

PETITION FOR ZONING HEARING(S)

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

Address 4618 Jolly Acres Road	t Baitimore Cot wh	inty for the prop nich is presently zo	ned RC2
Deed References: Liber 24341 Folio 0564	10 Digit Tax A	Account # 0 7 0 2	2 0 0 0 4 2 5
Property Owner(s) Printed Name(s) Howard R B	adders and Rosalie	Jean Badders and	John J. Badders
(SELECT THE HEARING(S) BY MARKING X AT THE APPROPRI	IATE SELECTION AND	PRINT OR TYPE THE PI	ETITION REQUEST)
The undersigned legal owner(s) of the property situate in E	Baltimore County an	d which is described	in the description
and plan attached hereto and made			
	4.0		
1 a Special Hearing under Section 500.7 of the Zoning	g Regulations of Bal	timore County, to de	etermine whether
or not the Zoning Commissioner should approve			
2. <b>Va Special Exception</b> under the Zoning Regulations of	of Baltimore County	to use the herein de	scribed property for
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/ glear	See	attack	Led
3 a Variance from Section(s)			
of the zoning regulations of Baltimore County, to the zo	oning law of Baltim	ore County for the	following reasons:
(Indicate below your hardship or practical difficulty or			
you need additional space, you may add an attachmen		0 DE 1 NEOEM12D	/// //_// // // // // // // // // // //
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To be pres	ented	at the	reduing.
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Property is to be posted and advertised as prescribed by the zoning regulati I, or we, agree to pay expenses of above petition(s), advertising, posting, et		nd are to be bounded by t	he 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 this is the publicat of this / those Patition(s)	er the penalties of perjur	, that I / We are the legal	l owner(s) of the property
which is the subject of this / these Petition(s).			
Contract Purchaser/Lessee:	Legal Owners (P	etitioners):	
TPE Maryland Solar Holdingsz, LLC		Rosalie Jean Badders	/ John J. Badders
Name- Type or Print	Name #1 /	Name #2	/ Name #3
<u> </u>	Yours Bless C	solie Jan Baddel	Di John Revolus
Signature	Signature #1	- Signat <b>u</b> re # 2	Signature # 3
747 S Corona St Suite 100 Denver, CO	4618 Jolly Acres	White Hall	MD
Mailing Address City State	_ Mailing Address	City	State
80207 , 785-393-6505 , mgreczyn@altisenergy.com	21161	(410) 692-0020	
Zip Code Telephone # Email Address	Zip Code	Telephone #	Email Address
Attorney for Petitioner:	Representative t	o be contacted:	
Jennifer R. Busse, Esquire			
Name-Type or Print	Name - Type or Print		
1 8 1/8 )			
Signature/ Whiteford, Taylor & Preston	Signature	, ·	W-10-2
Signature Whiteford, Taylor & Preston  1 W Pennsylvania Ave, Suite 300 Towson, MD			
Mailing Address City State	Mailing Address	City	State
21204 / 410-832-2077 / jbusse@wtplaw.com	<b>T</b>	7	
Zip Code Telephone # Email Address	Zip Code	Telephone #	Email Address
	VII. (10.7 € 1 × 1 × 1 × 1 × 1 × 1 × 1 × 1 × 1 × 1	ana aa magaabhtan € tarabh ghi canaba Al-ASC 120450	
CASE NUMBER 2019 - 0099 - SPHXA Filing Date 9 28, 18	Do Not Schedule	Dates:	Reviewer_) 5

# Attachment to Zoning Petitions

# 4618 Jolly Acres Road

Petition for Special Exception pursuant to Baltimore County Zoning Regulations Section 4F-102.A. to permit a solar facility in the RC2 zone.

Petition for Variance pursuant to Baltimore County Zoning Regulations Section 4F-104.A.4. to permit a 20 foot setback in lieu of the required 50 feet.

Petition for Special Hearing, if necessary, to approve shared access for an existing commercial use and a proposed solar facility.

And any other relief as deemed necessary.

10010514



### **Zoning Description**

#### For Special Exception, Zoning Variance, and Special Hearing

#### Baltimore County, Maryland

Commencing from the same at a point formed by the intersection of the centerline of Old York Road with the centerline of Jolly Acres Road. Thence leaving said point and running in a northwesterly direction with the centerline of said York Road a distance of 463 feet, more or less; thence leaving said centerline and running in a northeasterly direction 40 feet, more or less, to the point of beginning; thence leaving said point of beginning and referring all courses of this description to the Maryland Coordinate system (NAD 83/1991): (1) North 25 degrees 29 minutes 32 seconds West 264.31 feet; thence (2) North 35 degrees 18 minutes 58 seconds East 1,599.99 feet; thence (3) South 59 degrees 22 minutes 02 seconds East 275.16 feet; thence (4) North 20 degrees 55 minutes 14 seconds East 122.95 feet; thence (5) South 01 degrees 48 minutes 45 seconds East 977.23 feet; thence (6) North 48 degrees 22 minutes 32 seconds West 477.52 feet; thence (7) South 38 degrees 36 minutes 28 seconds West 720.00 feet; thence (8) South 35 degrees 18 minutes 58 seconds West 179.91 feet; thence (9) South 54 degrees 49 minutes 28 seconds West 260.00 feet to the point of beginning; having an area of 707,018.28 square feet or 16.231 acres, more or less.

THIS DESCRIPTION HAS BEEN PREPARED FOR ZONING PURPOSES ONLY AND IS NOT INTENDED TO BE USED FOR ANY TYPE OF CONVEYANCE.

September 27, 2018

Project No. 18027 (L18027)

2019-0099-SPHXA

9.27.19

RE: PETITION FOR SPECIAL HEARING

SPECIAL EXCEPTION AND VARIANCE

4618 Jolly Acres Road; NW/S of Jolly Acres \*
Road, 1510' NE of c/line with Old York Road

7<sup>th</sup> Election & 3<sup>rd</sup> Councilmanic Districts

Legal Owners: Howard, Rosalie & John Badders

Contract Purchaser: TPE Maryland Solar

Holdings2, LLC

Petitioner(s)

BEFORE THE OFFICE

OF ADMINSTRATIVE

**HEARINGS FOR** 

**BALTIMORE COUNTY** 

2019-099-SPHXA

\* \* \* \* \* \* \* \* \* \* \*

# **ENTRY OF APPEARANCE**

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

RECEIVED

OCT 16 2018

Peter Max Zummerman

PETER MAX ZIMMERMAN

People's Counsel for Baltimore County

Carle S Depulse

CAROLE S. DEMILIO

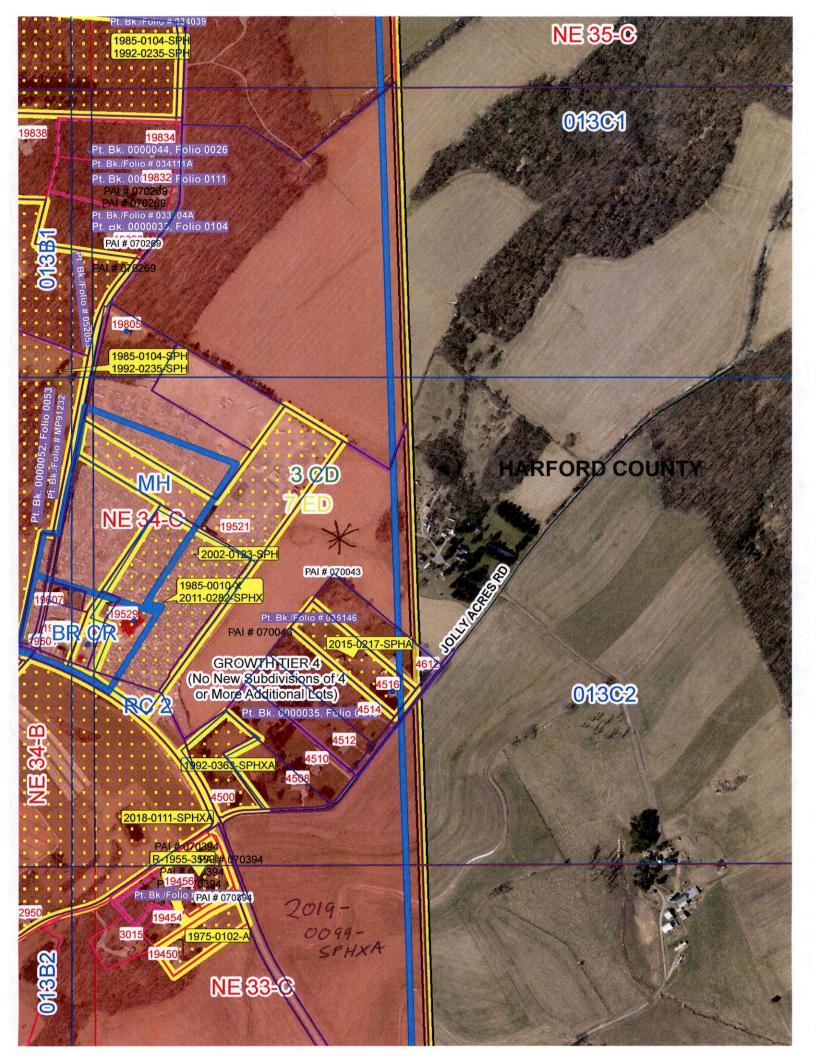
Deputy People's Counsel Jefferson Building, Room 204 105 West Chesapeake Avenue Towson, MD 21204 (410) 887-2188

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 16<sup>th</sup> day of October, 2018, a copy of the foregoing Entry of Appearance was mailed to Jennifer Busse, Esquire, Whiteford, Taylor & Preston, 1 West Pennsylvania Avenue, Suite 300, Towson, Maryland 21204, Attorney for Petitioner(s).

Peter Max Zummerman

PETER MAX ZIMMERMAN
People's Counsel for Baltimore County



# Kristen L Lewis

From: Busse, Jennifer R. <jbusse@wtplaw.com>

Sent: Tuesday, October 02, 2018 3:05 PM

To: Kristen L Lewis

Cc: Mitchell "Mitch" Kellman (mkellman@dmw.com)

Subject: case 2019-0099-SPHXA

Hi Kristen - Mitch just filed this case last Friday.

The client alerted me that he needs me to request that we not get scheduled for a hearing yet – is that ok?

Do you need a formal letter?

Thanks!



# Whiteford Taylor Preston."

#### Jennifer R. Busse | Partner

Towson Commons, Ste. 300 | One West Pennsylvania Avenue | Towson, MD | 21204-5025

t: 410.832.2077 | f: 410.339.4027

jbusse@wtplaw.com | Bio | vCard | http://secure-web.cisco.com/11Ghz-OnpBzG9Rk8oiz-

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# DEPARTMENT OF PERMITS, APPROVALS AND INSPECTIONS ZONING REVIEW OFFICE

# ADVERTISING REQUIREMENTS AND PROCEDURES FOR ZONING HEARINGS

The <u>Baltimore County Zoning Regulations</u> (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.

Case Number:
Property Address: 4618 Joury Acres Road, 21161
Property Description:
<del></del>
Legal Owners (Petitioners): HOWARD BADDES / ROSALLE BADDES / JOHN BADDES
Contract Purchaser/Lessee: TPE MARYLAND SOLAR HOLDINGS & LLC
<del></del> ,
PLEASE FORWARD ADVERTISING BILL TO:
Name: Jennifor R. Busse, Espure
Name: Tennifor R. Busse, Esquire Company/Firm (if applicable): Whiteful, Taylor, Prestone
Name: Jennifor R. Busse, Esquire  Company/Firm (if applicable): Whiteful, Taylor, Prestone  Address: I W. Pennsylvanic Ac, Ste 300
Name: Jennifor R. Busse, Esquire  Company/Firm (if applicable): Whiteful, Taylor, Prestone  Address: I w. Pennsylvanic Ac, Stc 300  Tousin, My 21704
Name: Jennifor R. Busse, Esquire  Company/Firm (if applicable): Whiteful, Taylor, Preston,  Address: I w. Pennsylvanic Ae, Ste 300  Touson, Mo 21204

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