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 2301 Sulphur Spring Road, Halethorpe, MD 21227 which is presently zoned ML

Deed References: JLE 43269 F 344 10 Digit Tax Account # 1 3 2 3 0 0 0 4 7 0

Property Owner(s) Printed Name(s) Jose BLANDON

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

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

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

See Attached

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

3. xxx a Variance from Section(s)

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)**

See attachment

Property is to be posted and advertised as prescribed by the zoning regulations.
I, or we, agree to pay expenses of above petition(s), advertising, posting, etc. and further agree to and are to be bounded by the zoning regulations and restrictions of Baltimore County adopted pursuant to the zoning law for Baltimore County.
Legal Owner(s) Affirmation: I / we do so solemnly declare and affirm, under the penalties of perjury, that I / We are the legal owner(s) of the property which is the subject of this / these Petition(s).

Contract Purchaser/Lessee:

Name- Type or Print

Signature

Mailing Address City State

Zip Code Telephone # Email Address

Legal Owners (Petitioners):

Jose BLANDON

Name #1 – Type or Print Name #2 – Type or Print

Signature #1 Signature # 2

3316 Devonshire Drive, Balto., Maryland

Mailing Address City State

21215 443-525-0939

Zip Code Telephone # Email Address

Attorney for Petitioner:

Terri D. Mason, Esquire

Name- Type or Print

Signature

2833 Smith Avenue, Suite 307; Baltimore, MD.

Mailing Address City State

21209 443-222-8229 terrimason@terridmason.com

Zip Code Telephone # Email Address

Representative to be contacted:

Name – Type or Print

Signature

Mailing Address City State

Zip Code Telephone # Email Address

PC Exh. 16

case # 2022-0197-SPHA Filing date 8/17/22

gh

2022-0197-SPHA

1. Special Hearing to permit a Temporary Trailer

2. Variances From sections, 255.1 & 238.1 of the Baltimore County Zoning Regulations (BCZR). To permit the storage of construction equipment within 30 feet of a residential zone boundary in lieu of the required 100 feet minimum setback.

3. Variance from sections, 255.1 & 238.1 of the BCZR. To permit a front property setback of 16.3 feet in lieu of the required 25 feet.

4. Variance from sections, 255.1 & 238.1 of the BCZR. To permit a 39 feet setback to the street center line in lieu of the required 50 feet.

5. Variance from sections, 255.1 & 238.2 of the BCZR.To permit an existing side yard setback of 13.3 feet in lieu of the required 30 feet.

Law Offices of

Terri D. Mason, P.C.

TO: **Zoning Review Office of Baltimore County**

FRCM: **Terri D. Mason, Esquire**

RE: **Attachment to Petition for Zoning Hearing**

Terri D. Mason, Attorney for Jose Blandon, reserves the right to present additional evidence at the hearing. Set forth below is a brief statement concerning the hardship and/or practical difficulty with compliance:

1. Jose M. Blandon, *hereinafter Petitioner*, is the owner of the sited property, 2301 Sulphur Spring Road, Halethorpe, Md. 21227.

2. The Petitioner operates his business, Silver Spring Contractor, Inc., also d/b/a Manuel Landscaping, Inc., from the address referenced above and sited in the attached "Violation Notice". *(See Violation Notice attached).*

3. Among other things, the Petitioner provides essential landscaping services to the State of Maryland; Baltimore County and Baltimore City including Baltimore County Code Enforcement per contracts.

4. Any disruption to the Petitioner's business could potentially cause a disruption to the essential services that he provides for the entities listed in paragraph number three (3) including Baltimore County.

5. To provide the services indicated at paragraph numbers three (3) and four (4) as well as other services, it is necessary for the Petitioner to operate and park commercial vehicles when not in use.

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443.948.7772 (voice) / 443.948.7775 (fax)
terridmason.com

2022-0197-A

6. Compliance with §253.4 would cause the Petitioner an extreme hardship because he would not have a sufficient space to park his vehicles.

7. The Petitioner cannot operate his business without the vehicles.

8. Due the extreme financial strain and disruption to his business caused by COVID-19, the Petitioner does not have the resources to relocate the vehicles to an alternate site.

9. Compliance with §253.4 would essentially put the Petitioner out of business thereby causing a disruption of essential services to the State of Maryland, Baltimore County and Baltimore City.

2022-0197-SOHA

PRECISION
SURVEY AND MAPPING LLC
Using Modern Technology to Map America

ZONING PROPERTY DESCRIPTION

2301 SULPHUR SPRING ROAD

Halethorpe, Maryland 21227

Beginning for south side of Sulphur Spring Road, 50 feet wide, at a distance of 106.5 feet from the centerline of Willow Avenue, thence running along Sulphur Spring Road

1. South 89 degrees 57 minutes 28 seconds East for a distance of 194.13 feet, thence
2. With a tangent with a curve to the right with an arc length of 55.61 feet, having a radius of 313.27 feet and a chord bearing of South 84 degrees 52 minutes 21 seconds East and a chord length of 55.54 feet, thence
3. With a non-tangent curve to the right with an arc length of 65.92 feet, having a radius of 5012.03 feet and a chord bearing of South 12 degrees 39 minutes 30 seconds West and a chord length of 65.92 feet, thence,
4. South 18 degrees 28 minutes 38 seconds West for a distance of 135.01 feet, thence
5. North 88 degrees 19 minutes 24 seconds West for a distance of 192.26 feet, thence
6. North 00 degrees 00 minutes 30 seconds West for a distance of 191.85 feet to the point of beginning.

Containing 43,553 square feet or 0.9998 acres of land, more or less.

Located in Council District No. 1 an Election District 13

DESCRIPTION FOR ZONING PURPOSES ONLY

STATE OF MARYLAND
CHARLES S. RUZICKA
No. 21169
PROFESSIONAL LAND SURVEYOR

Charles S. Ruzicka, LS 8/01/2023
Registered Maryland Professional Land Surveyor, No. 21169,
Expiration Date: 6/26/2023

Precision Survey and Mapping, LLC | 6809 South River Drive, Middle River, Maryland 21220
Phone (Direct): 410-459-2124 | email: chuck@precisionsurveys.us

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