

<b>IN RE: DEVELOPMENT PLAN HEARING &amp; PETITION FOR SPECIAL HEARING</b>	*	BEFORE THE OFFICE OF
(13015 Beaver Dam Road)	*	ADMINISTRATIVE HEARINGS
8 <sup>th</sup> Election District		
3 <sup>rd</sup> Council District	*	FOR
<b>(HUNT VALLEY CHURCH)</b>		
	*	BALTIMORE COUNTY
Hunt Valley Presbyterian Church, Inc.		
<i>Owner/Applicant</i>	*	<b>HOH Case No. 08-0524 &amp; Zoning Case 2016-0099-SPH</b>

\* \* \* \* \*

**ADMINISTRATIVE LAW JUDGE’S COMBINED DEVELOPMENT PLAN AND ZONING OPINION & ORDER**

This matter comes before the Office of Administrative Hearings (OAH) for Baltimore County for a public hearing on a development proposal submitted in accordance with Article 32, Title 4, of the Baltimore County Code (“B.C.C.”). Patricia A. Malone, Esquire, with Venable, LLP, on behalf of Hunt Valley Presbyterian Church, Inc., *Owner/Applicant* (hereinafter “the Developer”), submitted for approval a one-sheet redlined Development Plan (“Plan”) prepared by Century Engineering, Inc., known as “Hunt Valley Church.”

The Developer is currently proposing to construct a 51,000 sq. ft. expansion of the existing church/building for religious worship along with additional parking (i.e., 950 seats, 437 parking spaces). The Developer also has filed a Petition for Special Hearing pursuant to § 500.7 of the Baltimore County Zoning Regulations (B.C.Z.R), if necessary:

- (1) To approve the removal of Lot 1 as an amendment to the most recently approved Final Development Plan (FDP) for Bishops Pond or to approve the proposed plan changes as an amendment to the FDP; and (2) for such other relief as may be deemed necessary.

Details of the proposed development are more fully depicted on the redlined one-sheet Development Plan that was marked and accepted into evidence as Developer’s Exhibit 1. The

property was posted with the Notice of Hearing Officer's Hearing and Zoning Notice, both on December 28, 2015 in compliance with the regulations. The undersigned conducted hearings on January 28, 2016, February 16, 2016, February 17, 2016, and February 18, 2016, in Room 205 of the Jefferson Building, 105 West Chesapeake Avenue, Towson, Maryland.

In attendance at the Hearing Officer's Hearing (HOH) in support of the Plan on behalf of the Developer was J. Robert Green, Glenn Cook, Mark Eisner, Christa Kerrigan, Mitchell Kellman, Randall Race, Jay Cougnet, Fred Schulte, and Paul Sleeper. Also in attendance was Michael J. Pieranunzi, a landscape architect with Century Engineering, Inc., the consulting firm that prepared the site plan. Patricia A. Malone, Esquire and Adam Rosenblatt, Esquire, both with Venable, LLP, represented the Developer. Michael McCann, Esquire appeared and represented several members of the community who objected to the requests.

Numerous representatives of the various Baltimore County agencies who reviewed the Plan also attended the hearing, including the following individuals from the Department of Permits, Approvals and Inspections (PAI): Darryl D. Putty, Project Manager, Vishnu Desai and Jean M. Tansey (Development Plans Review [DPR]), Brad Knatz, Real Estate Compliance, and Joseph C. Merrey (Office of Zoning Review). Also appearing on behalf of the County were Jeff Livingston from the Department of Environmental Protection and Sustainability (DEPS), and Lloyd Moxley from the Department of Planning (DOP).

County agencies perform an independent and thorough review of the Development Plan as it pertains to their specific areas of concern and expertise. The agencies specifically comment on whether the Plan complies with all applicable Federal, State, and/or County laws, policies, rules and regulations pertaining to development and related issues. In addition, these agencies carry out this role throughout the entire development plan review and approval process, which includes

providing input to the Hearing Officer either in writing or in person at the hearing. Continued review of the Plan is undertaken after the Hearing Officer's Hearing during the Phase II review of the project. This continues until a plat is recorded in the Land Records of Baltimore County and permits are issued for construction.

Pursuant to §§ 32-4-227 and 32-4-228 of the B.C.C., which regulate the conduct of the Hearing Officer's Hearing, I am required first to identify any unresolved comments or issues as of the date of the hearing. All County agency representatives indicated the Plan addressed any comments submitted by their agency, and they each recommended approval of the Plan. Ms. Tansey, the County's landscape architect, indicated that the Local Open Space regulations are not applicable in this case since residential development is not proposed. In addition, Ms. Tansey noted a schematic landscape plan was approved on January 27, 2016.

#### DEVELOPER'S CASE

In the "formal" portion of the case, the Developer presented several witnesses. First was Michael Pieranunzi, a landscape architect with Century Engineering, Inc. Mr. Pieranunzi explained in detail the development proposal, and began by noting that the property is approximately 23 acres in size and zoned RC 3. He testified that at present the church has 375 seats, but would expand to 950 seats if the project was approved. In addition, the number of parking spaces would increase from 139 at present to 437. Mr. Pieranunzi also described the new dual entry/exit for the facility, which he believed would greatly improve the ingress and egress from the site. The witness also noted that a large portion of the site would be in a "no build" area pursuant to a private agreement, and that additional land would be protected by a recorded easement as a protected forest conservation area.

Mr. Pieranunzi testified that the proposed church is 50 ft. in height and therefore complies

with B.C.Z.R. § 300.2, even though the cupola is 54 ft. in height. The witness explained that an FDP is a mechanism used by Baltimore County for residential subdivisions, the purpose of which is to provide notice to neighbors in a subdivision of any proposed amendments to the plan. Mr. Pieranunzi reviewed the requirements for amending an FDP and opined that the proposed amendment is consistent with B.C.Z.R. § 1B01.3, as well as the Comprehensive Manual of Development Policies (CMDP) and scenic view regulations. The witness also opined that the amendment would be consistent with the “spirit and intent” of the regulations, which as noted above are designed to provide notice to existing homeowners in a residential subdivision. In concluding his direct examination testimony, Mr. Pieranunzi opined that the Developer satisfies all requirements set forth in the development and zoning regulations, including the special exception standards set forth at B.C.Z.R. § 502.1.

On cross-examination, Mr. Pieranunzi explained that the Developer is providing more parking spaces than required by the B.C.Z.R. since it wants to provide “ample” parking for all uses on site. In discussing the development plan amendment procedure, the witness opined that Dr. Gaspari, who resides at 13027 Beaver Dam Road, is not covered by the pertinent regulation since his dwelling is not shown on the Bishops Pond FDP. In response to a question on redirect, the witness stated that the “spirit and intent” analysis refers to the existing church compared with the proposed church, not to a hypothetical scenario where no church exists at the site.

The next witness in the Developer’s case was J. Robert Green, a civil engineer accepted as an expert witness. Mr. Green explained that at present there is no stormwater management on site, and that the Developer proposes to comply with all current stormwater regulations in connection with this project. Mr. Green explained that all surface water would drain to the southeast area of the site (as shown on Developer’s Exhibit 12) including a one acre portion of the site which at

present flows in a southwesterly direction towards the Fitz-Patrick residence. In concluding his testimony, Mr. Green opined that the proposed stormwater management system would not have any negative impact upon the adjoining residential properties. In response to a question on cross-examination, the witness testified that the Developer obtained a stormwater management waiver in connection with the original construction of the church, as shown on the approved CRG plan.

Glenn Cook was the next witness in the Developer's case. Mr. Cook is a transportation engineer who was accepted as an expert witness. The witness explained that his firm prepared a traffic impact analysis for the project. Mr. Cook explained that a church (like sporting events and other similar uses) experiences a mass exodus within a short time frame, which virtually guarantees there will be traffic congestion as parishioners exit the site. Even so, Mr. Cook provided three recommendations in his traffic analysis which (if implemented) would in his opinion allow the expanded church to function with no "major" impact upon the community. In conclusion, the witness opined that there would be no congestion in nearby roads, streets and alleys, and that a safe roadway network would be provided.

On cross-examination, the witness again indicated that he did not believe Hunt Valley Church would have any measurable impact upon Beaver Dam Road. Mr. Cook explained that at present approximately 80% of the vehicles access the site from the east. In addition, he conceded that there is a "surge" period of approximately 25 to 30 minutes when parishioners exit the site wherein the intersection would not function adequately, which he equated to a level of service "E" or "F". The witness testified that implementation of his recommendation for police officers during Sunday service would alleviate this condition to some extent. In this regard, Mr. Cook opined that nearby residents will experience less delay after the proposed church expansion than they experience now.

The next witness in Developer's case was Mark Eisner, a hydrogeologist accepted as an expert witness. Mr. Eisner explained that given the size of this project the Developer does not need to secure State permits for withdraw or discharge of groundwater. Even so, the witness explained that he applied State environmental guidelines concerning groundwater recharge to analyze the project. Using those standards, he opined that there will be sufficient groundwater recharge from rain to more than offset the amount of water the expanded church would use.

Mr. Eisner presented an exhibit (Developer's Exhibit 21) which he explained depicted the water well on the subject property. Mr. Eisner drew a circle around the well to show the maximum area of the water table drawdown, which he explained would not affect offsite properties. Mr. Eisner explained that the Developer would have to comply with all current regulations, and he opined that the septic reserve area shown on the Plan is sufficient for this project.

Mr. Eisner explained, in response to a question on cross-examination, that he became involved in this case after learning that several neighbors had concerns about water well adequacy or septic system failures. Mr. Eisner explained that if a facility uses more than 5,000 gallons of water a day (which the Hunt Valley Church would not), a water appropriations permit is required from the State of Maryland. Concerning the adequacy of the water supply and sewerage systems, Mr. Eisner explained that the church would not provide child day care on a daily basis, and that portable toilets would be used in connection with the vacation bible school and other large events, as is the current practice.

Architect Christa Kerrigan, who was accepted as an expert, was the next witness in the Developer's case. Ms. Kerrigan explained the design process for the proposed addition, which she explained would be situated closest to I-83 and farthest from adjoining dwellings. Ms. Kerrigan testified that in designing the project she tried to match the materials and design elements of the

existing church and the proposed addition. She stated that though the cupola is approximately 54 feet in height, no other portion of the church building would be above 50 feet. The witness also explained that while the church would have warming trays and a microwave oven in the new addition, it would not have an oven, stovetop or dishwasher.

In response to questions on cross-examination, the witness explained that the proposed expansion would be oriented towards I-83 so that the addition would not intrude upon the less developed rural residential portion of the area. Ms. Kerrigan testified that there would be six new classrooms, eight offices, approximately 11 new bathrooms, as well as a 300 to 400 sq. ft. kitchen in the proposed addition. The witness confirmed that under the Building and Fire Safety Code, the proposed church building would be classified as an “A-3 Assembly” usage, which could be occupied by a maximum of 2,200 people. In response to a question on redirect examination, Ms. Kerrigan confirmed that the proposed classrooms would be for periodic bible study and for use by children whose parents are attending church services. She testified it would be “very rare” to ever have the building filled to its maximum capacity or that all interior spaces shown in the plans would be used simultaneously.

The next witness in Developer’s case was Mitchell Kellman, who was accepted as an expert. Mr. Kellman explained that during his previous employment with Baltimore County, he reviewed numerous final development plans and proposed amendments thereto. The witness explained that FDPs provide notice of proposed changes to prospective residents of a residential subdivision, to guard against inappropriate amendments of such plans. In this case, Mr. Kellman testified that the FDP was approved in 1991, and that first and second amendments thereto were approved in 1992. The witness opined that newer development plans supersede prior plans, such that the original 1991 Hunt Valley Church plan has no legal effect. Mr. Kellman also testified that

the subject property was rezoned in 2012 to RC 3, which permits churches as a matter of right. Based upon his experience in reviewing such plans for Baltimore County. Mr. Kellman explained that in this case the regulations would require a comparison of the Second Amended Final Development Plan with the proposed development plan.

On cross-examination, Mr. Kellman opined that the restrictions set forth in the prior special exception case (Case No. 91-466-X) would no longer be applicable now that the zoning has been changed to RC 3, which permits churches as a matter of right. Mr. Kellman further explained that he has extinguished special exceptions by letter on previous occasions when employed by Baltimore County. In this case, Mr. Kellman opined the special exception would be extinguished by the note on the plan requested by Mr. Merrey in the Zoning Office.

The final witness in the Developer's case was Randall Race, Director of Operations at Hunt Valley Church. Mr. Race described the present operation of the church, including the satellite facility at "The Pointe," which is located in a warehouse across I-83. The witness explained that the Hunt Valley Church has experienced steady, "rock solid" growth and that the church has approximately 3,000 members, 1,100 of which attend services on any given Sunday. Mr. Race explained that three services are held every Sunday: at 8:00, 9:30, and 11:00 AM. He testified that on an average weeknight, approximately 15 to 20 people attend ministry services at The Pointe, and he explained that these operations would be moved to the Hunt Valley Church if this project was approved. Mr. Race testified that otherwise, not that much would change other than the size of the enlarged 950 seat sanctuary. The witness confirmed that there would not be a parochial school or child day care offered, and that day care would be provided only when the children's parents are on site.

On cross-examination, Mr. Race conceded that the church never offered to reduce the square footage of the proposed expansion, and that there are delays experienced by parishioners and neighbors exiting the site on Sunday mornings.

#### PROTESTANTS' CASE

As noted above, several members of the community oppose this project and provided testimony concerning their concerns. The citizens (including Mike Fitz-Patrick, Wanda Smith, Brian Gamble, Constance Newton and Deidre Bosley) testified the size and scope of the project is inconsistent with the rural nature of the area. They believe the expanded church would cause traffic congestion and disruption of their lives, including a potential decrease in the value of their homes and heightened security concerns associated with the number of additional people visiting the site. The neighbors described worsening traffic conditions along Beaver Dam Road, and did not believe the church was a “good neighbor.”

The Protestants presented one expert in their case, professional engineer Chris Tiesler. Mr. Tiesler analyzed current traffic conditions at the site, and studied the potential impact of the proposed expansion. He testified the expansion would generate at least 2.5 times the amount of traffic at present, and he disagreed with Mr. Cook’s opinion that the project would not have a “detrimental impact” on the road network.

The witness opined the unsignalized intersection of Beaver Dam and Old Mill Roads would function at a failing level of service based on Highway Capacity Manual calculations. In this regard, he noted there could be as much as a 20 minute delay for left-turning vehicles exiting the site during a “surge.” Mr. Tiesler also opined there would not be sufficient stopping sight distance for vehicles travelling west on Beaver Dam Road. He indicated he observed during a site visit five cars queuing to make a left turn into the church, which equates to a queue approximately 125 ft.

in length (i.e., 25 ft. per car). Based on the grade of the road, the witness testified the stopping sight distance required is 336 ft., while only 297 ft. is provided in the scenario where five cars are occupying the road (which is one lane in each direction) waiting to make a left turn into the site.

## LEGAL ISSUES

### A. Development Plan

As noted by Developer, the B.C.C. and its interpretation by the courts is such that when agency reviewers confirm the plan satisfies all requirements, it “shall” be approved by the Administrative Law Judge (ALJ) unless the protestants can undermine those findings or otherwise present evidence the plan does not satisfy the development regulations. Here, the Protestants have not done so, and I believe the Development Plan must be approved. B.C.C. § 32-4-229; People’s Counsel v. Elm Street Dev., 172 Md. App. 690, 703 (2007).

The testimony of Chris Tiesler was the only evidence presented by Protestants which could as a matter of law potentially rebut the findings of agency reviewers and Developer’s experts. Mr. Tiesler (and Developer’s traffic expert) testified traffic volume would increase significantly if the project is approved. He also testified there would be significant delays exiting the site after church services, and he opined the unsignalized intersection of the shared driveway and Beaver Dam Road would function at a level of service “F.” While all this may be true, Baltimore County does not evaluate the efficiency, vel non, of unsignalized intersections in reviewing development proposals, and Protestants cite no authority or regulation for the proposition that such adverse effects could justify plan denial. Indeed, all development and permitted land uses will have at least some adverse effect upon the locality. Schultz v. Pritts, 291 Md. 1, 20-21 (1981). In addition, Mr. Cook testified that a “surge” in traffic volume is inherent in the operation of a large church or sports venue where parishioners/patrons enter/exit at the same time. Thus, I do not believe the Development Plan can

be rejected based on a significant increase in traffic volume.

Mr. Tiesler's testimony regarding stopping sight distance presents a closer question. Two considerations play a role in evaluating this issue. First, Mr. Cook proposed several measures which in his opinion would increase the efficiency and/or safety of the ingress/egress from the site. Mr. Tiesler in his testimony did not comment upon these recommendations; in any event, he did not testify these measures would **not** be successful in improving traffic conditions. Thus, and as Mr. Cook testified, these four measures (as set forth at p. 10 of Developer's brief) should prevent the need for numerous vehicles to queue awaiting entry into the church.

Secondly, DPR and the Baltimore County Department of Public Works (DPW) reviewed the development proposal and did not express concern with the volume of traffic or the inadequacy of stopping sight distance along westbound Beaver Dam Road. Those agencies indicated in their comments a "field visit was made to this site on March 17, 2015." And in an email dated June 2, 2015, Kristoffer Nebre, an engineer in the DPW Bureau of Traffic Engineering, noted the speed limit on Beaver Dam Road and using accepted standards required the plan show a 445 ft. sight distance from the access point.

While no mention is made in the comments of the stopping sight distance, the point is these agencies considered the sufficiency and safety of the roadway, and Protestants did not challenge or contradict on cross-examination these agency findings. While neighbors testified motor vehicle accidents have occurred at the site through the years, the examples given all involved east-bound vehicles travelling along Beaver Dam Road. No evidence or police reports were presented to show accidents have occurred at the site involving vehicles travelling west along Beaver Dam Road, where Mr. Tiesler opined there exists inadequate stopping sight distance. Based on these factors, I do not believe the testimony of Mr. Tiesler can justify denial of the Plan.

The Baltimore County Code provides that the “Hearing Officer shall grant approval of a development plan that complies with these development regulations and applicable policies, rules and regulations.” B.C.C. § 32-4-229. After due consideration of the testimony and evidence presented by the Developer, the exhibits offered at the hearing, and confirmation from the various County agencies that the Plan satisfies those agencies’ requirements, I find that the Developer has satisfied its burden of proof and, therefore, is entitled to approval of the Development Plan.

B. Special Hearing – Final Development Plan Amendment Issue

Protestants primary legal argument is that the Developer cannot satisfy the requirements for amendment of an FDP. Protestants contend a large church is not “consistent” with the “spirit and intent” of the original FDP per B.C.Z.R. § 1B01.3.A.7. That inquiry is germane only if the plan must be amended in the first instance.

Both parties agree the amendment procedure is in the nature of a consumer protection device; i.e., the Code provides it is designed to protect those who have made decisions based on such plans from “inappropriate changes therein.” B.C.Z.R. § 1B01.3.A.1. An obvious example of such an inappropriate change would be where in a large community of new single family dwellings the developer attempts -- after half of the homes have been sold -- to amend the FDP and no longer construct a pool or other significant amenity shown thereon. Such amenities may well induce a purchaser to buy a home in that community, and to remove such feature(s) would constitute an “inappropriate change” of the FDP. In this case, it is undisputed the church was constructed approximately 20 years ago and the immediate neighbors owning lots shown on the Bishops Pond FDP purchased their homes after the church was built or were aware it had been approved and would soon be built.

In describing the “due diligence” they undertook prior to purchasing their homes, neither Mr. Fitz-Patrick nor Ms. Bosley testified they reviewed any of the prior FDPs. Thus, as a factual matter, neither could have “made decisions based on such plans” per B.C.Z.R. §1B01.3.A.1.a. So at best this is a hypothetical or philosophic exercise. Both neighbors consulted with real estate agents, attorneys and others prior to purchasing their homes and learned about the board of appeals ruling permitting the church along with the restrictions contained therein.

That board of appeals ruling (Case No. 91-466-X) granted a special exception to construct the church, and certain restrictions were imposed upon the use. At the time, the property was zoned RC 4, which permitted churches only by special exception. A special exception, known throughout most of the country as a “conditional use,” is a permitted use under the B.C.Z.R., but is one wherein the zoning commissioner is encouraged to impose conditions to protect the community from adverse impacts of the use. Montgomery County v. Mossburg, 228 Md. 555, 558 (1962)(“not only proper but desirable to attach to the grant of a special exception conditions” which are reasonable).

Here, the property was rezoned in 2012 to RC 3, a designation which permits churches “as of right.” As of that time, the church was no longer a “conditional use,” but was permitted without restriction(s). As Developer correctly notes, permitted uses like churches and schools will frequently have adverse impacts upon a community; i.e., traffic congestion. But the legislature, in designating the use as permitted, is presumed to have determined the benefits of the church outweigh its potential adverse effects. Schultz v. Pritts, 291 Md. 1, 21 (1981). In light of the above, I do not believe the restrictions set forth in Case No. 91-466-X are enforceable. For the same reasons, Protestants cannot rely upon those restrictions (which are enumerated on the amended Bishops Pond FDPs, Protestants’ Exhibits 5 and 6) to buttress their argument the enlarged

church would not be “consistent” with the “spirit and intent” of the original FDP. Finally, though it is not without risk, the Developer included a note on the Plan (Dev. Ex. 1, “Zoning History,” note 6) which would extinguish the special exception and along with it the restrictions imposed upon that relief in 1991.

The proposed church will be quite large, and it is understandable neighbors oppose the project. But the RC 3 zoning category does not impose a limitation upon the size of churches, a point not lost on Protestants, who opposed the rezoning request. Having lost that battle, I am not at liberty to permit a rehashing of the zoning change under the guise of the FDP amendment regulations. Those regulations are subsidiary to any change in the zoning classification (i.e., a change in the law) of some or all property shown on an FDP, which is the primary determinant in how a property may be used. B.C.Z.R. §102.1. Using a property in a manner permitted by its zoning classification and amending an FDP accordingly (if required) would not constitute an “inappropriate” change to the plans. Indeed, the development regulations expressly provide “[p]roposed development shall be in compliance with the present zoning classification on the property to be developed.” B.C.C. § 32-4-104(b). Thus, even if an amendment was required, I believe the Developer could satisfy the Regulations.

But in this case I do not believe the FDP needs to be amended. As an initial matter, the FDP amendment regulations apply to “residential development plans.” B.C.Z.R. § 1B01.3.A. The Development Plan in this case proposes an institutional use, not residential development, and such regulations are therefore inapplicable in this case. In addition, both Mr. Fitz-Patrick and Ms. Bosley constructed additions and/or accessory structures on their property, yet neither amended the Bishops Pond FDP. While the magnitude of the change proposed by Developer may be larger, these were nonetheless “changes” to what was shown on the original FDP. The point is not all

changes in the size or scale of a dwelling or building shown on a FDP necessitate an amendment to the Plan. An FDP amendment may be required (as it was here in 1992) when lots shown thereon are re-subdivided or uses of the lot(s) change. But the amended Bishops Pond FDP shows four Lots and “Church Use on Lot #1,” and that will continue to be the case. As such, an amendment is not required and the petition for special hearing will be dismissed on that basis.

THEREFORE, IT IS ORDERED by this Administrative Law Judge/Hearing Officer for Baltimore County, this 15<sup>th</sup> day of **March, 2016**, that the “**HUNT VALLEY CHURCH**” redlined Development Plan, marked and accepted into evidence as Developer’s Exhibit 1, be and is hereby **APPROVED**, subject to the conditions noted below.

IT IS FURTHER ORDERED that the Petition for Special Hearing pursuant to § 500.7 of the Baltimore County Zoning Regulations (B.C.Z.R), if necessary, to approve the removal of Lot 1 as an amendment to the most recently approved Final Development Plan (FDP) for Bishops Pond or to approve the proposed plan changes as an amendment to the FDP, be and is hereby **DISMISSED as unnecessary**.

The relief granted herein shall be subject to the following:

1. HVC must widen the point of egress from the church to provide two outbound lanes: an exclusive left turn lane, and an exclusive right turn lane along the entire length of the drive aisle;
2. HVC must provide police officer(s) (on-duty or uniformed secondary employment) to direct traffic at the church access on Sundays before and after services and during any event in which unusual traffic volume is expected;
3. On Sundays, HVC must allow 45 minutes to one hour between services to prevent the overlap of incoming and outbound vehicles from the HVC property;
4. HVC shall advocate for a sign to be installed on westbound Beaver Dam Road east of the I-83 overpass to alert travelers to the potential for vehicles turning into the HVC property; and

5. HVC shall add the following note to the Development Plan prior to plan signature:

**40. The following building, property or site is contiguous to the proposed development:**

- **13023 Beaver Dam Road (BA 975, MIHP only)**
- **13025 Beaver Dam Road (BA 2307, MIHP only)**
- **13027 Beaver Dam Road (BA 976, Baltimore County Final Landmarks List)**
- **13030 Beaver Dam Road (BA-90 and BA 276, MIHP only).**

Any appeal of this Order shall be taken in accordance with Baltimore County Code, § 32-4-281.

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Signed  
JOHN E. BEVERUNGEN  
Administrative Law Judge  
for Baltimore County

JEB/dlw