

IN THE MATTER OF	*	BEFORE THE
CORRIDOR SQUARE, LLC	*	HOWARD COUNTY
Petitioner	*	ZONING BOARD
	*	ZB-1130M

* * * * *

RESPONSE TO JOEL HUREWITZ’S EXCEPTIONS

Protestant Shahid Mahmood (“Protestant” or “Mr. Mahmood”), by his counsel Grant Amadeus Giel, files this Response to Protestant Joel Hurewitz’s Exceptions pursuant to Section 16.203A(d).

As to Mr. Hurewitz’s argument regarding the preliminary motion and the matter of whether the Hearing Examiner was properly approved to take up this new role, Mr. Mahmood makes no comment in opposition or assent to it. It is a novel legal question that this Board should earnestly consider, even if the Board ultimately decides that it has enshrined the proper powers in its capacity as the County Council to ultimately decide on a rezoning application regardless of whether the Hearing Examiner is involved or not.

As to Mr. Hurewitz’s argument regarding the documented site plan and its impact on the cemetery, Mr. Mahmood offers the following comments.

First, it is clear with the testimony adduced thus far that the cemetery is going to be impacted in *some* manner. Several parcels are identified as being developed “as part of the Rosa Bonheur Memorial Park,” with several acres of direct impact, so the Applicant’s attempt to cordon off the cemetery as not being relevant to the rezoning for measurement

or preservation purposes is specious, and the Board should absolutely consider whether the cemetery lots are being properly preserved as part of the rezoning request.

Second, the matter of the recently considered SB-233, which Mr. Mahmood expects to be enshrined into law in October of 2026, impacts this property in a way distinct from what Mr. Hurewitz quotes. He discusses the dictations by the Hearing Examiner on Page 46, where she refers to quiet title of “deeds” in deliberate air quotes. She does so because on Page 45 of her report, she talks about failures in recordkeeping from the former owner of the Memorial Park. She is not referring to the deed to purchase the identified lots such as Parcel 107, which identifies the Applicant as the “contract purchaser of the entirety . . . , which also includes Lot 58, 59, 60, 61, 62, and 63.” *See* HE Report at 17. She should have done so, particularly in light of the language of SB-233 and to the extent that the Applicant is not yet the owner of these lots and is merely submitting its application on behalf of Memorial LLC as is suggested in the Hearing Examiner’s report and the “Property Owner Authorization form filed with the Petition.” *See id.* SB-233 sets forth various specific requirements for the sale of cemetery lots, to be submitted with the Maryland State Director of the Office of Cemetery Oversight,” and if the sale of these parcels has not yet been finalized and is not expected to be finalized before SB-233 goes into effect, the Applicant would need to adhere to this state law in a manner that is novel and relevant to this Board’s determination of whether to approve rezoning of the Subject Property, particularly given that there are marked areas of the cemetery lots that are being expressly impacted by the rezoning request. The Board may ultimately decide that there is no concerning impact like those stated broadly in Mr. Zimmer’s Exceptions—which Mr. Mahmood generally adopts

but does not respond to in detail—but it is appropriate at the least to consider such impacts, given that the Hearing Examiner did not appear to do so in her report.

Third, Mr. Mahmood expressly adopts and expounds upon Mr. Hurewitz’s request that the Board consider the conditional use provisions for a MVFF. This rezoning is, in practice, requesting the same sort of relief as one would ask for in a conditional use proceeding: It is seeking the authority to operate a use previously disallowed in the identified zone, and more appropriate for other zones, on the basis that the land use fabric can support it generally. The expressed rationale is that there was a mistake in original zoning—even if the Board does not accept Mr. Mahmood’s argument to the contrary—should not limit the Board in reviewing the MVFF conditional use provisions and determining whether to accept the Applicant’s full requested relief or instead provide a lesser form of relief in the form of a different zone reclassification or limit the rezoning in a manner that would otherwise effect similar outcomes as would occur if a conditional use application were submitted instead.

Respectfully Submitted,



Grant Amadeus Giel, Esq.
AIS No. 2002200011
Law Office of G. Macy Nelson, LLC
600 Washington Avenue, Suite 202
Towson, Maryland 21204
(410) 296-8166
grant@gmacynelson.com

Attorney for Protestant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of May, 2026, a copy of the foregoing Response to Joel Hurewitz's Exceptions was served via electronic mail and first-class mail, postage prepaid, to the following:

Christopher DeCarlo, Esq.
Venable, LLC
210 W. Pennsylvania Avenue, Ste. 500
Towson, MD 21204
cmdecarlo@venable.com

Nathaniel Foreman, Esq.
O'Malley, Miles, Nysten & Gilmore, P.A.
7850 Walker Drive, Suite 310
Greenbelt, MD 20770
nforman@omng.com

Joel B. Hurewitz
5681 C Harpers Farm Road
Columbia, MD 21044
joelhurewitz@gmail.com

David Zinner
8112 Sea Water Path
Columbia, MD 21045
DavidZinner26@gmail.com



Grant Amadeus Giel