-referenced matter. At issue is zoning relief the Applicant/Petitioner obtained for a new office building on property it owns in the Pikesville area of Baltimore County. Appeals were filed, and, at the time of the appeal, a request was pending before the County Planning Board and County Council to rezone the subject property, during the 2012 Comprehensive Zoning Map Process (CZMP), to a zone that would potentially eliminate the need for the zoning relief at issue. For this reason, the Board agreed to refrain from setting the matter in for hearing until the conclusion of the CZMP. Although the County Council ultimately rezoned the subject property, as this Board may be aware, the results of the CZMP in the Second Councilmanic District (in which the property is located) were subjected to potential challenge by referendum. That challenge was just recently resolved, leaving the new zoning in place, which, as indicated, will likely eliminate the need for need for all of the zoning relief at issue in this matter. At the very least, some of the requested relief is no longer required, and the new zoning classification may ultimately result in the reconfiguration of the proposed improvements that may or may not require zoning relief.

Because of the implementation of the new zoning on the subject property, the Applicant/Petitioner is hereby withdrawing its Petitions for Special Hearing, Special Exception, and Variance, **without prejudice**, in accordance with Rule 3.b.2 of the Board's Rules of Practice and Procedure.

If you have any questions or require any additional information, please contact me.

Very truly yours,



Christopher D. Mudd

CDM

cc: Cynthia Hitt Kent, Esquire
Alan Zukerberg, Esquire

#8510406v1

CASE NAME 27 Hooks Lane
CASE NUMBER 2012-0135-SPHXA
DATE 1-12-12

[illegible]

CASE NAME 27 Weeks Lane
CASE NUMBER 2012-0135-5PHXA
DATE 1-12-12

27075900722

Zuckerberg

NAME _____

ADDRESS

CITY, STATE, ZIP

E-MAIL

ALAD Zuckersberg
Zuckersville Community

1919 Long Meadow Rd
LCS Corp
Corporation

21208

april@NSU.Cedu

President

Pheonix Communities Corp.

7919 Long Meadow	Load
Baltimore MD 21208	

Comp.

4/20 Prior
Zoning

IN RE: PETITION FOR ZONING VARIANCE * BEFORE THE
SE/S Hooks Lane, 68 ft. S of *
Reservoir Rd., c/l Hooks Lane * ZONING COMMISSIONER
27 Hooks Lane
3rd Election District * OF BALTIMORE COUNTY
2nd Councilmanic District
Twenty-Seven Hooks Lane, * Case No. 95-312-A
L.L.C., Petitioner

* * * * *

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This matter comes before the Zoning Commissioner as a Petition for Variance for the property located at 27 Hooks Lane near Pikesville. The Petition is filed by the Twenty-Seven Hooks Lane, L.L.C. by Richard Hoffman, Member. Variance relief is requested from Section 409.4.A of the Baltimore County Zoning Regulations (BCZR) to permit a driveway for two way movement to have a width of 10 ft. in lieu of the required 20 ft.; and a vehicular travelway with direct access to parking spaces. The subject property and relief requested are more particularly described on Petitioner's Exhibit No. 1, the plat to accompany the Petition for Zoning Variance. It is of particular note that the plat submitted was originally prepared on January 25, 1995 but contains revisions, dated February 7, 1995, February 17, 1995 and March 8, 1995.

Appearing at the requisite public hearing held for this case was Richard Hoffman, principal of Twenty-Seven Hooks Lane, L.L.C. Also presented was Vincent Moskunas, the consultant who prepared the site plan from M & H Development Engineers, Inc. The Petitioner was represented by Deborah C. Dopkin, Esquire. A neighboring property owner, Jeffrey Attman also appeared as an interested person. Mr. Attman was represented by Ned Kodeck, Esquire.

Testimony and evidence presented was that the subject property is approximately .24 acres in area and is zoned R.O. This is a narrow, yet

SECTION 204
R-O (Residential — Office) Zone
[Bill No. 13-1980⁷]

§ 204.1. Declaration of findings. [Bill No. 186-1994]

It is found that:

- A. Residential use of certain sites may not be economically feasible in some predominantly moderate-density residential areas that are within or near town centers, are near C.C.C. Districts, or lie along commercial motorways;
- B. Neither business zoning nor high-density residential zoning of those sites is appropriate; and
- C. With appropriate restrictions, houses converted to offices and, in some cases, small Class B office buildings and similar buildings are suitable, economically feasible uses of such sites.

§ 204.2. Statement of legislative policy. [Bill Nos. 151-1988; 186-1994]

The R-O zoning classification is established, pursuant to the findings stated above, to accommodate houses converted to office buildings and some small Class B office buildings in predominantly residential areas on sites that, because of adjacent commercial activity, heavy commercial traffic or other similar factors, can no longer reasonably be restricted solely to uses allowable in moderate-density residential zones. It is intended that buildings and uses in R-O Zones shall not intrude upon or disturb present or prospective uses of nearby residential property. It is not the R-O classification's purpose to accommodate a substantial part of the demand for office space, it being the intent of these zoning regulations that office space demand should be met primarily in C.T. Districts, C.C.C. Districts and, to a lesser extent, in other commercial areas.

§ 204.3. Use regulations. [Bill Nos. 167-1980; 37-1988; 151-1988; 186-1994]

- A. Uses permitted as of right. The following uses, only, are permitted as of right in any R-O Zone:
 1. Uses permitted as of right and as limited in D.R.5.5 Zones.
 2. Class A office buildings containing offices or medical offices and their accessory uses, including parking, except that no more than 25% of the total adjusted gross floor area of the office building may be occupied by medical offices.

7. Editor's Note: This bill originally added the R-O Zone as Section 203. It was subsequently changed to Section 204 by Bill No. 186-1994.

RESOLUTION TO CHANGE PRINCIPAL OFFICE OR RESIDENT AGENT

The directors/stockholders/general partner/authorized person of

Reservoir Limited Partnership

(Name of Entity)

organized under the laws of Maryland passed the following resolution:
(State)

(Check applicable boxes)

☐ The principal office is changed from: (old address)

to: (new address)

☒ The name and address of the resident agent is changed from:

Charles B. Heyman 100 E. Pratt St., 26th Floor, Baltimore, MD 21202

to:

Ned S. Kodeck, Esquire 8 Reservoir Circle, Suite 203, Baltimore, MD 21208

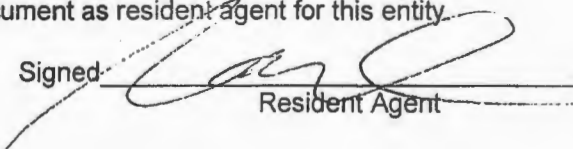
I certify under penalties of perjury the foregoing is true.

Signed


Secretary or Assistant Secretary
General Partner
Authorized Person

I hereby consent to my designation in this document as resident agent for this entity.

Signed


Resident Agent

CUST ID:0002869748
WORK ORDER:0004086328
DATE:01-31-2013 09:52 AM
AMT. PAID:\$50.00

RECEIVED
DEPARTMENT OF
2013 JUN 30 P 3:20

Maryland Department of Assessments and Taxation Business Services (w1)

[Search Help](#)

Entity Name: RESERVOIR LIMITED PARTNERSHIP

Department ID: M01823475

General Information

Amendments

Personal Property

Certificate of Status

Principal Office (Current):	7779 NEW YORK LANE GLEN BURNIE, MD 21061
Resident Agent (Current):	NED S. KODECK, ESQUIRE 8 RESERVOIR CIRCLE SUITE 203 BALTIMORE, MD 21208
Status:	ACTIVE
Good Standing:	Yes
Business Code:	What does it mean when a business is not in good standing or forfeited? Other
Date of Formation or Registration:	12/06/1983
State of Formation:	MD
Stock/Nonstock:	N/A
Close/Not Close:	Unknown

Case No.:

2012 - 0135-SPHXA

TK

1/12

205

Exhibit Sheet

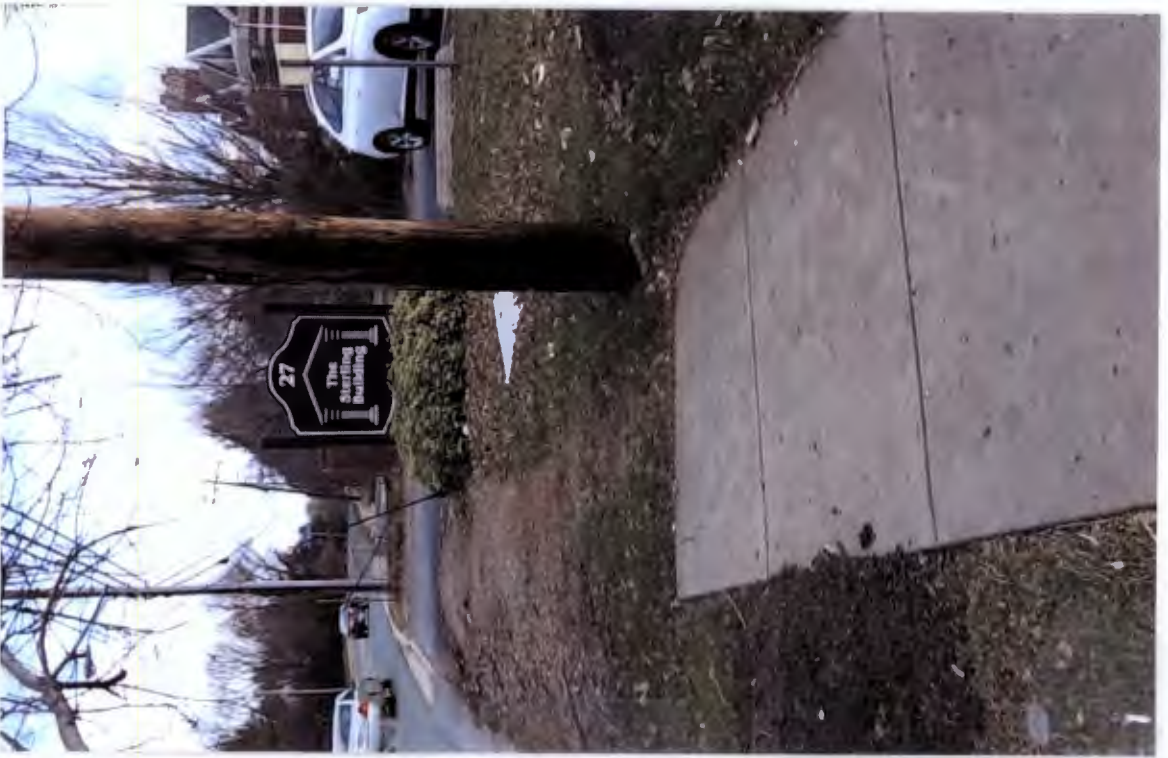
Petitioner/Developer

11/25/12
pro
Protestants

No. 1	Site Plan of the property	Photos of the Postings
No. 2	CV. Bruce Doak	Photo of Subject property
No. 3	Revised email from Dennis Kennedy	House down street photo
No. 4	Aerial Map of property zoning	White clapboard house
No. 5	Aerial Map of prop my zoning	My Neighborhood Map
No. 6	Photos to go along with the site Plan	Photo of Structure 1830 Restoran House like Structure
No. 7	Plat showing Vantage point of photos	Planning Board Report of 5/19/88
No. 8	Architects rendering of the Bldg	
No. 9	Ken Schmid C.V	
No. 10	Trip generation report	
No. 11	CV of Architect David Bern	
No. 12	Carriability report	

13 Planning Comment dated 1/10/12









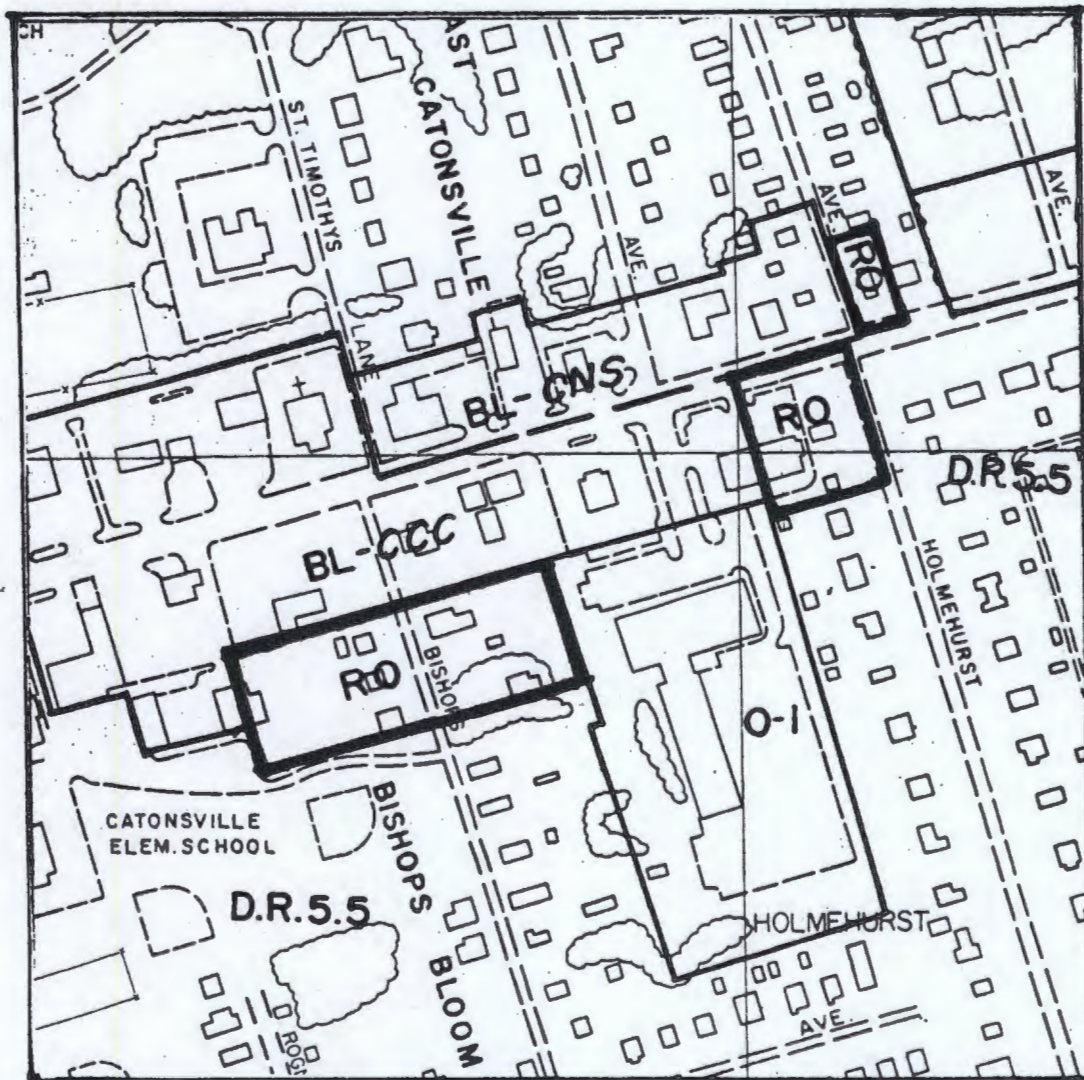
1830 Penttustown Ed
1/11/12 APD

PROTESTANT' S

EXHIBIT NO. 6

RESIDENTIAL-OFFICE ZONES

MAY 19, 1988



FINAL REPORT OF THE BALTIMORE COUNTY PLANNING BOARD
REGARDING THE RESIDENTIAL-OFFICE ZONE

PROTESTANT'S

EXHIBIT NO.

7

BALTIMORE COUNTY OFFICE OF PLANNING AND ZONING

Case No.:

2012 - 0135 - SPRXA

TK

1/12

205

Exhibit Sheet

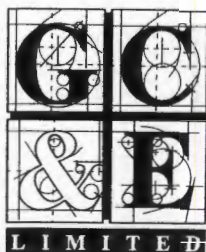
1-25-12
p3

Petitioner/Developer

Protestants

No. 1	Site Plan of the property	Picture of the Property
No. 2	CV Bruce Doak	Photo of Subject property
No. 3	Revised email from Dennis Kennedy	House down street photo
No. 4	Aerial Map of property zoning	Photo of clapboard house
No. 5	Aerial Map of prop my zoning w/ zon. designations	My Neighborhood Map
No. 6	Photos to go along with the site plan (A-2)	Photo of Structure 1830 Rutherford House & Structure
No. 7	Plot showing vintage print of photos	Planning Board Report of 5/19/38
No. 8	Architects rendering of the Bldg	
No. 9	Ken Schmid C.V.	
No. 10	Trip Generation map	
No. 11	CV of Architect David Bern	
No. 12	Corporation 2000	

13. Planning Commission dated 1/10/12



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

PETITIONER'S EXHIBIT L

May 19, 2011

Resume Profile of Bruce E. Doak

Name & Title:

Bruce E. Doak

Principal of Gerhold, Cross & Etzel, Ltd. 320 E. Towsontown Blvd. Towson, MD 21286

Years of Experience: Gerhold, Cross & Etzel, Ltd. 20 years Other firms 14 years

Education: Degree	Year	Specialization
Associate in Surveying	1980	Land Surveying

Continuing Education: Hundreds of hours since 1986 in Land Surveying, Business & Law

Active Registration:	Year First Registered
----------------------	-----------------------

Maryland Property Line Surveyor #531	1988
--------------------------------------	------

Expertise:

Licensed Property Line Surveyor

Project Manager / Surveyor – Land Development, Subdivision, Zoning & Title Surveys

Has professionally overseen and performed hundreds of boundary surveys. In addition, he has overseen hundreds of subdivisions and A.L.T.A. surveys and acted as a liaison with local and state agencies on most of the projects. Has testified in zoning hearings, Board of Appeal hearings, District Court proceedings, Circuit Court proceedings and in a Maryland State legislation panel hearing. Has been qualified as an expert witness in surveying, land development, zoning, title research and farming.

Professional Associations:

Chairman of the Baltimore Chapter of the Maryland Society of Surveyors

Board Member of the Maryland Society of Surveyors

Baltimore County Engineers Association

Towson Business Association

Mudd, Christopher D.

From: Dennis Kennedy <DKennedy@baltimorecountymd.gov>
Sent: Wednesday, January 11, 2012 11:46 AM
To: Mudd, Christopher D.
Subject: Re: 27 Hooks Lane - Case No. 2012-0127-SPHXA

Chris:

With new curb and gutter, new sidewalk and a new concrete driveway apron, the configuration shown is acceptable.
Dennis Kennedy

>>> "Mudd, Christopher D." <CDMudd@Venable.com> 1/10/2012 11:20 AM >>>
Dennis:

Following our conversation last week regarding your ZAC Comment issued in the above-referenced case, I have asked Bruce Doak to revise the site plan. The redlined plan is attached here, which shows an expansion of the width of the entrance to 16' for the first 20' into the site from the edge of paving of Hooks Lane. Based on our conversation, this should satisfy your concerns regarding the entrance width, without the need to lose parking spaces onsite.

Please respond to this email to confirm that this redline plan satisfies your comment regarding the width of the entrance.

Thank you,

Chris

Christopher D. Mudd, Esq. | Venable LLP
t 410.494.6365 | f 410.821.0147 | m 410.271.9105
210 W. Pennsylvania Avenue, Suite 500, Towson, MD 21204

CDMudd@Venable.com | www.Venable.com

U.S. Treasury Circular 230 Notice: Any tax advice contained in this communication (including any attachments) was not intended or written to be used, and cannot be used, for the purpose of (a) avoiding penalties that may be imposed under the Internal Revenue Code or by any other applicable tax authority; or (b) promoting, marketing or recommending to another party any tax-related matter addressed herein. We provide this disclosure on all outbound e-mails to assure compliance with new standards of professional practice, pursuant to which certain tax advice must satisfy requirements as to form and substance.

This electronic mail transmission may contain confidential or privileged information. If you believe you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

PETITIONER'S

EXHIBIT NO.

3



Created By
Baltimore County
My Neighborhood



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PETITIONER'S EXHIBIT 4

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PETITIONER'S EXHIBIT 4



My Neighborhood Map

Created By
Baltimore County
My Neighborhood



This data is only for general information purposes only. This data may be inaccurate, does not warrant, or imply any damages of, arising from this data.

PETITIONER'S EXHIBIT 5

Printed 1/5/2012



PETITIONER'S

EXHIBIT NO. 6-4-2







































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Sales Associates
Interested? Call
800-367-7629

HANOVER, PA













Professional Resume of
Kenneth W. Schmid
11022 Pfeffers Road
Kingsville, MD 21087

EXPERIENCE

January 1993 – Present

Traffic Concepts, Inc.
325 Gambrills Road, Suite E
Gambrills, MD 21054

Owner, Vice-President

Provides traffic engineering consultant services to the public and private sectors including:

Expert testimony before the County Zoning Officer and Board of Appeals for Special Exception and Rezoning cases. Development of Feasibility Analysis including access alternatives and the assessment of the impact of pertinent Adequate Public Facilities legislation of local governments on potential development sites. Development of Traffic Impact Studies including critical lane, highway capacity, and signal warrant analysis; recommendations of road improvements necessary to meet various Adequate Public Facility criteria and leading negotiations with government agencies to secure waivers for Adequate Public Facilities legislation. Design and preparation of traffic signal, maintenance of traffic, pavement marking, and road improvement concept plans. Preparation of technical and price proposals.

December 1989 – January 1993

Ronald W. Johnson Associates, Inc.
2661 Riva Road, Suite 420
Annapolis, MD 21401

Chief – Traffic Engineering Division

TRAFFIC CONCEPTS, INC.

Traffic Impact Studies • Feasibility • Traffic Signal Design • Expert Testimony

January 11, 2012

Mr. Christopher D. Mudd, Esq.
Venable LLP
210 W. Pennsylvania Avenue, Suite 500
Towson, Maryland 21204

RE: 27 Hooks Lane
Baltimore County, MD

Dear Mr. Mudd:

Traffic Concepts, Inc. has visited the site located at 27 Hooks Lane to observe the existing traffic conditions. We noted that Hooks Lane is a two lane roadway with a center turn lane and has a posted speed limit of 30 mph. Access from the site is directly onto Hooks Lane. The sight lines looking in each direction from the existing driveway are approximately 600 feet, which is adequate for a 30 mph roadway.

We have also conducted a trip generation analysis for the proposed site. Using the Institute of Transportation Engineers, Trip Generation Manual, 8th Edition, we have determined the peak hour trip generation for the proposed site. The morning peak hour occurs between 7 AM and 9 AM and the evening peak occurs between 4 PM and 6 PM. According to the trip generation manual, a four thousand square foot single tenant office building would generate 7 AM peak hour trips and 7 PM peak hour trips. If the proposed office space is defined as medical office the peak hour trips are 9 AM and 14 PM.

Additionally, we have researched the level of service at the nearest signalized intersections with our source as Baltimore County. According to the Baltimore County 2011 Basic Services Map, Transportation Zones, all signalized intersections operate in the acceptable level of service range.

PETITIONER'S EXHIBIT 10

DAVID W. BENN, AIA, LEED-AP
Principal-in-Charge

11
PETITIONER'S EXHIBIT ~~150~~

Cho Benn
Holback +
Associates



David Benn has over 36 years experience in the disciplines of architecture, urban design and planning with special expertise in urban and educational projects. Mr. Benn's work includes a wide variety of historic and new construction, architecture and planning. The recipient of the Cornell University Eidlitz Traveling Fellowship, he practiced architecture in London, Teheran, New York City and Ithaca, New York. After teaching architectural design at Cornell University, he joined Diane Cho in this Baltimore firm that is now 30 years old. He has won numerous design awards from the American Institute of Architects, the American Planning Assoc. Maryland Chapter, American School and University Association, the Maryland Historic Trust, Baltimore Heritage, the National Association of Homebuilders, and the Waterfront Center. He recently won the Public Building of the Year Award from the Maryland AIA for the Enoch Pratt Library, Orleans Branch. Many of these awards are the result of his sensitivity to education projects and planning.

Licensing
Maryland
New York
New Jersey
Pennsylvania
Delaware
Virginia
Washington, D.C.
North Carolina
NCARB
LEED accreditation, 2004

Education
Bachelor of Architecture
Cornell University-1974

Professional Memberships

American Institute of Architects
American Planning Association
Maryland Chapter

Waterfront Partnership of
Baltimore
Board Member

Society for College and
University Planning

Urban Design Committee
Baltimore AIA, Co-founder

The Waterfront Center
Washington, D.C.
Board Member/Correspondent

Preservation Maryland

Board Member
U.S. Green Building
Council
Leadership in Energy and
Environmental Design
Planning/Feasibility Studies:
MDOT Aberdeen MARC/Amtrak Station
Area
Transit Oriented Development
Study - Station and 3 sites
Aberdeen, Maryland

MDOT Reisterstown Plaza
Transit Oriented Development
Baltimore, MD

MTA Maglev Study-Baltimore to DC
MARC Station

MTA Bayview Multimodal
Transit Oriented Development
Baltimore, MD
Bayview TOD study

Clipper Mill TOD
Baltimore, Maryland

Inner Harbor Master Plan
Baltimore, Maryland

Mondawmin Mall/Master Plan/PUD
Addition and Renovation
Baltimore, Maryland

Allied Site - 28-acre PUD
Rezoning of Baltimore's Inner

Harbor
MTA Greenline Study
Baltimore, MD
Allied Site - 28 acre PUD
Rezoning of Baltimore's Inner
Harbor
Anne Arundel Community Colleg
Facilities Master Plan
Arnold, Maryland
Baltimore Lab School
Baltimore, Maryland
City of Baltimore, Maryland
City-wide Zoning,
Seton Hill, Mt Vernon studies
City of Annapolis, Maryland
Downtown Study
Anne Arundel County
▪ Odenton Revitalization Plan
▪ Commercial Revitalization P
Arlington Art Center, Feasibi
Study
Arlington, Virginia
Baltimore City Community Coll
Master Plan, Baltimore, Maryl
Baltimore County, Maryland

January 4, 2012

Ms. Diana Iiter, 2nd District Area Planner
Baltimore County Department of Planning
The Jefferson Building, Suite 101
105 West Chesapeake Avenue
Towson, Maryland 21204

Re: Zoning Case No. 2012-0135-SPHXA

Dear Ms. Iiter:

I am writing on behalf of Twenty Seven Hooks Lane, LLC, owner of property located at 27 Hooks Lane in the Pikesville area of Baltimore County (the "Property"), which is 0.241± acre and is zoned R-O (Residential – Office, 5.5 dwelling units per acre). The Property is currently occupied by a 2 story, frame and masonry Class A office building. The owner proposes to raze the existing structure and construct a new Class B office building on the Property, which requires a special exception and other relief. The necessary petitions have been filed, and the hearing is scheduled for January 12, 2012.

The Baltimore County Code (BCC) Section 32-4-402(c), as further outlined in the Comprehensive Manual of Development Policies (CDMP), requires the Director of the Department of Planning to make a compatibility recommendation to the Administrative Law Judge for a development in the RO zone. After consultation with my client's architect, David Benn of Cho Benn Holback, we have prepared this letter and the enclosed materials to assist your office in making the necessary recommendation.

Please note that the enclosed sketch represents a conceptual design for the project. The information below helps to demonstrate how this concept is compatible with other uses in the neighborhood. Notwithstanding the contents of this letter and the conceptual sketches, we reserve the right to make modifications to the design, subject to subsequent review by your Department prior to building permit issuance, without the need to attend a public hearing.

Defining the Neighborhood:

In addressing the compatibility objectives, the development must be judged in relation to the "neighborhood." Section 32-4-402(a) defines "neighborhood" to include existing buildings adjacent to and extending from the proposed development to a definable boundary, such as a primary collector or arterial street, an area with a significant change in character or land use, or a major natural feature.

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

TO: Arnold Jablon
Deputy Administrative Officer and
Director of Permits, Approvals and Inspections

DATE: January 10, 2012

FROM: Andrea Van Arsdale
Director, Department of Planning

SUBJECT: 27 Hooks Lane

INFORMATION:

Item Number: 12-135

Petitioner: 27 Hooks Lane LLC

Zoning: RO

Requested Action: Special Hearing, Special Exception and Variance

The petitioner proposes to redevelop a property that has been improved with a 2 story, 1782 sq. ft. frame and masonry Class A Office Building known as 27 Hooks Lane.

The subjects of this petition are a Special Hearing to amend a previously approved plan, a Special Exception for a 2-story 4,000 sq. ft. Class B Medical Office Building and associated Variances.

The Department of Planning has reviewed the prior order Case No. 95-132a; the site plan and compatibility report that addresses the compatibility objectives as set forth in Section 32-4-402(c) of the Baltimore County Code.

Note that a request to rezone the property from RO to OR2, known as 2012 CZMP Map Issue 2-005 has been filed; however this issue should not have any bearing on the subject case.

SUMMARY OF RECOMMENDATIONS:

The Department of Planning finds the site layout and building's conceptual design to be compatible with other uses within the neighborhood. Should the Administrative Law Judge grant the petitioner's requests the Department of Planning requests the following:

Submit full-scale architectural elevation drawings, sign and lighting details to the Department of Planning staff for review and approval prior to application for any building permits.

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

Prepared by:

Division Chief:
AVA/LL: CM



27 Hooks Lane

Cho Benn Holback+Associates



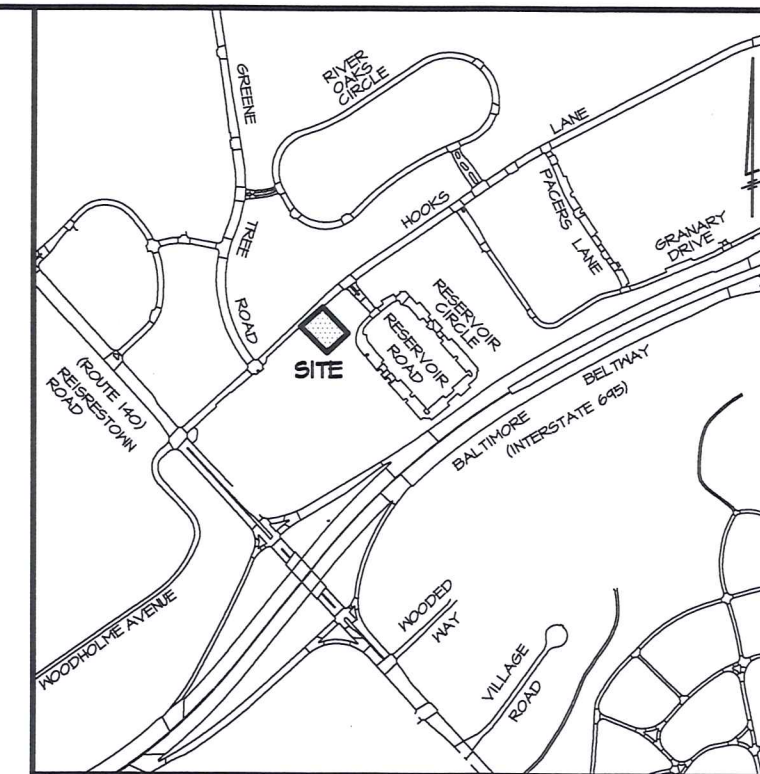
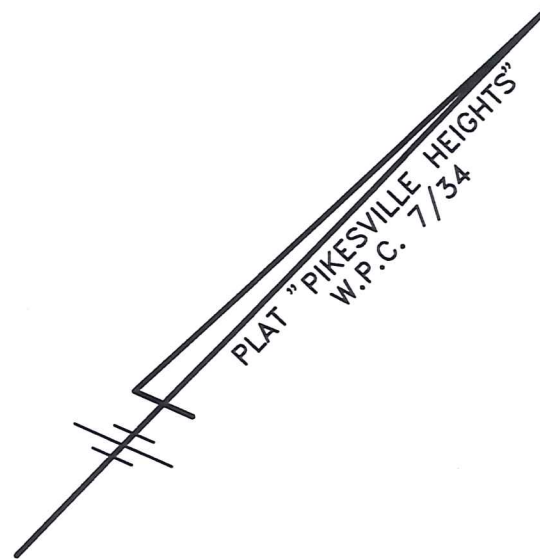
27 Hooks Lane

Cho Benn Holback+Associates



27 Hooks Lane

Cho Benn Holback+Associates



VICINITY MAP
1" = 1000'

ZONING ORDER CASE #45-312-A

THEREFORE, IT IS ORDERED by the Zoning Commissioner for Baltimore County this 8th day of May, 1995 that a variance from Section 409.4.A of the Baltimore County Zoning Regulations (BCZR) to permit a driveway for a two way movement to have a width of 10 ft. in lieu of the required 20 ft.; and a vehicular travelway with direct access to parking spaces, be and is hereby GRANTED, subject, however, to the following restrictions which are conditions precedent to the relief granted herein:

- The Petitioner is hereby made aware that proceeding at this time is at his own risk until such time as the 30 day appellate process from this Order has expired. If, for whatever reason, this Order is reversed, the Petitioner would be required to return, and be responsible for returning, said property to its original condition.
- The existing fence on the subject property shall be removed.
- The Petitioner shall consult with the County's Landscape Architect to develop and install an appropriate landscape plan. This plan shall be developed in accordance with site conditions and the use and zoning classifications of surrounding properties.

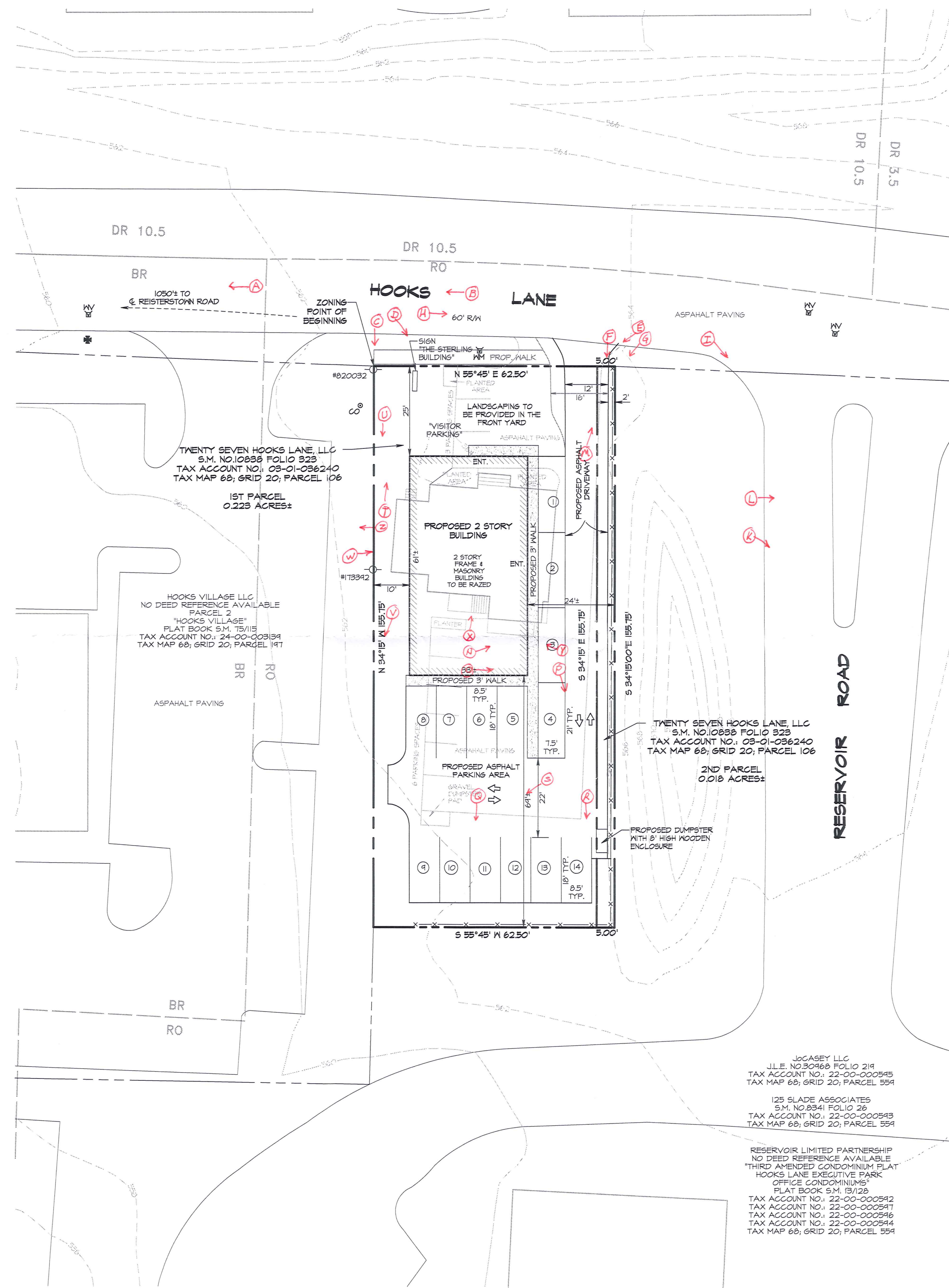
Lawrence E. Schmidt
Lawrence E. Schmidt
Zoning Commissioner
for Baltimore County

LES/mm

ORDER RECEIVED FOR FILING
Date 5/11/95
By CH

LEGEND

- EXISTING BUILDING
- WOODS LINE
- EXISTING PAVING
- ZONING LINE
- PROPERTY LINE
- CONTOURS
- FIRE HYDRANT
- UTILITY POLE
- CLEAN OUT
- WATER METER
- WATER VALVE



GENERAL NOTES

- THE BOUNDARIES SHOWN HEREON ARE BASED ON DEEDS AND PLATS OF RECORD.
- THE TOPOGRAPHY SHOWN HEREON WAS TAKEN FROM BALTIMORE COUNTY GIS TILE 068A3.
- CENSUS TRACT 40801 REGIONAL PLANNING DISTRICT 313
WATERSHED GWYNNS FALLS SUBWATERSHED GWYNNS FALLS
SCHOOL DISTRICT: ELEMENTARY - WOODHOLM E.S.; MIDDLE - PIKESVILLE M.S.; HIGH - PIKESVILLE H.S.
A.D.G. MAP # GRID OLD 2560 NEW 457T60
- ZONING CASE #45-312-A APPLIES TO THE SUBJECT PROPERTY. (SEE ORDER ATTACHED.)
- THE SUBJECT PROPERTY IS NEITHER HISTORIC NOR WITHIN A HISTORIC DISTRICT.
- THERE ARE NO KNOWN UNDERGROUND FUEL STORAGE TANKS ON THE SUBJECT PROPERTY.
- THE SUBJECT PROPERTY IS NOT LOCATED IN THE CHESAPEAKE BAY CRITICAL AREA.
- THE SUBJECT PROPERTY IS NOT WITHIN A 100 YEAR FLOOD PLAIN.
- THE PROPOSED BUILDING WILL BE FOR CLASS B OFFICE USE AND WILL BE 4000 SQUARE FEET AND WILL HAVE A HEIGHT OF LESS THAN 35'.
- FLOOR AREA RATIO OF PROPOSED CLASS B OFFICE IS 0.14.
- THE SUBJECT PROPERTY IS SERVICED BY PUBLIC WATER AND SEWER.
- ANY PROPOSED SIGNS WILL MEET THE REQUIREMENTS OF BALTIMORE COUNTY ZONING REGULATIONS.

R.O. (CLASS B) SETBACKS

- FRONT YARD: 25' OR THE AVERAGE OF THE SETBACKS OF THE ADJACENT STRUCTURES, WHICHEVER IS LESS.
- SIDE YARD: 10' ADJACENT PROPERTIES NOT RESIDENTIALLY ZONED, USED OR ADJACENT TO RESIDENTIAL STREET.
- REAR YARD: 30'

PARKING CALCULATIONS

OFFICE (MEDICAL) 4.5 X 4.0 = 18 SPACES REQUIRED
14 SPACES PROVIDED

OWNER
TWENTY SEVEN HOOKS LANE, LLC
2115 KNOX AVENUE
REISTERSTOWN, MARYLAND 21136

PLAN TO ACCOMPANY PHOTOGRAPHS
(PHOTOS A - Z)
AMENDED

PLAN TO ACCOMPANY PETITIONS
FOR ZONING RELIEF

ON THE

**TWENTY SEVEN
HOOKS LANE, LLC
PROPERTY**

27 HOOKS LANE
Deed Ref: S.M. No.10838 folio 323
Tax Account No.: 03-01-036240
Zoned R.O.; GIS Tile 068A3
Tax Map 68; Grid 20; Parcel 106
3rd ELECTION DISTRICT
2nd COUNCILMANIC DISTRICT
BALTIMORE COUNTY, MARYLAND

Scale: 1"=20'

Date: NOVEMBER 17, 2011

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

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

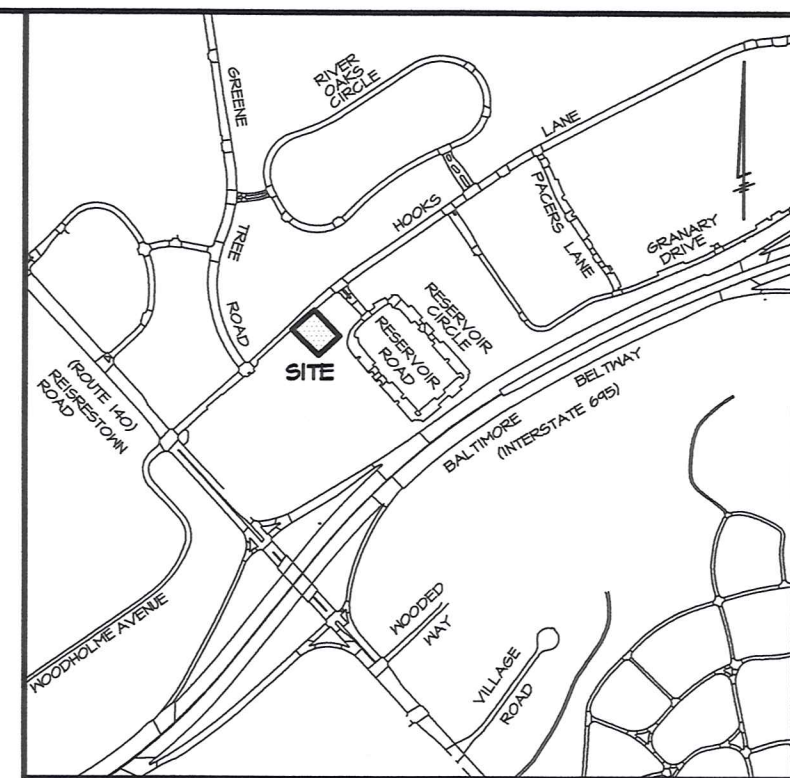
AMEND DRIVEWAY ENTRANCE & SIDEWALK SHOWN	01/04/2012
ZONING ORDER ADDED	11/30/2011
REVISION	DATE

COMPUTED:	DRAWN: RTD	CHECKED:
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PETITIONER'S
EXHIBIT NO. 1

X:\WHOFFMAN_HOOKS_LANE\Zoning Plat 10_17_11.pro

PLAT "PIKESVILLE HEIGHTS"
W.P.C. 7/54



VICINITY MAP
1" = 1000'

GENERAL NOTES

1. THE BOUNDARIES SHOWN HEREON ARE BASED ON DEEDS AND PLATS OF RECORD.
2. THE TOPOGRAPHY SHOWN HEREON WAS TAKEN FROM BALTIMORE COUNTY GIS TILE 068A3.
3. CENSUS TRACT 403101 REGIONAL PLANNING DISTRICT 313
WATERSHED GYMNAS FALLS SUBWERSHED GYMNAS FALLS
SCHOOL DISTRICT: ELEMENTARY - WOODHOLM E.S.; MIDDLE - PIKESVILLE M.S.; HIGH - PIKESVILLE H.S.
A.D.C. MAP # GRID OLD 2568 NEW 45TIC8
4. ZONING CASE #15-312-A APPLIES TO THE SUBJECT PROPERTY. (SEE ORDER ATTACHED.)
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8. THE SUBJECT PROPERTY IS NOT WITHIN A 100 YEAR FLOOD PLAIN.
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- REAR YARD: 30'

PARKING CALCULATIONS

OFFICE (MEDICAL) 4.5 X 4.0 = 18 SPACES REQUIRED
14 SPACES PROVIDED

OWNER
TWENTY SEVEN HOOKS LANE, LLC
2115 KNOX AVENUE
REISTERSTOWN, MARYLAND 21136

AMENDED PLAN TO ACCOMPANY PETITIONS FOR ZONING RELIEF ON THE

TWENTY SEVEN HOOKS LANE, LLC PROPERTY

27 HOOKS LANE
Deed Ref: S.M. No.10838 folio 323
Tax Account No.: 03-01-036240
Zoned R.O.; GIS Tile 068A3
Tax Map 68; Grid 20; Parcel 106
3rd ELECTION DISTRICT
2nd COUNCILMANIC DISTRICT
BALTIMORE COUNTY, MARYLAND



Licenses exp./Renew:
2/22/13

Scale: 1"=20'

Date: NOVEMBER 17, 2011

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

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

AMEND DRIVEWAY ENTRANCE & SIDEWALK SHOWN	01/04/2012
ZONING ORDER ADDED	11/30/2011
REVISION	DATE

COMPUTED:	DRAWN: RTD	CHECKED:
-----------	------------	----------

ZONING ORDER CASE #95-312-A

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1. The Petitioner is hereby made aware that proceeding at this time is at his own risk until such time as the 30 day appellate process from this Order has expired. If, for whatever reason, this Order is reversed, the Petitioner would be required to return, and be responsible for returning, said property to its original condition.
2. The existing fence on the subject property shall be removed.
3. The Petitioner shall consult with the County's Landscape Architect to develop and install an appropriate landscape plan. This plan shall be developed in accordance with site conditions and the use and zoning classifications of surrounding properties.

Lawrence E. Schmidt
LAWRENCE E. SCHMIDT
Zoning Commissioner
for Baltimore County

ORDER RECEIVED FOR FILING
Date: 5/8/95
By: [Signature]

LBS/mm

LEGEND

- EXISTING BUILDING [Symbol]
- WOODS LINE [Symbol]
- EXISTING PAVING [Symbol]
- ZONING LINE [Symbol]
- PROPERTY LINE [Symbol]
- CONTOURS [Symbol]
- FIRE HYDRANT [Symbol]
- UTILITY POLE [Symbol]
- CLEAN OUT [Symbol]
- WATER METER [Symbol]
- WATER VALVE [Symbol]

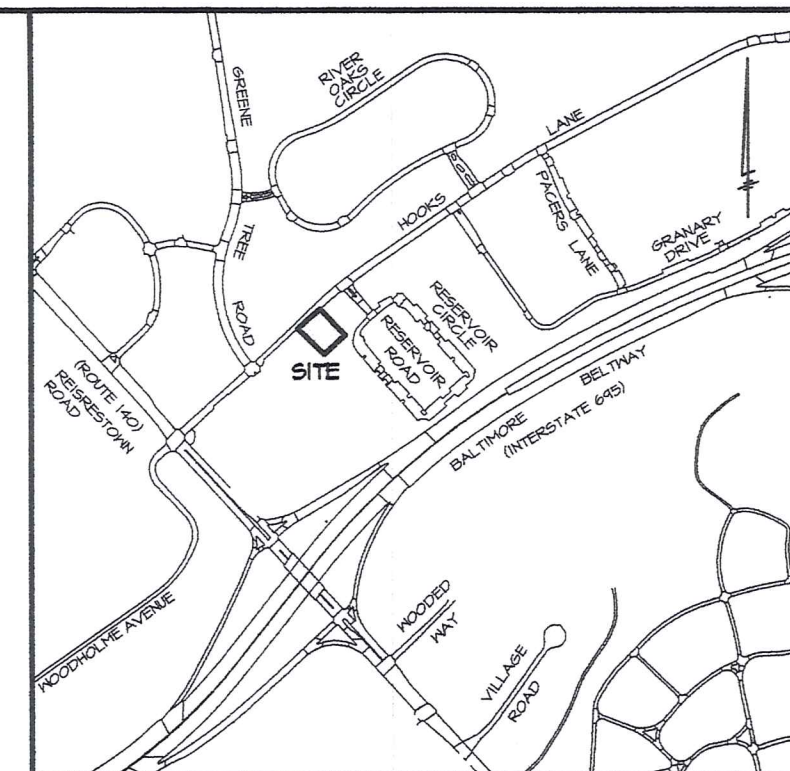
MICROFILMED

JOCASEY LLC
J.L.E. NO.30468 FOLIO 219
TAX ACCOUNT NO.: 22-00-000595
TAX MAP 68; GRID 20; PARCEL 554

125 SLADE ASSOCIATES
S.M. NO.6341 FOLIO 26
TAX ACCOUNT NO.: 22-00-000593
TAX MAP 68; GRID 20; PARCEL 554

RESERVOIR LIMITED PARTNERSHIP
NO DEED REFERENCE AVAILABLE
"THIRD AMENDED CONDOMINIUM PLAT
HOOKS LANE EXECUTIVE PARK
OFFICE CONDOMINIUMS"
PLAT BOOK S.M. 15/128
TAX ACCOUNT NO.: 22-00-000592
TAX ACCOUNT NO.: 22-00-000591
TAX ACCOUNT NO.: 22-00-000596
TAX ACCOUNT NO.: 22-00-000594
TAX MAP 68; GRID 20; PARCEL 554

PLAT "PIKESVILLE HEIGHTS"
W.P.C. 7754



VICINITY MAP
1" = 1000'

ZONING ORDER CASE #95-312-A

THEREFORE, IT IS ORDERED by the Zoning Commissioner for Baltimore County this 8th day of May, 1995 that a variance from Section 409.4.A of the Baltimore County Zoning Regulations (BCZR) to permit a driveway for a two way movement to have a width of 10 ft. in lieu of the required 20 ft.; and a vehicular travelway with direct access to parking spaces, be and is hereby GRANTED, subject, however, to the following restrictions which are conditions precedent to the relief granted herein:

1. The Petitioner is hereby made aware that proceeding at this time is at his own risk until such time as the 30 day appellate process from this Order has expired. If, for whatever reason, this Order is reversed, the Petitioner would be required to return, and be responsible for returning, said property to its original condition.
2. The existing fence on the subject property shall be removed.
3. The Petitioner shall consult with the County's Landscape Architect to develop and install an appropriate landscape plan. This plan shall be developed in accordance with site conditions and the use and zoning classifications of surrounding properties.

Lawrence E. Schmidt
LAWRENCE E. SCHMIDT
Zoning Commissioner
for Baltimore County

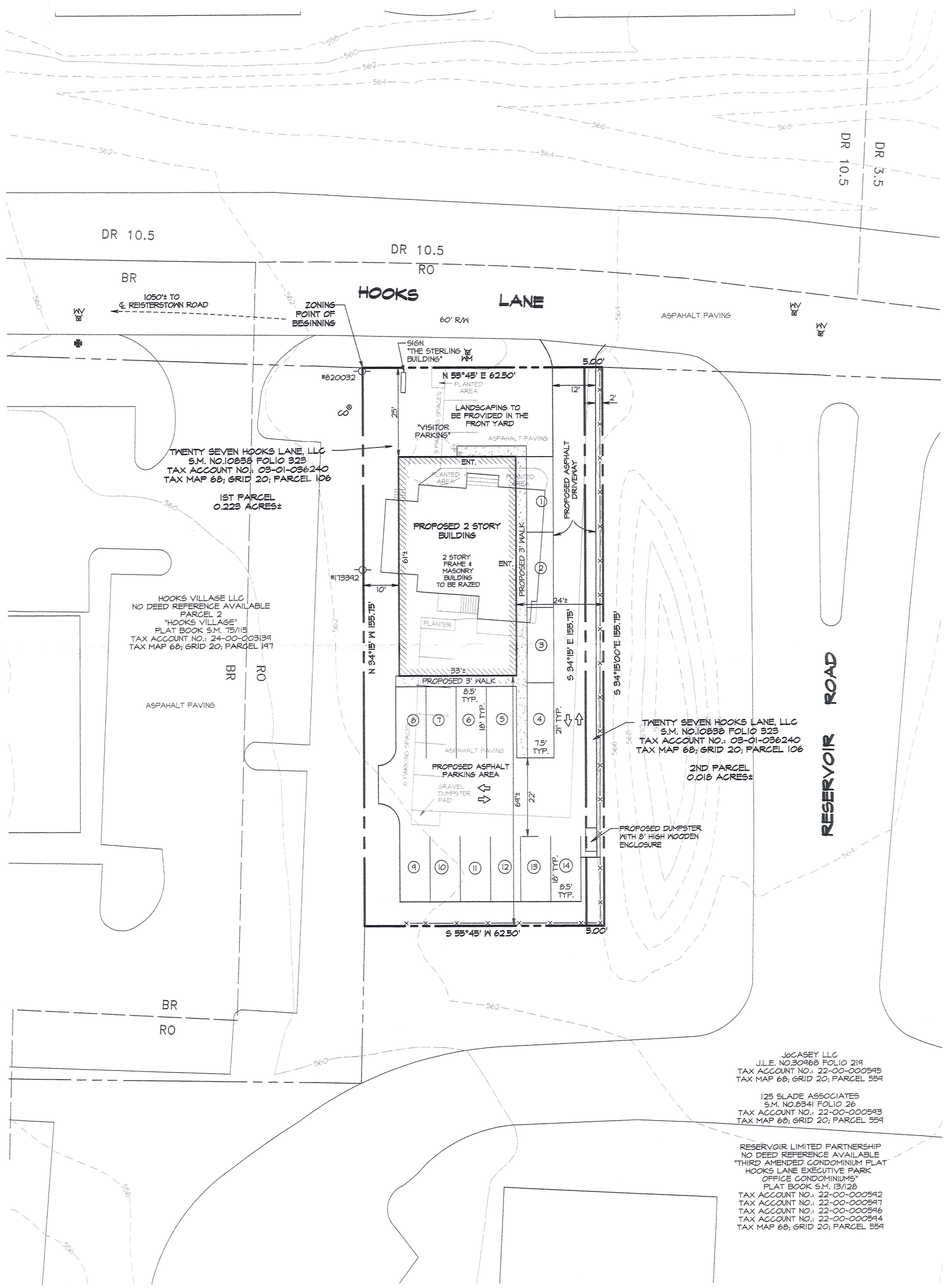
ORDER RECEIVED FOR FILING
Date 5/11/95
By L.E. Schmidt

1288/mm

MICROFILMED

LEGEND

- EXISTING BUILDING
- MOODS LINE
- EXISTING PAVING
- ZONING LINE
- PROPERTY LINE
- CONTOURS
- FIRE HYDRANT
- UTILITY POLE
- CLEAN OUT
- WATER METER
- WATER VALVE



GENERAL NOTES

1. THE BOUNDARIES SHOWN HEREON IS ARE BASED ON DEEDS AND PLATS OF RECORD.
2. THE TOPOGRAPHY SHOWN HEREON WAS TAKEN FROM BALTIMORE COUNTY GIS TILE 068A3.
3. CENSUS TRACT 403701 REGIONAL PLANNING DISTRICT 313
WATERSHED GWYNNS FALLS SUBWATERSHED GWYNNS FALLS
SCHOOL DISTRICT: ELEMENTARY - WOODHOLM E.S.; MIDDLE - PIKESVILLE M.S.; HIGH - PIKESVILLE H.S.
A.D.C. MAP & GRID OLD 2358 NEW 4517C3
4. ZONING CASE #95-312-A APPLIES TO THE SUBJECT PROPERTY. (SEE ORDER ATTACHED.)
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 NOT LOCATED IN THE CHESAPEAKE BAY CRITICAL AREA.
8. THE SUBJECT PROPERTY IS NOT WITHIN A 100 YEAR FLOOD PLAIN.
9. THE PROPOSED BUILDING WILL BE FOR CLASS B OFFICE USE AND WILL BE 4000 SQUARE FEET AND WILL HAVE A HEIGHT OF LESS THAN 35'.
10. FLOOR AREA RATIO OF PROPOSED CLASS B OFFICE IS 0.14.
11. THE SUBJECT PROPERTY IS SERVICED BY PUBLIC WATER AND SEWER.
12. ANY PROPOSED SIGNS WILL MEET THE REQUIREMENTS OF BALTIMORE COUNTY ZONING REGULATIONS.

R.O. (CLASS B) SETBACKS

- FRONT YARD: 25' OR THE AVERAGE OF THE SETBACKS OF THE ADJACENT STRUCTURES, WHICHEVER IS LESS.
- SIDE YARD: 10' ADJACENT PROPERTIES NOT RESIDENTIALLY ZONED, USED OR ADJACENT TO RESIDENTIAL STREET.
- REAR YARD: 30'

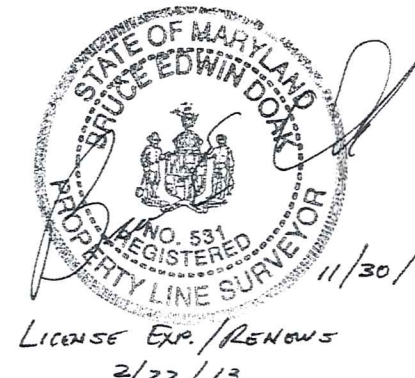
PARKING CALCULATIONS

OFFICE (MEDICAL) 4.5 X 4.0 = 18 SPACES REQUIRED
14 SPACES PROVIDED

OWNER
TWENTY SEVEN HOOKS LANE, LLC
2115 KNOX AVENUE
REISTERSTOWN, MARYLAND 21116

PLAN TO ACCOMPANY PETITIONS FOR ZONING RELIEF ON THE TWENTY SEVEN HOOKS LANE, LLC PROPERTY

27 HOOKS LANE
Deed Ref: S.M. No.10838 folio 323
Tax Account No.: 03-01-036240
Zoned R.O.; GIS Tile 068A3
Tax Map 68; Grid 20; Parcel 106
3rd ELECTION DISTRICT
2nd COUNCILMANIC DISTRICT
BALTIMORE COUNTY, MARYLAND



Scale: 1"=20' Date: NOVEMBER 17, 2011

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

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

ZONING ORDER ADDED	11/30/2011				
REVISION	DATE	COMPUTED	DRAWN	RTD	CHECKED

FILE: X:\VHOFFMAN_HOOKS_LANE\Zoning Plat 10_17_11.pro