IN THE MATTER OF EL PASO COLBY, INC PETITIONERS FOR SPECIAL HEARING ON THE PROPERTY LOCATED AT 6136 DEER PARK ROAD	*	BEFORE THE
	*	BOARD OF APPEALS
	*	OF
2ND ELECTION DISTRICT 4TH COUNCILMANIC DISTRICT	*	BALTIMORE COUNTY
	*	CASE NO: 18-155-SPH

* * * * * * * * * * * * *

MAJORITY OPINION

This matter comes before the Board as a *de novo* appeal from a decision by Administrative Law Judge John Beverungen ("ALJ"). The Petition for Special Hearing filed pursuant to BCZR, §500.7 to confirm/establish rights of subdivision (density) for existing Parcel 258 and Parcel 350 which are under common ownership and to confirm/ratify previous property conveyances from Parcel 258 and 350. The Board of Appeals (CBA) heard the matter on November 8, 2018. The Petitioner, El Paso Colby, Inc, was represented by Lawrence E. Schmidt, Esquire. Protestant Rebecca Conley was represented by Michael R. McCann, Esquire. Another Protestant, Robert C. Morgan, Esquire, represented himself. Deputy People's Counsel, Carol Demilio, also participated in the hearing.

The CBA held its public deliberation on February 7, 2019. The CBA ruled that there are no remaining density units on what is known as Parcel 350 and two density units on what is known as Parcel 258.

Introduction

Luis Lara, Sr. is a principal in El Paso Colby, Inc. Apparently, Mr. Lara has been a friend and business associate of Edward Silcott for many years. Mr. Silcott was the original owner of the parcels at issue herein which he acquired in 1979, that being 48 acres +/- (Pet. Ex. 3, Tab 2), and 42.6 acres +/- in 1982. These are depicted on the relevant plats and plans as parcels 350, 606,

598, 258, and 559. They compose two tracts: 350, 606, and 598, acquired in 1979, are one tract (Pet. Ex. 3, Tab 2); 258 and 559, acquired in 1982 (Pet. Ex. 3, Tab 4), are the other tract. It was represented to the CBA that, as a result of financial difficulties, Mr. Silcott sold his holdings to Mr. Lara, retaining a life estate on his own home on what came to be known as Lot 350.

The properties are zoned Resource Conservation (RC) 4. Both of the original parcels – 350 and 258 – are in excess of 10 acres. This means that under the zoning regulations, density is calculated as .2 times the acreage. Baltimore County Zoning Regulation (BCZR) § 1A03.4(B)((1)(b). There are further restrictions under RC4 that are not directly relevant here. *See* §§ 1A03.4(B)(1) – (3). In addition, these parcels are all in Tier IV of the Sustainable Growth and Agricultural Preservation Act of 2012, referred to herein as the "Septics Act". The Septics Act limits development on Tier IV land, which is, such as the land at issue here, serviced by well and septic. Under the statewide Septics Act, Tier IV acreage can only be developed to the extent of a minor subdivision as the term "minor subdivision" is defined by the various local jurisdictions. As discussed below, Baltimore County defines a "minor subdivision" as being composed of not more than three residential units. Accordingly, regardless of the zoning that may permit greater density, the tracts at issue are limited to three density units each. The question here is to what extent these density units have already been utilized.

Baltimore County's Definition of Minor Subdivision

Because the Septics Act incorporates a local jurisdiction's definition of "minor subdivision", an arguably relevant issue in this matter is Baltimore County's definition of "minor subdivision". We say "arguably" because Baltimore County has historically operated with the understanding that "minor subdivision" is no more than three residential lots.

On this issue, it is important to review the exact wording found in the Septics Act with

regard to "minor subdivisions":

> Definitions.
> (a) (6) "Minor subdivision" means:
> (i) Into new lots, plats, building sites, or other divisions of land ***defined or described*** as a minor subdivision in a local ordinance or regulations:
> * * * *

MD Code Ann., EN, §9-206(a)(6). (Emphasis Added).

From our reading of the Septics Act, the County Council has ***described*** "minor subdivisions" in the Baltimore County Code ("BCC") as those which have three or fewer lots. The County Council sufficiently described these smaller developments by providing several exemptions from the development review and approval process as follows:

> (a) §32-4-106(a)(ix) - Subdivision of land that was recorded before January 26, 1990 into three or fewer lots;
> (b) §32-4-106(a)(x) - Except as provided in paragraph (2) of this subsection, subdivision of land into three or fewer lots for residential single-family dwellings provided that the lots are not served by a panhandle driveway.
> (c) §32-4-106(a)(x)(2) - If a lot is served by a panhandle driveway, the subdivision of land into three or fewer lots for residential single-family dwellings is only exempt from:
> (i) The concept plan requirements under §§32-4-211 through 32-4-217; and
> (ii) The county review requirements under §§32-4-226 and 32-4-227 of this title.
> (d) §32-4-106(b)(5) - The subdivision of land into three or fewer lots for residential single-family dwellings;
> (e) §32-4-106(b)(8) – A minor development that does not exceed a total of three lots.

Additionally, the BCZR contains the following references to minor (and major) subdivisions. *See e.g.* §§ 1A04.4(A), 1A07.8(B)(1)(b), 1A07.10, 1A09.7(B)(2), and 4A03.4(A)(4).

We find these descriptions in the BCC and BCZR of "minor subdivisions" to be consistent with the purpose of the Septics Act which is to limit the disproportionate impacts of large subdivisions on septic systems on farm and forest land, streams, rivers and Chesapeake and Coastal Bays. The Septics Act provides for four tiers of land use categories to identify where major and minor residential subdivisions may be located and what type of sewage system will serve them. Toward that end, we find the County's description of "minor subdivision" has defined it for purpose of development exemptions and the Septics Act.

In order to avoid the limiting effect of the Septics Act on the density calculation of the parcels at issue, Petitioner's counsel invited this Board to conclude that the absence of an express *definition* of "minor subdivision" in the BCZR or the BCC means that a minor subdivision can be more than three lots. The Board rejects that invitation in the strongest terms possible. For the CBA to rule as Petitioner requests would be to ignore the express wording of the Septics Act requiring either a "definition" **or** a "description" as well as a departure from long established and relied upon County practice. Expert witnesses for Petitioner **and** for Protestants both testified that Baltimore County operates, and has operated for decades, with the understanding that a "minor subdivision" means three or fewer lots. Petitioner's counsel himself conceded that fact.

Indeed, we agreed with Petitioner's counsel in the case of *In re: Valley Framing*, Case No. 08-123 wherein the Petitioner's request for a limited exemption under § 32-4-106(b)(8) was supported by the argument that: "Subsection 32-4-106(b)(8) allows minor development that do not exceed a total of three lots to be exempted from the hearing officer's hearing and community input meeting". (*See* Petitioner's Hearing Memorandum in Lieu of Closing Argument filed 2/17/2009).[1]

No county official or developer could operate – as they have since at least 1979 when the BCZR was adopted in its present form -- under those provisions without a common understanding of the meaning of "minor subdivision". The County Zoning Office has a checklist of requirements for minor subdivisions which is premised on the three lot maximum. The Baltimore County Development Management Policy Manual describes the "Procedure for Minor Subdivision" which includes the processing fees for a subdivision of one, two, or three lots, but no more. These are but a few examples of the way the three lot maximum for minor subdivisions is embedded within

[1] Lawrence E. Schmidt, Esquire represented the Petitioner/Property owner who was seeking the limited exemption.

County law and practice. Of course, it is a fundamental principle that an agency's interpretation of the laws and regulations it is commissioned to administer is worthy of great deference. *Board of Physician Quality Assurance v. Banks*, 354 Md. 59, 69 (1999). People's Counsel describes the situation well by saying that to conclude otherwise would be to conclude that ". . . countless years of unchallenged minor subdivision policy and regulation, and application in hundreds if not thousands of development cases is [sic] meaningless." People's Counsel Memorandum at p.8.

Given all of the above, the CBA unanimously finds that the description of "minor subdivision" found in both the BCC and the BCZR as above, as well as years of County development history in Baltimore County, leads to the inescapable and sound conclusion that a "minor subdivision" is a subdivision with not more than three residential lots.

Parcels 350, 606, and 598

The first tract was originally known as Parcel 350 ("350"). Originally, 350 was 48 acres +/-. Under BCZR § 1A03.4(B)((1)(b) it yielded 9 density units: .2 units per acre means .2 x 48 acres = 9.6 which results in 9 units. Both experts agreed that the density yielded 9 units. In 2000, Mr. Silcott filed a minor subdivision plat and plan which identified two units. (Pet. Ex. 5). Lot 1 was approximately 5.19 acres and is now parcel 598. The plan and plat reflected a house to be built. The balance of the property, deemed Lot 2, was 43.6 acres +/-, and remained parcel 350. Lot 2 showed an existing house, another two story building, and a building labeled as a 'tenant house'. It also showed associated well and septic areas for each of the three structures. (*Id.*). As indicated above, a "minor subdivision" is composed of not more than three lots utilizing three

density units. Thus, as of 2000, the minor subdivision was composed of (at least)[2] two lots: parcels 350 and 598.

On October 11, 2004, Mr. Silcott gifted what is now designated as parcel 606 to his son, Stephen Silcott. (Pet. Ex. 3, Tab 5). This lot was carved out of 350. The subdivision plan was not amended – as it should have been -- to reflect the transfer of title, but a transfer it was, and the utilization of a density unit it is. A landowner cannot avoid the effect of a transfer by simply having that transfer be, essentially, "off the books" as it was with Parcel 606. This is the utilization of yet one more density unit associated with 350. And what was once 350, was now 350, 598, and 606.

The question then is: given the transactions described above, how many density units remain on the original tract 350. There is a house on 350; there is a house on 598; and there is a house on 606. Each of these houses has a separate address and is serviced by separate well and septic systems. Whatever density rights may remain under the RC4 zoning rules, the limitations of the Septics Act kicks in. Given Baltimore County's definition of "minor subdivision", the total tract originally known as 350 is limited to three residential units. This means that all of the density units have been utilized.

If this were not enough, the subdivision plat and plan include a structure denoted as a "tenant house" on 350, as it now stands **after** peeling off 606 and 598. A tenant house is defined in BCZR § 1A03.4(B)(5). If a building is a tenant house, it does not count as a density unit. If a building is not a tenant house within the meaning of § 1A03.4(B)(5), then it does count as density unit. The evidence in this case established beyond all doubt that the "tenant house" depicted in

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[2] See the discussion regarding the tenant house, *infra* at p.7.

the 2000 subdivision plan was not a legitimate tenant house within the meaning of BCZR § 1A03.4(B)(5). It was not registered as a tenant house with Land Preservation Advisory Board as required by § 1A03.4(B)(5). Moreover, the testimony clearly established that there was no farming activity on parcel 350 to which a tenant house could be associated. § 1A03.4(B)(5)(a). Vance Summerhill, for example, testified that he did not see farming activity and that Ed Silcott's in-laws resided in the "tenant house" as a residence. The burden of persuasion on this point is with El Paso Colby. The only conceivable evidence is the labeling of the building as a tenant house on the 2000 subdivision plan. That is a very self-serving designation and given the absence of the required registration with the County and the affirmative testimony about the absence of agricultural activities, the CBA concludes that this structure is not a tenant house.

Accordingly, Mr. Silcott has utilized four density units out of the original nine as permitted in an RC4 zone. These are: 598, 606,[3] and two on 350 – the house and the tenant house. Even putting aside the tenant house issue, there are three units taken: 598, 606, and 350. Accordingly, and by reason of the Septics Act, there are no further density rights available on the original 350.

Petitioner also argued that this Board should decide the maximum available density without regard to past, present or future uses of Parcels 258 and 350. In other words, this Board should ignore any dwellings which currently exist on both parcels. In our review of prior cases on density rights, we note that the existence of dwellings has consistently been considered by the Board in determining how many density rights remained.

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[3] Lots 598 and 606 were transferred by Mr. Silcott to his children. Mr. Silcott lives, or recently lived, in 350 with a life estate, the residual estate to El Paso Colby.

In the Matter of Myles R. McComas, Case No.: 15-208-SPH, the Parties agreed that there remained only 1 density unit after deducting an existing dwelling and other structures.[4]

Similarly, *In the Matter of William and Karen Chandler,* Case No.: 16-025-SPH, Petitioners agreed that eight total density units were attributed to that property. However, because a single family dwelling existed, the Petitioners admitted that there remained only seven available density units.[5]

Finally, *In the Matter of Craig and Karen Kehoe*, Case No.: CBA-16-021, we found that there were no available density units remaining due to the presence of the Kehoe's house as well as an out-conveyance to another person.[6] This case marked the second round of litigation involving the Kehoe's property. Interestingly, as with the tenant house here, there was a dispute in the *Kehoe* case about whether a tenant house (a line-straddling building) was used as a "principal dwelling". We found the evidence proved that the tenant house was used as a principal dwelling and, as a result, it used the last available density unit.

Before making that decision in the second *Kehoe* case, we were guided by the Court of Special Appeals' decision in the first *Kehoe* case regarding the calculation of available density units. The Court held that the process entails first determining the initial density rights, and then subtracting the density units which have already been used or conveyed. The Court explained, in pertinent part:

> Some of the parcels' density units have already been used or conveyed. The Kehoes' house on Parcel One utilizes one unit on that parcel, and the remaining Parcel One density unit was utilized by a three-acre conveyance in 1996, so no further development on that

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[4] Counsel for Petitioner, the Estate of Myles R. McComas, was Lawrence E. Schmidt, Esquire and Carole Demilio, Esquire, Deputy People's Counsel, agreed to the Order signed by the Board on October 22, 2015.

[5] William and Karen Chandler were represented by Lawrence E. Schmidt, Esquire. Carole Demilio, Esquire, Deputy People's Counsel also participated in the hearing.

[6] Kenneth Wells, registered property line surveyor in this case was also the expert for Craig and Karen Kehoe.

> parcel is possible. A 1998 three acre conveyance of a dwelling lot to Ms. Arthur utilized one of the density units for Parcel Two. Except for the dwelling straddling the boundary between Parcel One and Parcel Two, the remaining acreage of Parcel Two is undeveloped; whether or not that line-straddling building consumes a density unit is a matter of dispute.

Kehoe v. Arthur, Sept. Term 2013, No. 1448, at pp. 2-3.

In light of these prior Board cases, we believe that our decision in this case is consistent with those density calculations.

Parcels 258 and 559

The same logic applies to the two remaining parcels – 258 and 559, originally known as tract 258. This tract amounted to approximately 42 acres. It also is zoned RC4, and the same formula as cited above is used to determine the number of density units. That calculation results in 8 total density units. Mr. Silcott acquired this tract in 1982. In 1993, Mr. Silcott sold off 11.5 acres as lot 559 to the Craigs who constructed a residence. No minor subdivision plan was filed with Baltimore County, so this is another "off the record" transfer like that of parcel 606. This might otherwise leave 2 density units on 559 (one of which is taken) and 6 on 258. However, according to Bruce Doak, testifying as an expert in this matter, in order for there to be any development, the developer would have to file a minor subdivision plan that would include **both** 258 and 559 as one tract. Because the minor subdivision plan is limited to three density units under the Septics Act, there can only be a total of three density units on that entire tract. One of those units has been taken by the transfer of 559 to the Craigs. Parcel 258 is unimproved. Thus, on the balance of the tract – in effect, on what is presently 258, there are two density units remaining.[7]

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[7] Of course, any development would also have to satisfy all of the requirements for development of RC4 land, such as the establishment of a conservancy, minimum lot sizes, setbacks, permeable surface area, and the like. *See* § 1A03.4(B)(1)-(5).

CONCLUSION

For the reasons outlined above, it is the finding of the majority of the CBA that the Petitioner has no remaining density units on the parcels referred to as 350; and the unanimous finding of CBA that the Petitioner has two remaining density units on the parcel known as 258.

O R D E R

THEREFORE, IT IS THIS 28th day of August, 2019, by the Board of Appeals of Baltimore County, hereby

ORDERED, that in accordance with the conclusions herein, Petitioner El Paso Colby, Inc. has no remaining density units on the Parcel known in this matter as Parcel 350; and it is further

ORDERED, that Petitioner El Paso Colby, Inc. has two remaining density units on the Parcel known in this matter as Parcel 258.

Any petition for judicial review from this decision must be made in accordance with Rule 7-201 through Rules 7-201 of the *Maryland Rules.*

BOARD OF APPEALS OF BALTIMORE COUNTY

Joseph L. Evans, Panel Chair

Maureen E. Murphy

IN THE MATTER OF EL PASO COLBY, INC PETITIONERS FOR SPECIAL HEARING ON THE PROPERTY LOCATED AT 6136 DEER PARK ROAD	*	BEFORE THE
	*	BOARD OF APPEALS
	*	OF
2ND ELECTION DISTRICT 4TH COUNCILMANIC DISTRICT	*	BALTIMORE COUNTY
	*	CASE NO: 18-155-SPH

* * * * * * * * * * * * *

CONCURRENCE IN PART AND DISSENT IN PART

I concur with the majority on all issues and respectfully dissent in part.

FACTS

The Dissent does not dispute the statement of facts as laid out by the Majority, however, I would like to note several facts relevant to this Dissent. Petitioner, El Paso Colby, Inc, purchased the properties in question, which are undisputedly zoned RC 4, when the previous owner, a long-time friend of Appellant's principal, Luis Lara, Sr., experienced financial strain which threatened his continued ownership. In doing so, Mr. Lara graciously allowed his friend to remain on the property until he was able to relocate which he intended to do shortly for health reasons. Consequently, Appellant requested a determination of the permissible density units on Parcel 350 for the purpose of a sale.

It is not necessary to repeat all of the factual background that is recited by the Majority, but it is enough to note several facts related to Parcel 350 which is the basis for this Dissent.

Parcels 350 and 606 are separate parcels. Mr. Silcott's predecessor in title (Gray) owned both Parcel 350 and Parcel 606, which he conveyed to Mr. Silcott under a single deed sometime in 1979. This conveyance was prior to the effective date of RC 4 regulations. On February 5, 1982, Mr. Silcott subsequently filed a confirmatory deed to reiterate that Parcel 606 was a separate parcel of land from Parcel 350.

Since 1979, Mr. Silcott has sold two parcels of land from the totality of parcels related to this matter. In 2000, he subdivided Parcel 350 by creating Parcel 598 and sold it. (Pet. Ex. 5). In 2004, he conveyed Parcel 606 to his son, Steven Silcott. (Pet. Ex. 3 Tab 5)

ARGUMENT

This Dissent is based on the interpretations of alterations to the acreage of Parcel 350 prior to 1979, by subdivision and conveyances, and the application of the Sustainable Growth and Agricultural Preservation Act of 2012 ("Septics Act") on such actions. I respectfully disagree with my colleagues on the application of the Septics Act as applied to Parcel 350 for the reasons found herein.

The morass caused by the intersection of Baltimore County Zoning Regulation ("BCZR") § 1A03.4(B)(l)(b) and the Septics Act is a source of multiple interpretations. Everyone agrees that BCZR § 1A03.4(B)(l)(b) yields 9 density units for Parcel 350. The application of the SGAP Act is what prompted the chaos which is the subject of this action.

The Septics Act took effect on July 1, 2012 and it further limits the density of parcels beyond BCZRs. Parcel 350 is a Tier 4 parcel, which only permits minor subdivisions under BCZRs. The Septics Act defines a "minor subdivision" as:

> (i) The subdivision of land:
>
> 1. into new lots, plats, building sites or other divisions of land defined or described as a minor subdivision in a local ordinance or regulation:
>
> A. that is in effect on or before January 1, 2012; or
>
> B. adopted on or before December 31, 2012 if a local jurisdiction chooses to create a definition or description applicable solely to this Section or if a local ordinance or regulation does not define or describe a minor subdivision under A of this item, provided that a minor subdivision defined or described in the adopted ordinance or regulation

> does not exceed seven new lots, plats, building sites or other divisions of land; or
>
> 2. If a local jurisdiction has not adopted a definition or description of a minor subdivision on or before December 21, 2012, under item 1 of this item, into fewer than five new lots, plats, building sites, or other divisions of land; and
>
> (ii) If the local ordinance or regulation has multiple definitions or descriptions of a minor subdivision under item (i) of this paragraph, the definition or description of a minor subdivision that is determined by the local jurisdiction to apply for the purpose of this Section.
> MD Code Ann., EN, § 9-206(a)(6).

In applying the Septics Act to further limit the density of parcels, there are several paths of interpretation arising from the interface between the Baltimore County Code ("BCC") and the Septics Act and the ambiguity generated therein. The Petitioner would like for this Board to believe that Baltimore County never adopted a definition of a minor subdivision as contemplated by the Septics Act, and therefore, Petitioner is entitled to five (5) new subdivisions. My colleagues concluded that Baltimore County resolved the ambiguity by relying on other BCC definitions for minor subdivisions, which defines minor subdivisions as three or fewer lots. My colleagues then applied this limitation to conclude that Parcel 350 had no more subdivisions available. To reach this conclusion, they counted Parcels 350, 598 and 606.

The general principles of the law of equity and fairness causes me to conclude that after applying the Septics Act, Parcel 350 is limited to 1 additional subdivision. The crux of my disagreement with the Majority opinion concerning this parcel is based on applying new law to acts that were performed many years ago with the benefit of hindsight and applying new law to a property owner that effectively reduces the economic value of the property without due process combined with a new law that has unresolved ambiguities within its text.

The ambiguities between BCC and the Septics Act cause me to reach the same conclusion

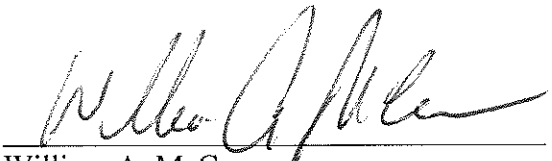
via two paths. Using the Majority finding that limits a Tier IV parcel to three (3) subdivisions, I find that Parcel 350 has one remaining subdivision because Parcel 606 was obtained through adverse possession and has always been a separate parcel from Parcel 350 (as acknowledged in the confirmatory deed). For this reason, I did not count the sale of Parcel 606 as a subdivision for Parcel 350. I also note that the Petitioner was only asking for a determination of the density units available to Parcel 350 without this Board considering the effect that the tenant house has on the density calculation.

I also found the Petitioner's argument convincing, concerning the defects arising from the interface between the BCC and the Septics Act convincing. I agree that the BCC fails to expressly provide a definition that clearly resolves the foregoing ambiguity. Applying the Petitioner's standard of five (5) subdivisions to Parcel 350, I count 606 as one subdivision, as I likewise count, 598 and the tenant house which yields a sum of four (4) subdivisions and therefore, I conclude that Parcel 350 has only one remaining subdivision. I also note that the Petitioner raises an interesting interpretation of the Septics Act when the Petitioner argued that the subdivisions must be "new," meaning that the subdivisions must occur after the effective date of the Septics Act.

CONCLUSION

To apply the Act in the manner that the Majority proposes would result in not only an unfair result for Petitioner, by any measure, a good county resident and a good neighbor, but would also contravene the intent of the legislature and violate the law of equities. For these reasons, I respectfully dissent in part and conclude that Parcel 350 has one remaining subdivision.

August 28, 2019
Date



William A. McComas

Board of Appeals of Baltimore County

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RE: In the Matter of: *El Paso Colby, Inc.*
Case No.: 18-155-SPH

Dear Counsel:

Enclosed please find a copy of the final Majority Opinion and Order, and the Concurrence in Part and Dissent in Part, issued this date by the Board of Appeals of Baltimore County in the above subject matter.

Any petition for judicial review from this decision must be made in accordance with Rule 7-201 through Rule 7-210 of the *Maryland Rules*, **WITH A PHOTOCOPY PROVIDED TO THIS OFFICE CONCURRENT WITH FILING IN CIRCUIT COURT. Please note that all Petitions for Judicial Review filed from this decision should be noted under the same civil action number.** If no such petition is filed within 30 days from the date of the enclosed Order, the subject file will be closed.

Very truly yours,

Sunny Cannington Hay

Krysundra "Sunny" Cannington
Administrator

KLC/taz
Enclosure
Multiple Original Cover Letters

c: See Distribution List Attached

c: El Paso Colby, Inc.
Rebecca Conley
Lawrence M. Stahl, Managing Administrative Law Judge
C. Pete Gutwald, Director/Department of Planning
Michael D. Mallinoff, Director/PAI
Nancy C. West, Assistant County Attorney/Office of Law
Michael E. Field, County Attorney/Office of Law