

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

(9990-9998 Liberty Road) *

2nd Election District *

4th Council District *

Kings Point Associates, LLC *

Legal Owner *

Petitioner *

BEFORE THE

OFFICE OF

ADMINISTRATIVE HEARINGS

FOR BALTIMORE COUNTY

Case No. 2017-0159-SPHA

* * * * *

OPINION AND ORDER

This matter comes before the Office of Administrative Hearings (OAH) for consideration of Petitions for Special Hearing and Variance filed on behalf of Kings Point Associates, LLC, legal owner ("Petitioner"). The Special Hearing was filed pursuant to § 500.7 of the Baltimore County Zoning Regulations ("B.C.Z.R") to approve the sale of utility trailers and trailer supplies in the B.L. zone. In addition, a Petition for Variance seeks to allow 464 off-street parking spaces in lieu of the required 791 parking spaces. A site plan was marked and accepted into evidence as Petitioner's Exhibit 1.

Joseph Savaro, professional engineer Joseph Ucciferro, and traffic engineer Ken Schmid appeared in support of the requests. David H. Karceski, Esq. and Neil Thupari, Esq. represented the Petitioner. Shirley and Jeff Supik attended the hearing and opposed the requests. In addition, numerous e-mails (included in the case file) were received from neighbors opposing the requests. The Petition was advertised and posted as required by the Baltimore County Zoning Regulations. Substantive Zoning Advisory Committee (ZAC) comments were received from the Department of Planning (DOP) and the Bureau of Development Plans Review (DPR). Neither agency opposed the requests.

ORDER RECEIVED FOR FILING

Date

4/4/17

By

Sen

The subject property is approximately 11.8 acres in size and is zoned BL-CCC. The property is improved with a shopping center which has been in operation for many years. This case concerns a large commercial space at the center, which is now vacant. The space was formerly occupied by a Food Lion grocery store which has closed. Petitioner proposes to lease the space to Tractor Supply, Inc. for operation of a retail store. To do so, variance relief is required.

SPECIAL HEARING

The petition for special hearing concerns the sale of "utility trailers and trailer supplies" at the site. Having reviewed the Regulations, I do not believe zoning relief of any sort is required for Petitioner to sell utility trailers at this site. The trailers in question are small utility trailers of the sort used by homeowners to transport mulch, garden supplies or hauling junk to the dump. Photos were submitted which show the type of trailer at issue. Petitioner's Exhibit 2D. These trailers are no larger or heavier than the tractors and riding lawn mowers which would also be sold at this store (and at other "big box" retailers like Home Depot).

While I do not believe granting the petition for special hearing would have a detrimental impact upon the community, I am concerned the approval could be construed as authority to sell at the site other sorts of "trailers" (e.g., RVs or manufactured homes) as that term is defined in the Regulations. B.C.Z.R. §415. To eliminate any doubt on the point, I will grant the request but permit sales of only the sort of trailers shown in the photos submitted at the hearing.

VARIANCE

A variance request involves a two-step process, summarized as follows:

- (1) It must be shown the property is unique in a manner which makes it unlike surrounding properties, and that uniqueness or peculiarity must necessitate variance relief; and
- (2) If variance relief is denied, Petitioner will experience a practical difficulty or hardship.

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Date 4/4/17

By SLH

Cromwell v. Ward, 102 Md. App. 691 (1995).

Petitioner has met this test. As Mr. Ucciferro testified, the large site is irregularly shaped and there is a significant grade change across the property. As such it is unique. Petitioner would experience practical difficulty if the regulations were strictly interpreted because it would be unable to lease the vacant space to the proposed tenant. Finally, I do not believe granting the variance request pertaining to the number of off-street parking spaces would have a detrimental impact upon the community. Mr. Ucciferro testified he visited the site on more than one occasion, and that nearly all of the spaces were unoccupied. Mr. Schmid performed a parking count study at the center and determined only 12-16% of the spaces were occupied on weekdays, while approximately 31% of the spaces were occupied on a Saturday. He opined that even if the variance was granted, only 61% of the spaces would be occupied with the center at full capacity. In these circumstances I do not believe there will be a shortage of parking at the shopping center.

The Supiks (and nearly all of the e-mails received from neighbors) expressed concern with the lack of a grocery store at this location, which they believed posed a special hardship for senior citizens. Ms. Supik testified she was "incensed [Petitioner] would put something in the community [i.e., the Tractor Supply store] they have no use for." I understand and am sympathetic to the community's plight, but the zoning regulations permit such an enterprise at this location. In addition, Mr. Savaro (on behalf of Petitioner) testified his firm attempted to lease the space to numerous grocery store chains, none of which were interested in this location.

THEREFORE, IT IS ORDERED this 4th day of **April, 2017**, by this Administrative Law Judge, that the Petition for Special Hearing filed pursuant to § 500.7 of the Baltimore County Zoning Regulations ("B.C.Z.R) to approve the sale of utility trailers and trailer supplies (such as

ORDER RECEIVED FOR FILING

Date 4/4/17
By Sen

those shown in the attached photograph, which is expressly incorporated into this Order) in the B.L. Zone, be and is hereby GRANTED.

IT IS FURTHER ORDERED that the petition for variance to allow 464 off-street parking spaces in lieu of the required 791 parking spaces, be and is hereby GRANTED.

The relief granted herein shall be subject to and conditioned upon the following:

1. Petitioner may apply for necessary permits and/or licenses upon receipt of this Order. However, Petitioner is hereby made aware that proceeding at this time is at its own risk until 30 days from the date hereof, during which time an appeal can be filed by any party. If for whatever reason this Order is reversed, Petitioner would be required to return the subject property to its original condition.
2. No permanent structures may be constructed and/or used in connection with the outdoor display area(s) shown on the plan.
3. No on-site rental and/or repair of any equipment or inventory offered for sale shall be permitted.
4. The outdoor sales area(s) shown on the plan shall be fenced and landscaped as determined in the sole discretion of the Baltimore County landscape architect.

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

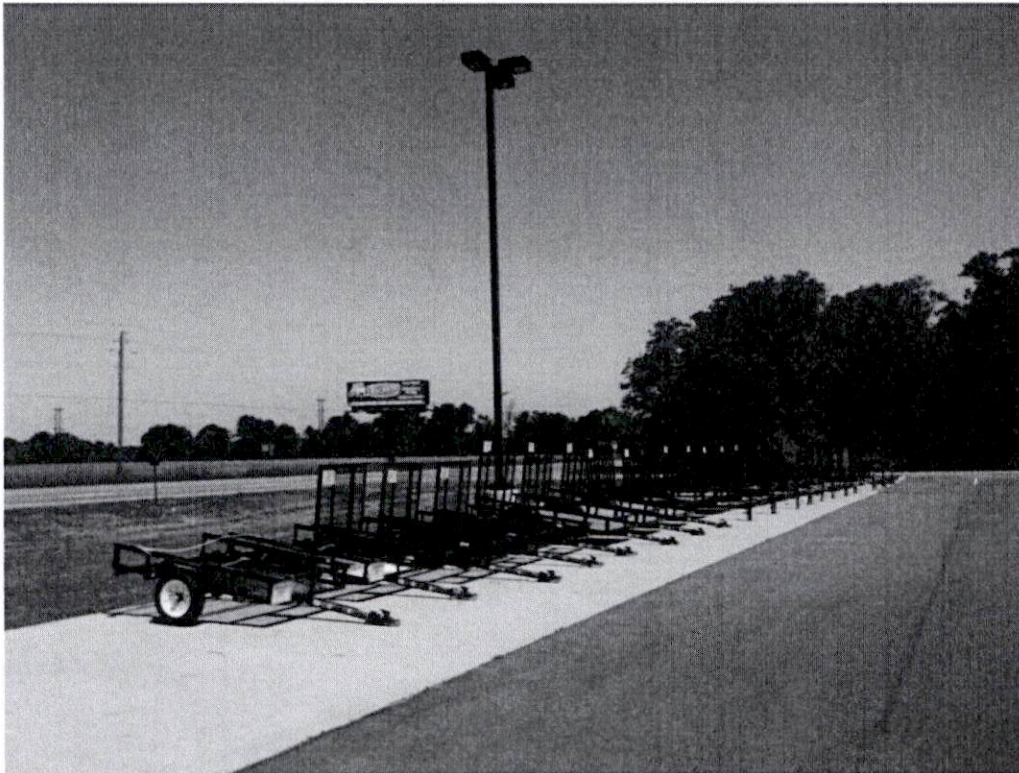
JEB/sln



JOHN E. BEVERUNGEN
Administrative Law Judge
for Baltimore County

ORDER RECEIVED FOR FILING

Date 4/4/17
By slh



Utility Trailer Display



ORDER RECEIVED FOR ~~TRUCK~~ Tractor Implement Display

Date 4/17/17

By Sen

2D



KEVIN KAMENETZ
County Executive

LAWRENCE M. STAHL
Managing Administrative Law Judge
JOHN E. BEVERUNGEN
Administrative Law Judge

April 4, 2017

David H. Karceski, Esq.
Neill Thupari, Esq.
210 W. Pennsylvania Avenue
Towson, Maryland 21204

RE: Petitions for Special Hearing and Variance
Case No. 2017-0159-SPHA
Property: 9990-9998 Liberty Road

Dear Counsel:

Enclosed please find a copy of the decision rendered in the above-captioned matter.

In the event any party finds the decision rendered is unfavorable, any party may file an appeal to the County Board of Appeals within thirty (30) days of the date of this Order. For further information on filing an appeal, please contact the Office of Administrative Hearings at 410-887-3868.

Sincerely,

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

JOHN E. BEVERUNGEN
Administrative Law Judge
for Baltimore County

JEB:sln
Enclosure

c: Jeff and Shirley Supik, 3525 N. Rolling Road, Baltimore, Maryland 21244



AMENDED 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 9900-9998 Liberty Road which is presently zoned BL-CCC

Deed References: 26355-523 10 Digit Tax Account # 2120001188

Property Owner(s) Printed Name(s) Kings Point Associates 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

SEE ATTACHMENT TO PETITION

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

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

SEE ATTACHMENT TO PETITION

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:

David H. Karceski, Esquire

Name- Type or Print

Signature Venable LLP

210 W. Pennsylvania Ave., Ste. 500 Towson MD

Mailing Address City State

21204 410-494-6285 dhkarceski@venable.com

Zip Code Telephone # Email Address

Legal Owners (Petitioners):

Kings Point Associates LLC

Name #1 - Type or Print Name #2 - Type or Print

By: [Signature]

Signature #1 Signature #2

1535 Chestnut Street, Suite 200 Philadelphia PA

Mailing Address City State

19102-2501 215-563-7222 LBRAHENC@BRAHENC.COM

Zip Code Telephone # Email Address

Representative to be contacted:

David H. Karceski, Esquire

Name - Type or Print

Signature Venable LLP

210 W. Pennsylvania Ave., Ste. 500 Towson MD

Mailing Address City State

21204 410-494-6285 dhkarceski@venable.com

Zip Code Telephone # Email Address

CASE NUMBER 2017-0159-SPHA Filing Date 12/13/16

Do Not Schedule Dates:

Reviewer AT

ORDER RECEIVED FOR FILING

REV. 10/4/11

Date 4/4/17

By Sen

KINGS POINT ASSOCIATES LLC

9900-9998 LIBERTY ROAD

ATTACHMENT TO PETITION FOR SPECIAL HEARING

A Special Hearing to approve the sale of utility trailers and trailer supplies in the BL Zone (Business, Local).

KINGS POINT ASSOCIATES LLC

9900-9998 LIBERTY ROAD

ATTACHMENT TO PETITION FOR VARIANCE

1. A variance from Section 409.A.2 of the Baltimore County Zoning Regulations (B.C.Z.R.) to allow 464 off-street parking spaces in lieu of the required 791 spaces.

- ~~2. A variance from Section 230.2.D of the B.C.Z.R. to permit storage and display of materials, vehicles and equipment more than five feet in front of the required front building line.~~



TITLE DESCRIPTION

BEGINNING AT A POINT IN THE NORTHERLY RIGHT-OF-WAY LIMITS OF LIBERTY ROAD - MD RTE. 26 (66' WIDE RIGHT-OF-WAY) SAID POINT MARKING THE INTERSECTION OF THE DIVISION LINE BETWEEN THE LANDS OF DP LIMITED PARTNERSHIP (LIBER 19097 FOLIO 408) ON THE EAST AND LOT 2, DEER PARK PLAZA (PLAT BOOK 57 FOLIO 112), THE LANDS OF DP LIMITED PARTNERSHIP (LIBER 7594 FOLIO 121) ON THE WEST, THENCE WITH SAID NORTHERLY RIGHT-OF-WAY LIMITS OF LIBERTY ROAD;

1. NORTH 56 DEGREES - 21 MINUTES - 31 SECONDS WEST, 35.00 FEET TO A POINT, MARKING THE INTERSECTION WITH THE NORTHERLY RIGHT-OF-WAY LIMITS OF DEER PARK ROAD (VARIABLE WIDTH RIGHT-OF-WAY) THENCE WITH SAID NORTHERLY RIGHT-OF-WAY LIMITS OF DEER PARK ROAD;
2. NORTH 37 DEGREES - 00 MINUTES - 00 SECONDS WEST, 151.44 FEET TO A POINT OF CURVATURE, THENCE;
3. CONTINUING, 344.36 FEET ALONG THE ARC OF A CURVE TO THE RIGHT, HAVING A RADIUS OF 1709.95 FEET. A CENTRAL ANGLE OF 11 DEGREES - 32 MINUTES 20 SECONDS, AND A CHORD BEARING AND DISTANCE OF NORTH 31 DEGREES 13 MINUTES - 50 SECONDS WEST, 343.79 FEET TO A POINT MARKING THE INTERSECTION WITH THE DIVISION LINE BETWEEN LOT 3, DEER PARK PLAZA (PLAT BOOK 57 FOLIO 112) ON THE EAST AND LOT 1, DEER PARK PLAZA (PLAT BOOK 57 FOLIO 112) ON THE WEST. THENCE WITH SAID DIVISION LINE;
4. NORTH 64 DEGREES - 58 MINUTES - 37 SECONDS EAST, 306.13 FEET TO A POINT, THENCE;
5. CONTINUING, NORTH 32 DEGREES - 01 MINUTE - 40 SECONDS EAST, 64.40 FEET TO A POINT MARKING THE INTERSECTION WITH THE DIVISION LINE BETWEEN SAID LOT 3, DEER PARK PLAZA ON THE SOUTH THE LANDS OF DP ASSOCIATES, LLC, (LIBER 13889 FOLIO 581) ON THE NORTH, THENCE WITH SAID DIVISION LINE AND WITH SAID LOT 2, DEER PARK PLAZA;
6. SOUTH 57 DEGREES - 58 MINUTES - 20 SECONDS EAST, 764.46 FEET TO A POINT, THENCE;
7. CONTINUING, SOUTH 68 DEGREES - 06 MINUTES - 30 SECONDS EAST, 33.31 FEET TO A POINT, THENCE;
8. CONTINUING, SOUTH 50 DEGREES - 32 MINUTES - 02 SECONDS EAST, 17.58 FEET TO A NONTANGENT POINT OF CURVATURE MARKING THE INTERSECTION OF SAID DIVISION LINE WITH THE WESTERLY RIGHT-OF-WAY LIMITS OF KINGS POINT ROAD (60' WIDE RIGHT-OF-WAY), THENCE WITH SAID WESTERLY RIGHT-OF-WAY LIMITS;
9. 52.49 FEET ALONG THE ARC OF A CURVE TO THE LEFT, HAVING A RADIUS OF 780.00 FEET, A CENTRAL ANGLE OF 03 DEGREES - 51 MINUTES - 19 SECONDS AND A CHORD BEARING AND DISTANCE OF SOUTH 10 DEGREES - 52 MINUTES - 09 SECONDS WEST, 52.48 FEET TO A POINT OF TANGENCY, THENCE;
10. CONTINUING, SOUTH 08 DEGREES - 56 MINUTES - 30 SECONDS WEST, 324.53 FEET TO A POINT OF CURVATURE, THENCE;
11. CONTINUING, 203.23 FEET ALONG THE ARC OF A CURVE TO THE RIGHT, HAVING A RADIUS OF 1219.43 FEET, A CENTRAL ANGLE OF 09 DEGREES - 32 MINUTES 56 SECONDS AND A CHORD BEARING AND DISTANCE OF SOUTH 13 DEGREES 42 MINUTES - 53 SECONDS WEST, 202.99 FEET TO A POINT, THENCE;

2017-0159-A



12. CONTINUING, SOUTH 71 DEGREES - 14 MINUTES - 20 SECONDS WEST, 18.31 FEET TO A POINT MARKING THE INTERSECTION OF THE WESTERLY RIGHT-OF-WAY LIMITS OF KINGS POINT ROAD WITH SAID NORTHERLY RIGHT-OF-WAY LIMITS OF LIBERTY ROAD, THENCE WITH SAID NORTHERLY RIGHT-OF-WAY LIMITS;

13. NORTH 56 DEGREES - 21 MINUTES - 31 SECONDS WEST, 526.48 FEET TO A POINT MARKING THE INTERSECTION WITH THE DIVISION LINE BETWEEN SAID LOT 2, DEER PARK PLAZA ON THE EAST AND THE LANDS OF SAID DP LIMITED PARTNERSHIP ON THE WEST, THENCE WITH SAID RIGHT-OF-WAY LIMITS;

14. CONTINUING, SOUTH 33 DEGREES - 38 MINUTES - 29 SECONDS WEST, 10.00 FEET TO A POINT, THENCE;

15. CONTINUING, NORTH 56 DEGREES - 21 MINUTES - 31 SECONDS WEST, 170.00 FEET TO A POINT, THENCE;

16. CONTINUING, NORTH 33 DEGREES - 38 MINUTES - 29 SECONDS EAST, 10.00 FEET TO THE POINT OF BEGINNING. CONTAINING 514,094 SQUARE FEET OR 11.801 ACRES MORE OR LESS.

LOCATED IN THE 02 ELECTION DISTRICT AND 04 COUNCIL DISTRICT.



12-12-16

2017-0159-A

№ 144028

Date: 12/13/16

PAID RECEIPT

BUSINESS ACTUAL TIME BWM
12/14/2016 12/13/2016 10:18:21 1
RED W501 WALKIN LJR
>>RECEIPT # 696713 12/13/2016 OFLN
Dept 5 S2S ZONING VERIFICATION
CR NO. 144025

Receipt Tot \$500.00
 \$500.00 CR \$.00 CA
 Baltimore County, Maryland

[illegible]

Total: 550

For:

9900-9998 LIBERTY RD

2017-0157-A

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

PLEASE PRESS HARD!!!!

**CASHIER'S
VALIDATION**

CERTIFICATE OF POSTING

2017-0159-A

RE: Case No.: _____

Petitioner/Developer: _____

Kings Point Associates, LLC

February 2, 2017

Date of Hearing/Closing: _____

Baltimore County Department of
Permits, Approvals and Inspections
County Office Building, Room 111
111 West Chesapeake Avenue
Towson, Maryland 21204

Attn: Kristen Lewis:

Ladies and Gentlemen:

This letter is to certify under the penalties of perjury that the necessary sign(s) required by law were posted conspicuously on the property located at: _____

9900-9998 Liberty Road

January 13, 2016

The sign(s) were posted on _____
(Month, Day, Year)



Sincerely,

January 13, 2016

(Signature of Sign Poster)

(Date)

SSG Robert Black

(Print Name)

1508 Leslie Road

(Address)

Dundalk, Maryland 21222

(City, State, Zip Code)

(410) 282-7940

(Telephone Number)



501 N. Calvert St., P.O. Box 1377
Baltimore, Maryland 21278-0001
tel: 410/332-6000
800/829-8000

WE HEREBY CERTIFY, that the annexed advertisement of Order No 4705567

Sold To:

VENABLE LLP - CU00174151
210 W Pennsylvania Ave Ste 500
TOWSON,MD 21204-5304

Bill To:

VENABLE LLP - CU00174151
210 W Pennsylvania Ave Ste 500
TOWSON,MD 21204-5304

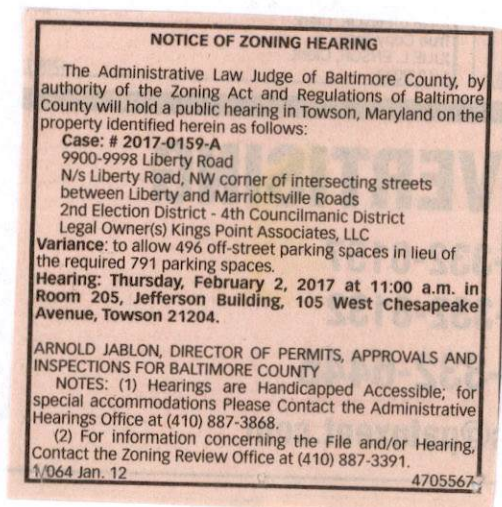
Was published in "Jeffersonian", "Bi-Weekly", a newspaper printed and published in Baltimore County on the following dates:

Jan 12, 2017

The Baltimore Sun Media Group

By *S. Wilkinson*

Legal Advertising



TO: PATUXENT PUBLISHING COMPANY
Thursday, January 12, 2017 Issue - Jeffersonian

Please forward billing to:

Barbara Lukasevich

410-494-6200

Venable, LLP

210 W. Pennsylvania Avenue, Ste. 500

Towson, MD 21204

NOTICE OF ZONING HEARING

The Administrative Law Judge 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: 2017-0159-A

9900-9998 Liberty Road

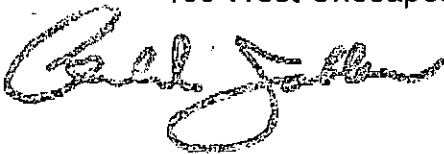
N/s Liberty Road, NW corner of intersecting streets between Liberty and Marriottsville Roads

2nd Election District – 4th Councilmanic District

Legal Owners: Kings Point Associates, LLC

Variance to allow 496 off-street parking spaces in lieu of the required 791 parking spaces.

Hearing: Thursday, February 2, 2017 at 11:00 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

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

January 9, 2017

NOTICE OF ZONING HEARING

The Administrative Law Judge 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: 2017-0159-A

9900-9998 Liberty Road

N/s Liberty Road, NW corner of intersecting streets between Liberty and Marriottsville Roads
2nd Election District – 4th Councilmanic District

Legal Owners: Kings Point Associates, LLC

Variance to allow 496 off-street parking spaces in lieu of the required 791 parking spaces.

Hearing: Thursday, February 2, 2017 at 11:00 a.m. in Room 205, Jefferson Building,
105 West Chesapeake Avenue, Towson 21204

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

Arnold Jablon
Director

AJ:kl

C: David Karceski, 210 W. Pennsylvania Avenue, Ste. 500, Towson 21204
Kings Point Associates, LLC, 1535 Chestnut St., Ste. 200, Philadelphia PA 19102

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY FRIDAY, JANUARY 13, 2017.**
(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.

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

NO 148599

Date: 2/10/17

Fund	Dept	Unit	Sub Unit	Rev Source/ Obj	Sub Rev/ Sub Obj	Dept Obj	BS Acct	Amount
001	806	0000		0150				250.00

Total: 250.00

Rec From: David Karceski
 For: 9901-9998 Liberty Rd 2017-0159
Commended P. Hudson

DISTRIBUTION

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

PAID RECEIPT

BUSINESS ACTUAL TIME DRN
 2/10/2017 2/10/2017 09:41:11 3
 REG W503 WALKIN CAN
 >>RECEIPT # 715603 2/10/2017 OFLN
 Dept 5 528 ZONING VERIFICATION
 CR NO. 148599
 Recpt Tot \$250.00
 \$250.00 CK \$.00 CA
 Baltimore County, Maryland

**CASHIER'S
 VALIDATION**

CERTIFICATE OF POSTING

2017-0159-SPHA

RE: Case No.: _____

Petitioner/Developer: _____

Kings Point Associates, LLC

March 28, 2017

Date of Hearing/Closing: _____

**Baltimore County Department of
Permits, Approvals and Inspections
County Office Building, Room 111
111 West Chesapeake Avenue
Towson, Maryland 21204**

Attn: Kristen Lewis:

Ladies and Gentlemen:

This letter is to certify under the penalties of perjury that the necessary sign(s) required by law were posted conspicuously on the property located at: _____

9900-9998 Liberty Road

March 8, 2017

The sign(s) were posted on _____
(Month, Day, Year)



Sincerely,

March 8, 2017

(Signature of Sign Poster)

(Date)

SSG Robert Black

(Print Name)

1508 Leslie Road

(Address)

Dundalk, Maryland 21222

(City, State, Zip Code)

(410) 282-7940

(Telephone Number)

ZONING NOTICE

CASE # 2017-0159-SPHA

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

ROOM 205, JEFFERSON BUILDING
PLACE: 105 W. CHESAPEAKE AVE. TOWSON MD 21204

DATE AND TIME: Tuesday, March 28, 2017 at 1:30 p.m.

REQUEST: Special Hearing to approve the sale of utility trailers and trailer supplies in the BL zone (Business Local).
Variance to allow 464 off-street parking spaces in lieu of the required 791 parking spaces. To permit storage and display of materials, vehicles and equipment more than 5 ft. in front of the required front building line.

POSTPONEMENTS DUE TO WEATHER OR OTHER CONDITIONS ARE SOMETIMES NECESSARY.
TO CONFIRM HEARING CALL 867-3341

DO NOT REMOVE THIS SIGN AND POST UNTIL DAY OF HEARING UNDER PENALTY OF LAW

HANDICAPPED ACCESSIBLE

ZONING NOTICE

Case # 2017-0159-SPHA

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

ROOM 205, JEFFERSON BUILDING
PLACE: 195 W. CHESAPEAKE AVE., TOWSON MD 21204
DATE AND TIME: Tuesday, March 28, 2017 at 1:30 P.M.

*NOTICE: A Special Hearing is to approve the sale of utility
variances and other support to the RT zone (Business Local)
variances to allow and support the RT zone (Business Local)
variances to allow and support the RT zone (Business Local)
variances to allow and support the RT zone (Business Local)
variances to allow and support the RT zone (Business Local)*

THE TOWSON ZONING COMMISSION is a public body created by the
Towson City Council. It is responsible for reviewing and recommending
variances to the Zoning Ordinance. The Commission is composed of
seven members, including the Mayor, the City Manager, and five
citizens appointed by the City Council.



501 N. Calvert St., P.O. Box 1377
Baltimore, Maryland 21278-0001
tel: 410/332-6000
800/829-8000

WE HEREBY CERTIFY, that the annexed advertisement of Order No 4814828

Sold To:

VENABLE LLP - CU00174151
210 W Pennsylvania Ave Ste 500
TOWSON, MD 21204-5304

Bill To:

VENABLE LLP - CU00174151
210 W Pennsylvania Ave Ste 500
TOWSON, MD 21204-5304

Was published in "Jeffersonian", "Bi-Weekly", a newspaper printed and published in Baltimore County on the following dates:

Mar 07, 2017

NOTICE OF ZONING HEARING

The Administrative Law Judge 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: # 2017-0159-SPHA
9900-9998 Liberty Road
NS of Liberty Road, NW corner of intersecting streets between Liberty and Marriottsville Roads
2nd Election District - 4th Councilmanic District
Legal Owner(s) Kings Point Associates, LLC

SPECIAL HEARING: to approve the sale of utility trailers and trailer supplies in the BL zone. (Business Local).

VARIANCE: to allow 464 off-street parking spaces in lieu of the required 791 parking spaces. To permit storage and display of materials, vehicle and equipment more than 5 ft. in front of the required front building line.

Hearing: Tuesday, March 28, 2017 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 3/626 Mar. 7 4814828

The Baltimore Sun Media Group

By S. Wilkinson

Legal Advertising

TO: PATUXENT PUBLISHING COMPANY
Tuesday, March 7, 2017 Issue - Jeffersonian

Please forward billing to:

Barbara Lukasevich

410-494-6200

Venable, LLP

210 W. Pennsylvania Avenue, Ste. 500

Towson, MD 21204

NOTICE OF ZONING HEARING

The Administrative Law Judge 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: 2017-0159-SPHA

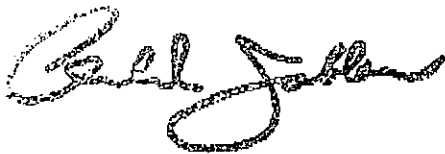
9900-9998 Liberty Road

NS of Liberty Road, NW corner of intersecting streets between Liberty and Marriottsville Roads
2nd Election District – 4th Councilmanic District

Legal Owners: Kings Point Associates, LLC

Special Hearing to approve the sale of utility trailers and trailer supplies in the BL zone. (Business Local). Variance to allow 464 off-street parking spaces in lieu of the required 791 parking spaces. To permit storage and display of materials, vehicles and equipment more than 5 ft. in front of the required front building line.

Hearing: Tuesday, March 28, 2017 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

February 28, 2017

NOTICE OF ZONING HEARING

The Administrative Law Judge 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: 2017-0159-SPHA

9900-9998 Liberty Road

NS of Liberty Road, NW corner of intersecting streets between Liberty and Marriottsville Roads
2nd Election District – 4th Councilmanic District

Legal Owners: Kings Point Associates, LLC

Special Hearing to approve the sale of utility trailers and trailer supplies in the BL zone. (Business Local). Variance to allow 464 off-street parking spaces in lieu of the required 791 parking spaces. To permit storage and display of materials, vehicles and equipment more than 5 ft. in front of the required front building line.

Hearing: Tuesday, March 28, 2017 at 1:30 p.m. in Room 205, Jefferson Building,
105 West Chesapeake Avenue, Towson 21204



Arnold Jablon
Director

AJ:kl

C: David Karceski, 210 W. Pennsylvania Avenue, Ste. 500, Towson 21204
Kings Point Associates, LLC, 1535 Chestnut St., Ste. 200, Philadelphia PA 19102-2501

- NOTES: (1) **THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY WEDNESDAY, MARCH 8, 2017.**
- (2) **HEARINGS ARE HANDICAPPED ACCESSIBLE; FOR SPECIAL ACCOMMODATIONS PLEASE CALL THE ADMINISTRATIVE HEARINGS OFFICE AT 410-887-3868.**
- (3) **FOR INFORMATION CONCERNING THE FILE AND/OR HEARING, CONTACT THE ZONING REVIEW OFFICE AT 410-887-3391.**

DEPARTMENT OF PERMITS, APPROVALS AND INSPECTIONS
ZONING REVIEW OFFICE

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 legal owner/petitioner) and placement of a notice in a newspaper of general circulation in the County, both at least twenty (20) days before the hearing.

Zoning Review will ensure that the legal requirements for advertising are satisfied. However, the legal owner/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:

Case Number: 2017-159-A
Property Address: 9900-9998 Liberty Road
Property Description: _____

Legal Owners (Petitioners): Kings Point Associates LLC
Contract Purchaser/Lessee: N/A

PLEASE FORWARD ADVERTISING BILL TO:

Name: Barbara Lukasevich
Company/Firm (if applicable): Venable LLP
Address: 210 W. Pennsylvania Ave., Ste. 500
Towson, MD 21204
Telephone Number: 410-494-6200



KEVIN KAMENETZ
County Executive

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

March 23, 2017

Kings Point Associates LLC
1535 Chestnut Street
Suite 200
Philadelphia PA 19102-2501

RE: Case Number: 2017-0159 SPHA, Address: 9900-9998 Liberty Road

To Whom It May Concern:

The above referenced petition was accepted for processing **ONLY** by the Bureau of Zoning Review, Department of Permits, Approvals, and Inspection (PAI) on December 13, 2016. This letter is not an approval, but only a **NOTIFICATION**.

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

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

Very truly yours,

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

W. Carl Richards, Jr.
Supervisor, Zoning Review

WCR: jaw

Enclosures

c: People's Counsel
David H. Karceski, Esquire, 210 W Pennsylvania Avenue, Suite 500, Towson MD 21204

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor



Pete K. Rahn, Secretary
Gregory C. Johnson, P.E., Administrator

Date: 12/19/16

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

Dear Ms. Lewis:

We have reviewed the site plan to accompany petition for variance on the subject of the Case number referenced below, which was received on 12/19/16. A field inspection and internal review reveals that an entrance onto MD26 consistent with current State Highway Administration guidelines is not required. Therefore, SHA has no objection to approval for Variance, Case Number 2017-0159-A.

*Variance
Kings Point Associates, LLC
9900-9998 - L. Henry Road
MD26*

Should you have any questions regarding this matter feel free to contact Richard Zeller at 410-229-2332 or 1-866-998-0367 (in Maryland only) X 2332 or by email at (rzeller@sha.state.md.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Zeller".

Wendy Wolcott, PLA
Metropolitan District Engineer – District 4
Baltimore & Harford Counties

WW/RAZ

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor



Pete K. Rahn, Secretary
Gregory C. Johnson, P.E., Administrator

Date: 2/13/17

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

Dear Ms. Lewis:

We have reviewed the site plan to accompany petition for variance on the subject of the Case number referenced below, which was received on 2/13/17. A field inspection and internal review reveals that an entrance onto MD26 consistent with current State Highway Administration guidelines is not required. Therefore, SHA has no objection to approval for Variance, Case Number 2017-0159-SPHA

*Variance Special Hearing
Kings Pond Associates, LLC
9908-9998 Liberty Road
MD26*

Should you have any questions regarding this matter feel free to contact Richard Zeller at 410-229-2332 or 1-866-998-0367 (in Maryland only) X 2332 or by email at (rzeller@sha.state.md.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Zeller".

Wendy Wolcott, PLA
Metropolitan District Engineer – District 4
Baltimore & Harford Counties

WW/RAZ

My telephone number/toll-free number is _____

Maryland Relay Service for Impaired or Speech 1-800-735-2258 Statewide Toll-Free

Street Address: 320 West Warren Road * Hunt Valley, Maryland 21030 * Phone 410-229-2300 or 1-866-998-0367 * Fax 410-527-4690

www.roads.maryland.gov

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE MEMORANDUM

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

DATE: 3/22/2017

FROM: Andrea Van Arsdale
Director, Department of Planning

SUBJECT: ZONING ADVISORY COMMITTEE COMMENTS
Case Number: 17-159 (Revised)

INFORMATION:

Property Address: 9990 – 9998 Liberty Road
Petitioner: Kings Point Associates, LLC
Zoning: BL-CCC
Requested Action: Variance, Special Hearing

The Department of Planning has reviewed the petition for variance to permit 464 off-street parking spaces and the storage and display of material, vehicles and equipment more than five feet in front of the required building line in lieu of the required 791 parking spaces and not more than five feet in front of the required building line. The petition for special hearing to determine whether or not the Administrative Law Judge should approve the sale of utility trailers and trailer supplies in the BL Zone was also reviewed.

A site visit was conducted on December 27, 2016. This property is the subject of multiple zoning cases. Of particular import is zoning case # 1983-0006-A in which a variance was granted to reduce the required parking by 18 spaces.

The Department has no objection to granting the petitioned zoning relief conditioned upon the following:

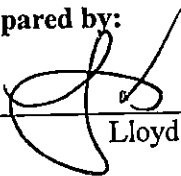
- There shall be no on-site rental or repair of any equipment offered for sale to include utility trailers.
- The outdoor sales area located within the front parking lot shall be enclosed with a decorative aluminum or steel fencing so that it becomes a suitably attractive feature of the shopping center being readily visible from the public right-of-way. Said outdoor sales area shall be landscaped to the satisfaction of the Baltimore County Landscape Architect.

The Department recommends that, provided the trailers are offered at retail only and not for rent they constitute inventory for sale associated with the hardware store. The Department will support the determination of the Administrative Law Judge on the special hearing request subsequent to the public hearing.

Please be advised that the Department observed numerous instances where the overall property condition was contrary to the provisions of BCC § 35-2-403 & 404. The Department received acknowledgement from the petitioner of the situation and recognizes the petitioner's good faith effort in addressing these issues.

For further information concerning the matters stated herein, please contact Chris Davis at 410-887-3480.

Prepared by:



Lloyd T. Moxley

Division Chief:



Kathy Schlabach

AVA/KS/LTM/ka

c: Chris Davis

James Hermann, R.L.A., Department of Permits, Approvals and Inspections
David H. Karceski, Esquire
Office of the Administrative Hearings
People's Counsel for Baltimore County

BALTIMORE COUNTY, MARYLAND

Inter-Office Correspondence



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

FROM: Jeff Livingston, Department of Environmental Protection and
Sustainability (EPS) - Development Coordination

DATE: December 21, 2016

SUBJECT: DEPS Comment for Zoning Item # 2017-0159-A
Address 9900-9998 Liberty Road
(Kings Point Associates, LLC
Property)

Zoning Advisory Committee Meeting of **December 26, 2016.**

X The Department of Environmental Protection and Sustainability has no
comment on the above-referenced zoning item.

Reviewer: Steve Ford

Date: 12-21-2016

BALTIMORE COUNTY, MARYLAND

Inter-Office Correspondence



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

FROM: Jeff Livingston, Department of Environmental Protection and
Sustainability (EPS) - Development Coordination

DATE: February 15, 2017

SUBJECT: DEPS Comment for Zoning Item # 2017-0159-A
Address 9900-9998 Liberty Road
(Kings Point Associates, LLC
Property)

Zoning Advisory Committee Meeting of February 20, 2017

X The Department of Environmental Protection and Sustainability has no
comment on the above-referenced zoning item.

Reviewer: Steve Ford

Date: 2-15-2017

BALTIMORE COUNTY, MARYLAND

INTEROFFICE CORRESPONDENCE

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

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

SUBJECT: Zoning Advisory Committee Meeting
For December 26, 2016
Item No. 2017-0159

DATE: December 27, 2016

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

If granted, Landscape and Lighting Plans are required per the requirements of the Landscape Manual.

* * * * *

DAK:CEN
Cc:file
ZAC-ITEM NO 17-0159-12262016.doc

RECEIVED

FEB 28 2017

DEPARTMENT OF PERMITS
APPROVALS AND INSPECTIONS

BALTIMORE COUNTY, MARYLAND

INTEROFFICE CORRESPONDENCE

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

FROM: Dennis A. Kennedy, Supervisor
Bureau of Development Plans Review

SUBJECT: Zoning Advisory Committee Meeting
For February 20, 2017
Item No. 2017-0159

DATE: February 23, 2017

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

The outdoor display areas are proposed to be over an existing County sewer. We cannot find a deed that conveyed the sewer easement to the County but the County has been maintaining the sewer since the 1970s. The petitioner is hereby notified that no permanent structures may be built over the sewer and if the sewer is damaged as a result of placing and maintaining the outdoor display areas as shown, the property owner will be held liable for repairs.

* * * * *

DAK:CEN
cc:file
ZAC-ITEM NO 17-0159-02202017.doc

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE MEMORANDUM

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

DATE: 3/22/2017

FROM: Andrea Van Arsdale
Director, Department of Planning

SUBJECT: ZONING ADVISORY COMMITTEE COMMENTS
Case Number: 17-159 (Revised)



INFORMATION:

Property Address: 9990 – 9998 Liberty Road
Petitioner: Kings Point Associates, LLC
Zoning: BL-CCC
Requested Action: Variance, Special Hearing

The Department of Planning has reviewed the petition for variance to permit 464 off-street parking spaces and the storage and display of material, vehicles and equipment more than five feet in front of the required building line in lieu of the required 791 parking spaces and not more than five feet in front of the required building line. The petition for special hearing to determine whether or not the Administrative Law Judge should approve the sale of utility trailers and trailer supplies in the BL Zone was also reviewed.

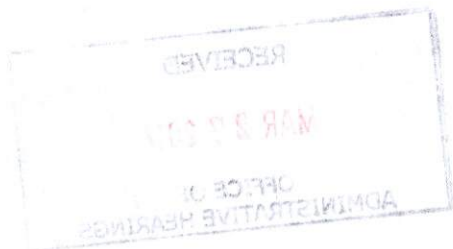
A site visit was conducted on December 27, 2016. This property is the subject of multiple zoning cases. Of particular import is zoning case # 1983-0006-A in which a variance was granted to reduce the required parking by 18 spaces.

The Department has no objection to granting the petitioned zoning relief conditioned upon the following:

- There shall be no on-site rental or repair of any equipment offered for sale to include utility trailers.
- The outdoor sales area located within the front parking lot shall be enclosed with a decorative aluminum or steel fencing so that it becomes a suitably attractive feature of the shopping center being readily visible from the public right-of-way. Said outdoor sales area shall be landscaped to the satisfaction of the Baltimore County Landscape Architect.

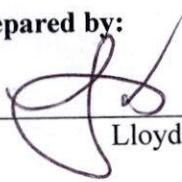
The Department recommends that, provided the trailers are offered at retail only and not for rent they constitute inventory for sale associated with the hardware store. The Department will support the determination of the Administrative Law Judge on the special hearing request subsequent to the public hearing.

Please be advised that the Department observed numerous instances where the overall property condition was contrary to the provisions of BCC § 35-2-403 & 404. The Department received acknowledgement from the petitioner of the situation and recognizes the petitioner's good faith effort in addressing these issues.



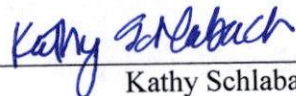
For further information concerning the matters stated herein, please contact Chris Davis at 410-887-3480.

Prepared by:



Lloyd T. Moxley

Division Chief:



Kathy Schlabach

AVA/KS/LTM/ka

c: Chris Davis
James Hermann, R.L.A., Department of Permits, Approvals and Inspections
David H. Karceski, Esquire
Office of the Administrative Hearings
People's Counsel for Baltimore County

MEMORANDUM

DATE: May 5, 2017
TO: Zoning Review Office
FROM: Office of Administrative Hearings
RE: Case No. 2017-0159-SPHA – Appeal Period Expired

The appeal period for the above-referenced case expired on May 4, 2017. There being no appeal filed, the subject file is ready for return to the Zoning Review Office and is placed in the 'pick up box.'

c: ✓ Case File
Office of Administrative Hearings

RE: PETITION FOR VARIANCE * BEFORE THE OFFICE
9900-9998 Liberty Road; N/S of Liberty Road
NW corner of Liberty Rd & Marriottsville Rd* OF ADMINISTRATIVE
2nd Election & 4th Councilmanic Districts
Legal Owner(s): Kings Point Associates, LLC * HEARINGS FOR
Petitioner(s) * BALTIMORE COUNTY
* 2017-159-A

* * * * *

ENTRY OF APPEARANCE

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

Peter Max Zimmerman

PETER MAX ZIMMERMAN
People's Counsel for Baltimore County

Carole S. Demilio

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

RECEIVED

DEC 22 2016

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of December, 2016, a copy of the foregoing Entry of Appearance was mailed to David Karceski, Esquire, 210 W. Pennsylvania Avenue, Suite 500, Towson, Maryland 21204, Attorney for Petitioner(s).

Peter Max Zimmerman

PETER MAX ZIMMERMAN
People's Counsel for Baltimore County

RE: AMENDED PETITION FOR SPECIAL
HEARING AND VARIANCE * BEFORE THE OFFICE
9900-9998 Liberty Road; N/S of Liberty Road
NW corner of Liberty Rd & Marriottsville Rd* OF ADMINISTRATIVE
2nd Election & 4th Councilmanic Districts
Legal Owner(s): Kings Point Associates, LLC * HEARINGS FOR
Petitioner(s) * BALTIMORE COUNTY
* 2017-159-SPHA

* * * * *

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
FEB 16 2017

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 16th day of February, 2017, a copy of the foregoing Entry of Appearance was mailed to David Karceski, Esquire, 210 W. Pennsylvania Avenue, Suite 500, Towson, Maryland 21204, Attorney for Petitioner(s).

Peter Max Zimmerman

PETER MAX ZIMMERMAN
People's Counsel for Baltimore County

David H. Karceski

T (410) 494-6285
F 410.821.0147
dhkarceski@venable.com

January 23, 2017

VIA HAND-DELIVERY

Mr. Arnold Jablon, Director
Baltimore County Department of Permits,
Approvals and Inspections
County Office Building
111 West Chesapeake Avenue
Towson, Maryland 21204

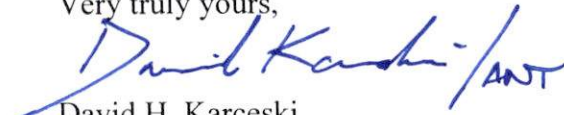
Re: 9900-9998 Liberty Road
Petitioner: Kings Point Associates, LLC
Case No.: 2017-159-

Dear Mr. Jablon:

This firm represents Kings Point Associates, LLC, petitioner and owner of the above-referenced property. In Case No. 2017-159-A, a public hearing for a parking variance has been scheduled for Thursday, February 2, 2017. I am writing to request a postponement of this hearing date because the parking calculations provided on the petition for variance and the site plan filed with the Zoning Office require revision. If granted, a postponement will allow my client to post and advertise the correct number of parking spaces required and proposed in this case.

Thank you for your time and consideration of this request.

Very truly yours,


David H. Karceski

DHK:ant

cc: Mr. John E. Beverungen, Administrative Law Judge
Mr. Joseph Savaro

Debra Wiley

JB 3/28 1:30
2017-0159-
SPHA

From: DE JACKSON <demamaj@comcast.net>
Sent: Friday, April 07, 2017 9:41 PM
To: Administrative Hearings
Subject: DO NOT GRANT VARIANCE!

Please do not allow this variance to let a tractor company take over the space at old Food Lion at Kings Point Shopping. That community needs a grocery store. Please keep looking.

I know so many people who are struggling now to find quality food for their families. Neighbors close are trying to do some of the elderly and disabled's shopping for them. To not have a store for miles is starting to have a negative ripple effect.

Is anyone listening to the people who are suffering?

De Jackson



Debra Wiley

From: Ananiah <sbrooks@ananiah.com>
Sent: Tuesday, March 28, 2017 1:50 PM
To: Administrative Hearings
Subject: Food Lion Replacement Case #2017-0159-SPHA

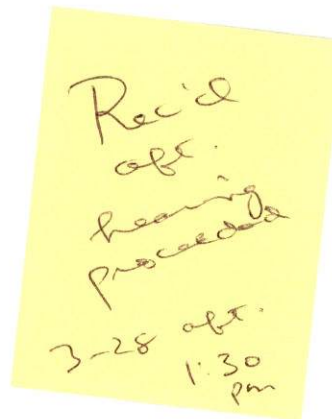
To: ALJ
Case #2017-0159-SPHA

I am the homeowner at 3842 Sandy Hook Road, Randallstown, MD 211133. I support having a grocery store in the Kings Point Shopping Center and not the Tractor Supply Company. We must have a grocer in this area. We have too many residents in this area that are not capable of getting to another grocery store. Beside that even those with automobiles have to travel further to get groceries.

Please block the Tractor Supply Co from getting the changes they are requesting to the zoning laws.

Sean L Brooks

Ananiah, LLC
PO Box 1353
Randallstown, MD 21133
443-612-9010
443-6129014 fax
www.ananiah.com



Debra Wiley

From: lsjones214@gmail.com on behalf of lisa jones <lisa.jones@claybankroad.net>
Sent: Tuesday, March 28, 2017 2:11 PM
To: Administrative Hearings
Subject: Closing of the Randallstown Food Lion

The closing of this grocery store has posed a hardship on the seniors in the area. I will not support the Tractor Supply store because it is not needed in the area. What is needed is another grocery store/Food Market.

Lisa Jones

Debra Wiley

From: Bavan Smith -MLGCA- <bavan.smith@maryland.gov>
Sent: Tuesday, March 28, 2017 8:08 AM
To: Administrative Hearings
Subject: Off ice of Administrative Hearings

I would like to request a postponement, because of the lack of visibility of the posting or the lack of the posting for the required time frame.

Bavan D. Smith
Human Resources Officer I

Maryland Lottery and Gaming Control Agency
1800 Washington Blvd, Suite 330
Baltimore, MD 21230
410-230-8765



More than \$1.079 billion in revenue to the State of Maryland in FY2016

Click [here](#) to complete a three-question customer experience survey.

Debra Wiley

From: DeVonne Parks <stoneybrookcommunity@gmail.com>
Sent: Tuesday, March 28, 2017 11:58 AM
To: Administrative Hearings
Subject: Oppose

It makes me sadden to hear that a tractor supply is going to be replacing a grocery store at Kings Point Plaza.

We have many senior citizens in the area without ample transportation for them to get healthy food. Please reconsider what you plan to place there as a means to and end with hasty decisions and not logical strategic thinking.

I oppose the tractor supply store.

DeVonne Parks
SCC President
Stoneybrook Community Council
stoneybrookcommunity@gmail.com
410.258.1968

Debra Wiley

From: sndarden <sndarden@verizon.net>
Sent: Monday, March 27, 2017 6:38 PM
To: Administrative Hearings
Subject: Food Lion Replacement with Transportation Retailer

It is my belief that this notice does not give community time to assess, evaluate, or clearly understand the present or future long term impact. This is not enough notice to . consider a business that sill improve or enhance the value of this established RESIDENTIAL community

Accordingly, it is my opinion that this hearing be postponed to allow the time to analyze this matter.

Sent from my Sprint Samsung Galaxy S® 6.



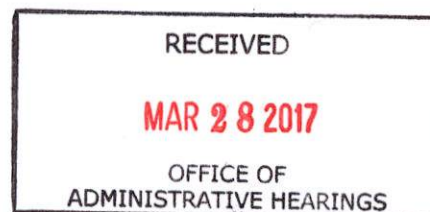
Debra Wiley

From: crystal.johnson10 <crystal.johnson10@comcast.net>
Sent: Monday, March 27, 2017 8:25 PM
To: Administrative Hearings
Subject: Off ice of Administrative Hearings

Thank you for the update, however very disappointed while no one wants a vacant building there is nothing a tractor company has to offer our community don't think it's a service we will be utilizing in the near future. Really disappointed and opposed.

Thank you,

Sent from my Verizon, Samsung Galaxy smartphone



... ..

2

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

Debra Wiley

From: lilbabs63@yahoo.com
Sent: Monday, March 27, 2017 9:17 PM
To: Administrative Hearings
Subject: Off ice of Administrative Hearings

RECEIVED
MAR 28 2017
OFFICE OF
ADMINISTRATIVE HEARINGS

Good-morning,

I am contacting you this day of March 27th, 2017, For I have just learned that my landlord whom is the property owner of my home that I rent is having zoning issues! I have been living in my home for almost 4 years now, and housing has been paying for and coming out to inspect it for such as long. And it always passed. I am disabled, and unemployed. The only income I have coming in is a monthly supplement from the Department of Social Services called TDAP, which only issues on a monthly basis of \$185 a month, and I must suffice off of this every month! My situation is desperate, and immediate in need of action as well as attention, I have nowhere else to go!! I don't know what else to do or say, therefore I am asking, no I am requesting immediate attention to my situation!!!! PLEASE, because I have no idea what I'm going to do or go. I and the property owner had put together and fixed my home to a beautiful and amazing living quarters for myself, I Barbara J. Evans..... I am a American citizen and I don't understand why the Government treats their American people so Horrible. FURTHERMORE, if I may say that if, and this is iffy and only if the property owner Gets Full Financial Backing! There's a house in the Neighborhood that needs to be renovated, Now if the housing is willing to approve this and again with full Financial backing with my property owner and keeping my paperwork and everything the same, meaning the housing Remains the Same, I'm quite sure the owner and I could agree on this situation so that I have permanent residence without having zoning issues ever again!!! I have a good Repore with the property owner and must say I have not met anyone like him since moving to Baltimore. I do not believe that as a American that myself and other Americans have to battle with our government, which we shouldn't have to. And again I am disabled, of very low income, and it makes me ashamed to be an American, why is this happening. I pray that you can help me and get all the help that we're going to need. And again this should not be happening and again on the Issy part I only think that is fair that my government help it's American citizen, Oh yes American-Born Citizen in this situation so that I am not homeless AGAIN!!!; been there, done that it's not a good feeling and only another issue that I have to deal with, Really!!! However, the property owner and myself should also be should be compensated on all the monies that we have spent to put in this house to be put back in the new residence that I may have to inquire, I'm so ashamed and so hurt now something else to deal with along with my disability thanks a lot America!!!!!!

Regards,
Ms. Barbara J Evans
443-226-8335 (my humble apologies, no minutes, a government phone go figure. Ugh)

☹️☹️☹️☹️☹️☹️☹️

Sent from Yahoo Mail on Android

Debra Wiley

From: Virginia Jones <woodlandsdp@gmail.com>
Sent: Tuesday, March 28, 2017 11:20 AM
To: Administrative Hearings; woodlands
Subject: Case # 2017-0159-SPHA postponement

Good Morning Special Hearing,

I am writing in response to requesting a postponement because the property was not visibly posted for 20 days. The community was not given sufficient notice to decide whether to support or oppose these variances. Many of the (400) people in my community do not know about this hearing and will not have opportunity to attend.

God Please Keep Our Community Safe,
Virginia Jones
President
Woodlands of Deer Park

Debra Wiley

From: gina smith <ptaginag@yahoo.com>
Sent: Tuesday, March 28, 2017 12:11 PM
To: Administrative Hearings
Subject: Closings of stores

I am writing to ask that u please do not close stores in the area. My mom and other elderly rely on stores for their needs. These stores give them the essentials they need in the area without going away from home. Please take this into consideration. Thank you.

Debra Wiley

From: Alexia Newsome <1lex53@comcast.net>
Sent: Tuesday, March 28, 2017 6:48 PM
To: Administrative Hearings
Subject: Office of Administrative Hearings

To whom It May Concern:

This email is in reference to the acceptance of a Tractor Supply store at the Kings Point Shopping Center (Liberty Rd & Marriottsville Rd.)

I am writing to state my opposition to the Tractor Supply store and the following variances the Shopping Center owner is requesting:

1. To allow 464 parking spaces on the site instead of the required 791 spaces.
2. To permit storage and display of materials, vehicles, and equipment more than 5 feet in front of the required building front line.

Sincerely,

Alexia Newsome
4224 Hanwell Road
Randallstown, Maryland 21133

Debra Wiley

From: nladynan <nladynan@aol.com>
Sent: Tuesday, March 28, 2017 9:24 PM
To: Administrative Hearings
Subject: Hardship For Senior

Think about the seniors, have some heart!!

Sent from my Verizon Wireless 4G LTE smartphone

Debra Wiley

From: londie37@gmail.com
Sent: Monday, March 27, 2017 8:10 PM
To: Administrative Hearings; County Council District 4
Cc: Jimmy Thomas
Subject: FW: Food Lion / Tractor Supply Co. Update - Case Number: 2017-0159-SPHA

As a home owning resident of Hernwood Heights, I feel that the granting of variances to allow Tractor Supply Company to occupy the property that once housed Food Lion in the Kings Point Square Shopping Center is not in the best interest of the community.

We were just notified of this hearing today by Councilman Julian Jones. Since I work during the hours of the hearing, I cannot rearrange my schedule and be in attendance in person.

I do not feel that the community has been well served because there has not been any signs directly adjacent to the property to be affected so we would know this was happening. I drive past this shopping center every day and I've not seen it. I believe if more people knew about this, the outcry would be greater.

I'm curious what the conversations were like with the food store companies. Knowing that that store had undergone some renovations less than three so to hear that renovations were part of the issue, I'm confused. Instead of driving or walking down the hill to pick up groceries, I now either drive 4-10 miles. This is not what I signed up for when I purchased my home. While the only thing constant is change, this is quite a blow. Not just for me, but for all the other families that live within a one mile radius of this location.

I've been to Tractor Supply in Westminster to purchase attachments for my lawn mowers. This is not a store that I go into just to "browse and see if there is something I'd like to purchase". Is the goal just to fill the property with anyone willing to locate there? We have a Home Depot at the intersection of Liberty and Brenbrook Roads which is about 3 miles away where we purchase most of the items listed on the TSC website or in their stores. This is not a farming area and most of the new properties being built in the 3 mile radius of the store do not require tractors, livestock or poultry supplies so I just don't see where this will be a successful venture.

Maybe the real issue is the configuration of the property overall and that is what really needs to be addressed. When I look at one item I found on the internet, I wonder how old this information is which also leads to how appealing it might be to potential occupants. <http://brahinproperties.com/properties/pdfs/KingsPoint.pdf>

While I understand the Brahin Properties Company would like to increase the occupancy of their only holding in Maryland, I'm very concerned this will not serve the community and within a year or so, it will have folded up and be yet again vacant.

Please reconsider this variance request and minimally postpone it so community residents can attend the hearings. Best case scenario, deny the request.

Thank you,

Yolanda Thomas
Hernwood Heights Resident

Sent from Mail for Windows 10



From: Julian Jones
Sent: Monday, March 27, 2017 4:02 PM
To: londie37@gmail.com
Subject: Food Lion / Tractor Supply Co. Update - TIME SENSITIVE

Share       

Trouble Viewing? Click [here](#)

March 27, 2017

Yolanda ,

In January 2016, Food Lion closed its doors at the Kings Point Shopping Center (Liberty Rd & I-95). Every effort was made to keep Food Lion open, but to no avail. The owners of the Kings Point Shopping Center, brokers, community members and I tried to find a Super Market to return to the Kings Point Shopping Center. No efforts were able to produce a super market for Kings Point Shopping Center. The owners of the shopping center signed an agreement with Tractor Supply Company (also known as "TSC"). Below is a message I received from an attorney who is representing the shopping center owner describing their efforts to secure a super market.

Message from shopping center owner via their attorney:

As we discussed with Joe Savaro on the telephone, my client attempted, through both their internal leasing department and through a third-party commercial real estate brokerage firm, Renaud Consulting, to lease the vacant space to the following grocery store operators:

Aldi
Giant
Harris Teeter
Lidl
Mars
Safeway
Price Rite
Shop Rite
Klein's Shop Rite
Shoppers Food Warehouse
Save-A-Lot

Global Foods
Grand Mart
H-Mart
Great Wall
Compare Foods
Food Bazaar Supermarket
International Food Market
Grandmart International
Caribbean Supermarket
El Grande International
Mega Grand
Good Fortune
Coco International
Fresh World and
Afrik International.

All of these attempts to lease the space to a grocery store were unsuccessful. As Joe Savaro explained Thursday, their first choice was to release the space to another grocery store. The tenant space had been a prior grocery store for this purpose so reuse by another grocery store would have been the best option.

(The only tenant they were able to get is Tractor Supply Company)

In total, all of this site work and improvements to the building will cost an estimated \$400,000.00 to complete. I understand that this amount of money is a significant re-investment by my client in the property. They see this reinvestment as necessary to retain existing tenants and as a catalyst to gain more tenants in the future. Please do not hesitate to call me with additional questions....

So now we are faced with a decision. The question is does the community accept the Tractor Supply Company to hold out for another use, such as a supermarket?

I have met with and/or talked to several community leaders, whose community is affected by the Food Loss. The general consensus among them is that, although we need and prefer a supermarket, we do not need a vacant market or vacant shopping center. Even if Tractor Supply Company store does not open, there is no guarantee a supermarket at that location anytime soon or at all.

The Shopping Center owner is asking for two variances which must be approved as part of a public Zoning Administrative Law Judge. One is to allow 464 parking spaces on the site instead of the required 791 spaces to permit storage and display of materials, vehicles, and equipment more than 5 feet in front of the required line. If they are successful at the Zoning Hearing, the community can appeal that decision to the County Board. The petition and hearing information is below.

Hearing Date and time: Tuesday, March 28th, 1:30pm - 3:30pm

Case Number: 2017-0159-SPHA

**Location: Northside of Liberty Road, northwest of Marriottsville Road
2nd Election District**

Legal Owners: Kings Point Associates, LLC

Special Hearing to approve the sale of utility trailers and trailer supplies in the BL Zone (Business Zone) Variance 1. To allow 464 off-street parking spaces in lieu of the required 791 parking spaces. 2. To allow storage and display of materials, vehicles and equipment more than five (5) ft. in front of the required front setback line. Hearing Location: Jefferson Building, 105 W. Chesapeake Avenue, Room 205, Towson 21204

Contact Name: PAI

Contact Phone: 410-887-3391

I am sorry for the short notice: The property is supposed to be posted 20 days before the hearing, and the certification which says it was; however, I never saw a sign on the property and there is no sign on the property. All that said, how do you feel about this situation?

Would you like to oppose or support the Tractor Supply Company store? Here for your reference is a link to the Tractor Supply Company (TSC).

<http://www.tractorsupply.com/>

As you will see from their page, they have been in business nationwide for many years and their business has grown over the years from a mail order catalog business offering tractor parts to family farmers into a major retailer of product offerings, including clothing & footwear; dog, cat & pet supplies; trailers & accessories; lawn & garden supplies; and propane & heating supplies, just to name a few.

If you support the Tractor Supply Company store, do nothing.

If you oppose the Tractor Supply Company store, you must object to the variance request. The Administrative Law Judge (ALJ) is not concerned with whether he believes a supermarket would be a better use than a retail supply store. His focus is whether the variance requests meet the required legal standard, and whether the requested relief is in a general sense, without injury to the health, safety and general welfare. The decision does not rest solely on whether the community wants or needs, or whether you feel a supermarket would be a better use than a supply store. If so, I can recommend the following that may be taken by members of the community:

1. Send an email and/or attend the hearing to make your objections known.

Some aspects of the variance request you may want addressed are:

- You may wish to request a postponement because the property was not visibly posted, so the community was not given sufficient notice to decide whether to support or oppose these variances. Although the petition includes a certification that it was posted, you may be able to persuade the ALJ that it was not posted for the required time or was not visible enough, so many people in the community do not know about this hearing and do not have the opportunity to attend.
- The property owner is asking for a significant reduction in required parking and you oppose the request.

Please call 410-887-3868 or email administrativehearings@baltimorecountymd.gov

Please call or email me with any questions. Make sure to attend my upcoming Town Hall Meetings.
Julian

Councilman Julian Jones
400 Washington Ave.
Townson, Maryland 21204

410-887-3389

SAVE THE DATES! TOWN HALL MEETINGS

Wednesday, April 19, 6-8:30pm,

[Real Property Data Search](#) [Guide to searching the database](#)
[Search Result for BALTIMORE COUNTY](#)

View Map		View GroundRent Redemption				View GroundRent Registration			
Account Identifier:		District - 02 Account Number - 2100001188							
Owner Information									
Owner Name:		KINGS POINT ASSOCIATES LLC				Use:		COMMERCIAL	
Mailing Address:		STE 200 1535 CHESTNUT ST PHILADELPHIA PA 19102-2501				Principal Residence:		NO	
						Deed Reference:		/26355/ 00523	
Location & Structure Information									
Premises Address:		LIBERTY RD RANDALLSTOWN MD 21133-0000				Legal Description:		9.819 AC N COR KINGS PT RD DEER PARK PLAZA	
Map:	Grid:	Parcel:	Sub District:	Subdivision:	Section:	Block:	Lot:	Assessment Year:	Plat No:
0066	0023	0460		0000			2	2016	Plat Ref: 0057/0112
Special Tax Areas:					Town:		NONE		
					Ad Valorem:				
					Tax Class:				
Primary Structure Built		Above Grade Enclosed Area		Finished Basement Area		Property Land Area		County Use	
1977		103589				9.8200 AC		14	
Stories	Basement	Type	Exterior	Full/Half Bath	Garage	Last Major Renovation			
		MARKET							
Value Information									
			Base Value		Value		Phase-in Assessments		
					As of		As of		As of
					01/01/2016		07/01/2016		07/01/2017
Land:			2,048,600		2,048,600				
Improvements			3,986,300		4,647,400				
Total:			6,034,900		6,696,000		6,255,267		6,475,633
Preferential Land:			0						0
Transfer Information									
Seller: DP LIMITED PARTNERSHIP				Date: 11/06/2007			Price: \$9,100,000		
Type: ARMS LENGTH MULTIPLE				Deed1: /26355/ 00523			Deed2:		
Seller: H M H COMPANY				Date: 06/30/1987			Price: \$0		
Type: NON-ARMS LENGTH OTHER				Deed1: /07594/ 00121			Deed2:		
Seller:				Date:			Price:		
Type:				Deed1:			Deed2:		
Exemption Information									
Partial Exempt Assessments:		Class		07/01/2016			07/01/2017		
County:		000		0.00					
State:		000		0.00					
Municipal:		000		0.00 0.00			0.00 0.00		
Tax Exempt:				Special Tax Recapture:					
Exempt Class:				NONE					
Homestead Application Information									
Homestead Application Status: No Application									

CASE NAME 9900-9998 Liberty Rd.
CASE NUMBER 2017-159-SHA
DATE 3/28/17
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ms. B.1.6 v. 9, fol. 7r

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7/20/2022

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Hydrophobic

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Original!

January 20, 1950

Robert H. Baker

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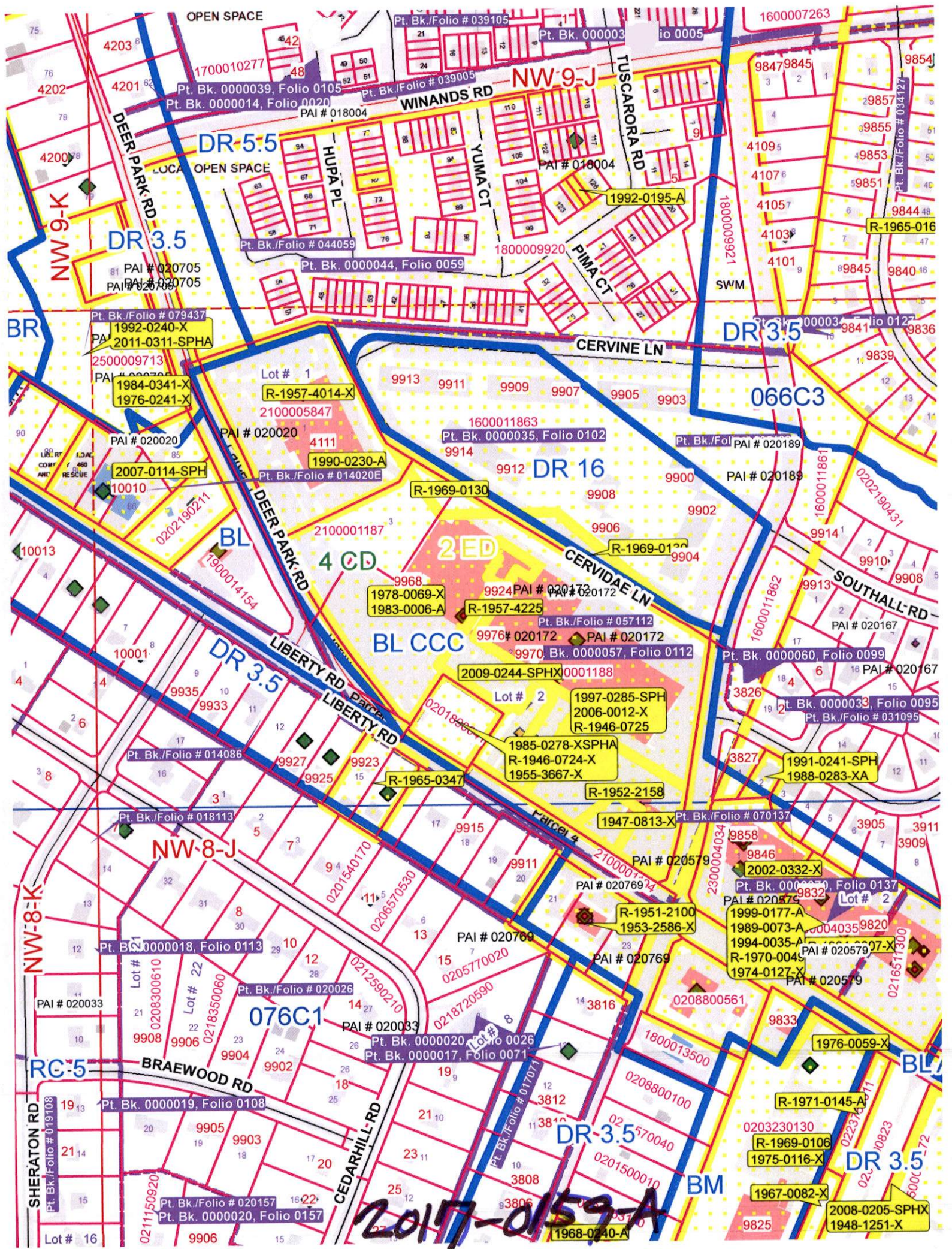
1978

1322 County St.

DATE _____

E - MAIL

[illegible]



2017-0159-A

Case No.: 2017-0159-SPHA

Exhibit Sheet

DW
5-4-17

sln
4/4/17

Petitioner/Developer

Protestants

No. 1	Plan	
No. 2	2A-ZH Photos	
No. 3	T.S. Company Profile	
No. 4	Ucciferro CV	
No. 5	ZCPM, p. 4-79	
No. 6	Photo of utility trailer	
No. 7	Map - Revital Area	
No. 8	My Neighborhood Aerial Map.	
No. 9	Topo. Exhibit	
No. 10	Photos + Key sheet.	
No. 11	Prior zoning case 83-6-A	
No. 12	Letter - Liberty Road Business Assn. 3-27-17	

Case No.: 2017-0159-SFHA

Exhibit Sheet - Continued

Petitioner/Developer

Respondent

No. 13	Elevation drawing	
No. 14	Schmid CV	
No. 15	Traffic counts for Tractor Supply	
No. 16		
No. 17		
No. 18		
No. 19		
No. 20		
No. 21		
No. 22		
No. 23		
No. 24		



Tractor Supply Front Entry



Tractor Supply Front Elevation



Sidewalk Sales and Display



Sidewalk Sales and Display



Fenced Sideyard Display



Fenced Sideyard Display



Utility Trailer Display



Tractor Implement Display



Sideyard Delivery Gate



Loading Dock and Ramp



Typical Pylon Sign



Sidewalk Sales and Display



Checkouts



Clothing Department

26

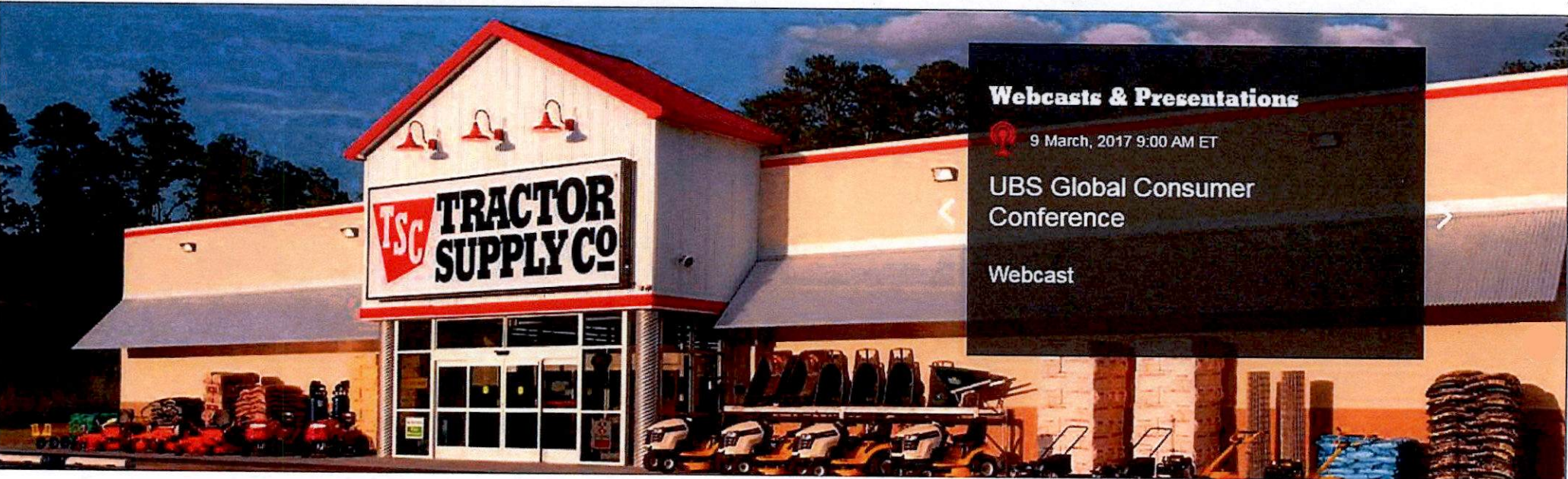


Interior Main Aisle



Stockroom Doors

2H



Webcasts & Presentations

9 March, 2017 9:00 AM ET

UBS Global Consumer
Conference

Webcast

Company Overview

Corporate Profile

About Us

History

Fact Sheet

Mission & Values

News & Events

Filings & Financials

Stock Information

Corporate Governance

Resources

Customer Solutions



\$6.8B
2016 SALES



79 YEARS
OF SERVICE



1,700+ STORES
IN 49 STATES



OVER 24,000
TEAM MEMBERS

Corporate Profile

Founded in 1938, Tractor Supply Company is the largest rural lifestyle retail store chain in the United States. At December 31, 2016, the Company operated 1,595 Tractor Supply stores in 49 states and an e-commerce website at www.tractorsupply.com. Tractor Supply stores are focused on supplying the lifestyle needs of recreational farmers and ranchers and others who enjoy the rural lifestyle, as well as tradesmen and small businesses. Stores are located primarily in towns outlying major metropolitan markets and in rural communities. The Company offers the following comprehensive selection of merchandise: (1) equine, livestock, pet and small animal products, including items necessary for their health, care, growth and containment; (2) hardware, truck, towing and tool products; (3) seasonal products, including heating, lawn and garden items, power equipment, gifts and toys; (4) work/recreational clothing and footwear; and (5) maintenance products for agricultural and rural use.

Tractor Supply Company also owns and operates Petsense, a small-box pet specialty supply retailer focused on meeting the needs of pet owners, primarily in small and mid-size communities, and offering a variety of pet products and services. At December 31, 2016, the Company operated 143 Petsense stores in 26 states. For more information on Petsense, visit www.petsense.com.



Joseph J. Ucciferro, P.E.
Project Manager

EDUCATION:

Bachelor of Civil Engineering, University of Delaware, Newark, DE

PROJECT TESTIMONY:

Testified on behalf of Bohler Engineering in numerous municipalities before Planning Commissions, Board of Supervisors, Board of Appeals, and related municipal entities in Maryland, Delaware, and Pennsylvania.

EXPERIENCE:

Currently serves as a Project Manager in Bohler Engineering's Towson, Maryland Office. Experience includes over twelve (12) years of design and project management. Primarily responsible for client and project management for various commercial, residential, and industrial developments. Areas of experience include site feasibility analysis and budgeting, site layout and planning, zoning and subdivision ordinance review/interpretation, horizontal and vertical roadway design, site grading, earthwork balancing and analysis, soil erosion and sediment control measures and facilities, utility design, stormwater management and water quality system designs, environmental compliance/evaluations, pump/tank design and permitting, lighting photometric studies/design, signage compliance, landscaping design, vehicular circulation design, oversight of expediting and application approvals, and related services. Expertise includes supermarkets, service stations, maintenance facilities, restaurants, shopping centers, retail centers, car washes and other related projects in municipalities in Maryland, Delaware, and Pennsylvania.

BALTIMORE COUNTY PROJECTS OF NOTE:

- Merritt Pavilion – (Planned Unit Development) Dundalk
- Insurance Auto Auction – Rosedale and Dundalk (Special Exception and Variance)
- Shelter Development and YMCA (Planned Unit Development) – Catonsville
- Federal Realty – Flats at 703 (Towson Multi-family Development Plan)
- Federal Realty – Avenue at White Marsh PUD Refinement
- YMCA Development – (Development Plan) Towson
- Multiple Quick Serve Restaurants (Chick-fil-A, Sonic)
- Multiple Bank Projects (Bank of America, M&T Bank, PNC Bank, BB&T Bank)
- Multiple Fuel Service Station Projects (SMO, Wawa, Royal Farms)
- Multiple Pharmacy Projects

PROFESSIONAL AFFILIATIONS:

- Maryland Professional Engineer #36064
- Urban Land Institute (ULI)
- National Association of Industrial & Office Properties (NAIOP)
- International Conference of Shopping Centers (ICSC)

PETITIONER'S EXHIBIT 4

415.6 TRAILERS

Modulars, double trailers, or manufactured homes that subject to the height and area regulations meets the Baltimore County Building Code (B.O.C.A.) are considered dwellings in the zone it is to be located.

This policy is to up-date and correct the schedule of uses pertaining to trailers (Section 415.6, B.C.Z.R.), which has not been revised since its adoption in 1964.

The following table was compiled from the 1987 edition B.C.Z.R. (as amended through March 6, 1989):

REVISED SCHEDULE OF USES PERTAINING TO TRAILERS:

S.E. Special Exception
- Use Permitted
X Use Prohibited

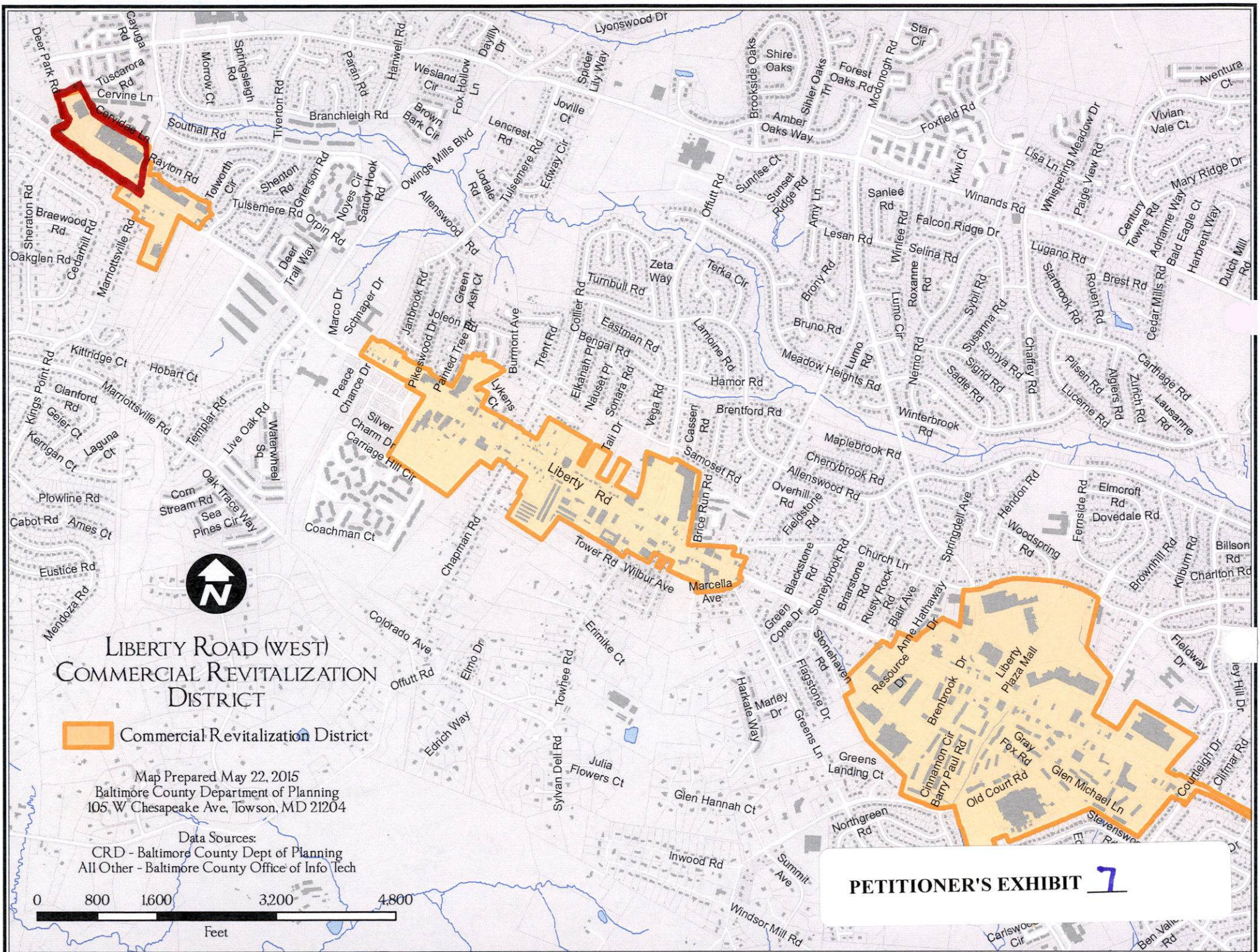
	1 RC2	1 RC3	1 RC4	1 RC5	1 RC20	1 RC50	1 RCC	DR1	DR2	DR 3.5	DR 5.5	DR 10.5	DR16	1 HAF1	1 HAF2	1 RO	1 O-1	1 O-2	1 OT	RI	RM	RR	MR	MLR	2 ML	2 MH
Trailer Park	X	X	X	X	X	X	X	SE	SE	SE	X	X	X	X	X	X	X	X	X	X	X	SE	X	X	X	SE
25+ Acre Farm	-	-	-	-	SE	-	X	-	-	-	-	X	X	X	X	-	-	X	X	X	X	X	X	X	SE	-
25 Acre Tract Outside Metro- politan Dist.	-	-	-	-	SE	-	X	-	-	X	-	X	X	X	X	-	-	X	X	X	X	X	X	X	SE	X
1 to 25 Acre Tract Outside Metro. Dist.	SE	SE	SE	SE	SE	-	X	SE	SE	X	SE	X	X	X	X	SE	SE	X	X	X	X	X	X	X	SE	SE
Prior Residence Use-3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Guest Use-4	-	-	-	-	SE	-	X	-	-	-	-	X	X	X	X	-	-	X	X	X	X	X	X	X	X	X
Office During Construction-4	-	-	-	-	SE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Residence During Construction-4	-	-	-	-	SE	-	-	X	X	X	X	X	X	X	X	X	X	X	X	X	5	5	5	5	5	5
Sales Office-4	-	-	-	-	SE	-	-	X	X	X	X	X	X	X	X	X	X	X	X	X	5	5	5	5	5	5
Trailer Sales and Storage Yard-4	X	X	X	X	X	X	-	X	X	X	X	X	X	X	X	X	X	X	X	X	5	5	5	5	5	5

NOTES:

- 1 -- New zoning classifications not listed in the original table with Schedule of Uses as indicated in respective section.
- 2 -- Interim uses only; see Section 253.2.C.
- 3 -- Must have a permit issued prior to January 24, 1965.
- 4 -- Temporary use only; see Section 415.4 as to requirement for permits.
- 5 -- Change from existing table because these uses are not listed under the zoning classification.



PETITIONER'S EXHIBIT 6/11/11







Kings Point Square Shopping Center

Created By
Baltimore County
My Neighborhood



This data is only for general information purposes only. This data may be in n w o B inc. damages, attorneys' and experts' fees, and court costs incurred as a result of, arising from or in connection with the use of or reliance upon this data.

PETITIONER'S EXHIBIT 8

BALTIMORE COUNTY

ZONING PLANS

ADVISORY COMMITTEE



PETITION AND SITE PLAN

EVALUATION COMMENTS

BALTIMORE COUNTY ZONING PLANS ADVISORY COMMITTEE

July 1, 1982

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

cc: Nicholas B. Connolly

Chairman

MEMBERS

Board of Engineering

Department of Traffic Engineering

State Roads Commission

Bureau of Fire Prevention

Health Department

Project Planning

Building Department

Board of Education

Zoning Administration

Industrial Development

Mr. Herbert A. Thaler
RKH Company
3802 Clarks Lane
Baltimore, Maryland 21215

RE: Item No. 221
Petitioner - RKH Company
Variance Petition

Dear Mr. Thaler:

The Zoning Plans Advisory Committee has reviewed the plans submitted with the above referenced petition. The following comments are not intended to indicate the appropriateness of the zoning action requested, but to assure that all parties are made aware of plans or problems with regard to the development plans that may have a bearing on this case. The Director of Planning may file a written report with the Zoning Commissioner with recommendations as to the suitability of the requested zoning.

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

Very truly yours,

Nicholas B. Connolly
NICHOLAS B. CONNOLLY
Chairman
Zoning Plans Advisory Committee

NEC:bac

Enclosures



BALTIMORE COUNTY
OFFICE OF PLANNING AND ZONING
TOWSON, MARYLAND 21204
494-3211

NORMAN E. GERBER
DIRECTOR

June 11, 1982

Mr. William E. Hammond, Zoning Commissioner
Zoning Advisory Committee
Office of Planning and Zoning
Baltimore County Office Building
Towson, Maryland 21204

Dear Mr. Hammond:

Comments on Item #221, Zoning Advisory Committee Meeting, May 4, 1982, are as follows:

Property Owner: H. M. H. Company
Location: NW corner Liberty Road and Kings Point Road
Acre: 16.924
District: 2nd

This office has reviewed the subject petition and offers the following comments. These comments are not intended to indicate the appropriateness of the zoning in question, but are to assure that all parties are made aware of plans or problems with regard to development plans that may have a bearing on this petition.

Landscaping should be provided.

Very truly yours,

John L. Wimbley
John L. Wimbley
Ianner III
Current Planning and Development

JLW:rh

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

William E. Hammond, Zoning Commissioner
TO: Office of Planning and Zoning

Date: April 29, 1982

FROM: Ian J. Forrest

SUBJECT: Zoning Variance Items

The Baltimore County Department of Health has reviewed the following zoning variance items, and has no specific comments regarding same:

- Item # 172 - Salvatore & Deborah A. Frascetti
- Item # 174 - North Park Associated
- Item # 179 - Abell Communications
- Item # 184 - Dorothy M. Markel
- Item # 185 - Margaret E. Hickey
- Item # 183 - Robert J. Rmadka, Jr.
- Item # 191 - Richard W. Ater
- Item # 192 - Vernon E. & Patricia A. Hodges
- Item # 195 - William E. & Jeannette M. Tunney
- Item # 197 - Leonard Gordon
- Item # 199 - Charles & Mary L. Gebhard
- Item # 200 - Raymond A. & Linda M. DeVall
- Item # 202 - William T. & Irene F. McKeever
- Item # 203 - Sheldon S. & Freya H. Satsky
- Item # 207 - James J. Ward, III
- Item # 209 - Charles E. & Ora F. Michael
- Item # 213 - Frank A. & Rosemarie Luca
- Item # 216 - Leonard & JoAnne Baker
- Item # 220 - Joseph Christopher Glomioso
- Item # 221 - H M H Company
- Item # 222 - Belair Beltway Partnership

Ian J. Forrest
Ian J. Forrest, Director
BUREAU OF ENVIRONMENTAL SERVICES

IJF/rth

PETITIONER'S EXHIBIT

11



Liberty Road Business Association

"In Business for Your Business"

9405 Liberty Road 2nd Floor

PO BOX 1417

Randallstown, MD 21133

Tel: 410-655-7766 Fax: 410-655-7767

John Heitsenrether
President

Adam Fitzpatrick
1st Vice President

Liza Ambrose
2nd Vice President
Treasurer

Nana Sherman
Secretary

Kelly Carter
Executive Director

Duane Baysmore

Cecil Fox,
Emeritus

Dr. Jermaine Johnson

Izzy Patoka

Alan Schwarzschild

Jenette Young

March 27, 2017

Dear Mr. Savaro,

The Liberty Road Business Association is committed to building a sustainable community by providing residents, small businesses and national chains with the resources and assistance necessary to be successful, healthy and vibrant members of the community.

It's important to the Liberty Road Business, we acknowledge the concerns of some in the community that the proposed occupancy of the Tractor Supply Company at Kings Point Square will continue to challenge our neighborhood's current limited access to a grocery store, since Food Lion's departure. However, the Liberty Road Business Association believes that vacant and abandoned properties over a long period has negative spillover effects that impact neighboring properties and, when concentrated, entire communities.

Liberty Road/Route 26 is considered one of eighteen revitalization districts in Baltimore County. Goals for a revitalization district are to increase business opportunities, recruiting new businesses, developing employment prospects for local residents, growth in property values, improving safety, livability and mobility for a more beautiful landscape. **Again, new businesses especially retail chains create economic growth, which represents an increase in jobs and income in our community; it also involves sustainable increases in the productivity of individuals and businesses.**

Brahin Management is a valued member of LRBA and has done a great job contributing to our Association's mission statement to promote, grow and sustain a diverse and thriving business community that enriches the quality of life and enhances prosperity in the Liberty Road Corridor and supporting communities.

The Liberty Road Business Association supports Brahlin Management's decision to move forward and lease the vacancy of 9910 Liberty Road, Kings Point Square, Randallstown, MD 21133 to the Tractor Supply Company.

PETITIONER'S EXHIBIT

12

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

EXPERIENCE

January 1993 – Present

Traffic Concepts, Inc.
7525 Connelley Drive, Suite B
Hanover, MD 21076

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 Analyses 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; Analyze impact fee requirements and preparation of impact fee credit agreements; 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



March 20, 2017

To Whom It May Concern:

Listed below are customer traffic counts for a typical Tractor Supply store. I believe these counts are reasonably applicable for stores in Maryland.

Weekdays

- Daily Total Count 150 - 200 Customers
- Peak Periods per Hour 20 - 40 Customers

Weekends

- Daily Total Count 200 - 350 Customers
- Peak Periods per Hour 30 - 50 Customers

The average customer will stay in the store for approximately 15 - 20 minutes.

Sincerely,

Mark Gillman
Director of Real Estate

PETITIONER'S EXHIBIT

15



25



24



23



22



21



20



19



18



17



1



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3



4



5



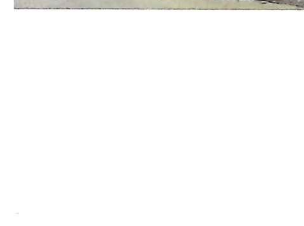
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7



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9



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16



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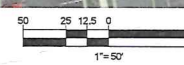
14



13



12



BOHLER ENGINEERING

SITE CIVIL AND CONSULTING ENGINEERING
LAND SURVEYING PERMITTING SERVICES TRANSPORTATION SERVICES
SUSTAINABLE DESIGN URBAN DESIGN

● BALTIMORE, MD
● BETHESDA, MD
● BOSTON, MA
● CHICAGO, IL
● COLUMBIA, SC
● DALLAS, TX
● DENVER, CO
● HOUSTON, TX
● KANSAS CITY, MO
● LOS ANGELES, CA
● MIAMI, FL
● MINNEAPOLIS, MN
● NEW YORK, NY
● PHILADELPHIA, PA
● RICHMOND, VA
● SAN ANTONIO, TX
● SEATTLE, WA
● TAMPA, FL
● WASHINGTON, DC

REVISIONS			
REV	DATE	COMMENT	BY

NOT APPROVED FOR CONSTRUCTION

THE FOLLOWING STATES REQUIRE NOTIFICATION BY LOCATIONS, DESIGNERS, OR ANY PERSON PREPARING TO DISTURB THE EARTH'S SURFACE ANYWHERE IN THE STATE OF VIRGINIA, MARYLAND, THE DISTRICT OF COLUMBIA, AND DELAWARE CALL-811

MD 1-800-252-4848 (PA 1-800-252-7777) (DC 1-800-252-7777) (VA 1-800-252-7001) (MD 1-800-252-7777) (DC 1-800-252-8559)

PROJECT No.: MD162074
DRAWN BY: DML
CHECKED BY: AGS
DATE: 03/27/17
SCALE: 1" = 50'
CAD ID: EXD

PROJECT: **PLAN TO ACCOMPANY VARIANCE PETITION**
FOR
BRAHIN MANAGEMENT CORPORATION
1535 CHESTNUT ST.
SUITE 200
PHILADELPHIA, PA 19102

LOCATION OF SITE
KINGS POINT SQUARE
LOTS 2 & 3 DEER PARK PLAZA
& TM PARCEL, 9900-9998 &
9920 LIBERTY ROAD,
2ND ELECTION DISTRICT
BALTIMORE COUNTY, MD

BOHLER ENGINEERING

901 DULANEY VALLEY ROAD, SUITE 801
TOWSON, MARYLAND 21204
Phone: (410) 821-7900
Fax: (410) 821-7907
MD@BohlerEng.com

J.J. UCCIFERRO

PROFESSIONAL ENGINEER
MARYLAND LICENSE NO. 3884

SHEET TITLE:
PHOTO LOCATION EXHIBIT

PETITIONER'S EXHIBIT 10

3



KINGS POINT SQUARE SHOPPING CENTER

9900 LIBERTY ROAD, RANDALLSTOWN, MD 21133



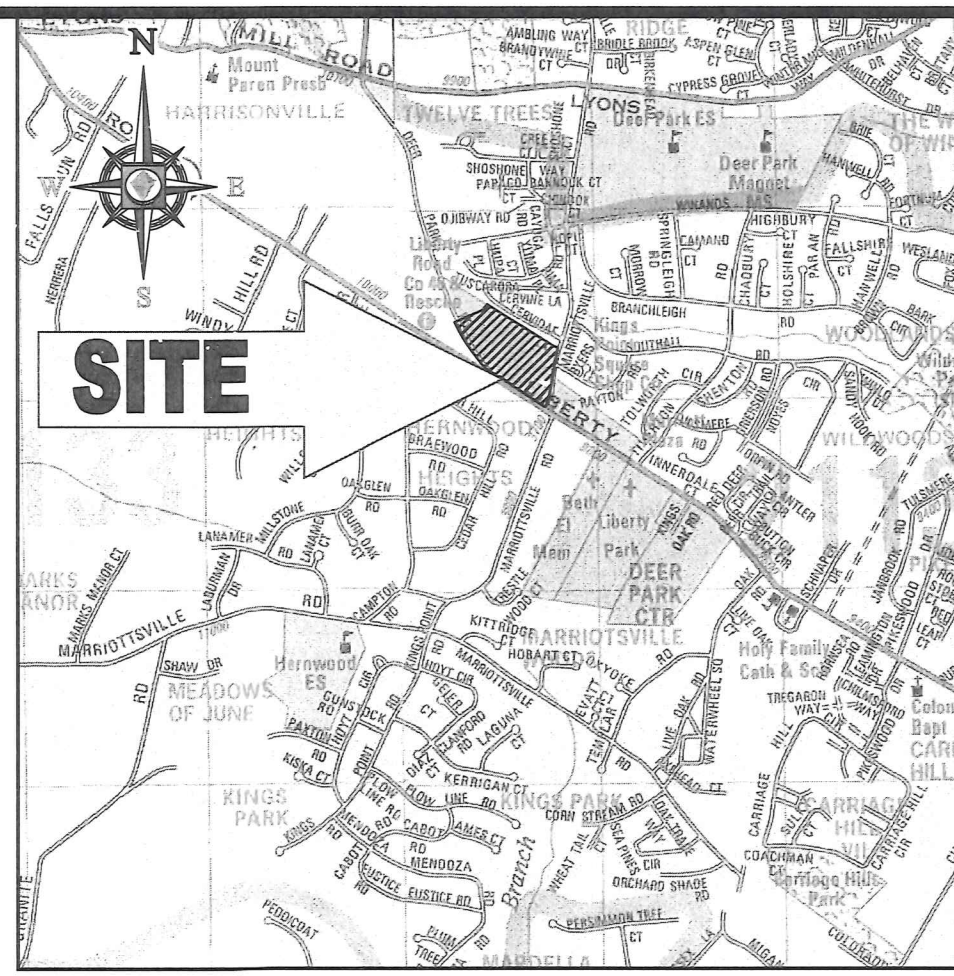
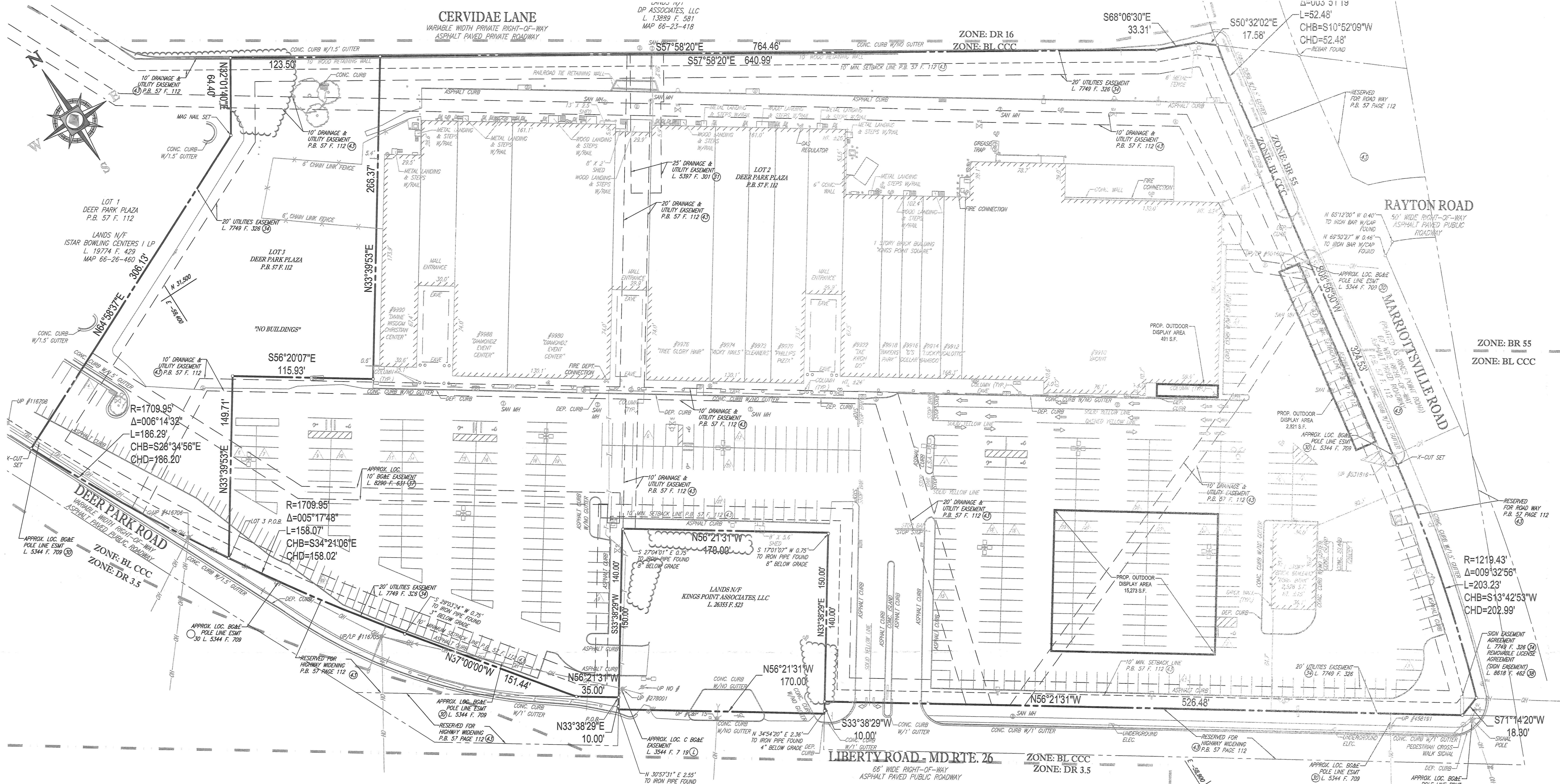
ALBERT TAUS & ASSOCIATES

ARCHITECTURE PLANNING INTERIOR DESIGN ENGINEERING
1187 MOREFIELD ROAD PHILADELPHIA, PA 19115
PHONE: (215) 698 - 2516 FAX: (215) 698 - 7398

03-27-2017

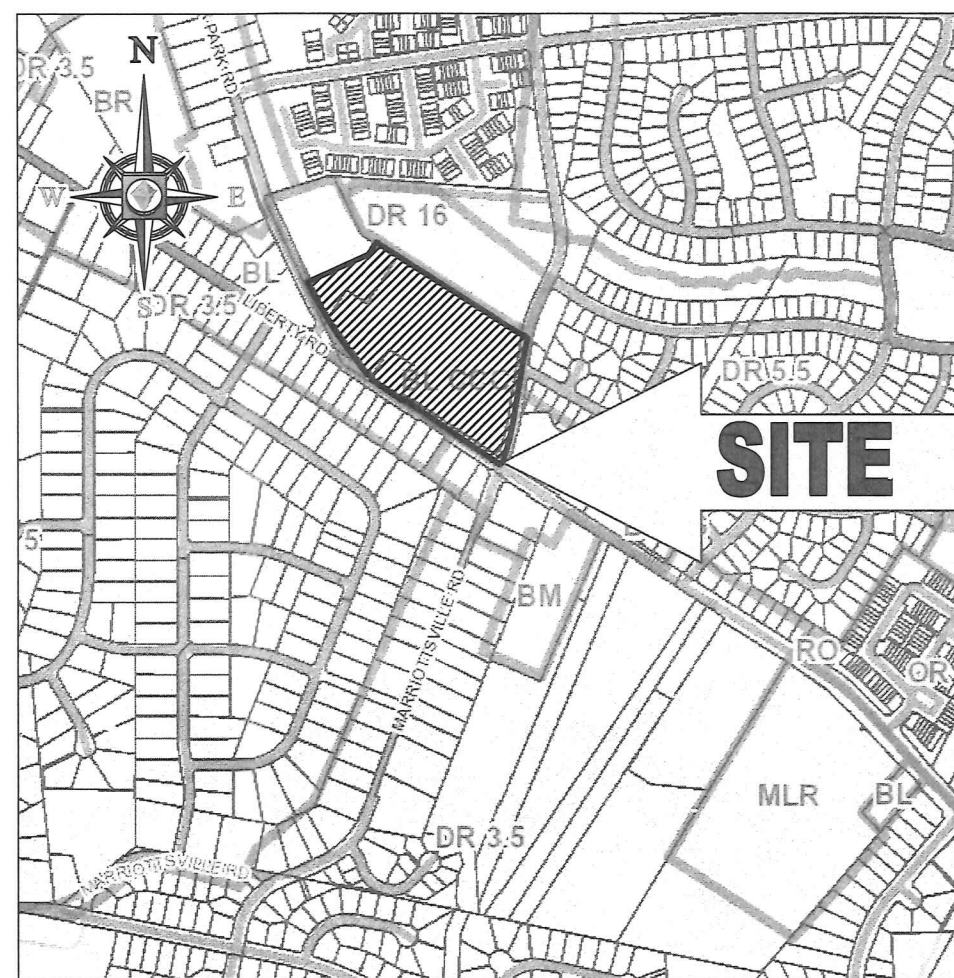
PETITIONER'S EXHIBIT **13**





LOCATION MAP

COPYRIGHT ADD THE MAP PEOPLE
PERMIT USE NO. 20802153-5
SCALE: 1"=1000'



ZONING MAP

BALTIMORE COUNTY MY NEIGHBORHOOD TOOL
NOT TO SCALE

PARKING TABULATION			
Type of Use	Area	Required Parking	Spaces Required
CATERING HALL	10,407	1/60 S.F.	209
CHURCH	5,346	1/6 SEATS @153 SEAT	26
OFFICE & OTHER	38,959	1/300 S.F.	130
RESTAURANT	3,691	1/50 S.F.	74
RETAIL	50,574	1/200 S.F.	253
OUTDOOR SALES AREA	19,750	1/200 S.F.	99
TOTAL LEASABLE AREA	128,727		
			TOTAL REQUIRED: 791
			LESS SPACES PER VARIANCE CASE 83-5-A-19
			TOTAL PROVIDED SPACES: 499

NOTES

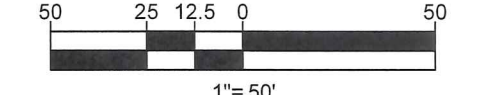
THIS PLAN IS BASED OFF OF THE BOUNDARY & PLANIMETRIC SURVEY COMPLETED ON 11/14/16 BY BOHLER ENGINEERING.

1. SITE ADDRESS: 9980 LIBERTY ROAD, RANDALLSTOWN, MD 21133
2. TOTAL SITE AREA: 514,094 S.F. OR 11.8 AC
3. OWNER/APPLICANT: KINGS POINT ASSOCIATES, LLC SUITE 200, 1535 CHESTNUT STREET, PHILADELPHIA, PA 19102-2501
4. COUNTY INFORMATION: TAX MAP: 66 PARCEL: 480, LOT 2 & LOT 3 CENSUS TRACT: 402507 WATERSHED: GWYNNS FALLS COUNTY COUNCIL DISTRICT: 04 ELECTION DISTRICT: 02 ZONING MAP: 78C1, 86C3
5. TAX ACCOUNT NO: 510001188 210001187
6. EXISTING USE: SHOPPING CENTER WITH VARIOUS USES; CATERING HALL PROPOSED USE: SHOPPING CENTER WITH VARIOUS USES; CATERING HALL
7. ZONE: BL-CCC (BUSINESS, LOCAL - COMMERCIAL, COMMUNITY CORE DISTRICT)
8. THIS PLAN IS LOCATED IN ZONE X (AREAS DETERMINED TO BE OUTSIDE OF THE 0.2% ANNUAL CHANCE FLOODPLAIN) PER PLAN FEMA MAP 2400100215F, DATED SEPTEMBER 26, 2008.
9. THERE ARE NO WETLANDS LOCATED WITHIN THE SITE BOUNDARY.
10. THE SUBJECT SITE IS NOT LOCATED WITHIN A WATER, SEWER OR TRANSPORTATION DEFICIENT AREA PER THE 2015 BASIC SERVICES MAPS.
11. LANDSCAPING SHALL BE PROVIDED IN ACCORDANCE WITH THE LANDSCAPE MANUAL AND ALL OTHER MANUALS ADOPTED PURSUANT TO SECTION 22-105 OF THE BALTIMORE COUNTY CODE AT THE TIME OF TECHNICAL PLAN APPROVAL.
12. NO CHANGES TO SITE LIGHTING ARE PROPOSED WITH THIS PLAN.
13. ALL HANDICAP SPACES ARE IN CONFORMANCE WITH THE ADA CODE OF MARYLAND REGULATIONS AT THE TIME OF TECHNICAL PLAN APPROVAL.
14. BUILDING AREA (NO ADDITIONAL BUILDING SQUARE FOOTAGE IS BEING PROPOSED): EXISTING: 108,977 S.F. PROPOSED: 108,977 S.F.
15. NO CHANGES TO SETBACKS ARE PROPOSED WITH THIS PLAN.
16. FLOOR AREA RATIO: MAX. ALLOWABLE FOR SHOPPING CENTER: 4.0 EXISTING SHOPPING CENTER: 108,719 S.F. TOTAL SITE AREA: 514,094 = 0.21
17. SITE IS SERVED BY PUBLIC WATER AND SEWER.
18. SITE CIRCULATION IS PROVIDED VIA TWO-WAY DRIVE AISLES, MINIMUM 22' WIDE.
19. ALL SIGNAGE WILL COMPLY WITH SECTION 450 OF THE BCZR OR A VARIANCE MUST BE REQUESTED.
20. THE SITE IS NOT LOCATED WITHIN THE CHESAPEAKE BAY CRITICAL AREA.
21. THERE ARE NO HISTORICAL STRUCTURES LOCATED ON THE PROPERTY.
22. A CRG PLAN FOR THIS SITE WAS APPROVED 11/25/1987. A REVISED CRG PLAN WAS APPROVED 10/11/1989. A LIMITED EXEMPTION FOR TWO ADDITIONS TO THE SHOPPING CENTER WAS APPROVED BY THE CRC ON 12/01/1995.

ZONING

1. CASE NO. R-1948-0725
A PETITION FOR RECLASSIFICATION OF ZONING STATUS FROM "A" RESIDENCE TO "E" COMMERCIAL FOR THE PROPERTY TO BE USED FOR AN ANTIQUE SHOP WAS DENIED ON DECEMBER 27, 1946.
2. CASE NO. R-1948-0724-X
A PETITION FOR RECLASSIFICATION OF ZONING STATUS FROM "A" RESIDENCE TO "E" COMMERCIAL FOR THE PROPERTY TO BE USED FOR A GASOLINE STATION WAS GRANTED ON DECEMBER 27, 1946.
3. CASE NO. 1947-0813-X
A PETITION FOR SPECIAL PERMIT TO USE THE LAND (AND IMPROVEMENTS NOW OR TO BE ERECTED THEREON) HEREINAFTER DESCRIBED FOR AN ANTIQUE SHOP WAS GRANTED ON FEBRUARY 18, 1947.
4. CASE NO. R-1952-2158
A PETITION FOR RECLASSIFICATION OF ZONING STATUS FROM "A" RESIDENCE TO "E" COMMERCIAL USE WAS GRANTED ON JANUARY 15, 1952.
5. CASE NO. 1954-3000-X
A PETITION FOR SPECIAL PERMIT TO USE THE LAND (AND IMPROVEMENTS NOW OR TO BE ERECTED THEREON) HEREINAFTER DESCRIBED FOR A 4' X 52' COMMERCIAL SIGN WAS GRANTED ON MAY 6, 1954.
6. CASE NO. 1955-3667-X
A PETITION FOR SPECIAL EXCEPTION TO USE THE LAND (AND IMPROVEMENTS NOW OR TO BE ERECTED THEREON) HEREINAFTER DESCRIBED FOR A GASOLINE FUELING STATION WAS GRANTED ON NOVEMBER 29, 1955.
7. CASE NO. R-1957-4014-X
A PETITION FOR RECLASSIFICATION OF ZONING STATUS FROM R-6 TO B-L, R-20 AND B-R ZONE WAS WITHDRAWN AT THE APPLICANT'S REQUEST.
8. CASE NO. R-1957-4225
A PETITION FOR RECLASSIFICATION OF ZONING STATUS FROM R-6 TO B-L WAS GRANTED ON OCTOBER 16, 1957.
9. CASE NO. R-1959-0130
A PETITION FOR RECLASSIFICATION OF ZONING STATUS FROM R-10

- AND R-6 TO R-A WAS DENIED ON JANUARY 15, 1959.
- A PETITION FOR RECLASSIFICATION OF ZONING STATUS FROM B-L TO R-A WAS GRANTED ON JANUARY 15, 1959.
- A PETITION FOR RECLASSIFICATION OF ZONING STATUS FROM R-10 TO B-L WAS GRANTED ON JANUARY 15, 1959.
10. CASE NO. 1978-0069-X
A PETITION FOR SPECIAL EXCEPTION TO PERMIT THE SALE OF FOOD AND SUNDRIES IN COMBINATION WITH A SERVICE STATION WAS GRANTED ON NOVEMBER 22, 1977. THE DECISION WAS APPEALED WITH THE APPEAL BEING DISMISSED ON FEBRUARY 23, 1979.
11. CASE NO. 1983-0006-A
A VARIANCE WAS REQUESTED TO REDUCE THE REQUIRED PARKING BY 18 SPACES WAS GRANTED ON DECEMBER 27, 1995.
12. CASE NO. 1985-0278-XSPHA
A PETITION FOR SPECIAL EXCEPTION TO PERMIT A FOOD STORE (LESS THAN 5,000 S.F.) IN COMBINATION WITH A SERVICE STATION (GAS AND GO) WAS GRANTED ON APRIL 16, 1985.
13. CASE NO. 1990-0230-A
A PETITION FOR ZONING VARIANCE TO ALLOW 3 FREESTANDING SIGNS WITH A TOTAL SQUARE FOOTAGE OF 372 S.F. (COUNTING ALL SIDES) IN LIEU OF THE PERMITTED 100 S.F. TO PERMIT A SIGN HEIGHT OF 28'-3" IN LIEU OF THE PERMITTED 25'-0" WAS GRANTED ON APRIL 16, 1985.
14. CASE NO. 1997-0285-SPH
A PETITION FOR A SPECIAL HEARING TO PERMIT A RESTAURANT WITH LIVE ENTERTAINMENT WAS DISMISSED WITHOUT PREJUDICE.
15. CASE NO. 2006-0012-X
A PETITION FOR SPECIAL EXCEPTION TO ALLOW A COMMUNITY BUILDING (CATERING HALL) WAS GRANTED BY AMENDED ORDER ON SEPTEMBER 19, 2015 - SUBJECT TO RESTRICTIONS.
16. CASE NO. 2008-0244-SPH-X
A PETITION FOR SPECIAL EXCEPTION TO PERMIT A COMMUNITY BUILDING AND A CATERING HALL WAS GRANTED BY AMENDED ORDER DATED OCTOBER 9, 2009 - SUBJECT TO RESTRICTIONS.



PROFESSIONAL CERTIFICATION
I, JOSEPH J. UCCIFERRO, HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MARYLAND, LICENSE NO. 36064, EXPIRATION DATE: 8/25/2018

BOHLER ENGINEERING

SITE CIVIL AND CONSULTING ENGINEERING
LANDSCAPE ARCHITECTURE
TRANSPORTATION SERVICES
SUSTAINABLE DESIGN

UPSTATE NEW YORK
NEW ENGLAND
NEW YORK, NY
SOUTHERN MARYLAND
PHILADELPHIA, PA

LEHIGH VALLEY, PA
CHARLOTTE, NC
BALTIMORE, MD
TAMPA, FL
DALLAS, TX
NORTH, TX

REVISIONS			
REV	DATE	COMMENT	BY

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1-800-245-4660 (PA 1-800-245-1771) 1-800-257-7777 (VA 1-800-532-7001) MD 1-800-257-7777 (DE 1-800-282-5555)

NOT APPROVED FOR CONSTRUCTION

PROJECT No.: MD162074
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Phone: (410) 821-7900
Fax: (410) 821-7587
MD@BohlerEng.com

J.J. UCCIFERRO

PROFESSIONAL ENGINEER
MARYLAND LICENSE NO. 36064

12-13-16

SHEET TITLE: **PLAN TO ACCOMPANY VARIANCE PETITION**

SHEET NUMBER: **1**

2017-159-A