

July 14, 2021

The Honorable, Christiana Rigby
Chair, The Howard County, Maryland Zoning Board
c/o The Administrator
councilboard@howardcountymd.gov
3430 Courthouse Dr.
Ellicott City, MD 21043

Subject: ZB 1118 M Erickson at Limestone Valley ZB CEF M

The undersigned hereby submits this Opposition Party Closing Statement under Zoning Board Rules of Procedure 2.403.D.7.

Statement

As I noted previously. The Zoning Board and many parties understand the HCZR's are a shambles. While there may not be much agreement regarding the wisdom of this Petition, I think there is near unanimity that the text criteria of the CEF Zoning district lacks objective standards and the non-legislative process we have endured is not in the public interest for such a locally momentous public policy decision.

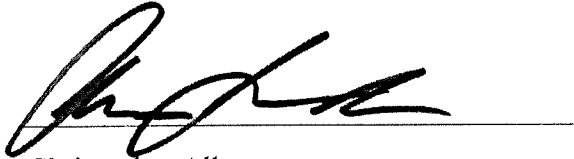
Deciding this case in a quasi-judicial forum handicaps Council members, the Petitioner, and the public. The rigid quasi-judicial structure inhibits the legislative body from carrying out their due diligence; The petitioner is stuck with the plans as submitted because any amendment would require them to start over. Opposition parties are not afforded the same latitude as the petitioner, and they are subject to objections of highly salient testimony that arguably the Board needs to decide fairly and properly.

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I am not going to be cumulative here. Others are going to address the seminal question of whether the Petitioner has met their burden of proof threshold. My July 15, 2020, motion to dismiss is still pending and speaks for itself. The Petitioner asked and was granted a deferral of a final ruling on this motion until they concluded their case in chief. I believe the Zoning Board has all the information they need to resolve the significant conflicts in the evidence, and I am confident that you will chronicle in the record; full, complete, and detailed findings of fact and conclusions of law.

I want to close by expressing my sincere appreciation to the Zoning Board, their Counsel, Robin Regner and Ann Nicholson, as well as Erickson and their Counsel. And a word of gratitude to all my fellow citizens that participated.

Faithfully submitted,

A handwritten signature in black ink, appearing to read 'Christopher Alleva', is written over a horizontal line.

Christopher Alleva
10848 Harmel Dr
Columbia, MD 21044
443 310 1974

**Certificate of Mailing Omitted per instructions. Transmitted to Administrator for Posting
July 14, 2021**