

M E M O R A N D U M

DATE: February 16, 2021
TO: Zoning Review Office
FROM: Office of Administrative Hearings
RE: Case No. 2020-0222-A – Appeal Period Expired

The appeal period for the above-referenced cases expired on February 11, 2021. 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.'

/dlw

c: ✓ Case File
Office of Administrative Hearings

IN RE: PETITION FOR VARIANCE

(1222 Tugwell Drive)

1st Election District

1st Council District

Sister Servants of Mary Immaculate, Inc.

Legal Owner

Petitioner

*

BEFORE THE

*

OFFICE OF ADMINISTRATIVE

*

HEARINGS FOR

*

BALTIMORE COUNTY

*

CASE NO. 2020-0222-A

* * * * *

OPINION AND ORDER

This matter comes before the Office of Administrative Hearings (OAH) as a Petition for Variance filed by Sister Servants of Mary Immaculate, Inc. (the "Petitioner") for property located at 1222 Tugwell Drive in Catonsville (the "Property"). The Petitioner is requesting variance relief from Baltimore County Zoning Regulations ("BCZR") §400.1 to approve a gazebo in the side yard.

Due to the COVID-19 pandemic, a public WebEx hearing was conducted virtually in lieu of an in-person hearing. The Petition was properly advertised and posted. Sister Carol Carne appeared on behalf of the Petitioner along with Aaron Kensinger P.E. from Century Engineering who prepared and sealed a redlined site plan (the "Redlined Site Plan"). (Pet. Ex. 1). Jennifer Busse, Esquire and Whiteford, Taylor and Preston represented the Petitioner. Neighboring property owners, James and Kelly Fox, 405 Newburg Avenue, Catonsville appeared in opposition at the hearing.

Zoning Advisory Committee ("ZAC") comments were received from the Department of Planning ("DOP") and the Department of the Environmental Protection and Sustainability ("DEPS"). Those agencies did not oppose the requested relief. DOP provided comments as reflected in the file.

ORDER RECEIVED FOR FILING

Date

11/12/21

By

J. Mignone

FACTS AND EVIDENCE

The Property is approximately 4.28 acres and is zoned DR 2. Aaron Kensinger, PE was accepted as an expert in civil engineering, zoning and land development. (Pet. Ex. 3). Mr. Kensinger testified that he visited the Property prior to the hearing and that he prepared and sealed the Redlined Site Plan. (Pet. Ex. 4). He described the Property as an irregularly shaped parcel improved with a nursing home and convent constructed in the 1950s. He explained that the odd layout and configuration of these buildings, along with a center driveway which bisects the Property, accessed by 2 entry points off Tugwell Drive, adds to its peculiarity. The front entrance to the nursing home is located off this center driveway.

The nursing home building is primarily T-shaped and envelopes an outdoor courtyard as reflected on the Redlined Site Plan. (Pet. Ex. 1). The courtyard is handicap accessible for wheelchairs and walkers and plays an important in caring for the residents in providing access to the outdoors. Mr. Kensinger testified that the proposal here is to erect a 16x16 gazebo located 13 ft. from the Property line. There was a 28x28 gazebo erected in the 1970s which has been removed.

Mr. Kensinger opined that strict compliance with the BCZR would result in a practical difficulty because the courtyard area is the only recreation area near the nursing home building which permits wheelchair access for the residents. The rear of the Property is sloped and too small to install a gazebo. The rear has historically been used for deliveries to the nursing home. Thus, while there are other green areas on the Property, in Mr. Kensinger's opinion, it would be impracticable and unreasonable to develop a new, handicap accessible recreation area with sidewalks in a distant location to which the residents would likely need to be transported.

Mr. Kensinger presented an aerial photograph showing the Property is surrounded by residences. (Pet. Ex. 5). He also identified photographs of the courtyard area where the proposed

ORDER RECEIVED FOR FILING

2

Date

1/12/21

By

D. Mignone

gazebo is to be located. (Pet. Ex. 6A and 6B). It was his opinion that the variance is within the spirit and intent of the BCZR as the gazebo will face the rear yards of the homes along Newburg Avenue. He also opined that no injury or harm will come to the public health, safety or general welfare from granting the requested relief because the courtyard has been used as a recreational area by the nursing home since the 1950s and previously had a larger gazebo.

Robert Jones, President of Carroll Landscaping, Inc., 9700 Old Court Rd., Windsor Mill, MD 21244 testified that he was initially hired by the Petitioner to revitalize the landscaping when the Petitioner put an addition on the nursing home. As part of that construction, he was hired to upgrade the drainage system. In that regard, drainage pipes were installed in the area where the previous 28x28 gazebo was located. Mr. Jones explained that the current location of these drainage pipes prevents the location of the new gazebo in the area of the old gazebo.

Mr. Jones added that the rear yard has a 3 to 1 slope and is therefore not functional, useable or accessible for residents. All amenities for the residents are in the side courtyard area. (Pet. Ex. 8). In regard to the architectural style of the proposed gazebo, he explained that the style of gazebo will be similar to the photograph. (Pet. Ex. 7). The gazebo roof will mirror the nursing home roof but will also have a cupola. Mr. Jones stated that the proposed gazebo will be octagonal, 13 ft. tall, and large enough for 20-25 people. The dimensions of the gazebo are reflected in the specifications. (Pet. Ex. 9).

Sister Carol Carne testified that she has lived in the convent on the Property since 1967. Sister Carol confirmed that the rear of the Property is sloped and not functional or accessible for a new recreational area for residents. She stated that the larger gazebo was installed in the 1970s and was used for birthday parties and other gatherings for residents, their family and friends. She emphasized the importance of taking the residents outside. The purpose of the gazebo is to provide

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Date 11/21/21

By L. Mignon

them with some shelter from rain, sun and/or heat. Sister Carol added that the average age of the residents is 97 years old.

James and Kelly Fox were provided the opportunity to ask questions of the Petitioners' witnesses. They declined to testify. Their home is directly behind the proposed gazebo area. Mr. Fox wanted to confirm the setback distance from their property line to the gazebo will be 13 ft. Mr. Fox also inquired as to whether the Petitioner investigated other areas for the gazebo location. The response was the courtyard has been the amenity/recreational area for the nursing home and that there were no other handicap accessible, proximate locations for a gazebo area.

DECISION

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.

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

As described by the Petitioners' witnesses, the Property is unique as a result of its size shape and topography. The outline of the nursing home building reflects a 1950s configuration which is asymmetrical and T shaped with numerous wings which jut out and surround an outdoor courtyard. The historical use of the courtyard for the residents of the nursing is practical and functional. A larger gazebo had been used there since the 1970s. As a result of these facts, I find that the Petitioner would suffer practical difficulty and unreasonable hardship if the variance relief were denied. To require the Petitioner to find another amenity area on the Property when the outdoor courtyard has been used since 1950s is unreasonable. The architectural style and modest height of the proposed gazebo is in keeping with the prior gazebo and will have a roof which

ORDER RECEIVED FOR FILING

Date

1/12/21.

By

[Signature]

mirrors the nursing home. Indeed, I would add that, even without a gazebo, nothing would prevent the residents from continuing to use the courtyard as a recreational area, for parties and gatherings as has been done for years. Yet, the installation of the gazebo as proposed on the Redline Site Plan is a benign use which offers some comfort from weather to the residents without causing injury to the neighboring properties. Accordingly, I find that variance can be granted within the spirit and intent of the BCZR and without harming the public health, safety, or welfare.

THEREFORE, IT IS ORDERED, this 12th day of **January 2021**, by the Administrative Law Judge for Baltimore County, that the Petition for Variance pursuant to BCZR, §400.1 to approve a gazebo in the side yard is hereby GRANTED.

The relief granted herein shall be subject to 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 their 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 Any appeal of this decision must be made within thirty (30) days of the date of this Order.
2. Petitioner must comply with the DOP comment, a copy of which are attached hereto and made a part thereof with the exception that since the 28x28 gazebo has been razed, the type and style of proposed gazebo shall reflect the photograph and dimensions as provided in the Exhibits.

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



MAUREEN E. MURPHY
Administrative Law Judge
for Baltimore County

MEM/dlm

ORDER RECEIVED FOR FILING

Date 1/12/21

By J. Mignone



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 1222 Tugwell Drive which is presently zoned DR-2

Deed References: 2891/158 10 Digit Tax Account # 0119390862

Property Owner(s) Printed Name(s) Sister Servants of Mary Immaculate, Inc.

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

PLEASE SEE ATTACHED

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)

REASONS 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:

N/A

Name - Type or Print

Signature

Mailing Address

City

State

Zip Code

Telephone #

Email Address

Attorney for Petitioner:

Jennifer R. Busse, Esquire

Name- Type or Print

Signature

Whiteford, Taylor & Preston

1 W. Pennsylvania Ave., Ste. 300, Towson MD

Mailing Address

City

State

21204

410-832-2077

jbusse@wtplaw.com

Zip Code

Telephone #

Email Address

Legal Owners (Petitioners):

Sister Servants of Mary Immaculate, Inc.

By: Sister Krystyna Mroczek

Name #1 - Type or Print

Name #2 - Type or Print

Sister Servants of Mary Immaculate, Inc.

Signature #1

Signature #2

Sister Krystyna Mroczek

1222 Tugwell Drive, Catonsville, MD

Mailing Address

City

State

21228

410-747-0026

Krystyna.mroczek@gmail.com

Zip Code

Telephone #

Email Address

Representative to be contacted:

Jennifer R. Busse, Esquire

Name - Type or Print

Signature

1 W. Pennsylvania Ave., Ste. 300, Towson

MD

Mailing Address

City

State

21204

410-832-2077

jbusse@wtplaw.com

Zip Code

Telephone #

Email Address

CASE NUMBER 2020-0222-1 Filing Date 9/3/20

Do Not Schedule Dates: _____

Reviewer JS

Attachment to Zoning Petition

1222 Tugwell Drive

Petition for Variance BCZR §400.1 to approve a gazebo in the side yard.

11497420

2020-0722 -A

August 17, 2020

ZONING DESCRIPTION FOR
#1222 TUGWELL DRIVE

Beginning at a point on the southwest side of Hilton Terrace, which is 30 feet wide, at the distance of 125 feet southeast of the centerline of Newberg Avenue, which is 50 feet wide. Thence the following courses and distances: (1) South 45 degrees 36 minutes 52 seconds East 521.44 feet; thence (2) South 42 degrees 00 minutes 25 seconds West 473.98 feet; thence (3) North 19 degrees 02 minutes 45 seconds West 325.00 feet; thence (4) North 54 degrees 46 minutes 58 seconds West 173.16 feet; thence (5) North 31 degrees 12 minutes 53 seconds East 78.11 feet; thence (6) North 42 degrees 03 minutes 05 seconds East 108.37 feet; thence (7) North 48 degrees 00 minutes 09 seconds West 50.00 feet; and thence (8) North 41 degrees 58 minutes 17 seconds East 173.70 feet to the place of beginning. Being that land as recorded in Deed Liber T.B.S. 1911, folio 227 and Deed Liber G.L.B. 2891, folio 158, containing 4.28 acres of land, more or less. Located in the First Election District and First Council District.



James G. Wiest
Professional Land Surveyor
MD Registration No. 21390
License Expires February 5, 2022

2020-0222-A

The Daily Record

200 St. Paul Place Suite 2480

Baltimore, Maryland 21202

1 (443) 524-8100

www.thedailyrecord.com

Order #: 11944239
 Case #: 2020-0222-A
 Description:

NOTICE OF ZONING HEARING - CASE NUMBER: 2020-0222-A

PUBLISHER'S AFFIDAVIT

We hereby certify that the annexed advertisement was published in The Daily Record, a daily newspaper published in the State of Maryland 1 times on the following dates:

12/16/2020



Darlene Miller, Public Notice Coordinator
 (Representative Signature)

Baltimore County

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 virtual hearing on the property identified herein as follows:

CASE NUMBER: 2020-0222-A

1222 Tugwell Drive

N/west side of Tulip Avenue, n/east of Magnolia Avenue

13th Election District - 1st Councilmanic District

Legal Owners: Sister Servants of Mary Immaculate, Inc.

Variance to approve a gazebo in the side yard.

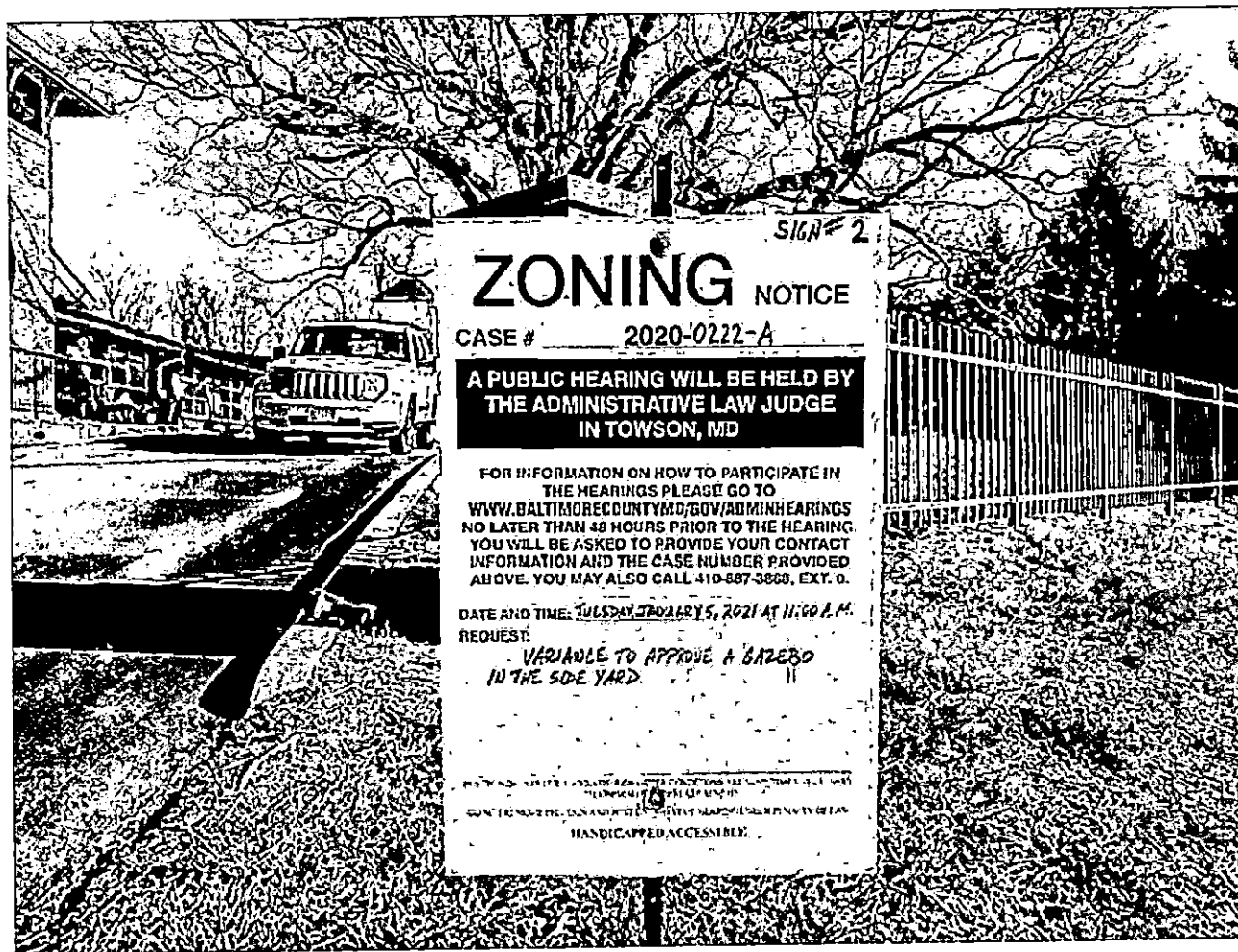
Hearing: Tuesday, January 5, 2021 at 11:00 a.m.

For information on how to participate in the hearings please go to www.baltimorecountymd.gov/adminhearings no later than 48 hours prior to the hearing. You will be asked to provide your contact information and the case number provided above. You may also call 410-387-3868, ext. 0.

Michael Mallinoff

Director of Permits, Approvals and Inspections for Baltimore County

d16



SIGN # 2

ZONING NOTICE

CASE # 2020-0222-A

A PUBLIC HEARING WILL BE HELD BY
THE ADMINISTRATIVE LAW JUDGE
IN TOWSON, MD

FOR INFORMATION ON HOW TO PARTICIPATE IN
THE HEARINGS PLEASE GO TO
WWW.BALTIMORECOUNTYMD.GOV/ADMINHEARINGS
NO LATER THAN 48 HOURS PRIOR TO THE HEARING.
YOU WILL BE ASKED TO PROVIDE YOUR CONTACT
INFORMATION AND THE CASE NUMBER PROVIDED
ABOVE. YOU MAY ALSO CALL 410-887-3868, EXT. 0.

DATE AND TIME: TUESDAY, JANUARY 5, 2021 AT 11:00 A.M.

REQUEST:

VARIANCE TO APPROVE A GAZEBO
IN THE SIDE YARD

FOR MORE INFORMATION, PLEASE CONTACT THE TOWSON OFFICE OF THE ADMINISTRATIVE LAW JUDGE AT 410-887-3868, EXT. 0.
FOR MORE INFORMATION, PLEASE CONTACT THE TOWSON OFFICE OF THE ADMINISTRATIVE LAW JUDGE AT 410-887-3868, EXT. 0.
HANDICAPPED ACCESSIBLE



ZONING NOTICE

CASE # 2020-0222-A

A PUBLIC HEARING WILL BE HELD BY
THE ADMINISTRATIVE LAW JUDGE
IN TOWSON, MD

FOR INFORMATION ON HOW TO PARTICIPATE IN
THE HEARINGS PLEASE GO TO
WWW.BALTIMORECOUNTYMD.GOV/ADMINHEARINGS
NO LATER THAN 48 HOURS PRIOR TO THE HEARING.
YOU WILL BE ASKED TO PROVIDE YOUR CONTACT
INFORMATION AND THE CASE NUMBER PROVIDED
ABOVE. YOU MAY ALSO CALL 410-857-3823, EXT. 0.

DATE AND TIME: TUESDAY, JANUARY 5, 2021 AT 10:00 A.M.

REQUEST: VARIANCE TO APPROVE A GAZEBO
IN THE SIDE YARD.

FOR INFORMATION: IF YOU ARE INTERESTED IN PARTICIPATING IN THE HEARING, PLEASE
CONTACT THE ZONING DEPARTMENT AT 410-857-3823, EXT. 0.
CALLING 24 HOURS A DAY. THE ZONING DEPARTMENT IS OPEN 24 HOURS A DAY.
HANDICAPPED ACCESSIBLE

ZAC AGENDA

Case Number: 2020-0222-A **Reviewer:** Jason Seidelman
Existng Use: COMMERCIAL **Proposed Use:** COMMERCIAL
Type: VARIANCE
Legal Owner: Sister Servants of Mary Immaculate, Inc.
Contract Purchaser: No Contract Purchaser was set.

Critical Area: No **Flood Plain:** No **Historic:** No **Election Dist:** 1 **Council Dist:** 1

Property Address: 1222 TUGWELL DR

Location: North East side of Tugwell Drive (40'), 165' South East of Newberg Avenue (50').

Existing Zoning: DR 2 **Area:** 4.28 AC

Proposed Zoning:

VARIANCE:

BCZR 400.1 To approve a gazebo in the side yard.

Attorney: Jennifer R. Busse

Prior Zoning Cases: 1956-3928-X; 1991-0001-SPH; 2002-0418-SPHA

Concurrent Cases: None

Violation Cases: None

Closing Date:

Miscellaneous Notes:

Case Number: 2020-0223-SPH **Reviewer:** Jason Seidelman
Existng Use: RESIDENTIAL **Proposed Use:** RESIDENTIAL
Type: SPECIAL HEARING
Legal Owner: Gordon Kelly
Contract Purchaser: No Contract Purchaser was set.

Critical Area: No **Flood Plain:** No **Historic:** No **Election Dist:** 13 **Council Dist:** 1

Property Address: 4948 TULIP AVE

Location: North West side of Tulip Ave (40') 75' North East of Magnolia Ave (50')

Existing Zoning: DR 2 **Area:** 7,500 SQ FT

Proposed Zoning:

SPECIAL HEARING:

Accessory structure with footprint square footage larger then principle structure.

Attorney: Not Available

Prior Zoning Cases: None

Concurrent Cases: None

Violation Cases: CB2000085

Closing Date:

Miscellaneous Notes:

CERTIFICATE OF POST

CASE NO. 2020-0222-A
PETITIONER/DEVELOPER
Whiteford Taylor Preston LLP.

Jennifer Busse

DATE OF HEARING/CLOSING
January 5, 2020

BALTIMORE COUNTY DEPARTMENT OF
PERMITS AND DEVELOPMENT MANAGEMENT
COUNTY OFFICE BUILDING ROOM 111
111 WEST CHESAPEAKE AVENUE

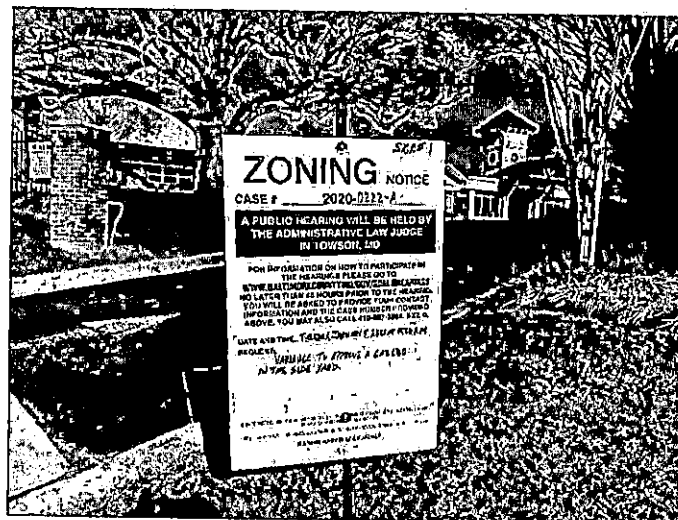
ATTENTION:

LADIES AND GENTLEMEN :

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

1222 Tugwell Drive

SIGN 1



THE SIGN(S) POSTED ON December 15, 2020
(MONTH, DAY, YEAR)

SINCERLEY ,

MARTIN OGLE

MARTIN OGLE
9912 MAIDBROOK RD.
PARKVILLE ,MD 21234
443-629-3411

CERTIFICATE OF POSTING

CASE NO. 2020-0222-A

PETITIONER/DEVELOPER

Whiteford Taylor Preston LLP.

Jennifer Busse

DATE OF HEARING/CLOSING

January 5, 2020

BALTIMORE COUNTY DEPARTMENT OF
PERMITS AND DEVELOPMENT MANAGEMENT

COUNTY OFFICE BUILDING ROOM 111

111 WEST CHESAPEAKE AVENUE

ATTENTION:

LADIES AND GENTLEMEN :

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

1222 Tugwell Drive

SIGN 2

THE SIGN(S) POSTED ON December 15, 2020

(MONTH, DAY, YEAR)

SINCERLEY ,

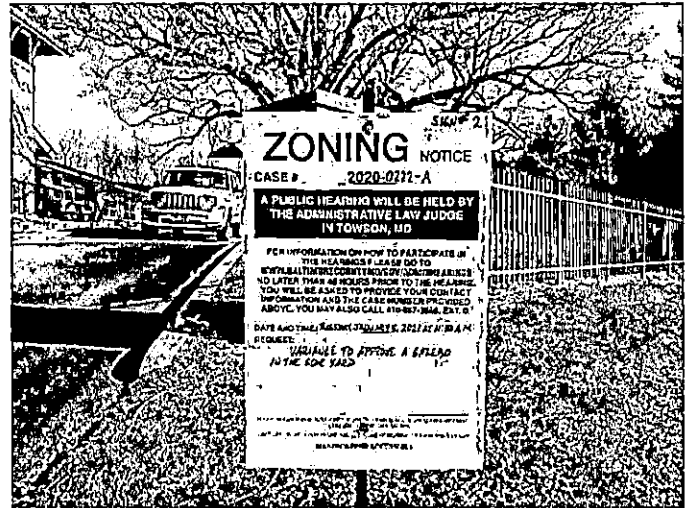
MARTIN OGLE

MARTIN OGLE

9912 MAIDBROOK RD.

PARKVILLE ,MD 21234

443-629-3411





JOHN A. OLSZEWSKI, JR.
County Executive

MICHAEL D. MALLINOFF, *Director*
Department of Permits,
Approvals & Inspections

December 14, 2020

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 virtual hearing on the property identified herein as follows:

CASE NUMBER: 2020-0222-A

1222 Tugwell Drive
N/west side of Tulip Avenue, n/east of Magnolia Avenue
13th Election District – 1st Councilmanic District
Legal Owners: Sister Servants of Mary Immaculate, Inc.

Variance to approve a gazebo in the side yard.

Hearing: Tuesday, January 5, 2021 at 11:00 a.m.

For information on how to participate in the hearings please go to www.baltimorecountymd.gov/adminhearings no later than 48 hours prior to the hearing. You will be asked to provide your contact information and the case number provided above. You may also call 410-887-3868, ext. 0.

A handwritten signature in cursive script, appearing to read "Michael Mallinoff".

Michael Mallinoff
Director

MM:kl

C: Jennifer Busse, 1 W. Pennsylvania Avenue, Ste. 300, Towson 21204
Sister Krystyna Mroczek, 1222 Tugwell Drive, Catonsville 21228

NOTES: (1) THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY WED., DECEMBER 16, 2020.

TO: THE DAILY RECORD
Wednesday, December 16, 2020 - Issue

Please forward billing to:

Jennifer Busse
Whiteford, Taylor & Preston
1 W. Pennsylvania Avenue, Ste. 300
Towson, MD 21204

410-832-0777

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 virtual hearing on the property identified herein as follows:

CASE NUMBER: 2020-0222-A

1222 Tugwell Drive

N/west side of Tulip Avenue, n/east of Magnolia Avenue

13th Election District – 1st Councilmanic District

Legal Owners: Sister Servants of Mary Immaculate, Inc.

Variance to approve a gazebo in the side yard.

Hearing: Tuesday, January 5, 2021 at 11:00 a.m.

For information on how to participate in the hearings please go to www.baltimorecountymd.gov/adminhearings no later than 48 hours prior to the hearing. You will be asked to provide your contact information and the case number provided above. You may also call 410-887-3868, ext. 0.



Michael Mallinoff

Director of Permits, Approvals and Inspections for Baltimore County

Lewis

Busse, Jennifer R. <jbusse@wtplaw.com>
Monday, December 14, 2020 1:54 PM
Kristen L Lewis
cc: Aaron Kensinger; Bob Jones; krystyna.mroczek@gmail.com
Subject: zoning hearing for #222

CAUTION: This message from prvs=1617d4a2e0=jbusse@wtplaw.com originated from a non Baltimore County Government or non BCPL email system. Hover over any links before clicking and use caution opening attachments.

Hi Kristen!
Thanks so much for calling –
I got the voicemail about the hearing date/time of 1/5 at 11:00 a.m.
That is great!
Here are names and emails for necessary attendees :

Jennifer Busse -
jbusse@wtplaw.com

Sister Krystyna Mroczek -
Krystyna.mroczek@gmail.com

Robert ("Bob") Jones –
rjonescl@gmail.com

Aaron Kensinger (Century) –
akensinger@centuryeng.com



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](#) | www.wtplaw.com

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This transmission contains information from the law firm of Whiteford, Taylor & Preston LLP which may be confidential and/or privileged. The information is intended to be for the exclusive use of the planned recipient. If you are not the intended recipient, be advised that any disclosure, copying, distribution or other use of this information is strictly prohibited. If you have received this transmission in error, please notify the sender immediately.

RE: PETITION FOR VARIANCE	*	BEFORE THE OFFICE
1222 Tugwell Drive; NE/S Tugwell Drive,	*	OF ADMINISTRATIVE
165' SE of Newberg Avenue	*	HEARINGS FOR
1 st Election & 1 st Councilmanic Districts	*	
Legal Owner(s): Sisters Servants of Mary	*	BALTIMORE COUNTY
Immaculate, Inc.	*	2020-222-A
Petitioner(s)	*	

* * * * *

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of September, 2020, a copy of the foregoing Entry of Appearance was emailed to Jennifer Busse, Esquire, 1 West Pennsylvania Avenue, Suite 300, Towson, Maryland 21204, jbusse@wtplaw.com, Attorney for Petitioner(s).

Peter Max Zimmerman

PETER MAX ZIMMERMAN
People's Counsel for Baltimore County

**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/neighbor 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: 2020-0222-4
Property Address: 1222 Tugwell Dr.
Property Description: _____

Legal Owners (Petitioners): Sister Servants of Mary Immaculate
Contract Purchaser/Lessee: N/A Inc.

PLEASE FORWARD ADVERTISING BILL TO:

Name: Jennifer Buse
Company/Firm (if applicable): WTP
Address: 1 W. Pennsylvania Ave.
Ste. 300
Towson MD 21204
Telephone Number: 410 832 2077



JOHN A. OLSZEWSKI, JR.
County Executive

MICHAEL D. MALLINOFF, *Director*
Department of Permits,
Approvals & Inspections

December 28, 2020

Jennifer R. Busse,
1 W Pennsylvania Ave Ste 300
Towson MD 21204

RE: Case Number: 2020-0222-A, 1222 Tugwell Drive

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 September 03, 2020. 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, appearing to read "W. Carl Richards, Jr.", is written over the words "Very truly yours".

W. Carl Richards, Jr.
Supervisor, Zoning Review

WCR/kl

Enclosures

c: People's Counsel

BALTIMORE COUNTY, MARYLAND

Inter-Office Correspondence



TO: Hon. Paul M. Mayhew; Managing Administrative Law Judge
Office of Administrative Hearings

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

DATE: September 18, 2020

SUBJECT: DEPS Comment for Zoning Item # 2020-0222-A
Address 1222 Tugwell Drive
(Sister Servants of Mary
Immaculate, Inc. Property)

Zoning Advisory Committee Meeting of **September 7, 2020**.

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

Reviewer: Steve Ford

BALTIMORE COUNTY, MARYLAND

INTER-OFFICE MEMORANDUM

TO: Michael D. Mallinoff
Director, Department of Permits, Approvals and Inspections

DATE: 9/23/2020

FROM: C. Pete Gutwald
Director, Department of Planning

SUBJECT: ZONING ADVISORY COMMITTEE COMMENTS
Case Number: 20-222

INFORMATION:

Property Address: 1222 Tugwell Drive
Petitioner: Sister Krystyna Mroczek - Sister Servants of Mary Immaculate, Inc.
Zoning: DR 2
Requested Action: Variance

The Department of Planning has reviewed the petition for Variance from Section 400.1 of the Baltimore County Zoning Regulations to approve a gazebo in the side yard. The subject property is in Catonsville. There is an existing Nursing home built in 1956 at the site. There is an existing octagonal gazebo (28'X28') to the west of the exiting building. The applicant is now proposing an additional octagonal gazebo (16'X16') adjacent to the existing gazebo.

A site visit was conducted on September 18, 2020. The site is subject to Patapsco Heritage Area Management Plan, Southwest Baltimore County Revitalization Strategy and Western Baltimore County Pedestrian and Bicycle Access Plan.

The Department of Planning has no objections to granting the petitioned zoning relief. However, the scale, proportions and detailing of the proposed structure should be compatible to the existing one.

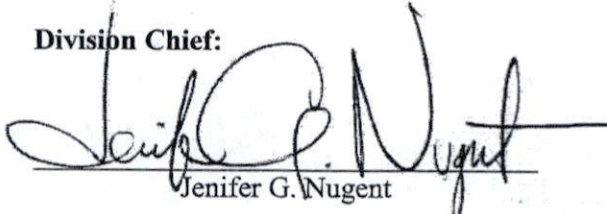
For further information concerning the matters stated herein, please contact Josephine Selvakumar at 410-887-3480.

Prepared by:



Krystle Patchak

Division Chief:



Jennifer G. Nugent

CPG/JGN/KP/

c: Josephine Selvakumar
Jennifer R. Busse, Esquire
Office of the Administrative Hearings
People's Counsel for Baltimore County

ORDER RECEIVED FOR FILING

Date 11/2/21
By J. Megnon

BALTIMORE COUNTY, MARYLAND

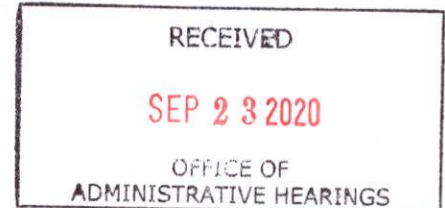
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Prepared by:

Krystle Patchak

Division Chief:

Jenifer G. Nugent

CPG/JGN/KP/

c: Josephine Selvakumar
Jennifer R. Busse, Esquire
Office of the Administrative Hearings
People's Counsel for Baltimore County

BALTIMORE COUNTY, MARYLAND

Inter-Office Correspondence



TO: Hon. Paul M. Mayhew; Managing Administrative Law Judge
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X The Department of Environmental Protection and Sustainability has no
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Reviewer: Steve Ford





JOHN A. OLSZEWSKI, JR.
County Executive

C. PETE GUTWALD, AICP, Director
Department of Permits,
Approvals & Inspections

July 13, 2022

Timothy M. Kotroco
Attorney at Law
305 Washington Avenue
Towson, Maryland 21204

Dear Mr. Kotroco:

RE: Spirit and Intent Request, Case # 2020-0222-A, 2002-0418-SPHA, 1991-0001-SPH and 1956-3928-X St. Joseph's Nursing Home, 1222 Tugwell Drive, Catonsville, MD 21228, 1st Election District

Your recent letter to the Zoning Review Office was forwarded to me for reply. Based on the information provided therein and my review of the available zoning records, the following has been determined:

1. The referenced property is zoned D.R. 2. Provided the proposed construction/reconstruction/renovation of the north wing of the nursing home complies with the D.R. 2 setbacks indicated in the Nonresidential Principal Building Setbacks chart (Section 1B01.2.C.1.a, BCZR), then the referenced property will be in the spirit and intent of the Baltimore County Zoning Regulations (BCZR) and the Zoning Commissioner's orders in Case # 2020-0222-A, 2002-0418-SPHA, 1991-0001-SPH and 1956-3928-X.
2. A copy of your request letter, this response and the revised site plan will be recorded and made a permanent part of the four zoning cases referenced above.
3. A verbatim copy of this response must be affixed to any building permit site plans prior to uploading the required documents for the building permit application.
4. This approval is for zoning only, and you will be required to comply with all other County and State regulations relative to this property.

The foregoing is merely an informal opinion. It is not an expert or legal opinion, it is not intended to be relied on as expert or legal advice, and it is not legally or factually binding on Baltimore County or any of its officials, agents, or employees. Baltimore County expressly disclaims any and all liability arising out of, or in any way connected with the information provided in this document, or any interpretation thereof.

I trust that the information set forth in this letter is sufficiently detailed and responsive to the request. If you need further information or have any questions, please do not hesitate to contact me at 410-887-3391.

Sincerely,

A handwritten signature in cursive script that reads "Jeffrey N. Perlow".

Jeffrey N. Perlow
Planner II
Zoning Review

JNP

cc: Zoning Hearing Files for Case # 2020-0222-A, 2002-0418-SPHA, 1991-0001-SPH and 1956-3928-X

TIMOTHY M. KOTROCO

Attorney at Law
305 Washington Avenue, Suite 502
Towson, Maryland 21204
410-299-2943
Tkotroco@gmail.com

July 10, 2022

Hand Delivered

Mr. Jeffrey Perlow, Zoning Supervisor
111 West Chesapeake Avenue
Towson, Maryland 21204

Re: 315 Newburg Avenue & 1222 Tugwell Drive
Proposal to Reconstruct North Wing of Our Nursing Home
Request for Zoning Verification

Dear Mr. Perlow,

I represent the Sisters Servant of Mary Immaculate, Inc. the owners of the St. Josephs Nursing Home located at 1222 Tugwell Drive in Catonsville, Maryland. The subject property comprises several parcels of land when added together comprise a total acreage of 4.981 acres all of which are zoned DR2. The nursing home was originally approved in 1956 and once constructed, has operated within the subject property since that time up until the present date. (See attached aerial view from My Neighborhood showing nursing home and property)

My clients are interested in renovating and reconstructing the north wing of their existing nursing home. The north wing was part of the original nursing home built in 1956 and needs to be upgraded. The reconstruction of the north wing will be somewhat larger than what exists today but will still meet all zoning setbacks. (See attached aerial view identifying the north wing)

This request was presented to the Development Review Committee ("DRC") on November 17th, 2021. My client requested a limited exemption pursuant to 32-4-106(a)(1)(vi) of the BCC. The DRC tabled the limited exemption request, subject to the Office of Zoning approving this verification letter. Once approved by Zoning and in accordance with the terms of the DRC letter, the matter would not have to be resubmitted to the DRC and the limited exemption would be automatically approved. (See attached DRC approval letter subject to Zoning verification)

Therefore, it is respectfully requested that your office approve this zoning verification letter, indicating that the reconstruction of the north wing of the nursing home complies with all zoning requirements, including setbacks for the proposed upgraded north wing. Attached to this letter is a surveyed site plan showing the reconstructed building and its specific setbacks to our property lines. The building is

Zoning Approval Letter

July 10, 2022

Page 2

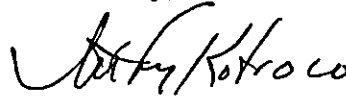
highlighted in yellow as are the setback distances to our property. As shown on the attached plan, the new building has a front setback of 122.4 feet from Newburg Avenue, side setbacks of 55.8 feet and 105.6 feet and there is no change to the rear setback. These setbacks comply with the BCZR. Of course, the regulations relating to the RTA are not applicable to this property as this use was approved as an Assisted Living Facility, Class A and that use is specifically exempted under section 1B01.1.B.1.g (15).

Perhaps the most relevant and applicable entry into the zoning history of this property occurred by a Spirit and Intent letter dated September 16, 2009 to which a response was written by the Zoning office dated November 10, 2009. (Copies attached for your guidance) In this most recent request, the Nursing Home requested approval to construct an addition to their Chapel with a new altar and Sacristy spaces. The Zoning Office approved that request so long as a 50-foot street setback was maintained to Tugwell Drive. (Tugwell Drive is located on the other side of our property and has no bearing to this request. Newburg Avenue does involve our current request). A similar letter to that which was written by your office in 2009 would suffice for this request.

Should you agree that the reconstruction of the north wing of our nursing home satisfies all zoning requirements, then I would respectfully request that a zoning verification letter be issued, (similar to the one issued in 2009) to allow us to proceed with the construction of a new replacement wing.

Thank you for your kind consideration of this matter.

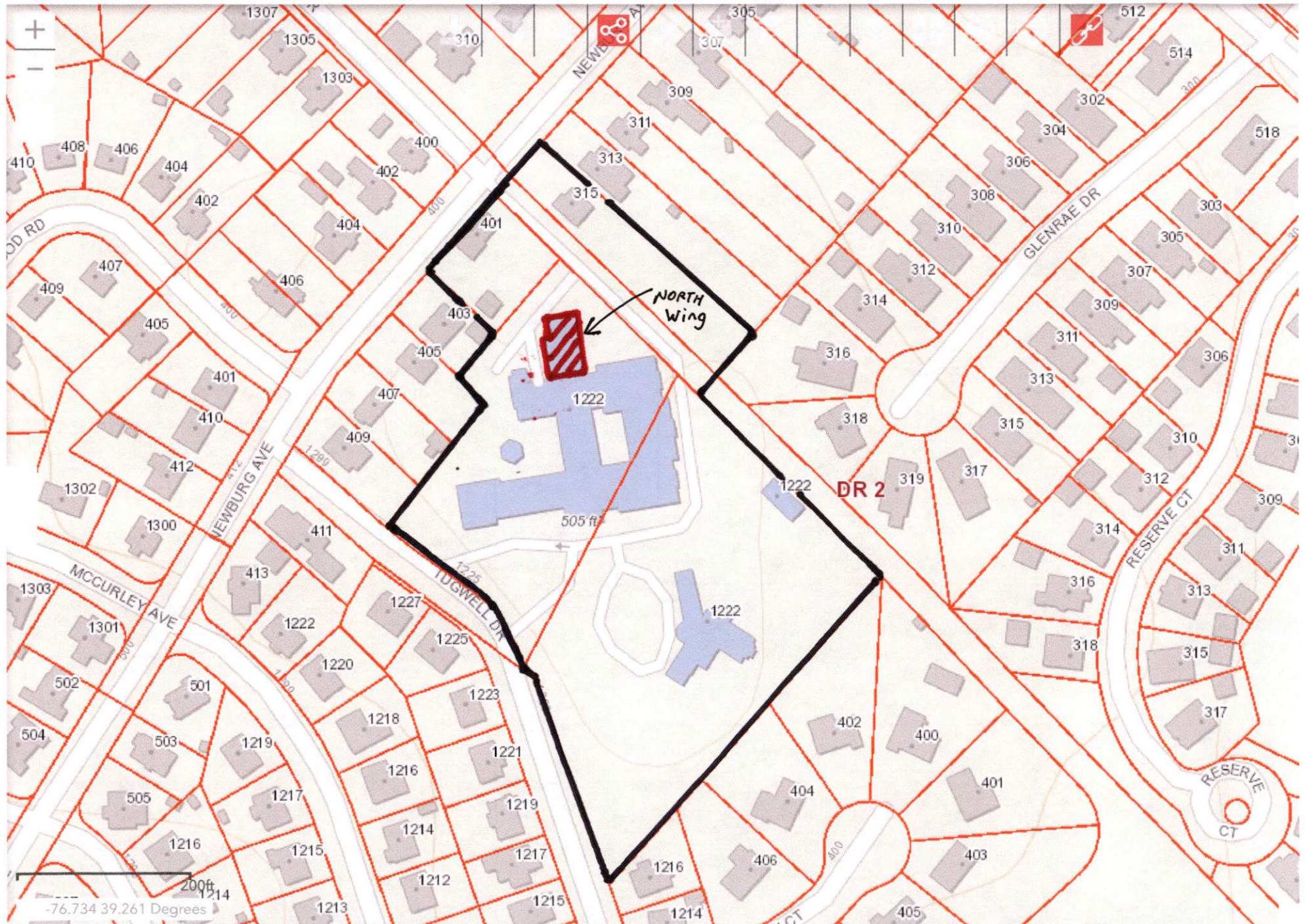
Sincerely,

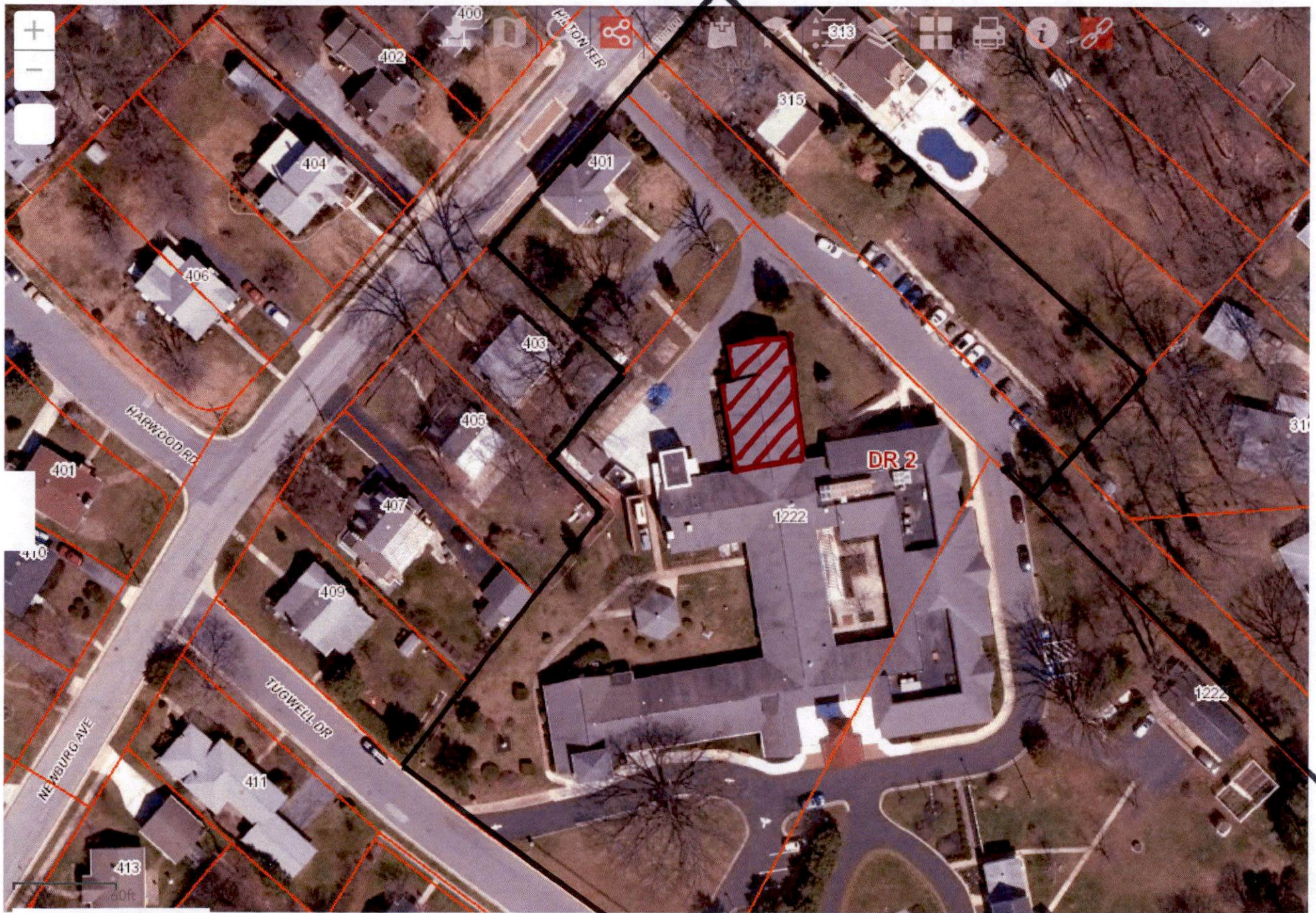
A handwritten signature in black ink, appearing to read "Timothy M. Kotroco", written in a cursive style.

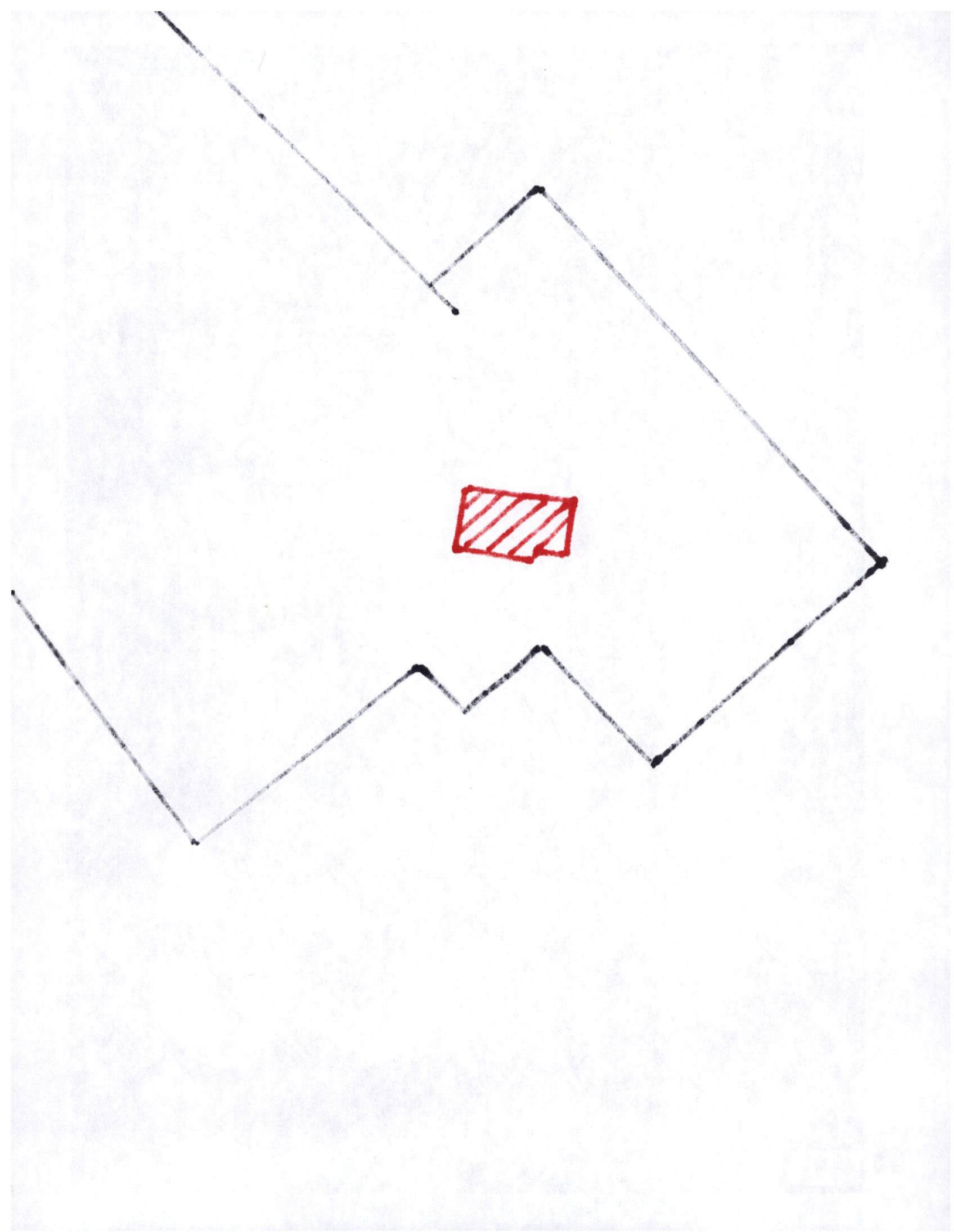
Timothy M. Kotroco

TMK/tk

Attachments





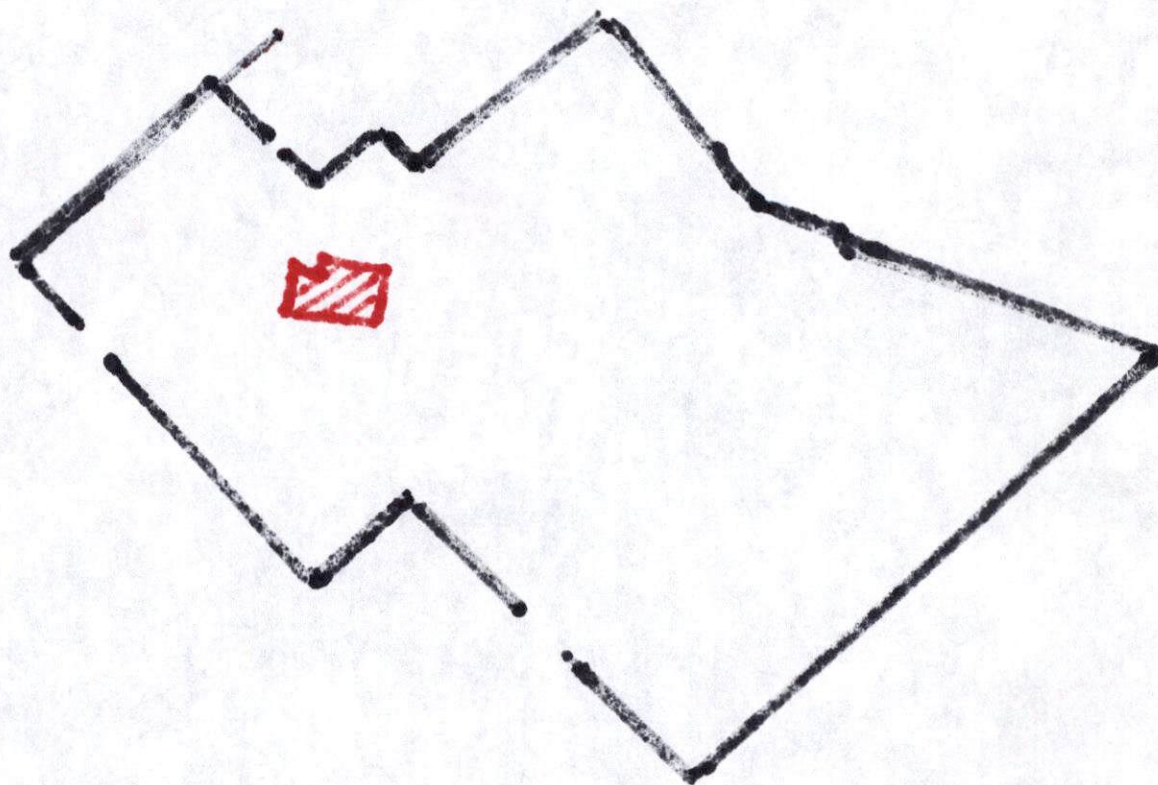




Baltimore County - My Neighborhood



-76.735 39.260 Degrees



1tr ✓
Order ✓

11/5/21
11:00 a.m.

CASE NO. 2020-0222-A

C H E C K L I S T

Comment
Received

Department

Support/Oppose/
Conditions/
Comments/
No Comment

DEVELOPMENT PLANS REVIEW

(if not received, date e-mail sent _____)

9/18

DEPS

(if not received, date e-mail sent _____)

No comment

FIRE DEPARTMENT

9/28

PLANNING

(if not received, date e-mail sent _____)

Comment
No objection

STATE HIGHWAY ADMINISTRATION

TRAFFIC ENGINEERING

COMMUNITY ASSOCIATION

ADJACENT PROPERTY OWNERS

ZONING VIOLATION

(Case No. _____)

PRIOR ZONING

(Case No. 1956-3928-X, 1991-0001SPH
2002-0418-SPHA)

NEWSPAPER ADVERTISEMENT

Date:

12-16-20

SIGN POSTING (1st)

Date:

12-15-20

by Ogle

SIGN POSTING (2nd)

Date:

12-23-20

by Ogle

PEOPLE'S COUNSEL APPEARANCE

Yes

☒

No

☐

PEOPLE'S COUNSEL COMMENT LETTER

Yes

☐

No

☐

Comments, if any: _____

'Donna Mignon

From: Administrative Hearings
Sent: Monday, January 4, 2021 12:00 PM
To: Maureen E Murphy
Cc: Debra Wiley
Subject: FW: Exhibits for Zoning Hearing case no. 2020-0222-A
Attachments: 16' Oct Vinyl Cathedral Gazebo (MD) 1-8-20 sealed (2).pdf; WTP-#11497160-v1-Sister_Servants_site_plan.PDF; image003 (2).jpg; SISTERS COURTYARD GAZEBO.pdf

Importance: High

Hi Maureen,

These are exhibits that were just emailed in regard to your case for tomorrow. They have been saved in the Exhibit folder. If you want me to move these to the FTP site, please let me know. Thank you.

From: Bob Jones <rjjonescl@gmail.com>
Sent: Monday, January 4, 2021 11:47 AM
To: Administrative Hearings <administrativehearings@baltimorecountymd.gov>
Subject: Exhibits for Zoning Hearing case no. 2020-0222-A

CAUTION: This message from rjjonescl@gmail.com originated from a non Baltimore County Government or non BCPL email system. Hover over any links before clicking and use caution opening attachments.

Good morning,

I have attached a few documents that should be helpful in tomorrow's meeting.

Regards,
Bob Jones
President
Carroll Landscaping, Inc.
410-922-2416

Debra Wiley

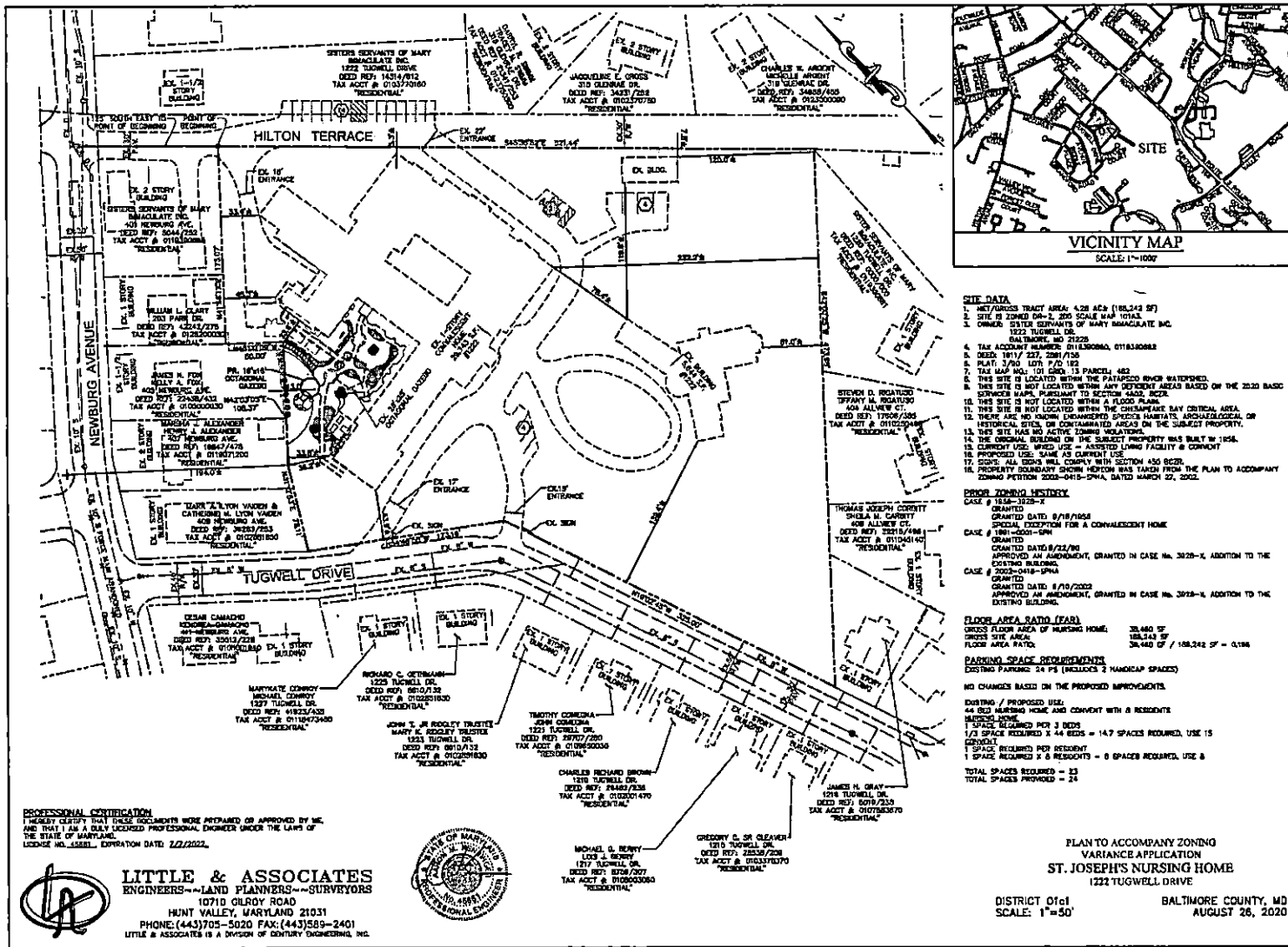
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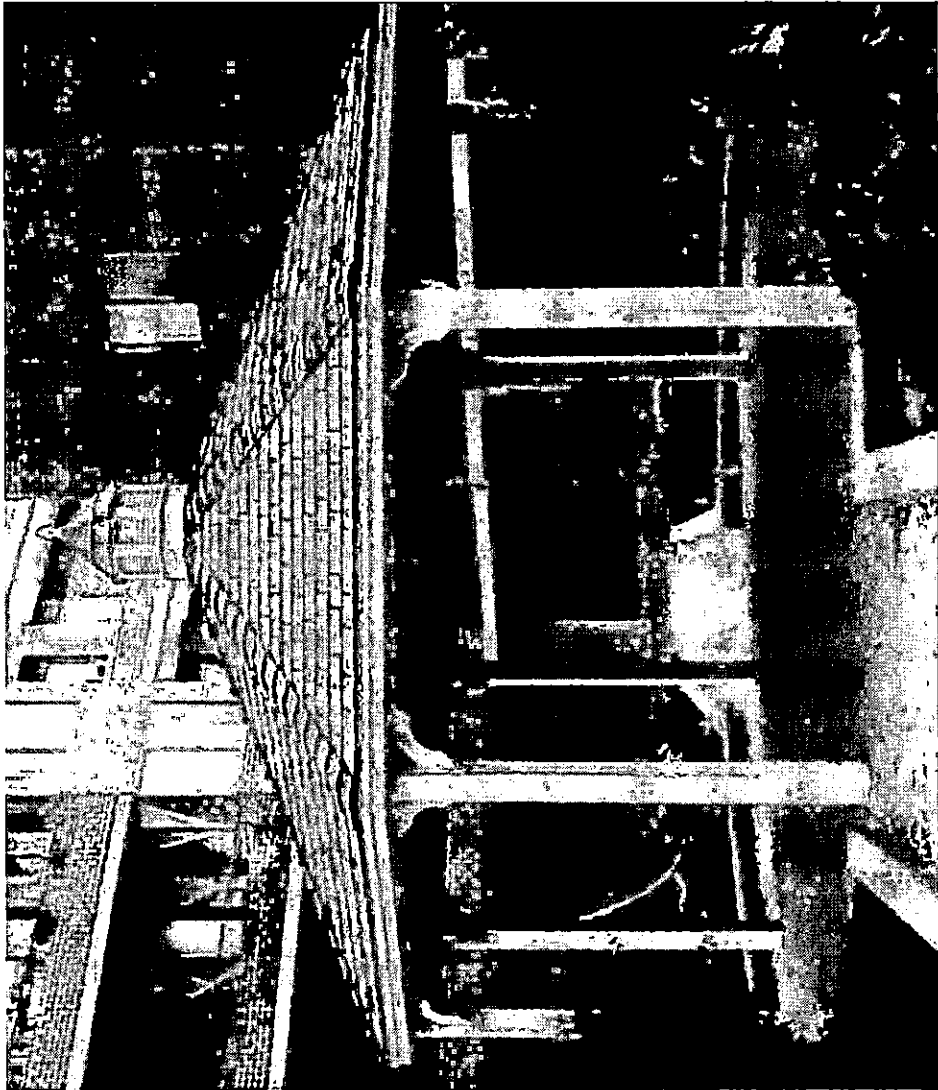
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Regards,
Bob Jones
President
Carroll Landscaping, Inc.
410-922-2416







[illegible]

Donna Mignon

1/5/21
11 Am
2020-0222-A

From: webmaster@baltimorecountymd.gov
Sent: Monday, January 4, 2021 10:48 AM
To: Administrative Hearings
Subject: Request to Testify

Results of Form Submission

Request to Testify

Label	Value
First Name	Robert
Last Name	Jones
Email	rjjonescl@gmail.com
Phone	4109770856
Address	9700 Old Court Rd, Suite J
City	Windsor Mill
State	Maryland
ZIP Code	21244
Case Number	2020-0222-A
Scheduled Hearing Date	Jan 5, 2021

1-4-20
Invited DW ✓

Edit Panelist Invitation List

You can select contacts from an existing address book, import a Comma or Tab Delimited file (file contains non-ASCII characters, use a Unicode file delimited either by commas or tabs) or add new contacts. Note that the number of invitation emails cannot exceed 10000.

[Select Contacts...](#)
[Import Contacts...](#)

Panelists to Invite

	Name	Email address	Phone number	Language	Time Zone	Locale
☐	Donna Mignon (Alternate Host)	dmignon@baltimorecountymd.gov	1-	English	New York Time	U.S.
☐	Henry Ayakwah (Alternate Host)	hayakwah@baltimorecountymd.gov	1-	English	New York Time	U.S.
☐	Maureen Murphy (Alternate Host)	mmurphy@baltimorecountymd.gov	1-	English	New York Time	U.S.
☐	Aaron Kensinger	akensinger@centuryeng.com	1-	English	New York Time	U.S.
☐	James Fox	jnf763@gmail.com	1-	English	New York Time	U.S.
☐	Jennifer Busse	jbusse@wtplaw.com	1-	English	New York Time	U.S.
☐	Paul Mayhew	pmayhew@baltimorecountymd.gov	1-	English	New York Time	U.S.
☐	Sister Carol Carne	srcarol@comcast.net	1-	English	New York Time	U.S.
☐	Sister Krystyna Mroczek	krystyna.mroczek@gmail.com	1-	English	New York Time	U.S.
☒	Robert Jones	rjonescl@gmail.com	1-	English	New York Time	U.S.

[Invite](#)
[Select All](#)
[Clear All](#)
[Delete](#)
[Cancel](#)

New Panelist

Full name: (required)

Email address: (required)

Phone number:

Time Zone: New York (Eastern Standard Time, GMT-05:00) ▼

Language: English ▼

Locale: U.S. ▼

☐ Add new panelist in my address book

☐ Invite as alternate host

1-5-21
11 Am

Donna Mignon

From: mert1114@aol.com
Sent: Friday, January 1, 2021 1:27 PM
To: Donna Mignon
Cc: Debra Wiley
Subject: 2nd set of certificates 2020-0222-A
Attachments: 1222 Tugwell 1A.docx; 1222 Tugwell 2A.docx

CAUTION: This message from mert1114@aol.com originated from a non Baltimore County Government or non BCPL email system. Hover over any links before clicking and use caution opening attachments.

Happy New Year, Marty.

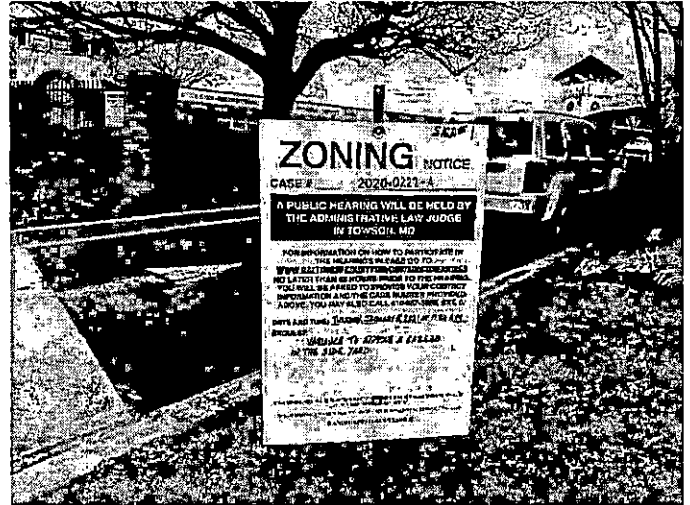
Sent from Mail for Windows 10
Martin Ogle

CASE NO. 2020-0222-A
PETITIONER/DEVELOPER
Whiteford Taylor Preston LLP.

Jennifer Busse

DATE OF HEARING/CLOSING

January 5, 2021



BALTIMORE COUNTY DEPARTMENT OF
PERMITS AND DEVELOPMENT MANAGEMENT
COUNTY OFFICE BUILDING ROOM 111
111 WEST CHESAPEAKE AVENUE
ATTENTION:

LADIES AND GENTLEMEN :

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

1222 Tugwell Drive

SIGN 1

THE SIGN(S) POSTED ON December 15, 2020 December 31, 2020
(MONTH, DAY, YEAR)

SINCERLEY,

MARTIN OGLE

MARTIN OGLE
9912 MAIDBROOK RD.
PARKVILLE ,MD 21234
443-629-3411

CERTIFICATE OF POSTING

CASE NO. 2020-0222-A

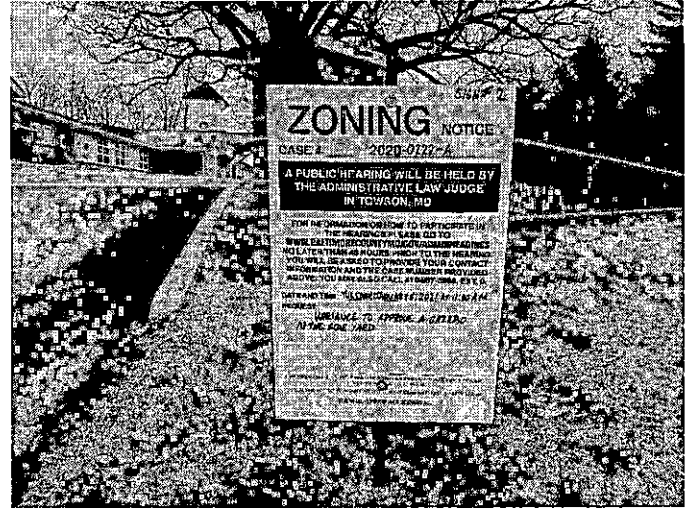
PETITIONER/DEVELOPER

Whiteford Taylor Preston LLP.

Jennifer Busse

DATE OF HEARING/CLOSING

January 5, 2021



BALTIMORE COUNTY DEPARTMENT OF
PERMITS AND DEVELOPMENT MANAGEMENT

COUNTY OFFICE BUILDING ROOM 111

111 WEST CHESAPEAKE AVENUE

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THE PROPERTY LOCATED AT

1222 Tugwell Drive

SIGN 2

THE SIGN(S) POSTED ON December 15, 2020 December 31, 2020
(MONTH, DAY, YEAR)

SINCERLEY ,

MARTIN OGLE

MARTIN OGLE

9912 MAIDBROOK RD.

PARKVILLE ,MD 21234

443-629-3411

1-5-21
11 AM

Debra Wiley

From: webmaster@baltimorecountymd.gov
Sent: Thursday, December 31, 2020 3:05 PM
To: Administrative Hearings
Subject: Request to Testify

Results of Form Submission

Request to Testify

Label	Value
First Name	James
Last Name	Fox
Email	jnf763@gmail.com
Phone	410-747-2235
Address	405 Newburg Ave
City	Catonsville
State	Maryland
ZIP Code	21228
Case Number	2000-0222-A
Scheduled Hearing Date	1/5/2021

✓ Initialed 12/31
3:14 pm

Edit Panelist Invitation List

You can select contacts from an existing address book, import a Comma or Tab Delimited file (file contains non-ASCII characters, use a Unicode file delimited either by commas or tabs) or add new contacts. Note that the number of invitation emails cannot exceed 10000.

[Select Contacts...](#)
[Import Contacts...](#)

Panelists to Invite

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☐	<u>Henry Ayakwah</u> (Alternate Host)	hayakwah@baltimorecountymd.gov	1-	English	New York Time	U.S.
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☐	<u>Aaron Kensinger</u>	akensinger@centuryeng.com	1-	English	New York Time	U.S.
☐	<u>Jennifer Busse</u>	jbusse@wtplaw.com	1-	English	New York Time	U.S.
☐	<u>Paul Mayhew</u>	pmayhew@baltimorecountymd.gov	1-	English	New York Time	U.S.
☐	<u>Robert "Bob" Jones</u>	rjonescl@gmail.com	1-	English	New York Time	U.S.
☐	<u>Sister Carol Carne</u>	srcarol@comcast.net	1-	English	New York Time	U.S.
☐	<u>Sister Krystyna Mroczek</u>	krystyna.mroczek@gmail.com	1-	English	New York Time	U.S.
☐	<u>James Fox</u>	jnf763@gmail.com	1-	English	New York Time	U.S.

[Invite](#)
[Select All](#)
[Clear All](#)
[Delete](#)
[Cancel](#)

New Panelist

Full name: (required)

Email address: (required)

Country/Region: Number (with area/city code):

Phone number:

Time Zone: ▼

Language: ▼

Locale: ▼

☐ Add new panelist in my address book

☐ Invite as alternate host

Debra Wiley

1/5/21
11 AM
2020-0222-A

From: Busse, Jennifer R. <jbusse@wtplaw.com>
Sent: Tuesday, December 29, 2020 12:57 PM
To: Donna Mignon; Debra Wiley; Administrative Hearings
Cc: srcarol@comcast.net
Subject: panelist for hearing on January 5th

CAUTION: This message from prvs=2632a860f0=jbusse@wtplaw.com originated from a non Baltimore County Government or non BCPL email system. Hover over any links before clicking and use caution opening attachments.

Hello!

Could you please send an invite to Sister Carol Carne for the hearing on January 5th?
Case 2020-222-A

Here is Sister Carne's contact info:

Sr. Carol Carne
Director of Community Affairs
st. Joseph's Nursing home
410-747-0026 ----- srcarol@comcast.net

✓ invited 12/29 1pm ✓ J.W.

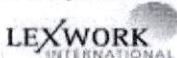
Previously we thought another representative would attend but she now has a conflict and thus we need to get an invite to Sister Carne.
Thank you!



Whiteford | Taylor | Preston^{LLP}

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](#) | www.wtplaw.com

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Edit Panelist Invitation List

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☐	<u>Jennifer Busse</u>	jbusse@wtplaw.com	1-	English	New York Time	U.S.
☐	<u>Paul Mayhew</u>	pmayhew@baltimorecountymd.gov	1-	English	New York Time	U.S.
☐	<u>Robert "Bob" Jones</u>	rjjonescl@gmail.com	1-	English	New York Time	U.S.
☐	<u>Sister Krystyna Mroczek</u>	krystyna.mroczek@gmail.com	1-	English	New York Time	U.S.
☐	<u>Sister Carol Carne</u>	srcarol@comcast.net	1-	English	New York Time	U.S.

New Panelist

Full name: (required)

Email address: (required)

Country/Region: Number (with area/city code):

Phone number:

Time Zone: ▼

Language: ▼

Locale: ▼

☐ Add new panelist in my address book

☐ Invite as alternate host

Real Property Data Search

Search Result for BALTIMORE COUNTY

View Map View GroundRent Redemption View GroundRent Registration

Special Tax Recapture: None

Account Identifier: District - 01 Account Number - 0119390860

Owner Information

Owner Name: SISTERS SERVANTS OF MARY IMMACULATE INC Use: EXEMPT COMMERCIAL
Principal Residence: NO
Mailing Address: 1220 TUGWELL DR Deed Reference: /01911/ 00227
BALTIMORE MD 21228

Location & Structure Information

Premises Address: 1220 TUGWELL DR Legal Description: 2.91 AC
BALTIMORE 21228- NES TUGWELL DR
260FT NE OF NEWBURG AV

Map:	Grid:	Parcel:	Neighborhood:	Subdivision:	Section:	Block:	Lot:	Assessment Year:	Plat No:
0101	0013	0482	10000.04	0000				2019	Plat Ref:

Town: None

Primary Structure Built	Above Grade Living Area	Finished Basement Area	Property Land Area	County Use
1958	62,230 SF		2.9100 AC	01

Stories	Basement	Type	Exterior	Quality	Full/Half Bath	Garage	Last Notice of Major Improvements
		CONVALESCENT HOSPITAL	/	C4			

Value Information

	Base Value	Value As of 01/01/2019	Phase-in Assessments As of 07/01/2020	As of 07/01/2021
Land:	582,000	582,000		
Improvements	4,480,400	6,050,100		
Total:	5,062,400	6,632,100	6,108,867	6,632,100
Preferential Land:	0	0		

Transfer Information

Seller:	Date:	Price:
RUFF CHARLES F	12/05/1950	\$0
Type: NON-ARMS LENGTH OTHER	Deed1: /01911/ 00227	Deed2:
Seller:	Date:	Price:
Type:	Deed1:	Deed2:
Seller:	Date:	Price:
Type:	Deed1:	Deed2:

Exemption Information

Partial Exempt Assessments:	Class	07/01/2020	07/01/2021
County:	780	6,108,867.00	6,632,100.00
State:	780	6,108,867.00	6,632,100.00
Municipal:	780	0.00 0.00	0.00 0.00

Special Tax Recapture: None

Homestead Application Information

Homestead Application Status: No Application

Homeowners' Tax Credit Application Information

Homeowners' Tax Credit Application Status: No Application Date:



✓
JOHN A. OLSZEWSKI, JR.
County Executive

✓ltr
✓order
MICHAEL D. MALLINOFF, Director
Department of Permits,
Approvals & Inspections

December 14, 2020

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 virtual hearing on the property identified herein as follows:

CASE NUMBER: 2020-0222-A

1222 Tugwell Drive

N/west side of Tulip Avenue, n/east of Magnolia Avenue

13th Election District – 1st Councilmanic District

Legal Owners: Sister Servants of Mary Immaculate, Inc.

Variance to approve a gazebo in the side yard.

Hearing: Tuesday, January 5, 2021 at 11:00 a.m.

For information on how to participate in the hearings please go to www.baltimorecountymd.gov/adminhearings no later than 48 hours prior to the hearing. You will be asked to provide your contact information and the case number provided above. You may also call 410-887-3868, ext. 0.

Handwritten signature of Michael Mallinoff.

Michael Mallinoff
Director

MM:kl

C: Jennifer Busse, 1 W. Pennsylvania Avenue, Ste. 300, Towson 21204
Sister Krystyna Mroczek, 1222 Tugwell Drive, Catonsville 21228

NOTES: (1) THE PETITIONER MUST HAVE THE ZONING NOTICE SIGN POSTED BY AN APPROVED POSTER ON THE PROPERTY BY WED., DECEMBER 16, 2020.

Lewis

Busse, Jennifer R. <jbusse@wtplaw.com>
Monday, December 14, 2020 1:54 PM
Kristen L Lewis
Aaron Kensinger; Bob Jones; krystyna.mroczek@gmail.com
Subject: zoning hearing for #222

CAUTION: This message from prvs=1617d4a2e0=jbusse@wtplaw.com originated from a non-Baltimore County Government or non-BCPL email system. Hover over any links before clicking and use caution opening attachments.

Hi Kristen!
Thanks so much for calling –
I got the voicemail about the hearing date/time of 1/5 at 11:00 a.m.
That is great!
Here are names and emails for necessary attendees :

Jennifer Busse -
jbusse@wtplaw.com

Sister Krystyna Mroczek -
Krystyna.mroczek@gmail.com

Robert ("Bob") Jones –
rjionescl@gmail.com

Aaron Kensinger (Century) –
akensinger@centuryeng.com



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](#) | www.wtplaw.com

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PANGAEA NET
Global Law Firm Network

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Debra Wiley

Subject: Web seminar scheduled: Zoning Hearing - Case No. 2020-0222-A - 1222 Tugwell Dr. - Sister Servants of Mary Immaculate, Inc.
Location: <https://baltimorecountymd.webex.com/baltimorecountymd/onstage/g.php?MTID=e39978ad8d5307c306efea00bf227bbe>
Start: Tue 1/5/2021 11:00 AM
End: Tue 1/5/2021 12:00 PM
Show Time As: Tentative
Recurrence: (none)
Meeting Status: Not yet responded
Organizer: webex

CAUTION: This message from messenger@webex.com originated from a non Baltimore County Government or non BCPL email system. Hover over any links before clicking and use caution opening attachments.

When it's time, start the Webex event here.

Host: Debra Wiley (dwiley@baltimorecountymd.gov)

Event number (access code): 180 486 1062

Tuesday, January 5, 2021 11:00 am, Eastern Standard Time (New York, GMT-05:00)

Event address for attendees:

<https://baltimorecountymd.webex.com/baltimorecountymd/onstage/g.php?MTID=e39978ad8d5307c306efea00bf227bbe>

Event address for panelists:

<https://baltimorecountymd.webex.com/baltimorecountymd/onstage/g.php?MTID=e86c2be22aaa3937a4de9010fe8a>



Audio conference information

+1-415-655-0001 US Toll

Global call-in numbers

Join from a video system or application

Dial 1804861062@baltimorecountymd.webex.com

You can also dial 173.243.2.68 and enter your meeting number.

Panelist numeric password: 897953

If you are a host, click here to view host information:

<https://baltimorecountymd.webex.com/baltimorecountymd/j.php?MTID=ee3c08165787a5addf03d5960d5721f04>.

Need help? Go to <http://help.webex.com>

Donna Mignon

From: Busse, Jennifer R. <jbusse@wtplaw.com>
Sent: Tuesday, December 15, 2020 1:06 PM
To: Kristen L Lewis; Donna Mignon
Subject: posting for Case #222
Attachments: IMG_3653.jpg; ATT00001.txt; IMG_3654.jpg; ATT00002.txt

CAUTION: This message from prvs=1618076781=jbusse@wtplaw.com originated from a non Baltimore County Government or non BCPL email system. Hover over any links before clicking and use caution opening attachments.

Hello!

Attached is proof of posting for Case #222 set to be heard on 1/5

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 | www.wtplaw.com

-----Original Message-----

From: Marty Ogle <mert1114@aol.com>
Sent: Tuesday, December 15, 2020 11:54 AM
To: Busse, Jennifer R. <jbusse@wtplaw.com>
Subject: [EXTERNAL] Pictures

Paperwork to follow.

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IN RE: PETITIONS FOR SPECIAL HEARING * BEFORE THE
 AND VARIANCE – SW/S Hilton Terrace, * ZONING COMMISSIONER
 125.09' SW of the c/I Newburg Avenue * OF BALTIMORE COUNTY
 (315 Newburg Ave. & 1222 Tugwell Dr.) *
 1st Election District *
 1st Council District *
 * Case No. 02-418-SPHA
 Sisters Servants of Mary Immaculate, Inc. *
 Petitioners *

* * * * *

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This matter comes before the Zoning Commissioner for consideration of Petitions for Special Hearing and Variance filed by the owners of the subject property, Sisters Servants of Mary Immaculate, Inc., by Sister Krystyna Mrocek, through their attorney, John V. Murphy, Esquire. The Petitioners request a special hearing to approve an amendment to the special exception relief granted in prior Case No. 3928-X to allow an addition to an existing nursing home, which will increase the number of beds from 40 to 44 and provide other amenities; and, to permit parking for commercial use in a residential zone. Additionally, the Petitioners request variance relief from Section 1B01.2.C.1.a of the Baltimore County Zoning Regulations (B.C.Z.R.) to permit a rear yard setback of 8 feet in lieu of the required 50 feet; from Section 1B01.1.B.1.a(1) to permit a portion of the proposed addition to be located within the 100-foot Residential Transition Area (RTA); and, from Section 1B01.1.B.1.e(3) to permit parking and storm water management facilities to be located within the 50-foot RTA buffer. The subject property and requested relief are more particularly described on the site plan submitted which was accepted into evidence and marked as Petitioner's Exhibit 1.

Appearing at the requisite public hearing in support of the request were Sister Krystyna Mrocek, on behalf of Sisters Servants of Mary Immaculate, Inc., property owners; Blair G. Farrand, the Registered Landscape Architect who prepared the site plan for this property; Richard

ORDER RECEIVED FOR FILING

Date

By

6/16/02
 [Signature]

L. Mitchell, a Title Abstractor; and John V. Murphy, Esquire, attorney for the Petitioners. There were no Protestants or other interested persons present.

Testimony and evidence presented revealed that the subject property is an irregular shaped parcel located near the southeast corner of the intersection of Newburg Avenue and Tugwell Drive in Catonsville. The property is actually comprised of two parcels, both owned by the Petitioners, which contain a combined gross area of 4.308 acres, more or less, zoned D.R.2. Although the Petitioners own other adjacent properties in this neighborhood, those parcels are not part of the instant Petition. The layout of the subject property is more particularly described on the site plan submitted as Petitioner's Exhibit 1.

As shown on the site plan, the predominant portion of the property is located with frontage on Tugwell Drive and is improved with a one-story brick and frame nursing home containing 21,000 sq.ft. The building was constructed in 1959 and has been used for many years as an assisted living facility, which currently features 40 beds. Testimony indicated that the existing facility is cramped and improvements are proposed to enlarge same by 14,000 sq.ft. Although the addition is large, many of the existing semi-private rooms will be converted to private rooms and the capacity of the site will be increased only by 4 additional beds.

In addition to the nursing home building and proposed addition, the site also features a 2.5 story stone and stucco building which serves as a convent for the Sisters. There are no improvements proposed for that building. The third building on the lot is a small one-story frame garage, which can accommodate up to 4 automobiles. All three of the buildings are located on the main portion of the tract which fronts on Tugwell Drive. The second parcel, which makes up the subject tract, abuts Newburg Avenue and is undeveloped. Over the years, the two parcels have been used in conjunction with one another to provide access to the nursing home. However, while preparing their plans for the addition, the Petitioners discovered that the two parcels are actually separated by a 30-foot in-fee right-of-way owned by the Trustees of the Community College of Baltimore County. In this regard, the Community College of Baltimore County at Catonsville is located nearby. Apparently, many years ago, the Trustees of the Community College acquired a

30-foot strip leading to their campus from Newburg Avenue. It was indicated at the hearing that this strip is not utilized and indeed is not paved. From a practical standpoint, it is impossible, owing to the existence of mature trees and vegetation. Mr. Mitchell, a Title Abstractor, testified as to the history of the deeds and that for all practical purposes, the strip has been used by the Sisters as part of their property for many years. It bears emphasis that the strip does not abut the Sisters' land, but actually bisects the property into two parcels, the larger piece fronting Tugwell Drive and the smaller parcel fronting Newburg Avenue. Counsel for the Petitioners indicated that steps would be taken to see if the strip can be acquired from the Trustees of the Community College in an effort to "clean up" the title for the subject property.

In any event, the matter comes before the undersigned Zoning Commissioner for consideration of the Petition for Special Hearing and Variances as set forth above. The primary purpose of the special hearing is to accommodate the proposed addition to the nursing home, which will provide needed amenities and space for residents. In addition, access to the property will be improved. The plan shows a new entry drive to be constructed from Tugwell Drive. An existing exit onto Tugwell Drive will be retained, as will access from Newburg Avenue. In sum, it appears that the planned expansion is reasonable and appropriate. The proposal will make better use of the property. I am persuaded that the Petition for Special Hearing should be granted and that the proposal meets the requirements set out for Special Exception relief under Section 502.1 of the B.C.Z.R.

In addition to the special hearing relief, a series of variances are requested as set out above. These variances are generated due to the uniqueness of the property as a result of the right-of-way, which bisects the lot. The internal lot line created by this right-of-way is located 8 feet from the rear of the proposed expansion. Thus, the rear setback relief is requested. Additionally, the right-of-way line impacts the required RTA buffers. It is to be particularly noted that the proposed improvements to the property meet all tract boundary setbacks and that variance relief is required only because of the internal lot line caused by the 30-foot right-of-way.

ORDER REVIEWED FOR FILING

Date

By

Based upon the testimony and evidence offered, I am persuaded that the property is unique. Indeed, this is one of the more interesting properties in the area owing to its unusual configuration and the right-of-way described above. To deny the Petition for Variance would surely cause a practical difficulty upon the Petitioners. Moreover, I am easily persuaded that relief can be granted without detrimental impact to adjacent properties.

In sum, I am easily persuaded to grant the Petitions for Special Hearing and Variance. The Petitioners' plans represent an upgrade to the property and to deny the Petitions will result in an undue burden upon the applicant.

Pursuant to the advertisement, posting of the property and public hearing on these Petitions held, and for the reasons set forth herein, the relief requested shall be granted.

THEREFORE, IT IS ORDERED by the Zoning Commissioner for Baltimore County this 16th day of June, 2002 that the Petition for Special Hearing to approve an amendment to the special exception relief granted in prior Case No. 3928-X to allow an addition to an existing nursing home, which will increase the number of beds from 40 to 44 and provide other amenities, and, to permit parking for commercial use in a residential zone, in accordance with Petitioner's Exhibit 1, be and is hereby GRANTED; and,

IT IS FURTHER ORDERED that the Petition for Variance seeking relief from Section 1B01.2.C.1.a of the Baltimore County Zoning Regulations (B.C.Z.R.) to permit a rear yard setback of 8 feet in lieu of the required 50 feet; from Section 1B01.1.B.1.a(1) to permit a portion of the proposed addition to be located within the 100-foot Residential Transition Area (RTA); and from Section 1B01.1.B.1.e(3) to permit parking and storm water management facilities to be located within the 50-foot RTA buffer, in accordance with Petitioner's Exhibit 1, be and is hereby GRANTED, subject to the following restrictions:

- 1) The Petitioners may apply for their building permit and be granted same upon receipt of this Order; however, Petitioners are hereby made aware that proceeding at this time is at their own risk until the 30-day appeal period from the date of this Order has expired. If an appeal is filed and this Order is reversed, the relief granted herein shall be rescinded.

- 2) In the event the Petitioners acquire the 30-foot right-of-way strip, an amended site plan incorporating the in-fee simple strip into the Petitioner's property, shall be submitted to the Department of Permits and Development Management (DPDM) for inclusion in the case file.
- 3) A new deed shall be recorded in the land Records of Baltimore County referencing this case and the restrictions of this Order.

LES:bjs


LAWRENCE E. SCHMIDT
Zoning Commissioner
for Baltimore County

ORDER RECEIVED FOR FILING

Date 6/10/02

By [Signature]

List of Exhibits

Case 2020-222-A

Hearing Date: 1/5/21

Time: 11:00 a.m.

Petitioner's Exhibits

1. Posting Certificate
2. Planning Comment
3. C.V. of Aaron Kensinger
4. Redlined Site plan
5. Aerial
6. Photos of site
7. Photo of proposed style of gazebo

1/14/21
LJH
2-17-21

WHITEFORD, TAYLOR & PRESTON L.L.P.

JENNIFER R. BUSSE
DIRECT LINE (410) 832-2077
DIRECT FAX (410) 339-4027
jbusse@wtplaw.com

TOWSON COMMONS, SUITE 300
ONE WEST PENNSYLVANIA AVENUE
TOWSON, MARYLAND 21204-5025
MAIN TELEPHONE (410) 832-2000
FACSIMILE (410) 832-2015

1-5-21
11 Am

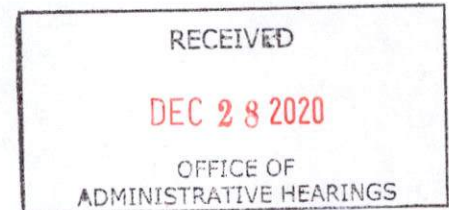
DELAWARE*
DISTRICT OF COLUMBIA
KENTUCKY
MARYLAND
MICHIGAN
NEW YORK
PENNSYLVANIA
VIRGINIA

WWW.WTPLAW.COM
(800) 987-8705

December 28, 2020

VIA HAND DELIVERY

Honorable Paul M. Mayhew, Administrative Law Judge
Office of Administrative Hearings
Jefferson Building, Suite 103
105 W. Chesapeake Avenue
Towson, Maryland 21204



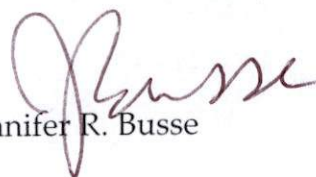
Re: **Sister Servants of Mary Immaculate**
Case No. 2020-222-A

Dear Judge Mayhew:

Enclosed are the Exhibits, along with an Exhibit list, for the hearing set to be heard on January 5, 2021. I have emailed these over as well.

Thank you, and please let me know if you have any questions or concerns.

Sincerely,


Jennifer R. Busse

JRB:tdm
Enclosures
11614980

CERTIFICATE OF POSTING

CASE NO. 2020-0222-A

PETITIONER/DEVELOPER

Whiteford Taylor Preston LLP.

Jennifer Busse

DATE OF HEARING/CLOSING

January 5, 2021

BALTIMORE COUNTY DEPARTMENT OF
PERMITS AND DEVELOPMENT MANAGEMENT

COUNTY OFFICE BUILDING ROOM 111

111 WEST CHESAPEAKE AVENUE

ATTENTION:

LADIES AND GENTLEMEN :

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

1222 Tugwell Drive

SIGN 1

THE SIGN(S) POSTED ON December 15, 2020

(MONTH, DAY, YEAR)

SINCERLEY ,

MARTIN OGLE

MARTIN OGLE

9912 MAIDBROOK RD.

PARKVILLE ,MD 21234

443-629-3411



EXHIBIT

tabbles

1

CERTIFICATE OF POSTING

CASE NO. 2020-0222-A

PETITIONER/DEVELOPER

Whiteford Taylor Preston LLP.

Jennifer Busse

DATE OF HEARING/CLOSING

January 5, 2021

BALTIMORE COUNTY DEPARTMENT OF
PERMITS AND DEVELOPMENT MANAGEMENT

COUNTY OFFICE BUILDING ROOM 111

111 WEST CHESAPEAKE AVENUE

ATTENTION:

LADIES AND GENTLEMEN :

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

1222 Tugwell Drive

SIGN 2

THE SIGN(S) POSTED ON December 15, 2020

(MONTH, DAY, YEAR)

SINCERLEY ,

MARTIN OGLE

MARTIN OGLE

9912 MAIDBROOK RD.

PARKVILLE ,MD 21234

443-629-3411



BALTIMORE COUNTY, MARYLAND

INTER-OFFICE MEMORANDUM

TO: Michael D. Mallinoff
Director, Department of Permits, Approvals and Inspections

DATE: 9/23/2020

FROM: C. Pete Gutwald
Director, Department of Planning

SUBJECT: ZONING ADVISORY COMMITTEE COMMENTS
Case Number: 20-222

INFORMATION:

Property Address: 1222 Tugwell Drive
Petitioner: Sister Krystyna Mroczek - Sister Servants of Mary Immaculate, Inc.
Zoning: DR 2
Requested Action: Variance

The Department of Planning has reviewed the petition for Variance from Section 400.1 of the Baltimore County Zoning Regulations to approve a gazebo in the side yard. The subject property is in Catonsville. There is an existing Nursing home built in 1956 at the site. There is an existing octagonal gazebo (28'X28') to the west of the exiting building. The applicant is now proposing an additional octagonal gazebo (16'X16') adjacent to the existing gazebo.

A site visit was conducted on September 18, 2020. The site is subject to Patapsco Heritage Area Management Plan, Southwest Baltimore County Revitalization Strategy and Western Baltimore County Pedestrian and Bicycle Access Plan.

The Department of Planning has no objections to granting the petitioned zoning relief. However, the scale, proportions and detailing of the proposed structure should be compatible to the existing one.

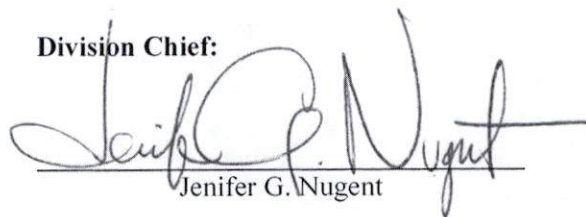
For further information concerning the matters stated herein, please contact Josephine Selvakumar at 410-887-3480.

Prepared by:



Krystle Patchak

Division Chief:



Jenifer G. Nugent

CPG/JGN/KP/

c: Josephine Selvakumar
Jennifer R. Busse, Esquire
Office of the Administrative Hearings
People's Counsel for Baltimore County



Aaron Kensinger, P.E.

Education:

M. Eng. Civil Engineering, University of Maryland College Park (2012)
B.S. Natural Resource Management, University of Maryland College Park (1999)

Certifications:

Professional Engineer (P.E.) #45681, State of Maryland
Professional Engineer (P.E.) #61093, State of Montana

Experience:

November, 2003 – Present

Senior Project Manager, Little & Associates (a division of Century Engineering, Inc.), Hunt Valley, MD

- Directly responsible for all aspects of land development projects, including:
 - o Writing proposals and evaluating site potential with the client
 - o Creation of development strategy
 - o Community meeting presentations and jurisdictional hearings
 - o Preparation of engineered site designs and the processing of all plans through pertinent jurisdictions for approvals; coordinate permit filing
 - o Performing construction inspection and preparation of as-built report packages
 - o Project closeout
- Thorough experience in commercial and residential development, including several national retailers and developers
- Very strong design experience in road, water, sanitary sewer, storm water management, sediment control, grading, flood studies, and environmental site design (ESD)
- Thorough AutoCAD, HEC-RAS, hydrology and hydraulics software knowledge
- Keen understanding of environmental permitting procedures, including wetland and critical area mitigation, through the U.S.A.C.O.E. and local jurisdictions
- Strong communication skills in discussing projects with clients and keeping them informed throughout the process
- Coordinate the hiring and training of new employees

Winter session, 2006 and 2007

Lecturer, Civil Engineering Department, University of Maryland College Park

- Created and taught a formal AutoCAD course to undergraduate and graduate level engineering students at the request of the Civil Engineering Department
- Wrote the syllabus, created course handouts, lecture notes, and design examples

August, 2000 – October, 2003

Engineering Technician, Maryland Department of Agriculture, Easton, Maryland

- Designed erosion control structures; manure control structures; wetland mitigation projects
- Performed field surveys
- Performed construction stakeout and construction inspection
- Performed as-built surveys and drawings
- Was selected to be on the committee which implemented AutoCAD and total station survey methods into the Department of Agriculture, both at the state and federal level
- Designed training seminars and taught other employees at these seminars in the use of AutoCAD and total station data collection methods
- Helped to create CADD standards for the Department of Agriculture



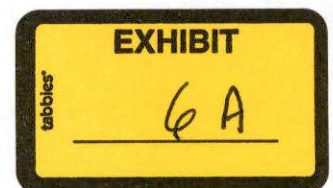
Sister's Servant #1222 Tugwell Drive, Catonsville, MD



Area of existing walk where the proposed gazebo will tie in



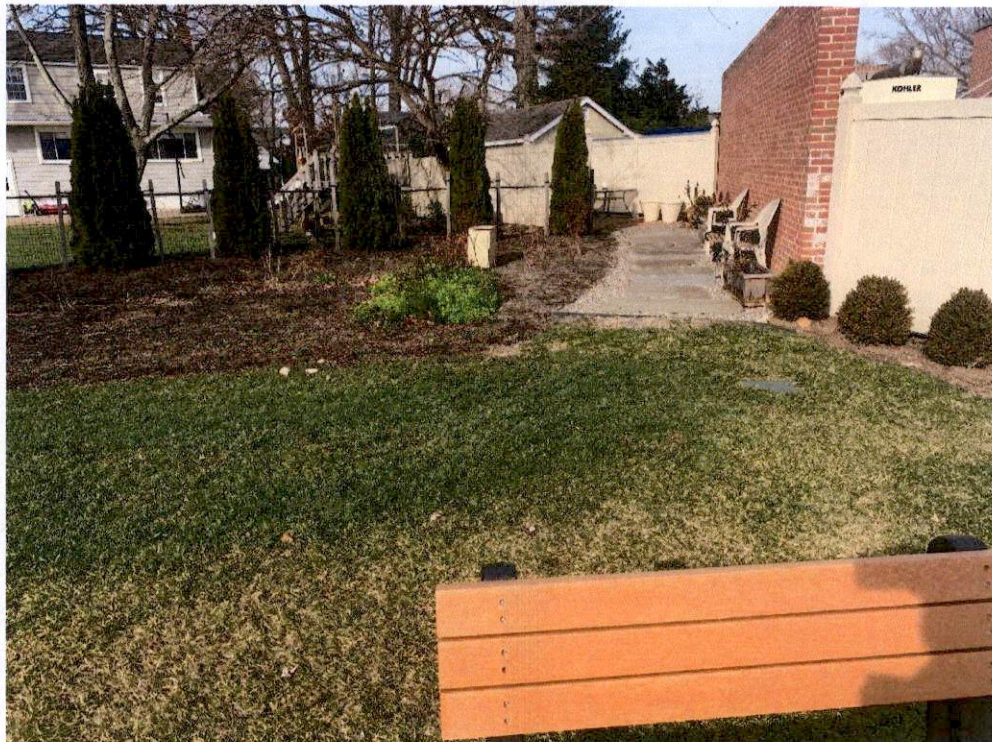
Closeup of area where the proposed gazebo will tie in



Sister's Servant #1222 Tugwell Drive, Catonsville, MD



Looking west at bench area and grass area where gazebo will be located.



Closeup of grass area where gazebo will be located.

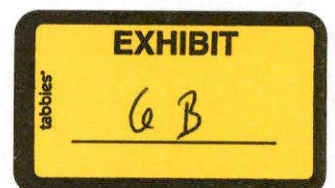




EXHIBIT
7

[illegible]

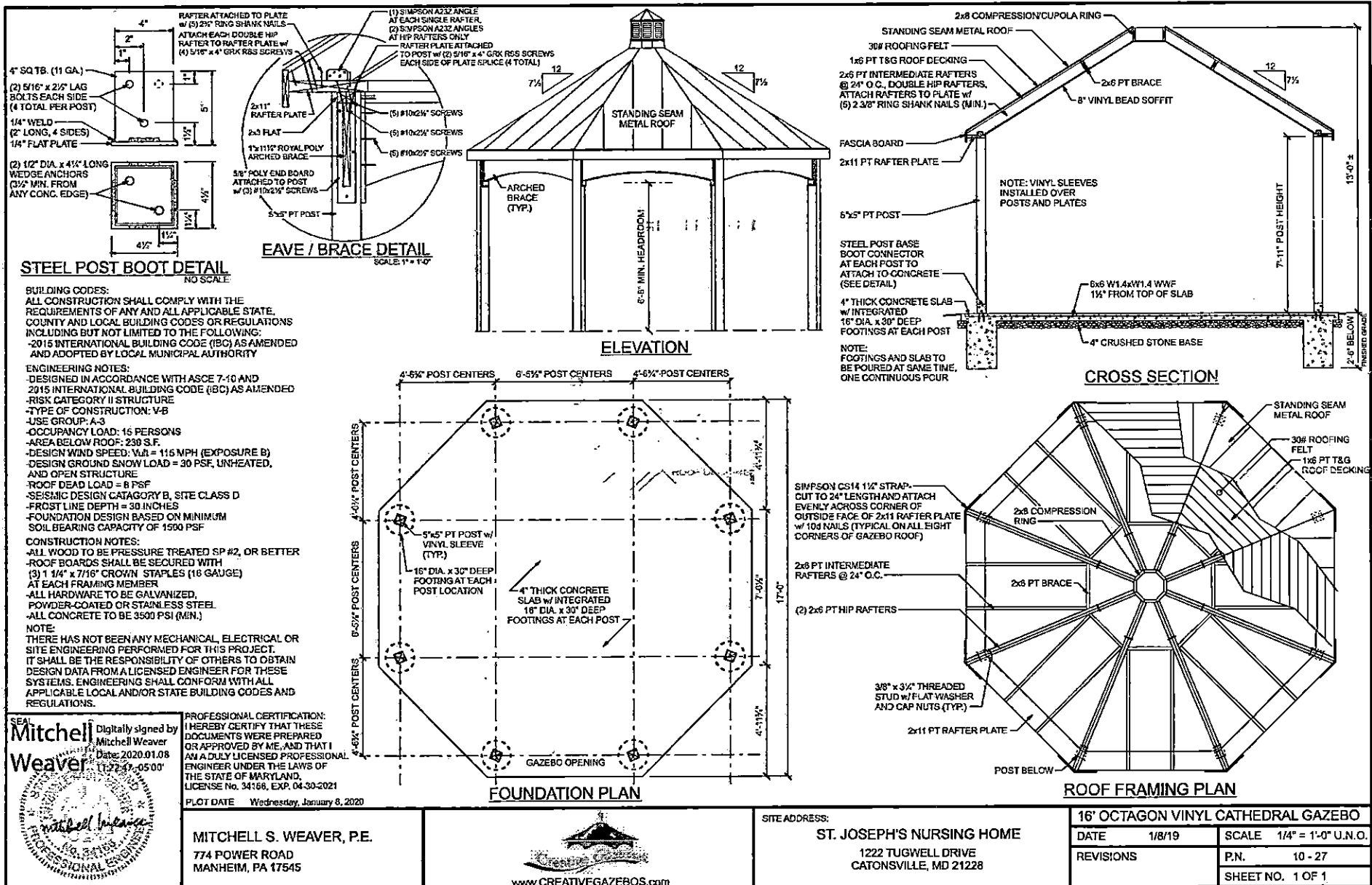
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OR MANNER TO A THIRD PARTY
WITHOUT THE WRITTEN PERMISSION OF
A REPRESENTATIVE OF
CORPUS LASCIVIA, ETC.

COURTYARD PLANTING PLAN
NOTE ADAPTED FROM A DESIGN
PRODUCED BY NORTH FORT, LLC

DATE: NOVEMBER 12, 2009
 BY: P. J. BOG
 DRAWN BY: PAUL GREENE
 DESIGN BY: PAUL GREENE
 SHEET: 1 OF 1



Debra Wiley

1-5-21
11 AM
2020-0222-A

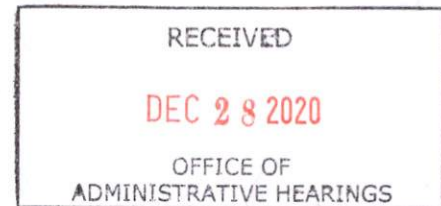
From: Martin, Tammy <TMartin@wtplaw.com>
Sent: Monday, December 28, 2020 12:01 PM
To: Administrative Hearings
Subject: FW: HEARING EXHIBITS - SISTER SERVANTS
Attachments: EXHIBIT LIST.PDF; EXHIBIT 1.PDF; EXHIBIT 2.PDF; EXHIBIT 3.PDF; EXHIBIT 4.PDF; EXHIBIT 5.PDF; EXHIBIT 6A.PDF; EXHIBIT 6B.PDF; EXHIBIT 7.PDF

CAUTION: This message from prvs=2631c93189=tmartin@wtplaw.com originated from a non Baltimore County Government or non BCPL email system. Hover over any links before clicking and use caution opening attachments.

Hi again, I am resending Sister Servants to you as well (splitting up the Exhibits as separate attachments). Please let me know if you need anything else. Thanks so much.



Tammy D. Martin, Legal Administrative Assistant to
George S. Lawler, Esq.
John B. Gontrum, Esq.
Jennifer R. Busse, Esq.
Brenda Price, Paralegal
Whiteford, Taylor & Preston LLP
One W. Pennsylvania Avenue, Suite 300
Towson, MD 21204
Direct Dial - 410-832-2122
Direct Fax - 410-339-4016
tmartin@wtplaw.com



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PANGAEA NET
MEMBER OF THE NETWORK OF INDEPENDENT LAW FIRMS

From: Martin, Tammy
Sent: Thursday, December 24, 2020 12:51 PM
To: 'Administrative Hearings' <administrativehearings@baltimorecountymd.gov>
Cc: jbusse@wtplaw.com
Subject: FW: HEARING EXHIBITS - SISTER SERVANTS

Sending on behalf of Jennifer Busse:

Attached are the exhibits for the Hearing for Sister Servants (Case No. 2020-222-A) to be held on January 5, 2021.

Please acknowledge receipt and let me know if you need anything else. Thanks so much.



Tammy D. Martin, Legal Administrative Assistant to
George S. Lawler, Esq.

John B. Gontrum, Esq.
Jennifer R. Busse, Esq.
Brenda Price, Paralegal
Whiteford, Taylor & Preston LLP
One W. Pennsylvania Avenue, Suite 300
Towson, MD 21204
Direct Dial - 410-832-2122
Direct Fax - 410-339-4016
tmartin@wtplaw.com

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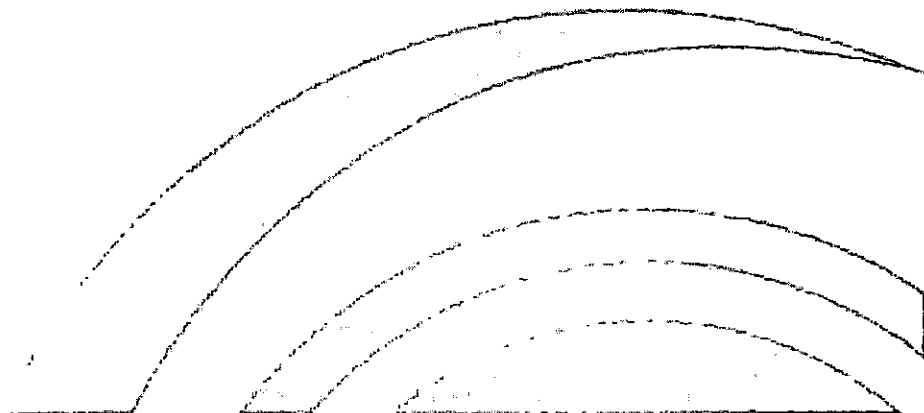
PANGEA NET

From: Martin, Tammy <TMartin@wtplaw.com>
Sent: Thursday, December 24, 2020 12:19 PM
To: Martin, Tammy <TMartin@wtplaw.com>
Subject: HEARING EXHIBITS - SISTER SERVANTS

Copitrak Scan Notification



Your Scan File Is Attached



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List of Exhibits
Case 2020-222-A
Hearing Date: 1/5/21
Time: 11:00 a.m.

Petitioner's Exhibits

1. Posting Certificate
2. Planning Comment
3. C.V. of Aaron Kensinger
4. Redlined Site plan
5. Aerial
6. Photos of site
7. Photo of proposed style of gazebo

CERTIFICATE OF POSTING

CASE NO. 2020-0222-A

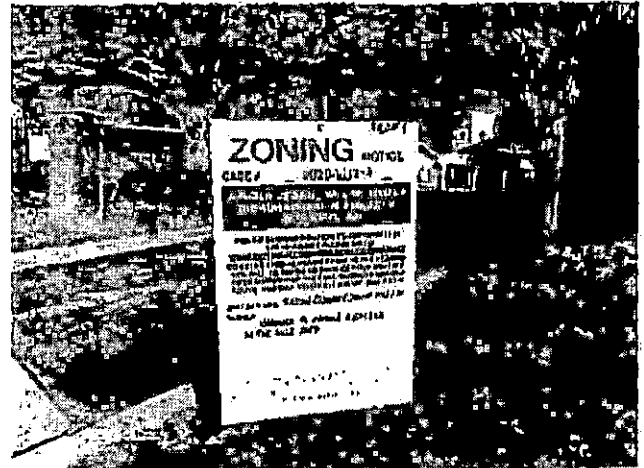
PETITIONER/DEVELOPER

Whiteford Taylor Preston LLP.

Jennifer Busse

DATE OF HEARING/CLOSING

January 5, 2021



BALTIMORE COUNTY DEPARTMENT OF
PERMITS AND DEVELOPMENT MANAGEMENT

COUNTY OFFICE BUILDING ROOM 111

111 WEST CHESAPEAKE AVENUE

ATTENTION:

LADIES AND GENTLEMEN :

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

1222 Tugwell Drive

SIGN 1

THE SIGN(S) POSTED ON December 15, 2020
(MONTH, DAY, YEAR)

SINCERLEY ,

MARTIN OGLE

MARTIN OGLE

9912 MAIDBROOK RD.

PARKVILLE ,MD 21234

443-629-3411

EXHIBIT

CERTIFICATE OF POSTING

CASE NO. 2020-0222-A

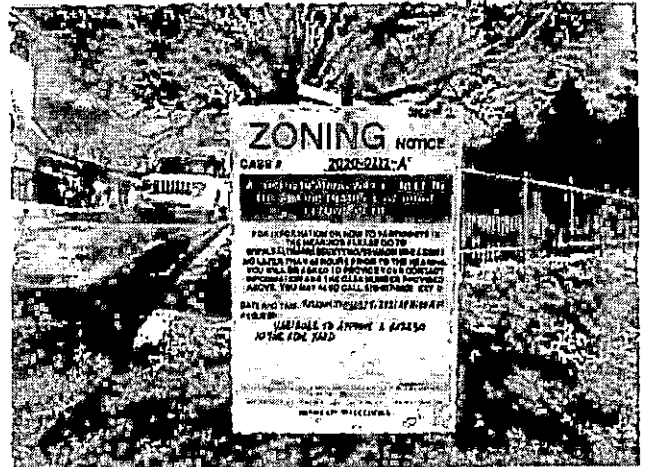
PETITIONER/DEVELOPER

Whiteford Taylor Preston LLP.

Jennifer Busse

DATE OF HEARING/CLOSING

January 5, 2021



BALTIMORE COUNTY DEPARTMENT OF
PERMITS AND DEVELOPMENT MANAGEMENT
COUNTY OFFICE BUILDING ROOM 111
111 WEST CHESAPEAKE AVENUE

ATTENTION:

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THIS LETTER IS TO CERTIFY UNDER PENALTIES OF PERJURY THAT THE
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THE PROPERTY LOCATED AT

1222 Tugwell Drive

SIGN 2

THE SIGN(S) POSTED ON December 15, 2020
(MONTH, DAY, YEAR)

SINCERLEY,

MARTIN OGLE

MARTIN OGLE

9912 MAIDBROOK RD.

PARKVILLE, MD 21234

443-629-3411

**BALTIMORE COUNTY, MARYLAND
INTER-OFFICE MEMORANDUM**

TO: Michael D. Mallinoff
Director, Department of Permits, Approvals and Inspections

DATE: 9/23/2020

FROM: C. Pete Gutwald
Director, Department of Planning

SUBJECT: ZONING ADVISORY COMMITTEE COMMENTS
Case Number: 20-222

INFORMATION:

Property Address: 1222 Tugwell Drive
Petitioner: Sister Krystyna Mroczek - Sister Servants of Mary Immaculate, Inc.
Zoning: DR 2
Requested Action: Variance

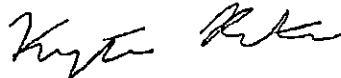
The Department of Planning has reviewed the petition for Variance from Section 400.1 of the Baltimore County Zoning Regulations to approve a gazebo in the side yard. The subject property is in Catonsville. There is an existing Nursing home built in 1956 at the site. There is an existing octagonal gazebo (28'X28') to the west of the exiting building. The applicant is now proposing an additional octagonal gazebo (16'X16') adjacent to the existing gazebo.

A site visit was conducted on September 18, 2020. The site is subject to Patapsco Heritage Area Management Plan, Southwest Baltimore County Revitalization Strategy and Western Baltimore County Pedestrian and Bicycle Access Plan.

The Department of Planning has no objections to granting the petitioned zoning relief. However, the scale, proportions and detailing of the proposed structure should be compatible to the existing one.

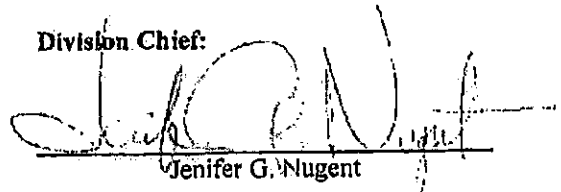
For further information concerning the matters stated herein, please contact Josephine Selvakumar at 410-887-3480.

Prepared by:



Krystle Patchak

Division Chief:



Jennifer G. Nugent

CPG/JGN/KP/

c: Josephine Selvakumar
Jennifer R. Busse, Esquire
Office of the Administrative Hearings
People's Counsel for Baltimore County



Aaron Kensinger, P.E.

Education:

M. Eng. Civil Engineering, University of Maryland College Park (2012)
B.S. Natural Resource Management, University of Maryland College Park (1999)

Certifications:

Professional Engineer (P.E.) #45681, State of Maryland
Professional Engineer (P.E.) #61093, State of Montana

Experience:

November, 2003 – Present

Senior Project Manager, Little & Associates (a division of Century Engineering, Inc.), Hunt Valley, MD

- Directly responsible for all aspects of land development projects, including:
 - o Writing proposals and evaluating site potential with the client
 - o Creation of development strategy
 - o Community meeting presentations and jurisdictional hearings
 - o Preparation of engineered site designs and the processing of all plans through pertinent jurisdictions for approvals; coordinate permit filing
 - o Performing construction inspection and preparation of as-built report packages
 - o Project closeout
- Thorough experience in commercial and residential development, including several national retailers and developers
- Very strong design experience in road, water, sanitary sewer, storm water management, sediment control, grading, flood studies, and environmental site design (ESD)
- Thorough AutoCAD, HEC-RAS, hydrology and hydraulics software knowledge
- Keen understanding of environmental permitting procedures, including wetland and critical area mitigation, through the U.S.A.C.O.E. and local jurisdictions
- Strong communication skills in discussing projects with clients and keeping them informed throughout the process
- Coordinate the hiring and training of new employees

Winter session, 2006 and 2007

Lecturer, Civil Engineering Department, University of Maryland College Park

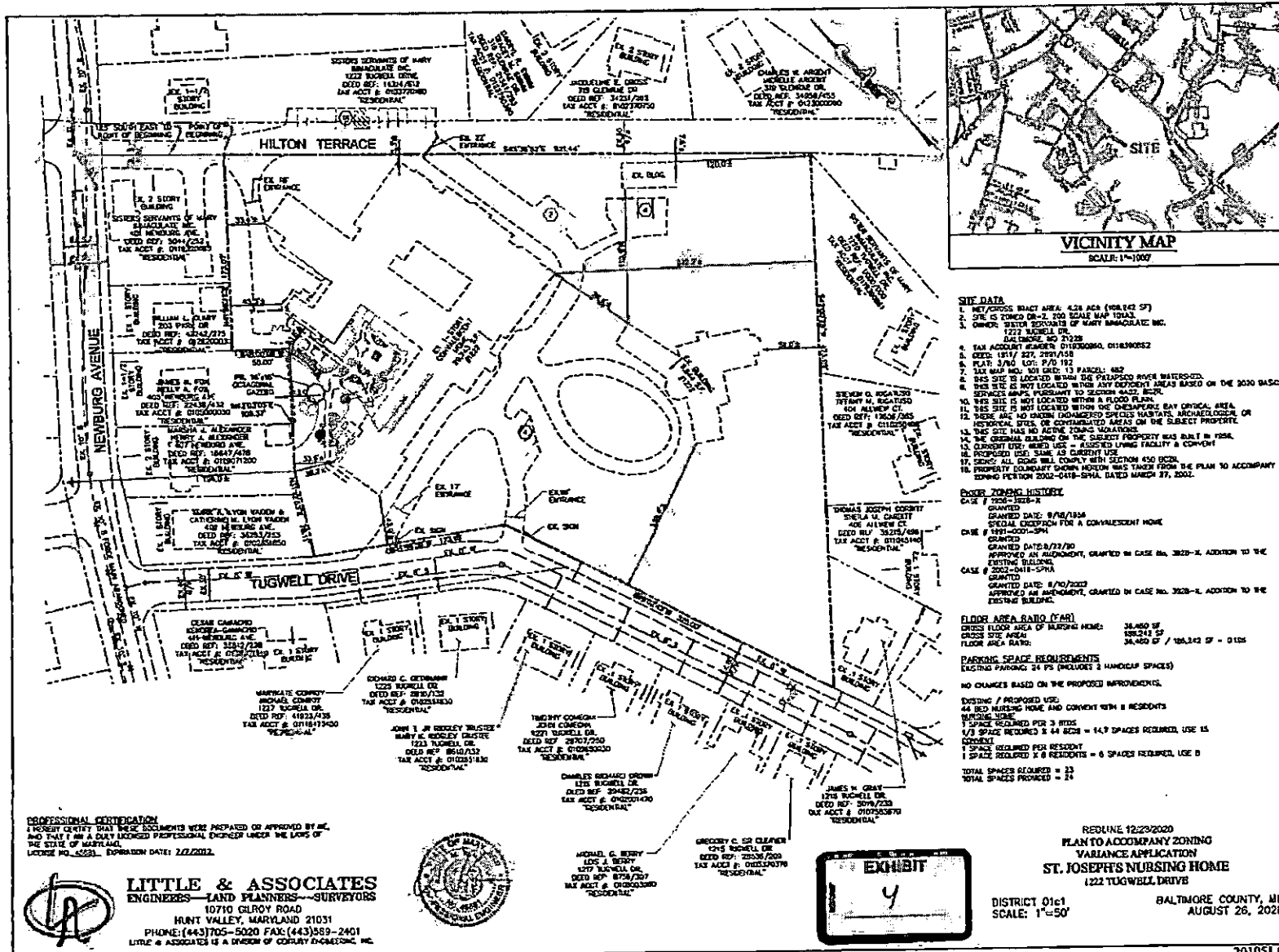
- Created and taught a formal AutoCAD course to undergraduate and graduate level engineering students at the request of the Civil Engineering Department
- Wrote the syllabus, created course handouts, lecture notes, and design examples

August, 2000 – October, 2003

Engineering Technician, Maryland Department of Agriculture, Easton, Maryland

- Designed erosion control structures; manure control structures; wetland mitigation projects
- Performed field surveys
- Performed construction stakeout and construction inspection
- Performed as-built surveys and drawings
- Was selected to be on the committee which implemented AutoCAD and total station survey methods into the Department of Agriculture, both at the state and federal level
- Designed training seminars and taught other employees at these seminars in the use of AutoCAD and total station data collection methods
- Helped to create CADD standards for the Department of Agriculture





SITE DATA
1. NET/CROSS RACE AREA: 428 ACRES (TOTAL 57)
2. SITE IS ZONED OR-2, 200 SCALE MAP 100A.
3. OWNER: ST. JOSEPH'S NURSING HOME, INC.
1222 RUSSELL DR.
BALTIMORE, MD 21228
4. TAX ACCOUNT NUMBER: 0100000000, 0100000002
5. DEED: 1817 / 227, 2891/158
6. PLAT: 3/10 LOT: P/D 182
7. TAX MAP NO.: 501 GRID: 13 PARCEL: 482
8. THIS SITE IS LOCATED WITHIN THE PATAPSCO RIVER WATERSHED.
9. THIS SITE IS NOT LOCATED WITHIN ANY POTENTIAL BAY CRITICAL AREA.
10. THIS SITE IS NOT LOCATED WITHIN A FLOOD PLAIN.
11. THERE ARE NO KNOWN ENDANGERED SPECIES HABITATS, ARCHAEOLOGICAL OR
HISTORICAL SITES, OR CONVENTIONAL AREAS ON THE SUBJECT PROPERTY.
12. THERE ARE NO KNOWN ENDANGERED SPECIES HABITATS, ARCHAEOLOGICAL OR
HISTORICAL SITES, OR CONVENTIONAL AREAS ON THE SUBJECT PROPERTY.
13. THIS SITE HAS NO ACTIVE ZONING VIOLATIONS.
14. THE ORIGINAL BUILDING ON THE SUBJECT PROPERTY WAS BUILT IN 1958.
15. CURRENT USE: NURSING HOME - ASSOCIATED LIVING FACILITY & CONVENT
16. PROPOSED USE: SAME AS CURRENT USE
17. ZONING: ALL CODES WILL COMPLY WITH SECTION 450 DCPL
18. PROPERTY BOUNDARY SHOWN HEREON WAS TAKEN FROM THE PLAN TO ACCOMPANY
ZONING PETITION 2002-0418-SHA, DATED MARCH 27, 2002.

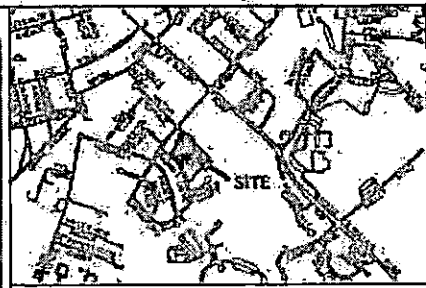
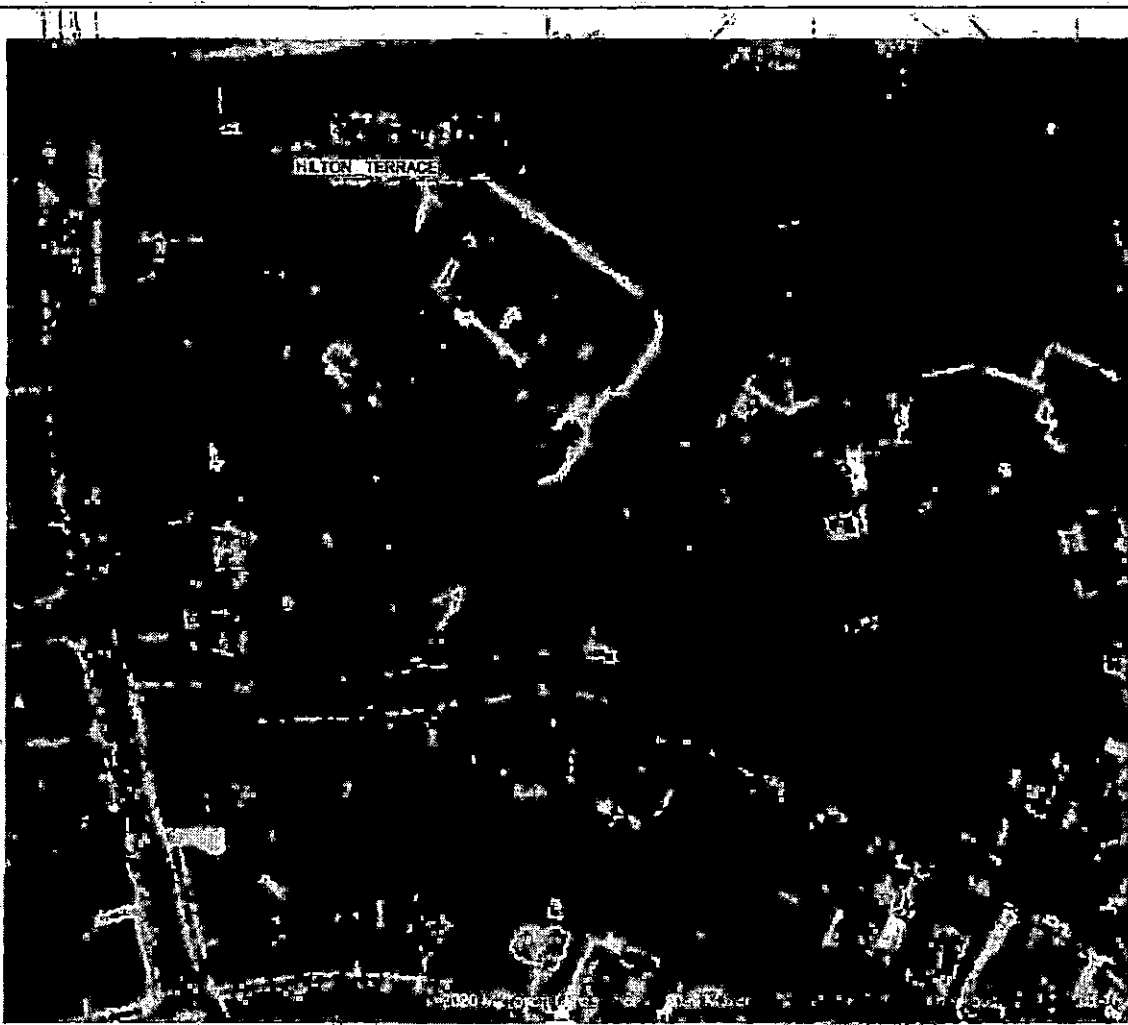
POWER ZONING HISTORY
CASE # 1991-0001-SHA
GRANTED
GRANTED DATE: 8/18/1994
SPECIAL EXCEPTION FOR A CONVALESCENT HOME
CASE # 1991-0001-SHA
GRANTED
GRANTED DATE: 8/23/90
APPROVED AN AMENDMENT, GRANTED IN CASE NO. 3822-S, ADDITION TO THE
EXISTING BUILDING.
CASE # 2002-0418-SHA
GRANTED
GRANTED DATE: 8/10/2002
APPROVED AN AMENDMENT, GRANTED IN CASE NO. 3822-S, ADDITION TO THE
EXISTING BUILDING.

FLOOR AREA RATIO (FAR)
EXISTING FLOOR AREA OF NURSING HOME: 36,460 SF
GROSS SITE AREA: 180,343 SF
FLOOR AREA RATIO: 36,460 SF / 180,343 SF = 0.202

PARKING SPACE REQUIREMENTS
EXISTING PARKING: 24 SPACES (INCLUDES 2 HANDICAP SPACES)

NO CHANGES BASED ON THE PROPOSED IMPROVEMENTS.

EXISTING / PROPOSED USE:
44 BED NURSING HOME AND CONVENT WITH 8 RESIDENTS
WORKING SPACE:
1/3 SPACE REQUIRED PER 3 BEDS = 14.7 SPACES REQUIRED, USE 15
1/3 SPACE REQUIRED PER RESIDENT = 8 SPACES REQUIRED, USE 8
TOTAL SPACES REQUIRED = 23
TOTAL SPACES PROVIDED = 24



VICINITY MAP
SCALE 1"=50'



LITTLE & ASSOCIATES
ENGINEERS—LAND PLANNERS—SURVEYORS
10710 CLROY ROAD
HUNT VALLEY, MARYLAND 21031
PHONE: (443) 705-5020 FAX: (443) 589-2401
LITTLE & ASSOCIATES IS A DIVISION OF CENTURY ENGINEERING, INC.

MICHAEL G. BERRY
LTS & SURV
1227 TUGWELL DR
DTCO 871 8706/207
146 ACCT P. 0102000000
"RESIDENTIAL"

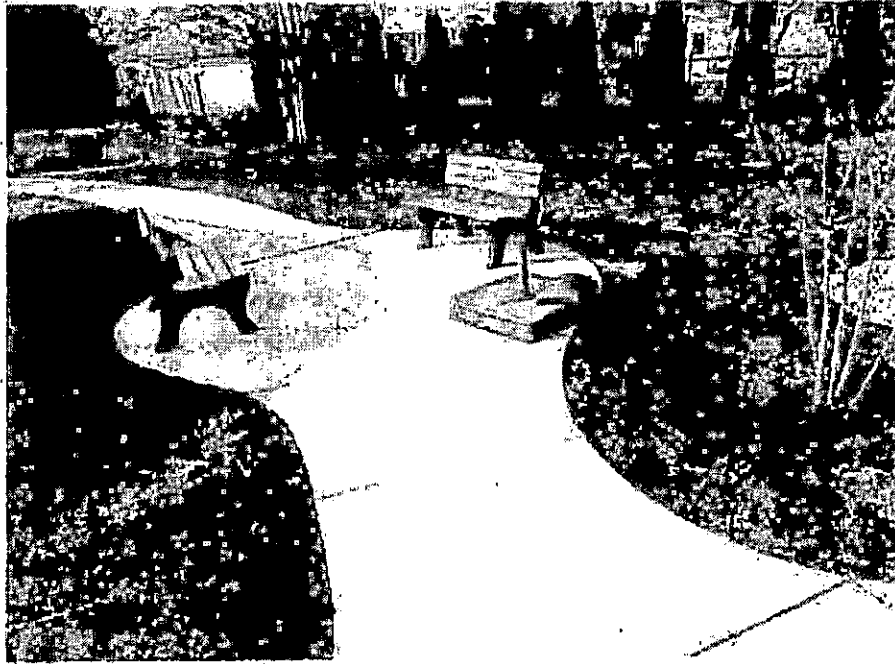
1216 TUGWELL DR
DTCO REF. 20570/208
146 ACCT P. 0102000000
"RESIDENTIAL"

AERIAL SITE PLAN
ST. JOSEPH'S NURSING HOME
1222 TUGWELL DRIVE

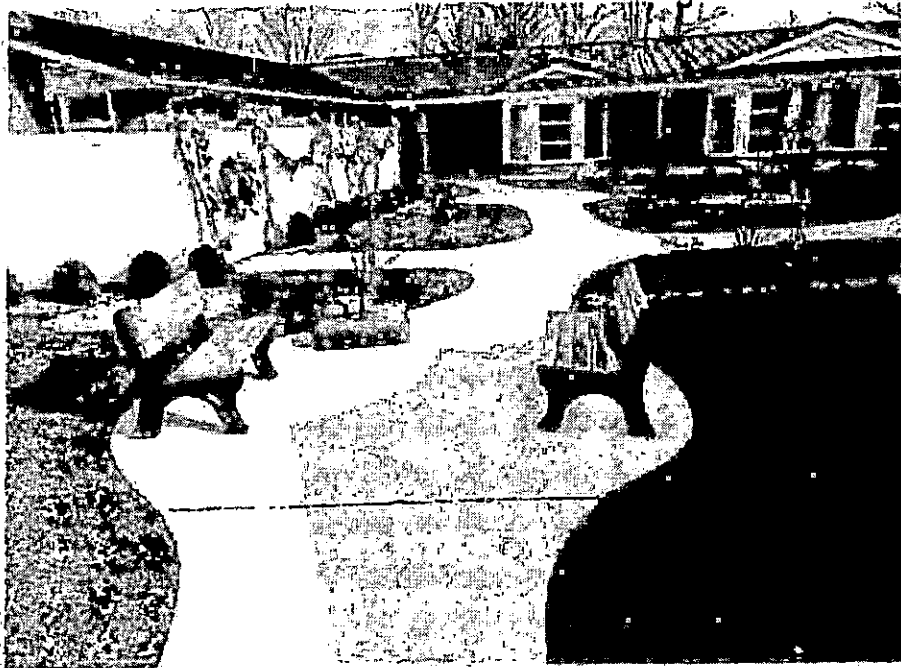
DISTRICT 0101
SCALE: 1"=50'

BALTIMORE COUNTY, MD
DECEMBER 23, 2020

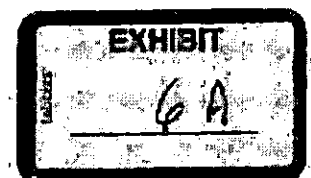
Sister's Servant #1222 Tugwell Drive, Catonsville, MD



Area of existing walk where the proposed gazebo will tie in



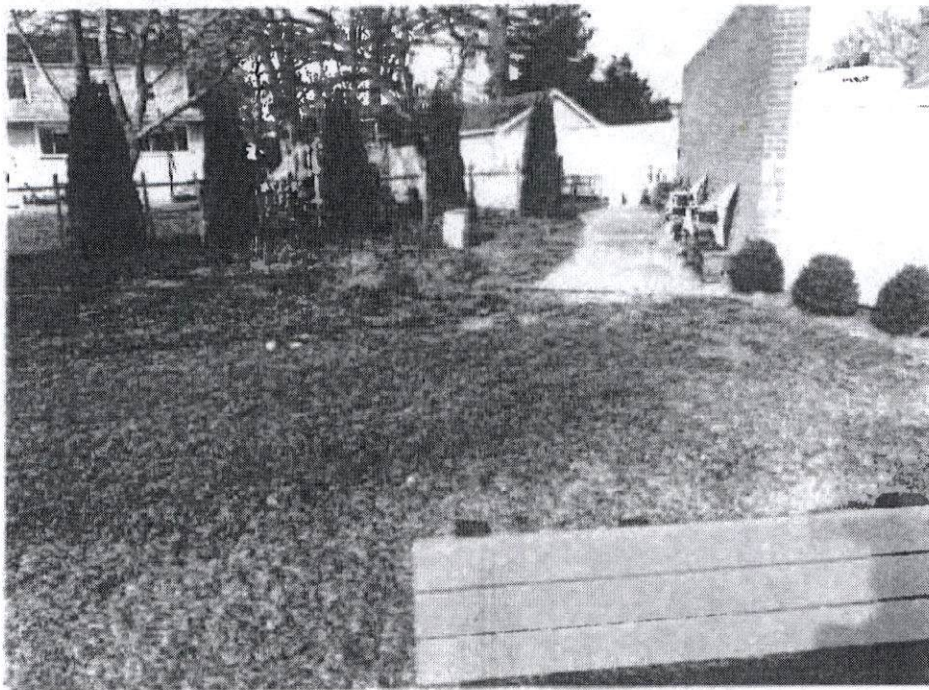
Closeup of area where the proposed gazebo will tie in



Sister's Servant #1222 Tugwell Drive, Catonsville, MD



Looking west at bench area and grass area where gazebo will be located.



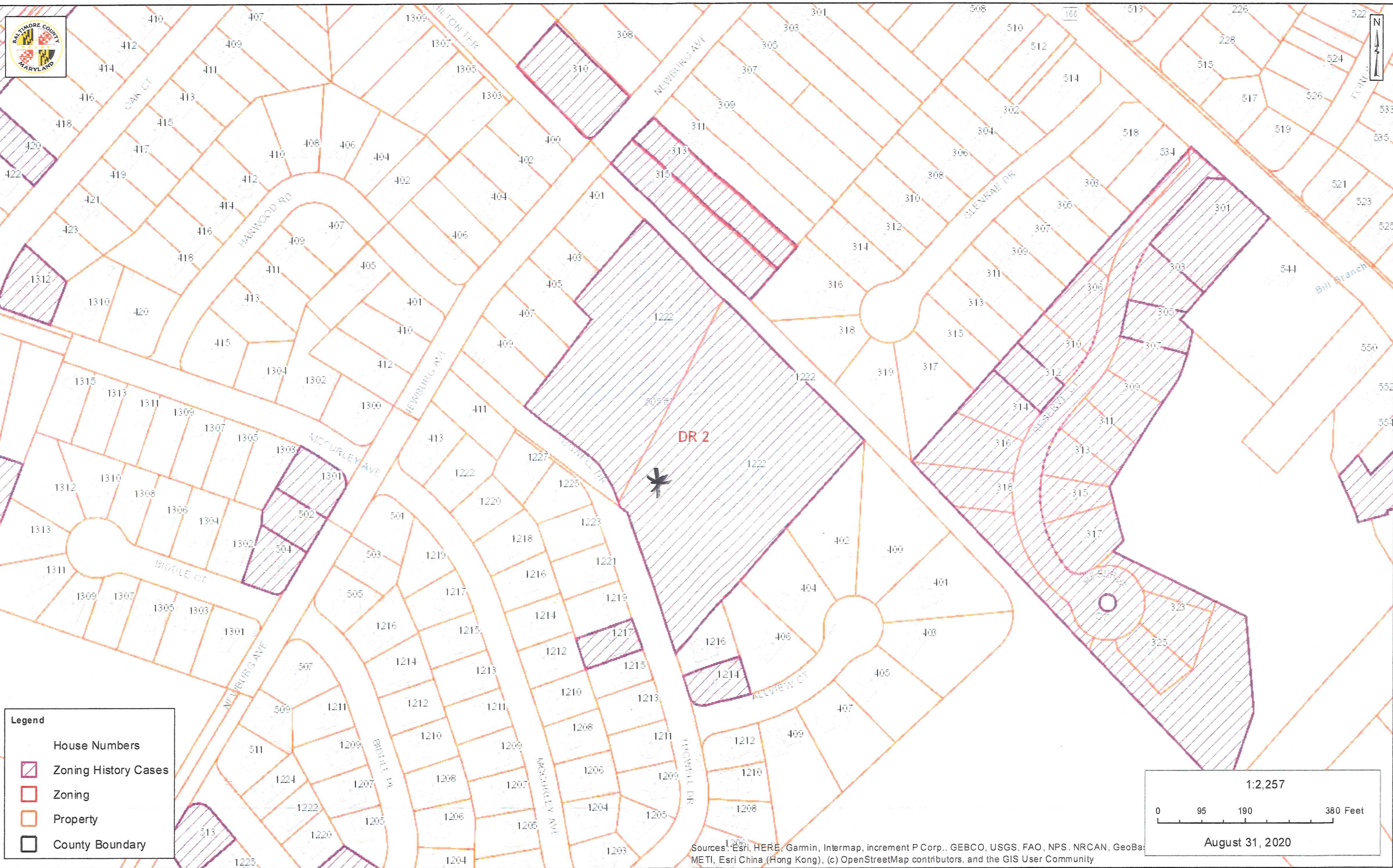
Closeup of grass area where gazebo will be located.

EXHIBIT

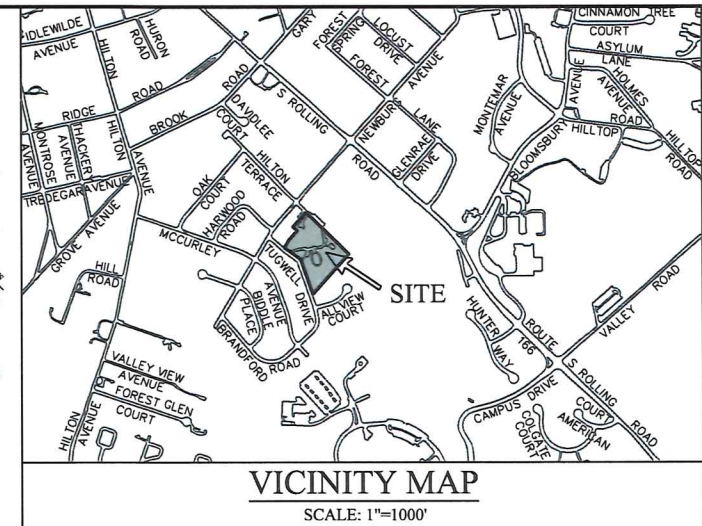
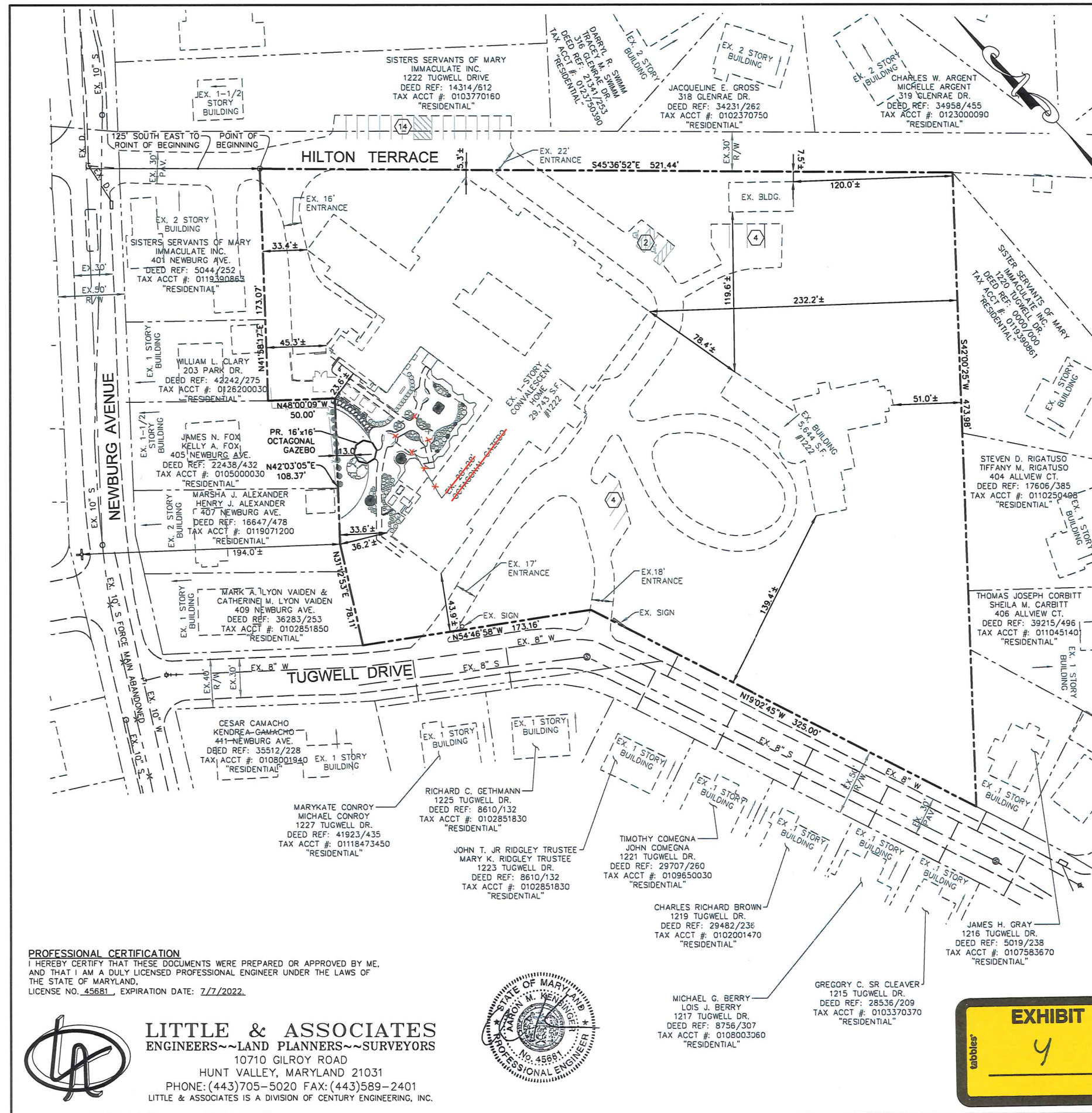
6 B



Baltimore County - My Neighborhood



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBasis, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



- SITE DATA**
- NET/GROSS TRACT AREA: 4.28 AC± (186,242 SF)
 - SITE IS ZONED DR-2, 200 SCALE MAP 101A3.
 - OWNER: SISTERS SERVANTS OF MARY IMMACULATE INC.
1222 TUGWELL DR.
BALTIMORE, MD 21228
 - TAX ACCOUNT NUMBER: 0119390860, 0119390862
 - DEED: 1911/ 227, 2891/158
 - PLAT: 3/90 LOT: P/O 192
 - TAX MAP NO.: 101 GRID: 13 PARCEL: 482
 - THIS SITE IS LOCATED WITHIN THE PATAPSCO RIVER WATERSHED.
 - THIS SITE IS NOT LOCATED WITHIN ANY DEFICIENT AREAS BASED ON THE 2020 BASIC SERVICES MAPS, PURSUANT TO SECTION 4A02, BCZR.
 - THIS SITE IS NOT LOCATED WITHIN A FLOOD PLAIN.
 - THIS SITE IS NOT LOCATED WITHIN THE CHESAPEAKE BAY CRITICAL AREA.
 - THERE ARE NO KNOWN ENDANGERED SPECIES HABITATS, ARCHAEOLOGICAL OR HISTORICAL SITES, OR CONTAMINATED AREAS ON THE SUBJECT PROPERTY.
 - THIS SITE HAS NO ACTIVE ZONING VIOLATIONS.
 - THE ORIGINAL BUILDING ON THE SUBJECT PROPERTY WAS BUILT IN 1956.
 - CURRENT USE: MIXED USE - ASSISTED LIVING FACILITY & CONVENT
 - PROPOSED USE: SAME AS CURRENT USE
 - SIGNS: ALL SIGNS WILL COMPLY WITH SECTION 450 BCZR.
 - PROPERTY BOUNDARY SHOWN HEREON WAS TAKEN FROM THE PLAN TO ACCOMPANY ZONING PETITION 2002-0418-SPHA, DATED MARCH 27, 2002.

- PRIOR ZONING HISTORY**
- CASE # 1956-3928-X
GRANTED
GRANTED DATE: 9/18/1956
SPECIAL EXCEPTION FOR A CONVALESCENT HOME
- CASE # 1991-0001-SPH
GRANTED
GRANTED DATE: 8/22/90
APPROVED AN AMENDMENT, GRANTED IN CASE No. 3928-X. ADDITION TO THE EXISTING BUILDING.
- CASE # 2002-0418-SPHA
GRANTED
GRANTED DATE: 6/10/2002
APPROVED AN AMENDMENT, GRANTED IN CASE No. 3928-X. ADDITION TO THE EXISTING BUILDING.

FLOOR AREA RATIO (FAR)

GROSS FLOOR AREA OF NURSING HOME:	36,460 SF
GROSS SITE AREA:	186,242 SF
FLOOR AREA RATIO:	36,460 SF / 186,242 SF = 0.196

PARKING SPACE REQUIREMENTS

EXISTING PARKING: 24 PS (INCLUDES 2 HANDICAP SPACES)

NO CHANGES BASED ON THE PROPOSED IMPROVEMENTS.

EXISTING / PROPOSED USE:
44 BED NURSING HOME AND CONVENT WITH 8 RESIDENTS
NURSING HOME
1 SPACE REQUIRED PER 3 BEDS
1/3 SPACE REQUIRED X 44 BEDS = 14.7 SPACES REQUIRED, USE 15
CONVENT
1 SPACE REQUIRED PER RESIDENT
1 SPACE REQUIRED X 8 RESIDENTS = 8 SPACES REQUIRED, USE 8

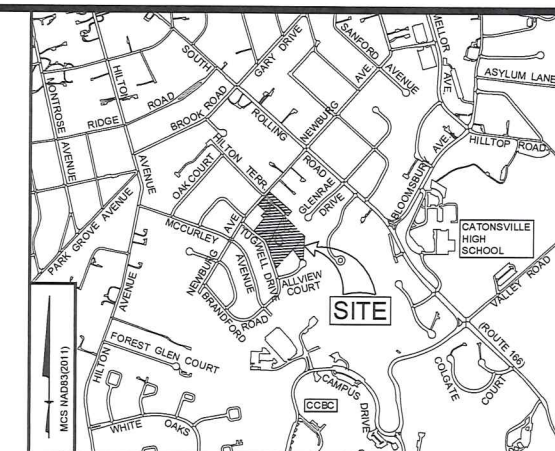
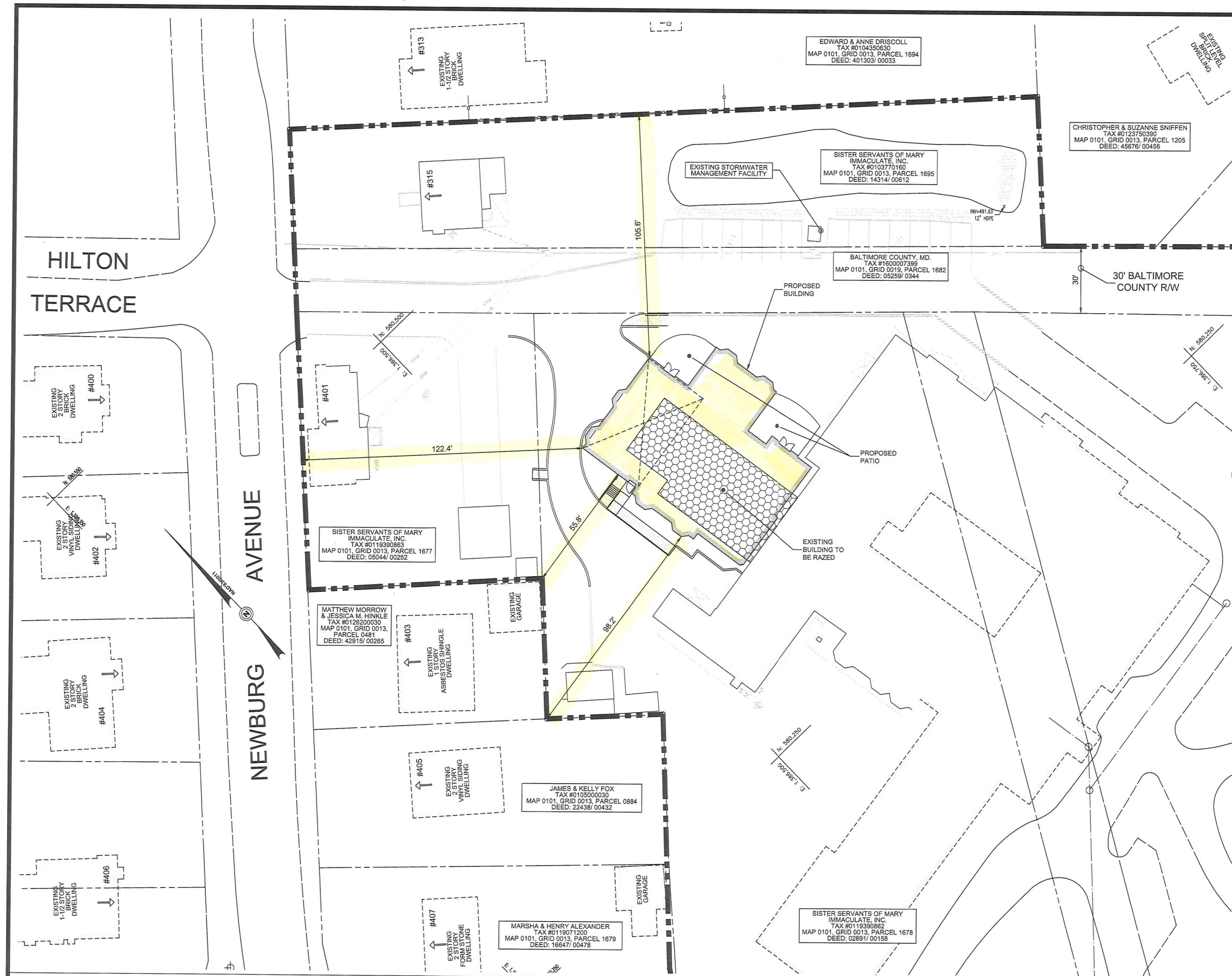
TOTAL SPACES REQUIRED = 23
TOTAL SPACES PROVIDED = 24

PROFESSIONAL CERTIFICATION
I 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. 45681, EXPIRATION DATE: 7/7/2022.

LITTLE & ASSOCIATES
ENGINEERS~LAND PLANNERS~SURVEYORS
10710 GILROY ROAD
HUNT VALLEY, MARYLAND 21031
PHONE: (443) 705-5020 FAX: (443) 589-2401
LITTLE & ASSOCIATES IS A DIVISION OF CENTURY ENGINEERING, INC.

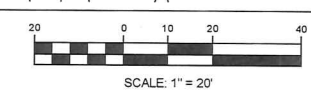


REDLINE 12/23/2020
PLAN TO ACCOMPANY ZONING
VARIANCE APPLICATION
ST. JOSEPH'S NURSING HOME
1222 TUGWELL DRIVE
DISTRICT 01c1
SCALE: 1"=50'
BALTIMORE COUNTY, MD
AUGUST 26, 2020



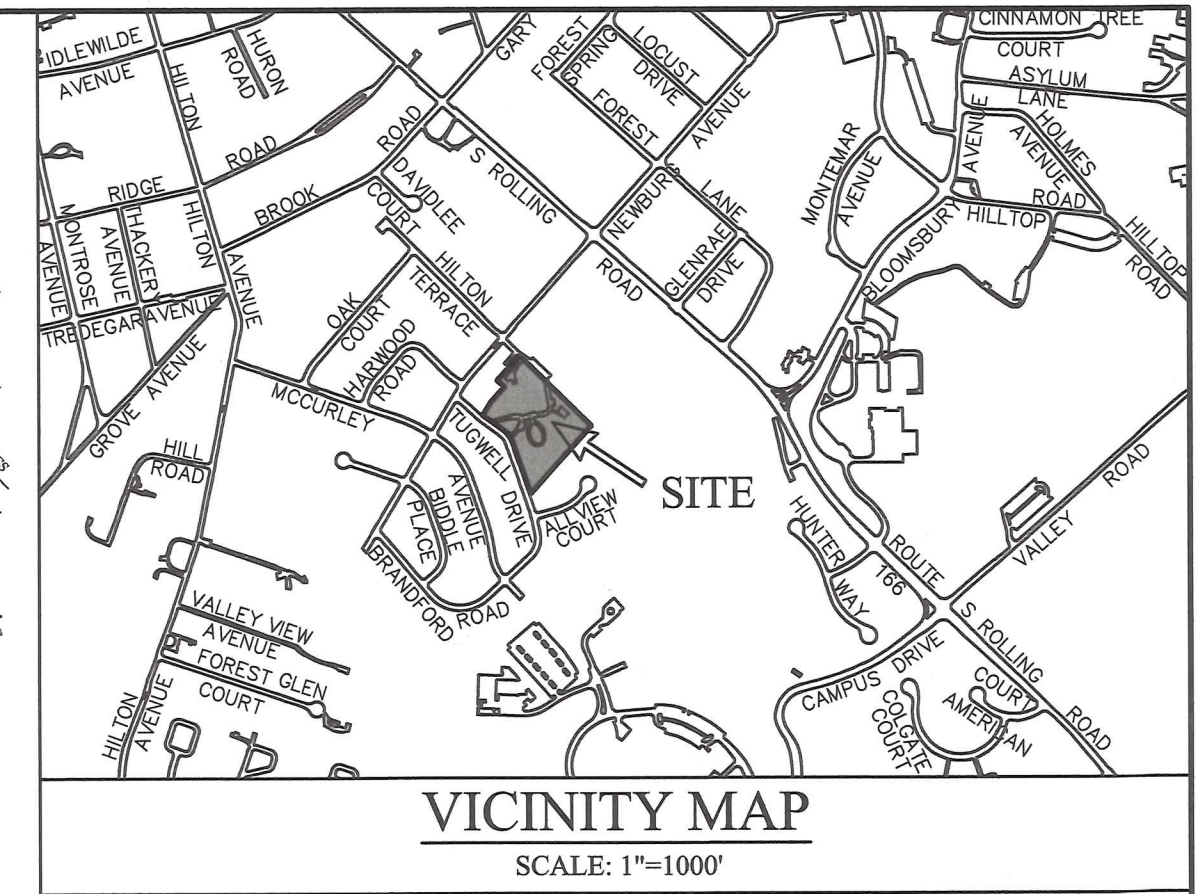
VICINITY MAP
SCALE: 1" = 1000'

PLAN
SCALE: 1" = 20'



MCS

SET-BACK SITE PLAN				
SAINT JOSEPH'S NURSING HOME				
1222 TUGWELL DRIVE				
TAX MAP: 0101, GRID: 0013 BALTIMORE COUNTY, MARYLAND 21228				
ELECTION DISTRICT: ONE COUNCILMANIC DISTRICT: ONE				
Colbert Matz Rosenfelt				
Engineers * Surveyors * Planners				
2835 Smith Avenue, Suite G Baltimore, Maryland 21209				
Telephone: (410) 653-3838 Facsimile: (410) 653-7953				
Professional Certification				
I 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. 12311				
Expiration Date: 02/09/2023				
SCALE: 1" = 20'				
DATE: JUNE 20, 2022				
JOB NO.: 2021091				
DESIGNED: KBH				
DRAWN: KBH				
CHECKED: KBH				
FILE: 2021091 BASE				
DRAWING NUMBER: RTA EXHIBIT				
NO.	DATE	REVISIONS:	BY	SHEET 1 OF 1



1. NET/GROSS TRACT AREA: 4.28 AC± (186,242 SF)
2. SITE IS ZONED DR-2, 200 SCALE MAP 101A3.
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BALTIMORE, MD 21228
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5. DEED: 1911/ 227, 2891/158
6. PLAT: 3/90 LOT: P/O 192
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10. THIS SITE IS NOT LOCATED WITHIN A FLOOD PLAIN.
11. THIS SITE IS NOT LOCATED WITHIN THE CHESAPEAKE BAY CRITICAL AREA.
12. THERE ARE NO KNOWN ENDANGERED SPECIES HABITATS, ARCHAEOLOGICAL OR HISTORICAL SITES, OR CONTAMINATED AREAS ON THE SUBJECT PROPERTY.
13. THIS SITE HAS NO ACTIVE ZONING VIOLATIONS.
14. THE ORIGINAL BUILDING ON THE SUBJECT PROPERTY WAS BUILT IN 1956.
15. CURRENT USE: MIXED USE – ASSISTED LIVING FACILITY & CONVENT
16. PROPOSED USE: SAME AS CURRENT USE
17. SIGNS: ALL SIGNS WILL COMPLY WITH SECTION 450 BCZR.
18. PROPERTY BOUNDARY SHOWN HEREON WAS TAKEN FROM THE PLAN TO ACCOMPANY ZONING PETITION 2002-0418-SPHA, DATED MARCH 27, 2002.

CASE # 1956-3928-X
GRANTED
GRANTED DATE: 9/18/1956
SPECIAL EXCEPTION FOR A CONVALESCENT HOME

CASE # 1991-0001-SPH
GRANTED
GRANTED DATE: 8/22/90
APPROVED AN AMENDMENT, GRANTED IN CASE No. 3928-X. ADDITION TO THE
EXISTING BUILDING.

CASE # 2002-0418-SPHA
GRANTED
GRANTED DATE: 6/10/2002
APPROVED AN AMENDMENT, GRANTED IN CASE No. 3928-X. ADDITION TO THE
EXISTING BUILDING.

GROSS FLOOR AREA OF NURSING HOME: 36,460 SF
GROSS SITE AREA: 186,242 SF
FLOOR AREA RATIO: 36,460 SF / 186,242 SF = 0.196

EXISTING PARKING: 24 PS (INCLUDES 2 HANDICAP SPACES)

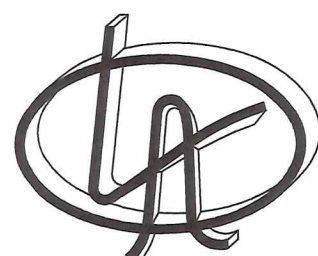
NO CHANGES BASED ON THE PROPOSED IMPROVEMENTS.

EXISTING / PROPOSED USE:
 44 BED NURSING HOME AND CONVENT WITH 8 RESIDENTS
NURSING HOME
 1 SPACE REQUIRED PER 3 BEDS
 $1/3 \text{ SPACE REQUIRED} \times 44 \text{ BEDS} = 14.7 \text{ SPACES REQUIRED, USE 15}$
CONVENT
 1 SPACE REQUIRED PER RESIDENT
 $1 \text{ SPACE REQUIRED} \times 8 \text{ RESIDENTS} = 8 \text{ SPACES REQUIRED, USE 8}$
 TOTAL SPACES REQUIRED = 23
 TOTAL SPACES PROVIDED = 24

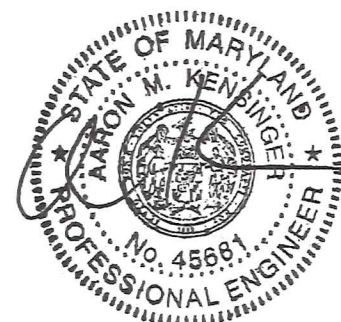
DISTRICT 01c1
SCALE: 1"=50'

BALTIMORE COUNTY, MD
AUGUST 26, 2020

I 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. 45681, EXPIRATION DATE: 7/7/2022.



LITTLE & ASSOCIATES
ENGINEERS~~LAND PLANNERS~~SURVEYORS
10710 GILROY ROAD
HUNT VALLEY, MARYLAND 21031
PHONE: (443)705-5020 FAX: (443)589-2401
LITTLE & ASSOCIATES IS A DIVISION OF CENTURY ENGINEERING, INC.



2020-0222-A

PLAN TO ACCOMPANY ZONING
VARIANCE APPLICATION
ST. JOSEPH'S NURSING HOME
1222 TUGWELL DRIVE