

RE: Case No. 2025-014-S  
4338 Mountain Rd., Pasadena MD 21122  
The Dena Property, LLC

March 24, 2025

**PRO. EXHIBIT#** 1  
**CASE:** 2025-0014-S  
**DATE:** 3/25/25

ATTN: Mr. Douglas Hollmann, Esq.  
Administrative Hearing Officer

Dear Mr. Hollman:

Before proceeding with the intent of this letter, I respectfully request the hearing be postponed due to the Signage not meeting Codes and the vast majority of the public being unaware of this hearing.

My name is Nona Kay Wollenschlager Rondeau and I have been a resident of Pasadena, specifically the peninsula area for the past 25 years. I am writing to ask that you reject the request for Special Exception for the property located at 4338 Mountain Rd., Pasadena, MD.

Reference is made to the FINDINGS AND RECOMMENDATION OFFICE OF PLANNING AND ZONING ANNE ARUNDEL COUNTY, MARYLAND (not dated) for the above referenced property.

I **oppose** the Special Exception for the building of a self-storage unit at 4338 Mountain Rd., Pasadena, MD.

The reasons are as follows:

Page 2 of 23: "The applicant further describes that the property is located in a Commercial District in a Priority Funding Area, and is surrounded on three sides by **similarly zoned** C2 and C3 District properties.

- In 1997, the Maryland General Assembly passed "Smart Growth" legislation that created Priority Funding Areas (PFA). This PFA was last updated in 2001. All that can be said is technically 4338 Mountain Rd Pasadena MD is in a PFA boundary but much has changed in 24 years on The Peninsula. The surrounding properties may be similarly zoned but **are not similar in use or characteristics with what is proposed.**
- Driving from Rt 2, Ritchie Hwy down Mountain Road all the way to Gibson Island there is **not one** three-story commercial structure. The majority of the commercial structures closest to 4338 Mountain Road are one or sometimes 2 stories that look more residential than commercial, thus blending in with the neighborhood characteristics. The Peninsula has the feel of small town suburbia and sometimes even rural. It should be noted on Mountain Rd. currently there are only 2 residential rental properties that are three stories or more, both closer to Ritchie Hwy.



Above is the commercial building closest to 4338 Mountain Rd, #4330 and is depictive of the area.

Continuing down Page 2 of 23: "The applicant contends that self-service storage facilities are not significant traffic generators, and that the location of the facility will be easily accessed from Mountain Road and convenient to residential communities and businesses in the Pasadena area.

- It is impossible to state they are not significant traffic generators because one would hope local residents would utilize, but where are the people coming from and during what hours of the day?
- Easily accessed from Mountain Road is a stretch. What direction is the vehicle traveling?
  - If driving South on Mountain Road, that intersection is a divided arterial highway with a difficult turn. As now configured and as shown on the site plan any vehicle would need to make a U-turn crossing a lane of oncoming traffic. When taking items to a storage facility cars can be pulling trailers. I had difficulty making the U-turn in a mid-sized sedan.
  - You cannot access directly from Route 100.
  - Driving North on Mountain Rd is the only "easily accessed" means.



The above picture actually shows the turning lane which is meant for the Golf Range and Private Drive to a residence.



Above is an aerial of the intersection.

Page 4 of 23 "The applicant indicated that evidence of the public need for the facility will be provided at the hearing."

- Of 17 facilities within 10 miles of the proposed building not one is at 100% capacity. The newest multi-story structure at 8237 Ritchie Hwy Pasadena has approximately 470 units and only 1 is rented.

Additionally, the applicant references case law to support their argument for community need, but this is for a case in Montgomery County. Lucky Stores, Inc. v. Board of Appeals of Montgomery County, 270 Md. 513 (1973) Montgomery County has a population of 1.05 million. As of 2020, Pasadena had a population of 32,979, and in 2010 Lake Shore only had a population of 19,477. There is the proximity of Montgomery County to major Metropolitan areas and the presence of tall infrastructure, including office buildings and apartment complexes. None of which is comparable to this area or neighborhood.

Given the meeting time is limited to one hour I believe I have hit on the most important concerns. Thank you for your time.



PRO. EXHIBIT# 2  
CASE: 2025-0014-S  
DATE: 3/25/25

**Request for Postponement of Special Exception Hearing – Case No. 2025-0014-S,  
4338 Mountain Rd, Pasadena (Dena Property)**

1 message

Tracy Poyneer <tra.poyneer@gmail.com>  
To: zhcolb22@aacounty.org

Mon, Mar 24, 2025 at 1:58 PM

**March 24, 2025**

Holly Colby  
Administrative Hearings Administrative Secretary  
Office of Administrative Hearings  
[Anne Arundel County](#)  
[2660 Riva Road](#)  
[Annapolis, MD 21401](#)  
Email: [zhcolb22@aacounty.org](mailto:zhcolb22@aacounty.org)

**Subject:**

Dear Ms. Colby,

We, Adam and Tracy Poyneer, two-decade residents of the North Shore on Magothy community, are writing to formally request a postponement of the scheduled administrative hearing for the Special Exception regarding the Dena Property at [4338 Mountain Rd, Pasadena](#), Case No. 2025-0014-S. We are unable to attend the Zoom hearing scheduled for tomorrow, March 25, 2025, and are concerned about procedural deficiencies in the public notification process that we believe warrant a delay to ensure fair and adequate community input.

Specifically, the public notification signage for this case does not comply with Maryland law and Anne Arundel County requirements. The sign, which is intended to inform the public of the hearing, is not positioned three feet off the ground as required for visibility, particularly along a divided highway like Mountain Road. This placement renders it effectively invisible to passing traffic and undermines its purpose of providing proper notice. Furthermore, the sign has not been posted for the minimum duration stipulated under the updated law. While the previous requirement was 14 days, the current standard effective as of recent legislative changes requires adequate notice, and the sign has been up for fewer than 10 days as of today, March 24, 2025. These deficiencies have prevented meaningful public awareness and participation in this matter, which is critical given the significance of the proposed special exception.

In light of these issues, we respectfully request that the hearing be postponed to a later date to allow for proper notification and an opportunity for affected residents to organize, review the proposal, and provide informed testimony. A delay would align with the intent of Maryland's public notification laws, ensuring transparency and due process.

If a postponement cannot be granted before today's 5:00 PM deadline for written testimony, please consider this letter as our formal written testimony objecting to the hearing proceeding as scheduled due to the lack of adequate public notice and rezoning request. We appreciate your attention to this matter and look forward to your response.

Thank you for your consideration.

Sincerely,

Adam & Tracy Poyneer

Two-Decade Residents of North Shore on [Magothy](#)

[389 N Shore Rd, Pasadena, MD 21122](#)

Re: Case 2025-0014-s  
4338 Mountain Road, Pasadena, MD 21122  
Dena Properties LLC

Attorney Hollmann:

Before proceeding with the intent of this letter, I'd like to respectfully ask that this meeting be postponed due to the fact that the required signage for public notice does/did not meet code.

My name is Emily Mariner, and I am a lifelong resident of Pasadena. I am writing to ask that you reject the request for Special Exception for the property located at 4338 Mountain Road.

Contrary to the argument made by the applicant on pages 8 and 16 of 23 (citing both the Priority Funding Area Law and Plan 2040 Development) the proposed facility does not fit with the character of the Lake Shore community, as this peninsula boasts a small town, suburban, and even in places rural, feel. Most of the homes and buildings that run along this corridor are modest, single story or two-story structures. Many of the commercial spaces have been repurposed from residential properties and therefore maintain the characteristics of the neighborhood. Even the plazas remain at a 2-story height or less. In fact, Mountain Road, which runs approximately 12 miles from the 648 intersection to the Gibson Island and Downs Park Gates, does not have a single 3-story commercial building.

Furthermore, on page 2 of 23 the applicant suggests that there is a community need for such a facility; however, of the 17 self-service storage facilities that can be found in a 10 miles radius of 4338 Mountain Road, not even one is at capacity. And it should be noted that the newest facility in Pasadena (8237 Ritchie Highway), with 470 units, currently only has 1 unit under a rental agreement. Additionally, on page 3 the applicant references case law to support their argument for community need, but this is for a case tried in Montgomery County. Montgomery County has a population of 1.05 million. As of 2020, Pasadena had a population of 32,979, and in 2010 Lake Shore only had a population of 19,477. Then there is the proximity of Montgomery County to major metropolitan areas and the presence of tall infrastructure, including office buildings and apartment complexes. None of which is comparable to this area or neighborhood.

Lastly, I would like to reference the applicants request on page 9 to extend their time to obtain a building permit from 18 months to 3 years. I find this to be an exorbitant period of time to "coordinate development issues" and process a permit. They state that the site must undergo public facility testing, site plan development and State Highway reviews, however, they already made arguments claiming that the designated departments and offices associated with these items (e.g. public sewer and water, ingress/egress) are in favor of their request. As such, additional time should not be necessary.

In closing, I ask that you please strongly consider the above points and associated data when you make your final determination for the special exception requested.

Sincerely,

Emily Mariner



PRO. EXHIBIT# 4  
CASE: 2025-0014-S  
DATE: 3/25/25

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**reschedule hearing on 4334 Mountain Rd . Case2025-0014-s AD3,CD3**

1 message

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**Meg Kauder** <megklibrarian@gmail.com>

Mon, Mar 24, 2025 at 2:39 PM

To: Holly Colby <zhcolb22@aacounty.org>, Nathan Volke <ccvolk33@aacounty.org>, ccgannon33@aacounty.org

Please reschedule the zoom hearing set for tomorrow at 11:00 A.M as there has not been enough time to review the counties plans for developing a commercial storage facility at 4334 Mountain Rd.

And,though the signs are supposed to be up for 10 days, this sign has not been up that length of time.

Case2025-0014-s AD3,CD3

Thank you

MKauder