



JOHN A. OLSZEWSKI, JR.
County Executive

PAUL M. MAYHEW
Managing Administrative Law Judge
MAUREEN E. MURPHY
Administrative Law Judge

October 16, 2023

Ioaniss Chalkias and Sofia Kouroublakis
9130 Cowenton Avenue
Perry Hall, MD 21128

RE: Petition for Administrative Variance
Case No. 2023-0188-A
Property: 9130 Cowenton Avenue

Dear Petitioners:

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

Pursuant to Baltimore County Code § 32-3-401(a), "a person aggrieved or feeling aggrieved" by this Decision and Order may file an appeal to the County Board of Appeals within thirty (30) days of the date of this Order. For further information on filing an appeal, please contact the Office of Administrative Hearings at 410-887-3868.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul M. Mayhew", is written over the word "Sincerely,".

PAUL M. MAYHEW
Managing Administrative Law Judge
for Baltimore County

PMM:dlw
Enclosure

c: Bruce Doak – bdoak@bruceedoakconsulting.com

IN RE: PETITION FOR ADMIN. VARIANCE	*	BEFORE THE
(9130 Cowenton Avenue)		
11 th Election District	*	OFFICE OF ADMINISTRATIVE
5 th Council District		
	*	HEARINGS FOR
Ioaniss Chalkias &		
Sofia Kouroublakis	*	BALTIMORE COUNTY
Petitioners	*	CASE NO. 2023-0188-A

* * * * *

OPINION AND ORDER

This matter comes before the Office of Administrative Hearings (“OAH”) for Baltimore County for consideration of a Petition for Administrative Variance filed by the legal owners of the subject property, Ioaniss Chalkias and Sofia Kouroublakis (“Petitioners”). The Petitioners are requesting Variance relief pursuant to the Baltimore County Zoning Regulations (“BCZR”) § 400.3: To permit an accessory building (garage) to have a height of 22 ft. in lieu of the required maximum height of 15 ft. per the Baltimore County Zoning Regulations (“BCZR”). The subject property and requested relief are more fully depicted on the site plan that was marked and accepted into evidence as Petitioners’ Exhibit 1.

The Zoning Advisory Committee (“ZAC”) comments were received and are made part of the record of this case. There were no adverse ZAC comments received by any of the County reviewing agencies.

The Petitioners having filed a Petition for Administrative Variance and the subject property having been posted on September 23, 2023 and there being no request for a public hearing, a decision shall be rendered based upon the documentation presented.

The Petitioners have filed the supporting affidavits as required by § 32-3-303 of the Baltimore County Code (“BCC”). Based upon the information available, there is no evidence in

the file to indicate that the requested variance would adversely affect the health, safety or general welfare of the public and should therefore be granted. In the opinion of the Administrative Law Judge, the information, photographs, and affidavits submitted provide sufficient facts to satisfy the requirements of § 307.1 of the BCZR. Furthermore, strict compliance with the BCZR would cause practical difficulty and/or unreasonable hardship for the Petitioners.

Although the Department of Planning did not make any recommendations related to the proposed accessory building (garage) height and usage, I will impose conditions that if the proposed garage is detached, it shall not be converted into a dwelling unit or apartment, not contain any sleeping quarters, living area, kitchen or bathroom facilities, or used for commercial purposes.

THEREFORE, IT IS ORDERED, this 16th day of **October, 2023**, by the Administrative Law Judge for Baltimore County, that the Petition for Variance seeking relief from the Baltimore County Zoning Regulations ("BCZR") § 400.3: To permit an accessory building (garage) to have a height of 22 ft. in lieu of the required maximum height of 15 ft. per the Baltimore County Zoning Regulations ("BCZR"), be and is hereby GRANTED.

The relief granted herein shall be subject to the following:

- Petitioners may apply for their appropriate permits 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 such time as the 30-day appellate process from this Order has expired. If, for whatever reason, this Order is reversed, Petitioners would be required to return, and be responsible for returning, said property to its original condition.
- Petitioners or subsequent owners shall not convert the proposed garage, if detached, into a dwelling unit or apartment. The proposed garage, if detached, shall not contain any sleeping quarters, living area, or kitchen or bathroom facilities.
- The proposed garage, if detached, shall not be used for commercial purposes.

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



PAUL M. MAYHEW
Managing Administrative Law Judge
for Baltimore County

PMM:dlw



ADMINISTRATIVE ZONING PETITION
FOR ADMINISTRATIVE VARIANCE – OR – ADMINISTRATIVE SPECIAL HEARING
To be filed with the Department of Permits, Approvals and Inspections
To the Office of Administrative Hearings for Baltimore County for the property located at:

Address 9130 COWENTON AVENUE Currently Zoned DR3.5H
Deed Reference 39363 / 249 10 Digit Tax Account # 1 1 0 2 0 6 6 3 0 2
Owner(s) Printed Name(s) IOANISS CHALKIAS & SOFIA KOUROUBLAKIS

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

For Administrative Variances, the Affidavit on the reverse of this Petition form must be completed and notarized.

The undersigned, who own and occupy the property situate in Baltimore County and which is described in the plan/plat attached hereto and made a part hereof, hereby petition for an:

1. **X** ADMINISTRATIVE VARIANCE from Section(s) 400.3 BCZR

of the zoning regulations of Baltimore County, to the zoning law of Baltimore County.

2. ADMINISTRATIVE SPECIAL HEARING to approve a waiver pursuant to Section 32-4-107(b) of the Baltimore County Code: (indicate type of work in this space: i.e., to raze, alter or construct addition to building)

of the zoning regulations of Baltimore County, to the zoning law of Baltimore County.

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

I/we agree to pay expenses of above petition(s), advertising, posting, etc. and further agree to be bound by the zoning regulations and restrictions of Baltimore County adopted pursuant to the zoning law for Baltimore County.

Owner(s)/Petitioner(s):

IOANISS CHALKIAS / SOFIA KOUROUBLAKIS
Name #1 – Type or Print Name #2 – Type or Print
X [Signature] **X** [Signature]
Signature #1 Signature #2
9130 COWENTON AVENUE PERRY HALL MD
Mailing Address City State
21128 / 443-653-5002 /
Zip Code Telephone #'s (Cell and Home) Email Address

Attorney for Owner(s)/Petitioner(s):

Name - Type or Print
Signature
Mailing Address City State
Zip Code Telephone # Email Address

Representative to be Contacted:

BRUCE E. DOAK
BRUCE E. DOAK CONSULTING, LLC
Name - Type or Print
[Signature]
Signature
3801 BAKER SCHOOLHOUSE ROAD FREELAND MD
Mailing Address City State
21053 / 410-919-9906 /
Zip Code Telephone # Email Address
BD@BRUCEEDOAKCONSULTING.COM

A PUBLIC HEARING having been formally demanded and/or found to be required, it is ordered by the Office of Administrative Hearings for Baltimore County, this _____ day of _____, that the subject matter of this petition be set for a public hearing, advertised, and re-posted as required by the zoning regulations of Baltimore County.

Administrative Law Judge for Baltimore County

Case Number 2023-0188-A Filing Date 9/15/2023 Estimated Posting Date 9/24/2023 Reviewer CF

Revised 8/2022

Affidavit in Support of Administrative Variance
(THIS AFFIDAVIT IS NOT REQUIRED FOR AN HISTORIC ADMINISTRATIVE SPECIAL HEARING)

The undersigned hereby affirms under the penalties of perjury and upon personal knowledge to the Administrative Law Judge for Baltimore County, that the information herein given is true and correct and that the undersigned is/are competent to testify in the event that a public hearing is scheduled in the future with regard thereto. In addition, the undersigned hereby affirms that the property is not the subject of an active Code Enforcement case and that the residential property described below is owned and occupied by the undersigned.

Address: 9130 COWINGTON AVENUE PERRY HALL MD 21128
Print or Type Address of Property City State Zip Code

Based upon personal knowledge, the following are the facts upon which I/we base the request for an **Administrative Variance** at the above address. (Clearly state practical difficulty or hardship here)

Uniqueness of the Subject Property

The subject property is narrow in width and very deep.

Hardship & Practical Difficulty

We have a modest house which was originally built in 1945 and updated since. We have very little storage space in the house and wish to have more. We also don't have a garage to store our cars in. Therefore, we decided to build a garage to solve both problems. It has been determined that it will be cheaper and easier to build a detached garage then to tie it into the house somehow. If we did tie the garage into the house, we would lose our only patio, which we use quite often. The 22 foot height of the proposed garage is the lowest we can make it and have head room for storage on the second floor.

The houses that surround us are all modern and have large garages that provide storage above them. We feel that our proposed garage will be in keeping with them.

This garage will not be converted into a dwelling unit or apartment. The proposed garage shall not contain any sleeping quarters, bathroom, living area or kitchen facilities.

(If additional space for the petition request or the above statement is needed, label and attach it to this Form)

x [Signature]
Signature of Owner (Affiant)

x [Signature]
Signature of Owner (Affiant)

IOANNIS CHALKIAS
Name - Print or Type

SOFIA KOUROUBLAKIS
Name - Print or Type

The following information is to be completed by a Notary Public of the State of Maryland

STATE OF MARYLAND, COUNTY OF BALTIMORE, to wit:

I HEREBY CERTIFY, this 11 day of September, 2023, before me a Notary of Maryland, in and for the County aforesaid, personally appeared:

Print name(s) here: IOANNIS CHALKIAS SOFIA KOUROUBLAKIS

the Affiant(s) herein, personally known or satisfactorily identified to me as such Affiant(s).

AS WITNESS my hand and Notaries Seal

[Signature]
Notary Public
01/15/2027
My Commission Expires

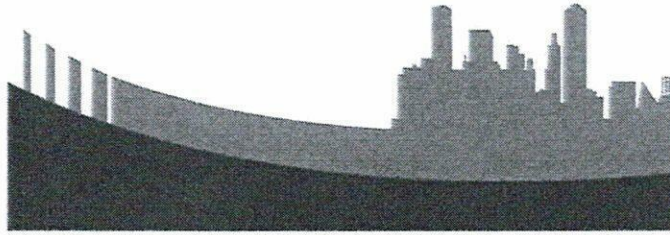


2023-0188-A

Zoning Hearing Petitions Being Requested

Variance to permit an accessory building (garage) to have height of 22 feet in lieu of the required maximum height of 15 feet per Section 400.3 BCZR

2023 0188-A



ZONING DESCRIPTION
#9130 Cowenton Avenue

Beginning for the same on the west side of Cowenton Avenue, 953 feet, more or less, north of the center line extension of Panorama Drive, thence binding on the west side of Cowenton Avenue and binding on the outlines of the subject property, the following course and distance, viz. 1) South 07 degrees 22 minutes 00 seconds West 100.00 feet, thence leaving said west side of Cowenton Avenue and continuing to bind on the outlines of the subject property, the four following courses and distances, viz. 2) North 82 degrees 38 minutes 00 seconds West 703.60 feet, 3) North 45 degrees 45 minutes 00 second East 60.64 feet, 4) North 32 degrees 36 minutes 00 seconds East 58.00 feet and 5) South 82 degrees 38 minutes 00 seconds East 641.39 feet to the point of beginning.

Containing 1.000 acre, more or less.

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



Bruce E. Doak Consulting, LLC
3801 Baker Schoolhouse Road
Freeland, MD 21053
410-419-4906 cell / 443-900-5535 office
bdoak@bruceedoakconsulting.com

2023-0188-A

BALTIMORE COUNTY DEPARTMENT OF PERMITS, APPROVALS AND INSPECTIONS
ZONING REVIEW OFFICE

ADMINISTRATIVE VARIANCE INFORMATION SHEET AND DATES

Case Number: 2023 - 0188 -A Address 9130 Cowenton Ave

Contact Person: Christina Frank Phone Number: 410-887-3391

Planner, Please Print Your Name

Filing Date: 9-15-2023 Posting Date: 9-24-2023 Closing Date: 10-9-2023

Any contact made with this office regarding the status of the administrative variance should be through the contact person (planner) using the case number.

1. **POSTING/COST:** The petitioner must use one of the sign posters on the approved list and the petitioner is responsible for all printing/posting costs. Any reposting must be done only by one of the sign posters on the approved list and the petitioner is again responsible for all associated costs. The zoning notice sign must be visible on the property on or before the posting date noted above. It should remain there through the closing date.
2. **DEADLINE:** The closing date is the deadline for a neighbor (occupant or owner) within 1,000 feet to file a formal request for a public hearing. Please understand that even if there is no formal request for a public hearing, the process is not complete on the closing date.
3. **ORDER:** After the closing date, the file will be reviewed by the Administrative Law Judge. The judge may: (a) grant the requested relief; (b) deny the requested relief; or (c) order that the matter be set in for a public hearing. If all County/State agencies' comments are received, you will receive written notification as to whether the petition has been granted, denied, or will proceed to a public hearing. This decision is usually made within 10 days of the closing date. The written order will be mailed to you by First Class mail.
4. **POSSIBLE PUBLIC HEARING AND REPOSTING:** In cases that must go to a public hearing (whether due to a neighbor's formal request or by order of the Administrative Law Judge), notification will be forwarded to you. The sign on the property must be changed giving notice of the hearing date, time and location. As when the sign was originally posted, certification of this change and a photograph of the altered sign must be forwarded to this office.

Petitioner: This Part of the Form is for the Sign Poster Only (Detach Along Dotted Line)

USE THE ADMINISTRATIVE VARIANCE SIGN FORMAT

Case Number: 2023 - 0188 -A Address 9130 Cowenton Ave

Petitioner's Name: Chalkias Ioannis & Sofia Karoulakis Telephone (Cell) 943-653-5002

Posting Date: 9-24-2023 Closing Date: 10-9-2023

Wording for Sign: To Permit an accessory Building (garage) at A
height of 22ft in lieu of the required maximum height
of 15ft

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

No. 221266

Date: 9-15-2023

Fund	Dept	Unit	Sub Unit	Rev Source/ Obj	Sub Rev/ Sub Obj	Dept	Obj	BS Acct	Amount
001	806	0000		0150					75.00
Total:									75.00

Rec From: 9130 Cowenton Ave

For: 2023-0188-A

D & S H

DISTRIBUTION

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

CASHIER'S
VALIDATION

CP 23-0852

BRUCE E DOAK 12-12
BRUCE E DOAK CONSULTING
3801 BAKER SCHOOLHOUSE RD
FREELAND, MD 21053-9738

3038

15-3/540
429

9/11/23

Date

Pay to the
Order of BALTIMORE COUNTY MD

\$ 75.00

SEVENTY FIVE AND 00/100

Dollars



PNCBANK

PNC Bank, N.A. 040

For CHALKLINE ZONING FEE

BE O

⑆054000030⑆ 5336741067⑆ 3038

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 28, 2023

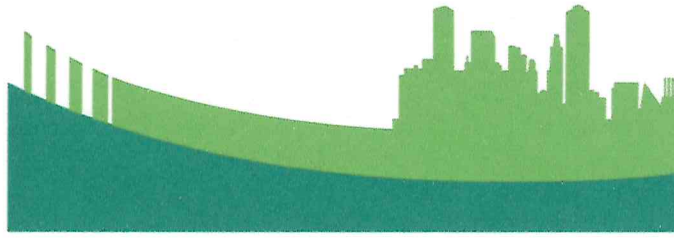
SUBJECT: DEPS Comment for Zoning Item # 2023-0188-A
Address: 9130 COWENTON AVE.
Legal Owner: Ioaniss Chalkias, Sofia Kouroublakis

Zoning Advisory Committee Meeting of October 2, 2023.

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

Additional Comments:

Reviewer: Earl D. Wrenn



CERTIFICATE OF POSTING

September 25, 2023

_____ amended for second inspection

Re:

Zoning Case No. 2023-0188-A

Legal Owner: Ioannis Chalkias

Closing date: October 09, 2023

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

Attention: Jeff Perlow

Ladies and Gentlemen,

This letter is to certify under the penalties of perjury that the two necessary signs required by law were posted conspicuously on the property located at **9130 Cowenton Avenue**.

The signs were initially posted on **September 23, 2023**.

The subject property was also inspected on _____.

Sincerely,

Bruce E. Doak
MD Property Line Surveyor #531

See the attached sheets for the photos of the posted signs

Bruce E. Doak Consulting, LLC
3801 Baker Schoolhouse Road
Freeland, MD 21053
410-419-4906 cell / 443-900-5535 office
bdoak@bruceedoakconsulting.com

ZONING NOTICE

ADMINISTRATIVE VARIANCE

CASE NO. 2023-0188-A

9130 Cowenton Avenue

**REQUEST: TO PERMIT AN ACCESSARY
BUILDING (GARAGE) AT A HEIGHT OF 22
FEET IN LIEU OF THE REQUIRED MAXIMUM
HEIGHT OF 15 FEET.**

PUBLIC HEARING?

**PURSUANT TO SECTION 26-127(b)(1) BALTIMORE
COUNTY CODE, AN ELIGIBLE INDIVIDUAL OR GROUP
MAY REQUEST A PUBLIC HEARING CONCERNING
THE PROPOSED VARIANCE, PROVIDED IT IS DONE IN
THE ZONING OFFICE BEFORE OCTOBER 09, 2023.**

**ADDITIONAL INFORMATION IS AVAILABLE AT ZONING
ADMINISTRATION AND DEVELOPMENT MANAGEMENT 111 W.
CHESAPEAKE AVENUE TOWSON, MD 21204 410-887-3391**

ZONING NOTICE

ADMINISTRATIVE VARIANCE

CASE NO. 2023-0188-A

9130 Cowenton Avenue

**REQUEST: TO PERMIT AN ACCESSARY
BUILDING (GARAGE) AT A HEIGHT OF 22
FEET IN LIEU OF THE REQUIRED MAXIMUM
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**ADDITIONAL INFORMATION IS AVAILABLE AT ZONING
ADMINISTRATION AND DEVELOPMENT MANAGEMENT 111 W.
CHESAPEAKE AVENUE TOWSON, MD 21204 410-887-3391**



PAI # 111133 PAI # 111133 PAI # 111133
Pt. Bk. 0000077, Folio 0132

9206 2400009517

Pt. Bk./Folio # 077132
PAI # Lot # 1C0
2500000074
PAI # 110910

Lot # 3 2500015214
PAI # 111166
Pt. Bk./Folio # MP17054
PAI # 111166

PAI # 111166
2500015213

Lot # 12 1113076710

Lot # 11 1103023375

PAI # 110910
PAI # 110910

1106057976

Lot # 10 2500000074
2011-0183-SPH

9200

Lot # 10 2016-0211-A

Lot # 8 2016-0306-SPHA
2500000073

9136

1116055126

Lot # 8

STREET

Lot # 7

1116055125

9134

1102066303

PAI # 118040

Lot # 6

PAI # 118040

1102066302

9130

Pt. Bk./Folio # 013001

NE 10th

072C2

DR 3.5 H

5 CD

Lot # 5

1600000272

9128

9128-A
2200026159
2021-0103-A

Lot # 4

1104001670

9126

PAI # 110930

PAI # 110930
Pt. Bk./Folio # MP03009

PAI # 110930

1112020525

Lot # 3

1119012390

9124

Lot # 1

Pt. Bk. 0000013, Folio 0001

111000928

Lot #

2023-0188-A



KEY SHEET FOR SITE PHOTOS

2023-0188-A

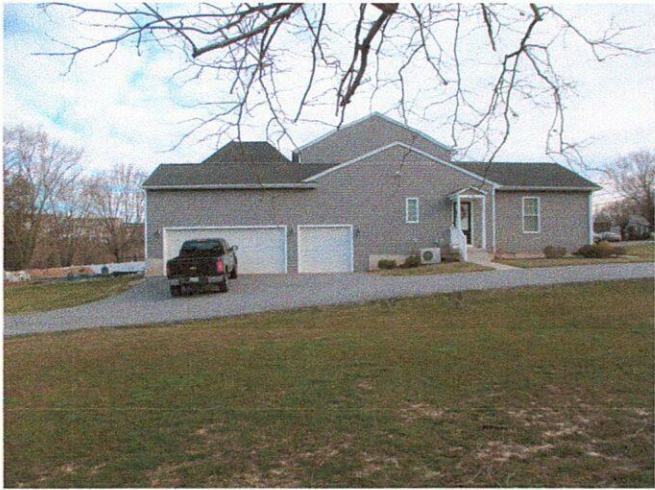
Site Photos to accompany Administrative Variance Petition



A



B



C



D



E



F

2023-0188-A



G



H



I



J



K



L

2023-0188-A

Real Property Data Search ()
Search Result for BALTIMORE COUNTY

[View Map](#)
[View GroundRent Redemption](#)
[View GroundRent Registration](#)

Special Tax Recapture: None

Account Identifier: District - 11 Account Number - 1102066302

Owner Information

Owner Name:

CHALKIAS IOANISS
KOUROUBLAKIS SOFIAUse: RESIDENTIAL
Principal Residence: YES

Mailing Address:

9130 COWENTON RD
PERRY HALL MD 21128-9625

Deed Reference: /39363/ 00249

Location & Structure Information

Premises Address:

9130 COWENTON AVE
PERRY HALL 21128-9625

Legal Description:

9130 COWENTON AVE
HERMAN KOCH PLAT

Map: Grid: Parcel: Neighborhood: Subdivision: Section: Block: Lot: Assessment Year: Plat No:

0072 0011 0344 11090084.04 0000

6 2024

Plat Ref: 0013/ 0001

Town: None

Primary Structure Built Above Grade Living Area Finished Basement Area Property Land Area County Use
1945 2,019 SF 1.0000 AC 04

Stories Basement Type

1 NO STANDARD UNITS SIDING/3 2 full

Exterior Quality Full/Half Bath Garage Last Notice of Major Improvements

Value Information

	Base Value	Value			Phase-in Assessments	
		As of	As of	As of	As of	As of
		01/01/2021	07/01/2023	07/01/2024		
Land:	100,000	100,000				
Improvements	102,900	102,900				
Total:	202,900	202,900	202,900			
Preferential Land:	0					

Transfer Information

Seller: BEHN JON C	Date: 09/07/2017	Price: \$261,000
Type: NON-ARMS LENGTH OTHER	Deed1: /39363/ 00249	Deed2:
Seller: EIKENBERG GARY L	Date: 01/27/1997	Price: \$147,900
Type: ARMS LENGTH MULTIPLE	Deed1: /12006/ 00165	Deed2:
Seller: BRAUN EMMA W	Date: 08/05/1982	Price: \$0
Type: NON-ARMS LENGTH OTHER	Deed1: /06418/ 00346	Deed2:

Exemption Information

Partial Exempt Assessments: Class		07/01/2023	07/01/2024
County:	000	0.00	
State:	000	0.00	
Municipal:	000	0.00	0.00

Special Tax Recapture: None

Homestead Application Information

Homestead Application Status: Approved 10/20/2017

Homeowners' Tax Credit Application Information

Homeowners' Tax Credit Application Status: No Application Date:

2023-0188-A

GENERAL INFORMATION

- 1. Ownership: Ioaniss Chalkias & Sofia Kouroublakis
9130 Cowenton Avenue Perry Hall, MD 21128 443-653-5002
- 2. Address: 9130 Cowenton Avenue
- 3. Deed references: JLE 39363/249
- 4. Area: 1.000 acre (per SDAT)
- 5. Tax Map / Parcel / Tax account #: 72 / 344 / 11-02-066302
- 6. Election District: 11 Councilmanic District: 5
ADC Map: GIS tile: 072C2 Position sheet: 38NE33
Census tract: 411308 Census block: 240054113081003
Schools: Chapel Hill ES Perry Hall MS Perry Hall HS
- 7. The boundary shown hereon is from the deed recorded in the Land Records of Baltimore County.
All other information shown hereon was taken from Baltimore County GIS tile 072C2 and the information provided by Baltimore County on the internet.
- 8. Improvements: 1 story dwelling, pool & garage. All of the improvements will remain.

OFFICE OF ZONING

Zoning: DR 3.5 H There are no previous zoning cases on the subject parcels.

DR 3.5 H Setbacks for Dwellings

Front: 30 feet from the property line or street right of way
Side: 10 feet from a property line /sum of 25 feet
Rear: 30 feet from a property line

DR 3.5 H Setbacks for Accessory Structures: 2.5 feet from a property line

ENVIRONMENTAL

Watershed: Bird River URDL land type: 1

- 1. The subject property is served by public water and sewer
- 2. There are no underground storage tanks on the subject property.
- 3. The subject property is not in the Chesapeake Bay Critical Area.
- 4. The subject property is not located within a 100 year flood plain.

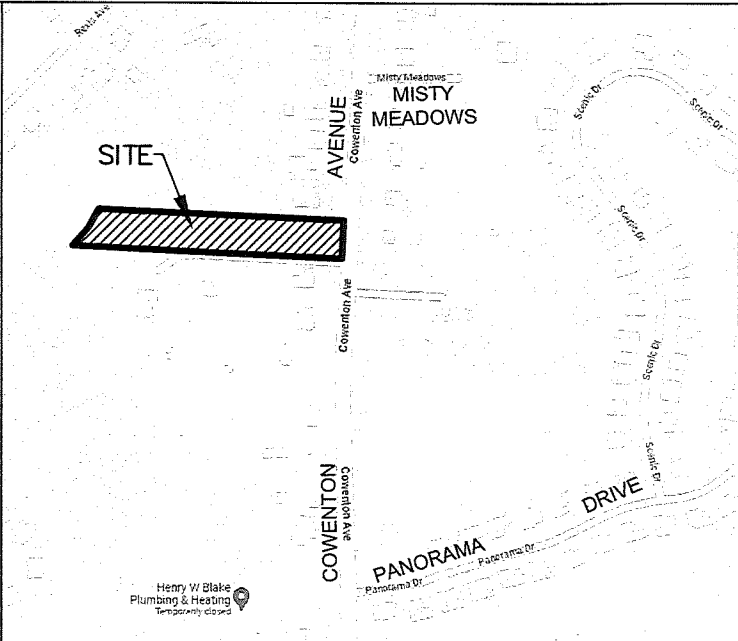
OFFICE OF PLANNING

Regional Planning District: Perry Hall / White Marsh District Code: 317

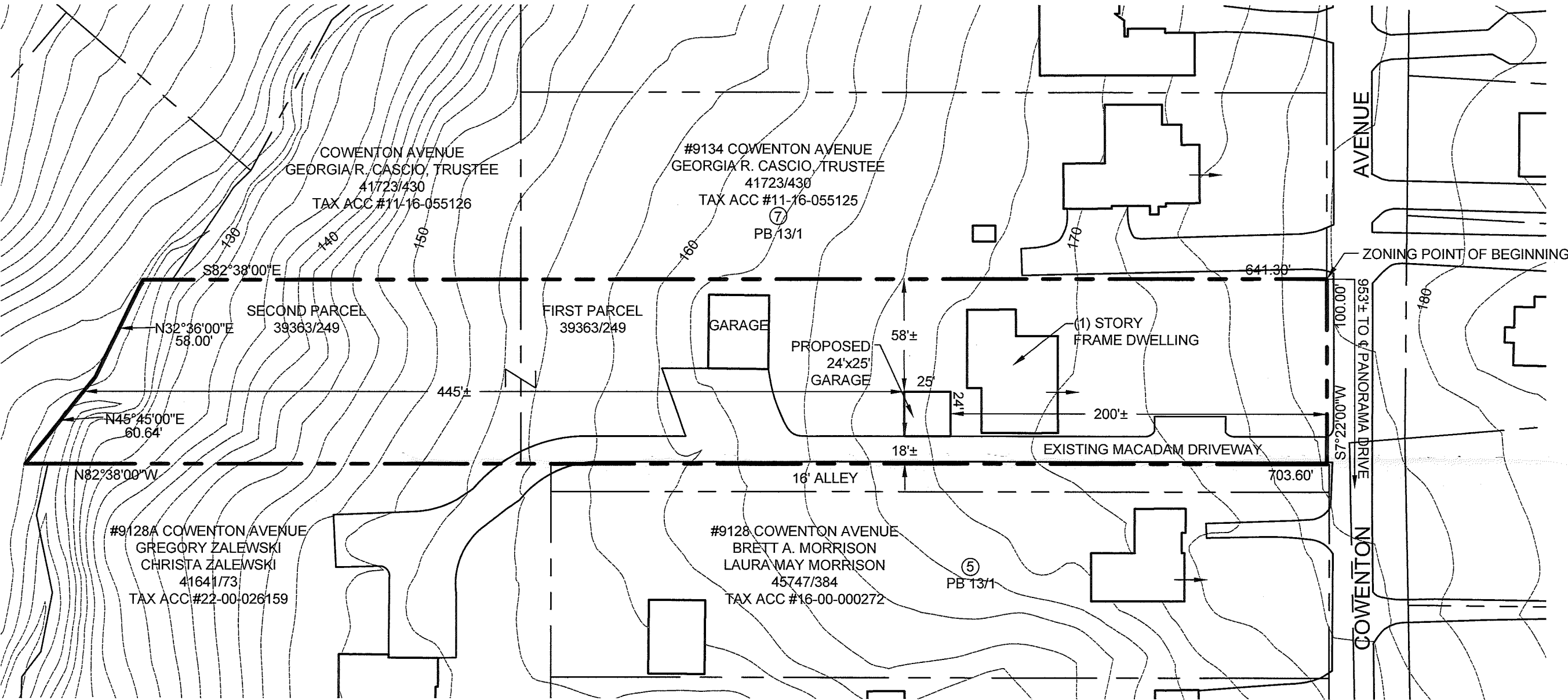
- 1. The subject property is not in a National Register Historic District

PROPOSED DEVELOPMENT

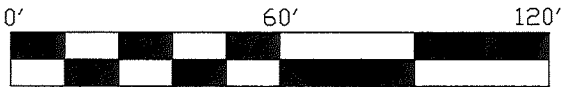
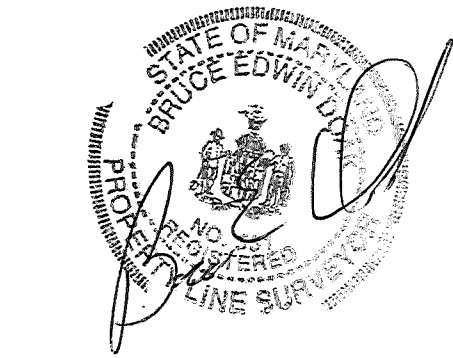
To construct a garage for residential use only.



Vicinity Map - Scale: 1" = 500'



PROPOSED GARAGE ELEVATIONS



REVISION

Bruce E. Doak Consulting, LLC
Land Use Expert and Surveyor
3801 Baker Schoolhouse Road
Freeland, MD 21053
o 443-900-5535 m 410-419-4906
bdoak@bruceedoakconsulting.com

PLAN TO ACCOMPANY
A ZONING PETITION
FOR
#9130 COWENTON AVENUE

BALTIMORE COUNTY, MARYLAND
11th ELECTION DISTRICT 5th COUNCILMANIC DISTRICT

Date: 9/12/23
Scale: 1"=100'