



For DPZ Office use only:

BA Case No. 817D

Date Submitted: 5/12/2025

ADMINISTRATIVE APPEAL PETITION TO THE HOWARD COUNTY HEARING AUTHORITY

A person who wishes to appeal a departmental decision must use this petition form. It is recommended that a person determine whether he/she can be acknowledged as being an aggrieved person¹. The appellant must submit the completed form to the Department of Planning and Zoning within 30 days of issuance of the departmental ruling or action.



1. APPEAL REQUEST

BRIEF DESCRIPTION OF RULING OR ACTION FROM WHICH THIS APPEAL IS TAKEN: Appeal of F-25-2022, signed on April 10, 2025 and recorded into land records on April 17, 2025.

DATE OF RULING OR ACTION: 4/17/25 (or 4/10/25)

BRIEF DESCRIPTION OF ERROR OF FACT, OR LAW, IF ANY, PRESENTED BY THIS APPEAL: Errors in platting related to tree protection, grading, density, and other regulatory requirements.

MANNER IN WHICH THE APPELLANT IS AGGRIEVED BY THE RULING OR ACTION: Appellants live in the vicinity of the property, several of whom live directly adjacent to the property and are prima facie aggrieved, and are all affected by development in a manner distinct from the general community.

OTHER FACTORS WHICH THE APPELLANT WISHES THE HEARING AUTHORITY TO CONSIDER: Appellants wish for the hearing authority to consider equitable relief related to lack of notice.

¹ As a brief explanation of this concept: Generally speaking, a person "aggrieved" is one whose personal or property rights are adversely affected by the decision. The decision must not only affect a matter in which the protestant has a specific interest or property right, but his interest therein must be such that he is personally and specifically affected in a way different from that suffered by the public generally. The Department of Planning and Zoning does not advise persons on whether they may or may not qualify as being aggrieved. Persons intending to file an appeal may want to obtain separate legal advice on this issue because it may have an impact on the validity of the appeal.

2. APPELLANT'S NAME Joshua Chartier and Amy Gao
TRADING AS (IF APPLICABLE) (Other appellants are listed on signature sheet)
ADDRESS 3519 Church Road, Ellicott City, MD 21043
PHONE NO. (H) c/o attorney G. Macy Nelson (W) _____
EMAIL c/o attorney G. Macy Nelson
3. COUNSEL FOR APPELLANT G Macy Nelson
COUNSEL'S ADDRESS 600 Washington Avenue, Suite 202, Towson, MD 21204
COUNSEL'S PHONE NO. 410-296-8166
EMAIL gmacynelson@gmacynelson.com
4. RESPONDENT Will Pippen (Permit applied for by Jenn M. Wellen)
RESPONDENT'S ADDRESS 8480 Baltimore National Pike, Ellicott City, MD 21043
5. PROPERTY IDENTIFICATION (IF REAL PROPERTY IS INVOLVED)
ADDRESS OF SUBJECT PROPERTY 3538 Church Road
Ellicott City, MD 21043
TOTAL ACREAGE OF PROPERTY 8.5 acres
PROPERTY LOCATION Ellicott City
ELECTION DISTRICT 1 ZONING DISTRICT R-ED
TAX MAP # 0025 GRID # 0001 PARCEL/LOT # 0013
6. APPELLANT'S INTEREST IN SUBJECT PROPERTY
[] OWNER (Including joint ownership) [] OTHER (Describe and give name and address of owner) Owner is SDC Mill Creek according to permit, same address as Will Pippen's: 8480 Baltimore National Pike, Ellicott City, MD 21043
7. ADDITIONAL MATERIAL, FEES, POSTING, AND ADVERTISING
A) The Appellant must submit one (1) signed original and nine (9) copies of the signed original, for a total of ten (10) copies, of this petition. If supplementary documents or other materials are included, ten (10) complete sets must be submitted.
B) The appellant is advised to consult the Rules of Procedure of the Board of Appeals. In accordance with Section 2.210(b) of that document, an "on the record" appeal requires that within 30 days of filing an administrative appeal, the appellant file a record transcript of the hearing being appealed. In addition, within 15 days of filing the transcript, the appellant must file a Memorandum addressing the points of law upon which the appeal is based.

- C) The undersigned agrees in matters involving land use, except in administrative appeals from the issuance of a notice of violation of County laws or regulations, to properly post the property at least thirty (30) days immediately prior to the hearing and to maintain the posters as required and submit an affidavit of posting at, or before the time of the hearing. If the Appellant is not the owner or does not have a beneficial interest in the subject property, the posting of the property is not required; however, the Appellant must send copies of the petition and notification of the public hearing to the property owner and the adjoining property owners in accordance with Section 2.203(e) of the Rules of Procedure of the Board of Appeals.
- D) The undersigned also agrees in matters involving land use, except in administrative appeals from the issuance of a notice of violation of County laws or regulations, to insert legal notices, to be published one (1) time in at least two (2) newspapers of general circulation in Howard County, as prepared and approved by the Department of Planning and Zoning, within at least thirty (30) days prior to the hearing, and to pay for such advertising costs; and further agrees to submit (2) approved certificates of the text and publication date(s) of the advertisement at or before the time of the hearing.
- E) The undersigned also agrees to furnish such additional plats, reports, plans, or other materials as may be required by the Department of Planning and Zoning and/or the Hearing Authority in connection with the filing of this petition.
The undersigned agrees to pay all costs in accordance with the current schedule of fees.

8. SIGNATURES

The undersigned hereby affirms that all of the statements and information contained in, or filed with, this petition are true and correct.

The undersigned has read the instructions on this form, filing herewith all of the required accompanying information.



Signature of Attorney

Signature of Appellant

For DPZ office use only: (Filing fee is \$1,500.00 plus \$50.00 per poster)

Hearing Fee: \$ _____

Poster Fee: \$ _____

TOTAL: \$ _____

Receipt No. _____

County Website: howardcountymd.gov

(Make check payable to "Director of Finance")

**PLEASE READ CAREFULLY
DATA TO ACCOMPANY PETITION**

Drawings: Where a parcel of land and/or building(s) as defined in the Zoning Regulations is involved in that which is being appealed, petition forms must be accompanied by **(10) copies of required drawings** showing the following information:

- ☐ (a) Courses and distances of outline boundary lines and the size of the property
- ☐ (b) North arrow
- ☐ (c) Existing zoning of subject property and adjoining property
- ☐ (d) Location, extent, boundary lines and area of any current use and proposed change in use
- ☐ (e) Any existing or proposed building(s), structures, signs, points of access, natural features, landscaping, parking, and other objects and/or uses on subject property which may be relevant to the petition
- ☐ (f) Same as (e) above, if any, of adjoining property which may be required in the proper examination of the petition
- ☐ (g) Location of subject property in relation, by approximate dimension, to nearest intersection of two public roads
- ☐ (h) Ownership of effected roads
- ☐ (i) Election District in which the subject property is located
- ☐ (j) Tax Map number on which the subject property is located
- ☐ (k) Name and local community in which the subject property is located or name of nearby community
- ☐ (l) Name, mailing address, telephone number (and e-mail address, if any) of the appellant
- ☐ (m) Name, mailing address, telephone number (and e-mail address, if any) of attorney, if any
- ☐ (n) Name and mailing address of property owner
- ☐ (o) Any other information as may be necessary for full and proper consideration of the appeal.

BA Case # _____

PETITIONER: _____

ADDRESS: _____

Affidavit made pursuant to the pertinent provisions of Title 22 of the Howard County Code as amended.

THE UNDERSIGNED DOES HEREBY DECLARE THAT NO OFFICER OR EMPLOYEE OF HOWARD COUNTY, WHETHER ELECTED OR APPOINTED, HAS RECEIVED PRIOR HERETO OR WILL RECEIVE SUBSEQUENT HERETO, ANY MONETARY OR MATERIAL CONSIDERATION, ANY SERVICE OR THING OF VALUE, DIRECTLY OR INDIRECTLY, UPON MORE FAVORABLE TERMS THAN THOSE GRANTED TO THE PUBLIC GENERALLY IN CONNECTION WITH THE SUBMISSION, PROCESSING, ISSUANCE, GRANT OR AWARD OF THE WITHIN APPLICATION OR PETITION IN BA CASE # _____ FOR A ZONING CHANGE AS REQUESTED.

I, WE, DO SOLEMNLY DECLARE AND AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE CONTENTS OF THE AFOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY, OUR, KNOWLEDGE, INFORMATION AND BELIEF.

Trish D. Haller
Witness

[Signature] 5/12/2021
Signature Date

Witness

Signature Date

Witness

Signature Date

PLEASE CALL 410-313-2350 FOR AN APPOINTMENT TO SUBMIT YOUR APPLICATION

County Website: www.howardcountymd.gov

T:\shared\PubSer\Division Forms\AdminAppeal.doc REV 0214

SIGNATURES OF APPELLANTS

Jan Probst
Dorlene Chatter 3519 Church Rd.

Amy Gao
Amy Gao, 3519 Church Rd.

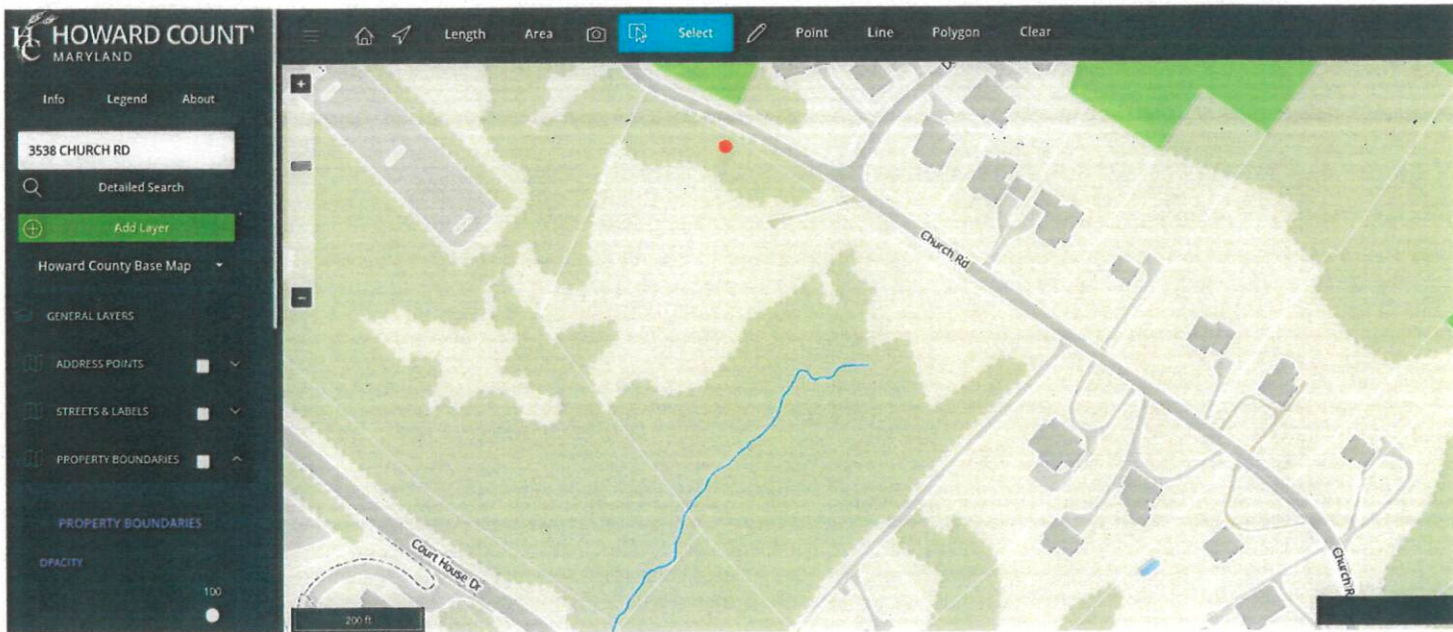
St Walsh
Sarah Lynne Walsh, 3626 Church Rd
3560 Church Rd

Ed Furtado
Edward Furtado 3600 Church Rd

Kelsey +
Chris Laatsch 3601 Church Rd

Kelsey Laatsch
Kelsey Laatsch 3574 Church Rd

Elizabeth Walsh



- a) Shown on GIS map and in attached F-25-022 Document
- b) GIS faces cardinal directions
- c) Existing zoning is R-ED
- d) No proposed change in use. Current use is not relevant to this appeal.
- e) Detailed natural features relevant to appeal are shown in F-25-022.
- f) No adjoining property will need to be examined
- g) Nearest public roads shown
- h) Public roads are not affected by this appeal
- i) Election District 1
- j) Tax Map No. 0025
- k) Woods of Park Place
- l) Addresses are provided below:
 - Elizabeth Walsh, 3574 Church Road
 - Sarah Lynne Walsh, 3626 Church Road
 - Ed Fortunato, 3560 Church Road
 - Christopher Laatsch, 3601 Church Road
 - Kelsey Laatsch, 3601 Church Road
 - Joshua Chartier, 3519 Church Road
 - Amy Gao, 3519 Church Road
- m) G. Macy Nelson, Esq., 600 Washington Ave., Ste. 202, Towson, MD 21204
- n) 8480 Baltimore National Pike, Ellicott City, MD 21043
- o) Petitioners will supplement appeal with additional information as becomes relevant



HOWARD COUNTY DEPARTMENT OF PLANNING AND ZONING
3430 Court House Drive ■ Ellicott City, Maryland 21043 ■ 410-313-2350
Lynda D. Eisenberg, AICP, Director FAX 410-313-3467

April 21, 2025

Mill Creek LLC
Attn: James Moxley III
8480 Baltimore National Pike, Suite 415
Ellicott City, MD 21043

Lacey Property Homeowners Association, Inc.
c/o Vincent P. Lacey
6026 Trotter Rd
Clarksville, MD 21029

RE: F-25-022 Lacey Property

Dear Applicants:

Please be advised that the above referenced final resubdivision plat was recorded on April 17, 2025 among the Land Records of Howard County as **Plat Nos. 26861-26865**.

A site development plan must be submitted to the County for review and approval for the construction of new residential dwellings located within the Planned Service Area for both public water and sewer prior to building permit application.

If you have any questions concerning this resubdivision plat or if you would like an electronic copy of the plat, please contact Derrick Jones at (410) 313-4330 or email at djones@howardcountymd.gov.

Sincerely,

Signed by:

8FD031E5754C4C7...

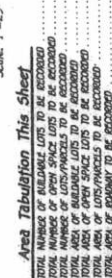
Julia Sauer, Planning Supervisor
Division of Land Development

JS/ps

cc: Research
Real Estate Services, DPW
Environmental Health
Department of Assessments and Taxation
FCC
Community Members

[illegible]

RECORDED AS PLAT NO. _____ ON _____
AMONG THE LAND RECORDS OF HOWARD COUNTY, MARYLAND.



**Part Of
Open Space
Lot 30**
10,364 Sq Ft. (This Sheet)
Total Area = 25,460 Sq Ft.
0.6086 Ac.
Owned & Controlled by
The Leaky Property
Homeowners
Association, Inc.

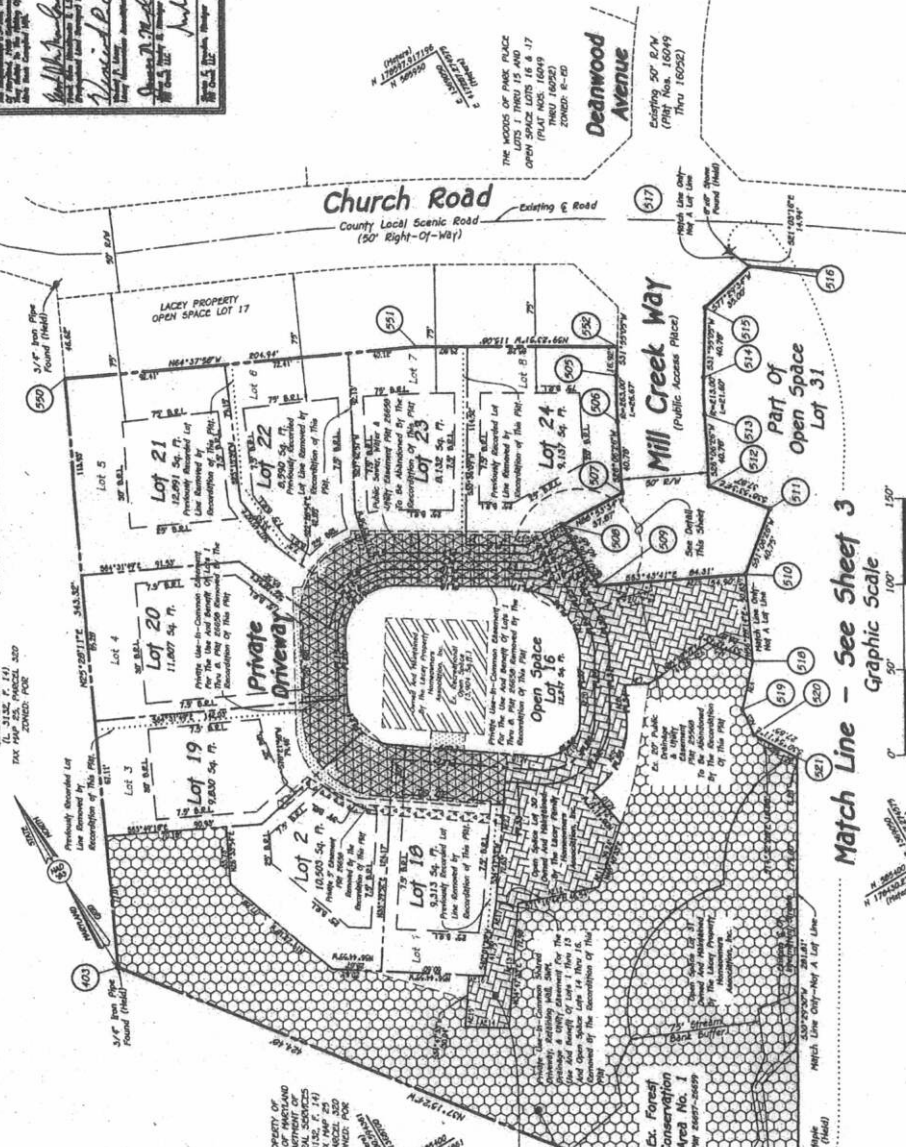
**Part Of
Open Space
Lot 31**
2,972 Ac. (This Sheet)
Total Area = 4,0195 Ac.

Developer

SOC Mill Creek, LLC
Attn: Mr. James R. Mosley
Suite 415
6460 Baltimore National Pike,
Ellicott City, MD 21043
410-269-4244


Property Homeowners Association, Inc.
c/o Mr. Vincent P. Lacey,
6026 Trotter Road
Clarksville, Maryland 21029
Phe 410-707-2539


Flisher, Collins & Carter, Inc.
Civil Engineering Consultants & Land Surveyors
Centennial Square Office Park - 10272 Baltimore National Pike
Cty., Maryland 21142
Bticut (410) 461-2995




This Subdivision Is Subject To Section 18.1220 Of The
Howard County Code, Public Order And Public Safety
Has Been Granted Under The Terms And Provisions. The
Effective Date Developer On Which Date Developer
Agreement 14-0913-0 Was Filed And Accepted

Legend

 Existing Public Forest Conservation Area
(Notation) (See No. 26657-26659)

 Private Use by Common National Ordinance

 Subdividing

<p>to 1940, 1941, 1942, and 1943, and 1944, 1945, 1946, 1947, 1948, 1949, 1950, 1951, 1952, 1953, 1954, 1955, 1956, 1957, 1958, 1959, 1960, 1961, 1962, 1963, 1964, 1965, 1966, 1967, 1968, 1969, 1970, 1971, 1972, 1973, 1974, 1975, 1976, 1977, 1978, 1979, 1980, 1981, 1982, 1983, 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619</p>
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Line	Feet/Inch	Length
P51	N 41° 17' 00" E	29.00'
P52	S 45° 42' 30" E	29.00'
P53	S 44° 17' 00" E	140.20'
P54	N 45° 42' 30" E	29.00'
P55	N 44° 17' 00" E	102.20'
P56	N 45° 42' 30" E	9.30'

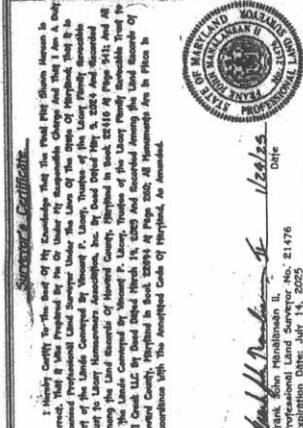


(Being Reassignment of Lots 1, 3 Thru 13 And Open Space
Lots 14 & 15, and a Section to Lot 2 and 16 As Shown On
Map entitled "Lacey Property."
Lots 1 Thru 13 And Open Space Lots 14 Thru 17
Recorded As Plat No. 26557 Thru 26559)

Zoned: R-4D
Tax Map No. 25, Grid No. 1, Parcel No. 13
Second Election District - Howard County, Maryland
Date: October 28, 2024 Scales: 1" = 50' Sheet 5 Of 5

OT 2

OF PARK PLACE
SUITE 115 AND
LOTS 15 & 17
N25. 16249
J 1624921
SD. R-CD



Line	Stretching	Length
P.1	3' 30" x 3' 34" C	3' 37"
P.2	3' 30" x 3' 34" C	3' 39" 55"
P.3	3' 30" x 3' 34" C	3' 41" 17"
P.4	3' 30" x 3' 34" C	3' 42" 39"
P.5	3' 30" x 3' 34" C	3' 44" 57"
P.6	3' 30" x 3' 34" C	3' 46" 20"
P.7	3' 30" x 3' 34" C	3' 47" 42"
P.8	3' 30" x 3' 34" C	3' 49" 04"
P.9	3' 30" x 3' 34" C	3' 50" 26"
P.10	3' 30" x 3' 34" C	3' 51" 48"
P.11	3' 30" x 3' 34" C	3' 53" 10"
P.12	3' 30" x 3' 34" C	3' 54" 32"

Legend

Solidity 37 Private 8947-07-107
For the Purpose of Inquiry, Expense
And Progress For Use Of Left 5, 6
And 8 IL 8317, P. 657

Endings 8947-07-107, Classroom
Instructor, Maryland IL 9145, P. 112

Collecting Public Record Communications And
Information (PREF No. 26857-26859)

Private Use-In-Common Shared driveway,
Establishing 1042, 50th, Redding & 10871

10" Private Storm
Drain Easement
Line Table Chart

Line	Building	Length
06	5 39'-30"03" E	10.00'
07	5 34'-29"03" E	53.75'
08	5 34'-29"03" E	52.68"
09	5 32'-01"16" N	18.00'
10	N 32'-41"37" E	18.00'
011	N 65'-01"16" E	53.99'
012	N 34'-29"27" E	90.94'

This Subdivision Is Subject To Section 1A.1220 Of The
Honeywell County Code, Public Water And Public Sewer
Has Been Granted Under The Terms And Provisions. The
Effective 1998.10.2024 On Which Date Developer
Agreement 14-4913-0 Was Filed And Accepted

Acre Tabulation This Sheet

APPROVED: For Public Water And Public Sewerage Systems

Howard County Health Department

11 Dec.

3/21/25
Date

APPROVED: Howard County Department Of Planning And Zoning

4/2/95

Chief, Development Engineering Division WPA

4/10/95