



# HOWARD COUNTY DEPARTMENT OF PLANNING AND ZONING

3430 Courthouse Drive

Ellicott City, Maryland 21043

410-313-2350

Voice/Relay

Valdis Lazdins, Director

FAX 410-313-3467

## HOWARD COUNTY STATE AGRICULTURAL PRESERVATION ADVISORY BOARD December 17, 2018

### Staff Report

**Owner:** Reuwer Family Resource Trust, Deborah L. & Megan L. Reuwer, trustees  
c/o Donald Reuwer  
8313 Forrest Street, Suite 200  
Ellicott City, MD 21043

**Farm Location:** 4389 Jennings Chapel Road  
Tax Map 21, Parcel 221; 214 +/-acres

**Easement Designation:** MALPF easement #13-79-05Ces1

**Owner:** FAL Properties, LLC  
c/o Donald Reuwer, Managing Member  
8313 Forrest Street, Suite 200  
Ellicott City, MD 21043

**Farm Location:** Jennings Chapel Road  
Tax Map 21, Parcel 14; 82 +/-acres

**Easement Designation:** MALPF easement #13-79-05Ce

**Owner:** Reuwer Family Holdings Trust, Donald Reuwer, trustee  
8313 Forrest Street, Suite 200  
Ellicott City, MD 21043

**Lot location:** 4401 Jennings Chapel Road  
Tax Map 21, Parcel 14; Lot 1, 1 +/-acre

**Request:** Review by the Howard County Agricultural Preservation Advisory Board for an agricultural subdivision.

**Recommendation:** Recommendation to the APAB to recommend approval to MALPF of the request for an ag subdivision, subject to the following conditions: preparation, execution, and recordation of corrective easements reflecting the ag subdivision, and obtaining all appropriate county and state permits and approvals.

## Summary:

Reuwer Family Resource Trust, Deborah L. & Megan L. Reuwer, trustees, is the owner of 4389 Jennings Chapel Road (Parcel 221) and FAL Properties, LLC is the owner of the unimproved property to the south identified as Tax Map 21, Parcel 14 (Parcel 14). Reuwer Family Holdings Trust, Donald Reuwer, trustee, is the owner of Lot 1 (Lot 1). All three parcels were once part of the same farm which was placed in the Maryland Agricultural Land Preservation Foundation (MALPF) easement program on March 30, 1982 by Long Valley Farm, Inc. In 1998, an agricultural subdivision created the current parcel configuration. Lot 1 was released as an owner's lot on March 21, 2000. There are two dwellings on Parcel 221, the pre-existing principal dwelling and a tenant house, which was approved by the MALPF Board on November 25, 2003. There is a house on Lot 1. The current proposal is for an agricultural subdivision to reconfigure Parcels 221 and 14, and to merge Lot 1 back into Parcel 14.

## Staff Analysis:

According to Mr. Reuwer, the current boundary line does not follow existing fence lines and splits some of the paddocks in half. The proposed boundary line would respect existing fence lines and paddocks. In addition, the new line would add several more paddocks to Parcel 14. Mr. Reuwer believes that Parcels 14 and 221 would be better positioned to function independently if the request is approved. A single large-scale horse boarding operation currently leases both parcels, but as currently configured, it would be unlikely that they could function independently in the future, particularly Parcel 14 with its limited paddock area. Mr. Reuwer feels that it is unlikely that another single operation would lease both parcels in the future, so he wants to arrange them now to be independently successful. By shifting the proposed acreage from Parcel 221 to Parcel 14, the paddocks will respect the fencing and lay of the land. Also, merging Lot 1 into Parcel 14 will provide the currently unimproved Parcel 14 with an unsubdividable principal dwelling. This is a benefit to the long-term management of Parcel 14 and viability of the farming operation. Lastly, as currently configured, the boundary line for Parcel 14 cuts across the access for Lot 1. This is not an issue now, with common ownership of both parcels, but would be problematic in the future if one or both parcels transfer.

The soils capability analysis found that the reconfigured parcels sufficiently meet MALPF soil requirements of a composition of at least 50% USDA soil capability classes I, II, & III. The new configuration of Parcel 221 has 57% classes I, II, & III. The new configuration of Parcel 14 has 95% classes I, II, & III.

## Staff Recommendation:

Staff believes that Mr. Reuwer has made a strong case for the agricultural subdivision. He has demonstrated why the reconfiguration will benefit the continued viability of the current farm operation, and the independent functioning of both parcels in the future. Staff recommends that the APAB recommends approval to the MALPF Board.

Prepared by:

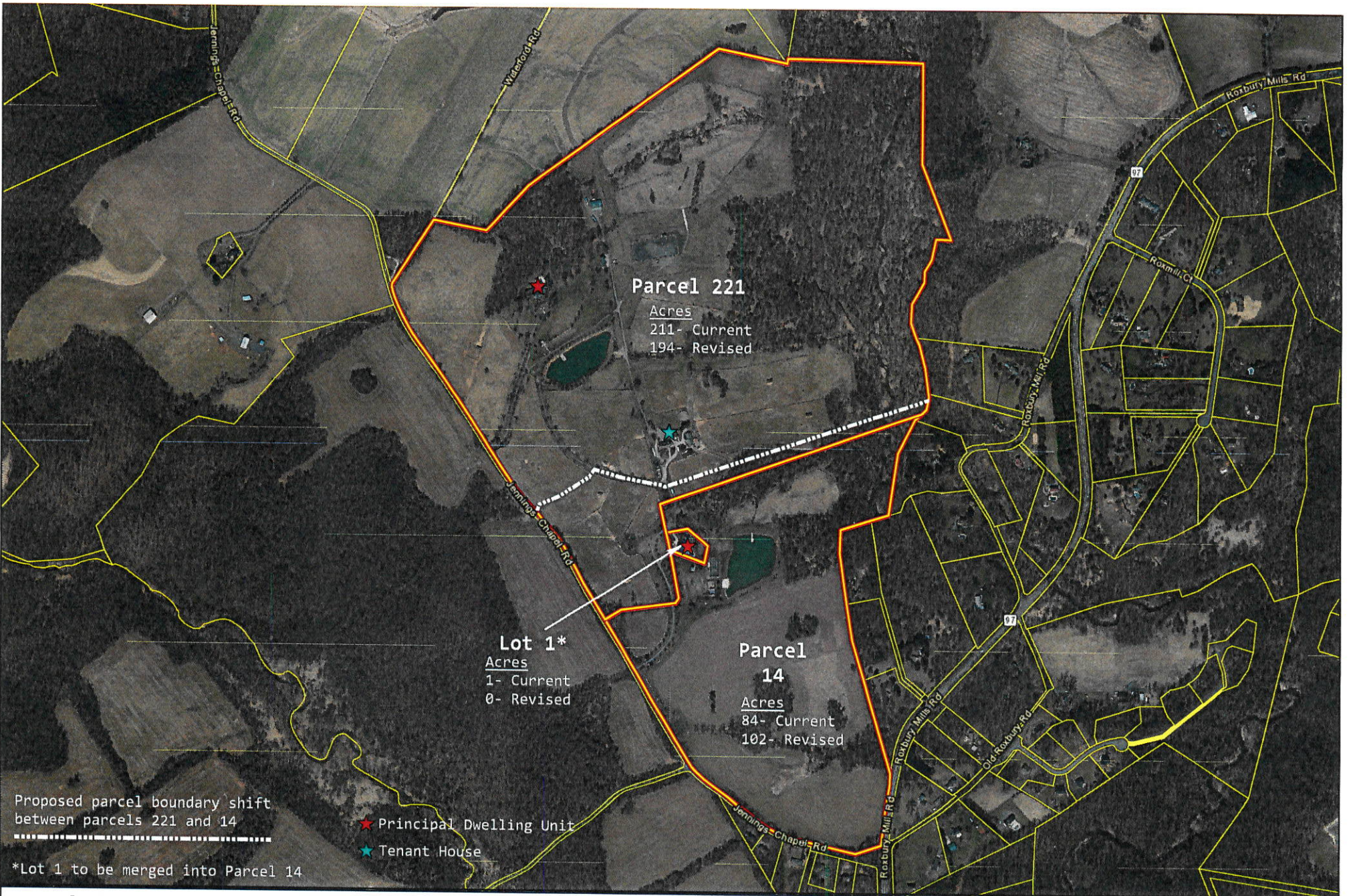
  
\_\_\_\_\_  
Joy Levy, Administrator  
Agricultural Land Preservation Program

Date:

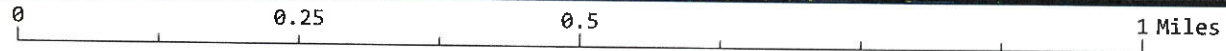
  
\_\_\_\_\_  
12/16/18

## Attachments:

- Aerial Photo
- Preservation Map
- Soils Map
- Application form from Don Reuwer, with maps



# Aerial Overview



**REUWER PROPERTY**  
 4389 Jennings Chapel Road  
 Brookeville, Maryland 20833

Tax Map: 21  
 Parcel(s): 221 & 14

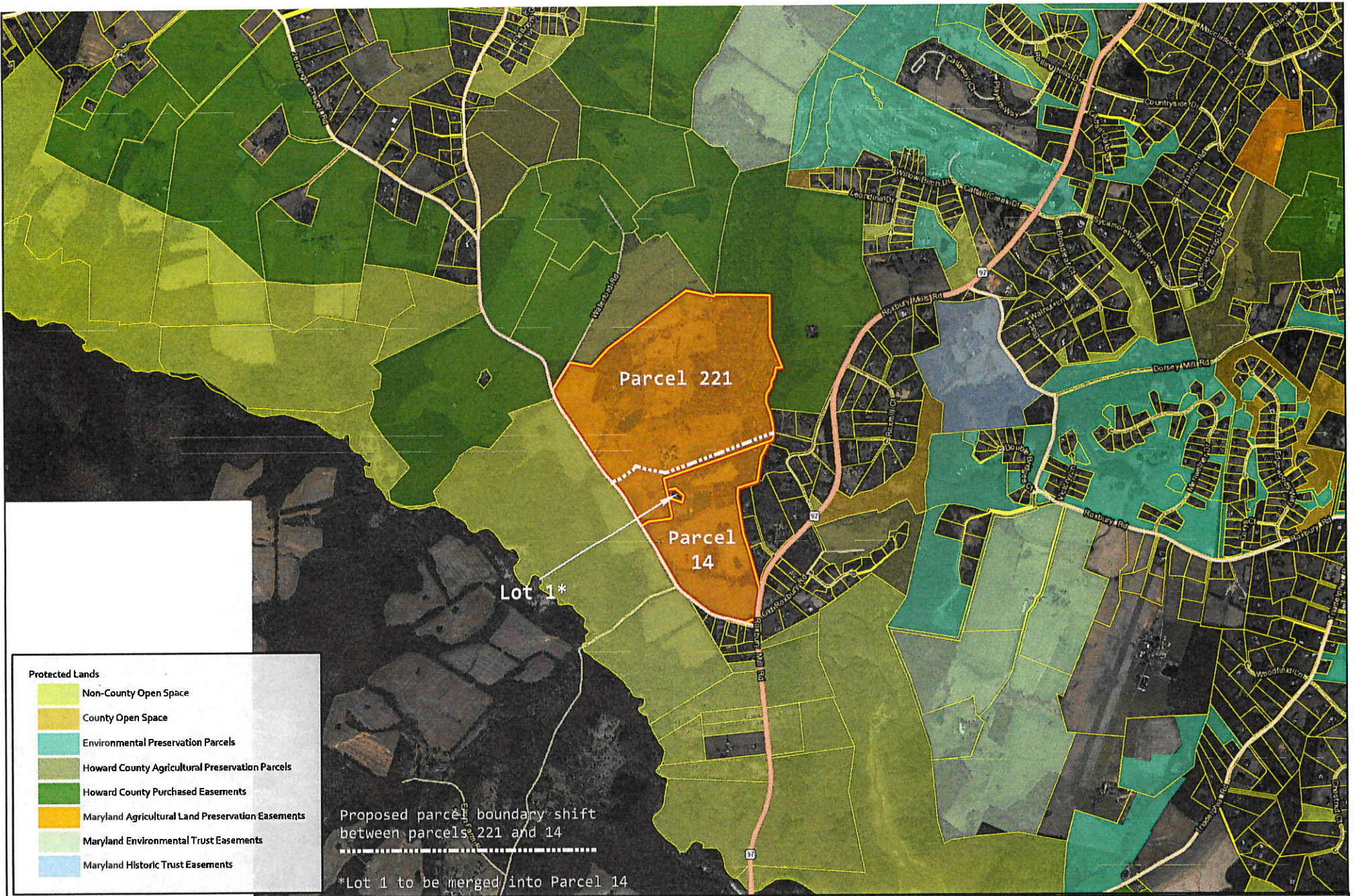
Howard County Dept. of Planning & Zoning  
 Resource Conservation Division  
 Division of Research  
 December 07, 2018



Aerial imagery covers only Howard County and terminates just beyond the county line.



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# Protected Lands



**REUWER PROPERTY**  
 4389 Jennings Chapel Road  
 Brookeville, Maryland 20833

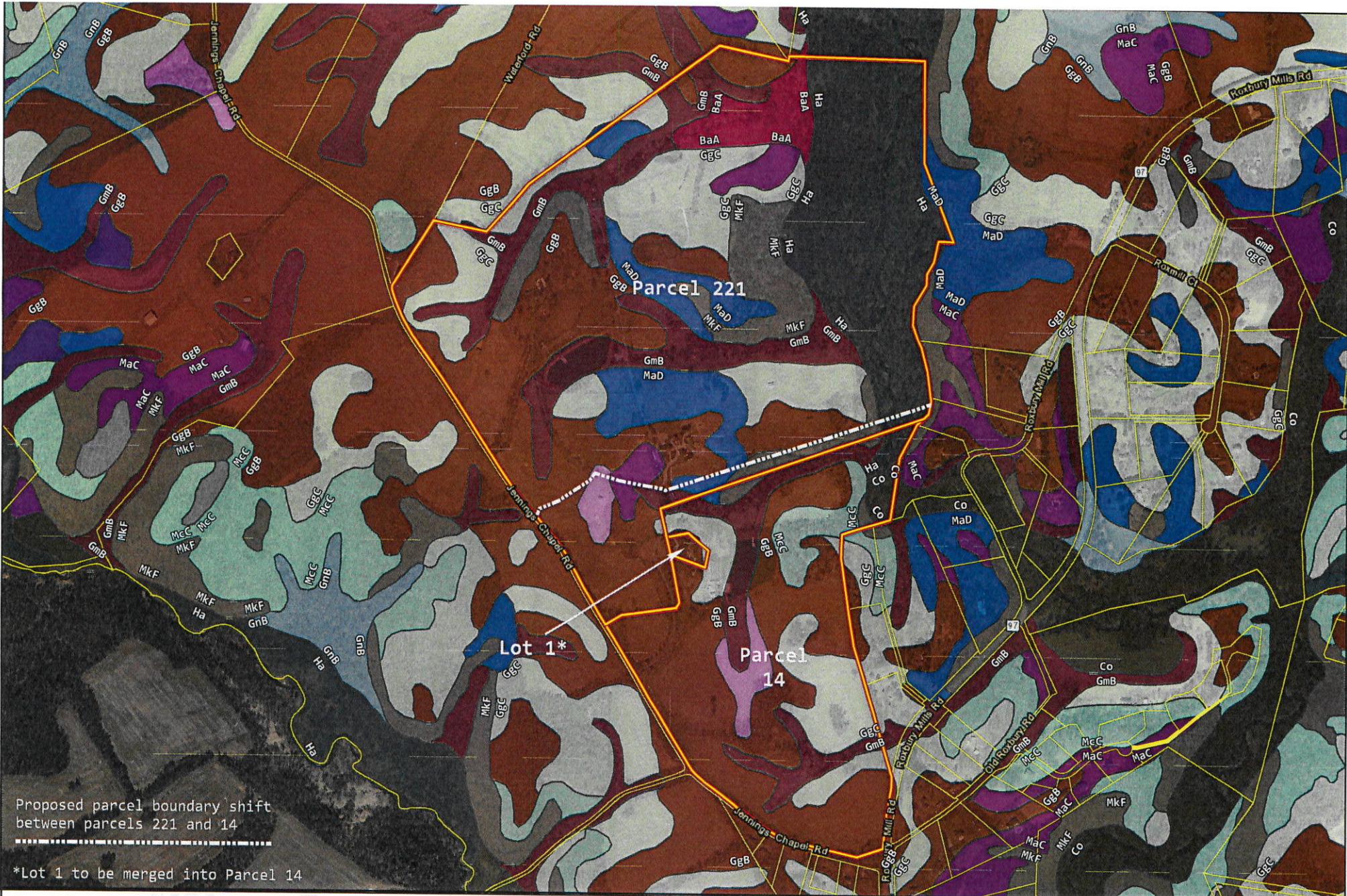
Tax Map: 21  
 Parcel(s): 221 & 14

Howard County Dept. of Planning & Zoning  
 Resource Conservation Division  
 Division of Research  
 December 07, 2018



Aerial imagery covers only Howard County and terminates just beyond the county line

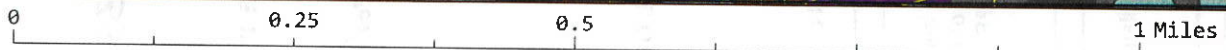
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Proposed parcel boundary shift between parcels 221 and 14

\*Lot 1 to be merged into Parcel 14

# Soils Overview



**REUWER PROPERTY**  
 4389 Jennings Chapel Road  
 Brookeville, Maryland 20833

Tax Map: 21  
 Parcel(s): 221 & 14

Howard County Dept. of Planning & Zoning  
 Resource Conservation Division  
 Division of Research  
 December 07, 2018

Aerial imagery covers only Howard County and terminates just beyond the county line

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State of Maryland  
Department of Agriculture



The Wayne A. Cawley, Jr., Building  
50 Harry S. Truman Parkway  
Annapolis, MD 21401  
410-841-5860 FAX 410-841-5730

MARYLAND AGRICULTURAL LAND PRESERVATION FOUNDATION  
APPLICATION FOR AGRICULTURAL SUBDIVISION

(COMAR 15.15.12.)

A. NAMES OF ALL OWNERS IN TITLE: FAL PROPERTIES LLC  
DONALD R KEUWER JR TRUSTEE DEBORAH L KEUWER TRUSTEE

CONTACT ADDRESS: 4401 JENNINGS CHAPEL RD BROOKVILLE, MD 20833

FILE NO.: \_\_\_\_\_ COUNTY: HOWARD ACRES: 295.43

TAX MAP 21 PARCEL NO. 14 TAX MAP 21 PARCEL NO. 221

TAX MAP 21 PARCEL NO. 14 TAX MAP \_\_\_\_\_ PARCEL NO. \_\_\_\_\_

PLEASE ANSWER THE FOLLOWING QUESTIONS REGARDING PREVIOUS APPROVAL(S) FOR AGRICULTURAL SUBDIVISION INVOLVING THIS LAND:

Has the Foundation approved any prior agricultural subdivisions involving this land?  Yes  No

If yes, please indicate date of approval: UNKNOWN - PRIOR OWNERS

If the land was previously agriculturally subdivided without Foundation approval, are you seeking retroactive approval: Yes  No

Please complete the following if the land was previously subdivided:

What are the sizes of the resulting divided parcels?

Parcel #1 81.27 acres, Parcel #2 1 acres, Parcel #3 213.16 acres, Parcel #4 \_\_\_\_\_ acres

Who presently owns the resulting divided parcels?

Parcel #1 Name FAL PROPERTIES LLC Deed reference: \_\_\_\_\_

Parcel #2 Name DONALD R KEUWER TRUSTEE Deed reference: \_\_\_\_\_

Parcel #3 Name DEBORAH L KEUWER TRUSTEE Deed reference: \_\_\_\_\_

Parcel #4 Name \_\_\_\_\_ Deed reference: \_\_\_\_\_

B. PLEASE ANSWER THE FOLLOWING QUESTIONS REGARDING THIS APPLICATION FOR APPROVAL OF AN AGRICULTURAL SUBDIVISION

1. What are the proposed sizes of the resulting divided parcels?

Parcel #1 100+ acres, Parcel #2 195 acres, Parcel #3 \_\_\_\_\_ acres, Parcel #4 \_\_\_\_\_ acres

2. Do the boundaries for agricultural subdivision follow some physical characteristics of the farm, such as the end of a field or hedge row, a stream, or some other physical feature of the farm?  Yes  No. If yes, explain: SEE ATTACHED

3. If one of the divided parcels is less than 50 acres, please describe either the physical separation of the land created by (a) bodies of water; (b) public roads; or (c) features that significantly restrict the movement of agricultural equipment from one portion of the land to another, and/or whether the parcel is to be conveyed to owners of adjacent land which is already encumbered by a MALPF Easement or another type of conservation easement:

N/A

4. Please state the agricultural purpose of the requested subdivision. You should provide as much detail as possible to explain the agricultural purpose of your proposed subdivision. Estate Planning or estate distribution are not agricultural purposes.

SEE ATTACHED

5. How many acres in each resulting divided parcel are classified as USDA Soil Capability Class I, II, III and/or Woodland Group I or 2? Parcel #1 \_\_\_\_\_ acres, Parcel #2 \_\_\_\_\_ acres, Parcel #3 \_\_\_\_\_ acres, Parcel #4 \_\_\_\_\_ acres **PLEASE SEE ATTACHED**

5.a. If you stated under #3 that a parcel is to be conveyed to owners of adjacent land which is already encumbered by a MALPF Easement, state how many acres out of the total acreage of newly configured land are classified as USDA Soil Capability Class I, II, III and/or Woodland Group I or 2: **N/A**

6. Will any of the resulting divided parcels be added to another parcel to enhance an adjacent agricultural operation?  Yes  No  
If yes, please explain which parcel(s) and how it/they will enhance the adjacent agricultural operation, and state whether the adjacent parcel is encumbered by a MALPF Easement or another type of conservation easement:  
**PLEASE SEE ATTACHED**

7. How many existing dwellings (excluding tenant houses) are on the land? **2** How many tenant houses are on the land? **1**  
Describe where each dwelling or tenant house will be located after the agricultural subdivision (a tax map or boundary survey must be attached depicting the current locations(s) of all building(s) as specified under 9 b.iii. below): **PLEASE SEE ATTACHED**

7a. Will you agree to make any of the existing dwellings or dwelling rights non-subdividable from either/both of the proposed subdivided portions of the easement? If yes, please indicate on the attached aerial map which dwelling(s) will be non-subdividable from the easement property. **YES SEE ATTACHED**

8. Will the county require any road frontage dedication as a prerequisite for subdivision approval? Yes  No  If yes, please explain:

**9. Please attach the following to this application:**

- a. An unmarked copy of a tax map or boundary survey which outlines the entire easement land, including any land previously subdivided, whether approved or unapproved.
- b. A second copy of the tax map or boundary survey which clearly shows:
  - i. the boundaries of the easement land;
  - ii. the location of the proposed line or lines of subdivision and the amount of acreage each resulting divided parcel is proposed to contain;
  - iii. the location of, and access to, all existing dwellings, lot exclusions, tenant houses and farm buildings; and
  - iv. which dwelling(s) will be designated as non-subdividable from the easement property.
- c. A written statement from the landowner indicating:
  - i. the reason for the agricultural subdivision request, including an **explanation of how the agricultural subdivision serves the agricultural purpose, how the subdivision will enhance or have no effect upon the agricultural operations, and how the resulting divided parcels will be able to sustain long-term agricultural production, independent from each other;**
  - ii. if any rights to a lot or lots have been reserved, but still unexercised, under the easement, a proposal detailing which resulting divided parcel or parcels are to be allocated those rights, provided that family lots that will continue to be reserved and unexercised after the subdivision must be allocated to the resulting divided parcel to be retained by the original grantor of the easement;
  - iii. the name, address, email address and telephone number of all landowners whose lands are involved in this request; and
  - iv. the name of the individual or entity who will pay for the costs of the required corrective easement transaction(s).
- d. A written statement from the county program administrator describing the current overall farm operation, whether the proposed agricultural subdivision serves an agricultural purpose, whether it will enhance or will have no effect upon the agricultural operations, and whether the resulting divided parcels will be able to sustain long-term agricultural production, independent from each other.
- e. A letter of recommendation from the local agricultural land preservation advisory board addressing the potential for continued agricultural use of each of the resulting divided parcels.

- f. Written verification from the local tax assessment office that each of the resulting divided parcels continue to qualify for agricultural use assessment under Tax-Property Article, Annotated Code of Maryland.
- g. A letter from local planning and zoning office or the county program administrator that the requested subdivision is consistent with county planning and zoning regulations.
- h. If applicable, letters of support from organizations such as the Soil Conservation Service and Forest Service attesting to the long-term productive capabilities for each resulting divided parcel of less than 50 acres.
- i. If the landowner is seeking retroactive approval for an previously unapproved subdivision, such additional evidence that establishes that the subdivision served an agricultural purpose, that the subdivision enhanced or had no effect upon the agricultural operations being conducted upon the land, that the resulting divided parcels have sustained agricultural production independently of each other from the time of the subdivision, and the resulting divided parcels have sufficient potential to sustain agricultural production independent of each other in the future.
- j. Such other information concerning the landowner's situation and plans to provide the Foundation with a complete analysis of the proposed subdivision.

In signing this application, the landowner(s) acknowledge(s):

1. No easement land may be subdivided without the written approval of the Foundation. The Foundation may give written approval to a landowner's request for an agricultural subdivision of the land and separate ownership of the resulting divided parcels for reasons the Foundation considers sufficiently extraordinary to justify an exception to the prohibition against subdivision. The approval for an agricultural subdivision is not an absolute right of a landowner, and requests shall be reviewed by the Foundation on a case-by-case basis to determine if, in the Foundation's opinion:

- (a) The proposed agricultural subdivision serves an agricultural purpose;
- (b) The proposed agricultural subdivision will enhance or have no effect upon the agricultural operations being conducted upon the land; and
- (c) The resulting divided parcels from the agricultural subdivision are able to sustain long-term agricultural production, independent from each other.

2. Corrective easements are required to formalize the Foundation's approval. The corrective easements may include other additional terms, conditions, waivers, or restrictions that the Foundation considers appropriate to protect the agricultural purpose and the future profitability of resulting divided farm parcels. The landowner shall pay for the cost of all title work, title insurance premiums, surveys and documentation necessary to complete the agricultural subdivision. These transactions are not considered a priority of the Foundation and shall be completed as staff resources permit.

3. The owners of all of the resulting divided parcels of an approved agricultural subdivision under this Chapter shall waive the right to request termination under Agriculture Article §2-514 Annotated Code of Maryland and shall agree to specify the waiver in the corrective easements.

4. The Foundation may deny a request for an agricultural subdivision if an easement violation exists upon the land.

5. If a subdivision was previously unapproved, the Foundation may either require that the land be restored to its original configuration or it may consider accepting a subdivision request from the owners of all of the resulting divided parcels. If it accepts a subdivision request, but does not ultimately approve the agricultural subdivision, the land shall be restored to its original configuration under the easement.

**6. A landowner shall not proceed with plans pursuant to the approval (including, but not limited to, plat recordation or deed conveyance) until the corrective easements have been recorded among the land records in the county in which the land is situated, unless the Foundation issues a letter permitting the landowner to proceed.**

7. If the Foundation approves the request, then the landowner:

- (a) shall submit to the Foundation, 10 copies of a survey plat, signed and sealed by a surveyor registered in the State of Maryland depicting the resulting divided parcels of the land, along with separate written metes and bounds descriptions of those resulting divided parcels; and
- (b) shall remit funds in the amount and manner directed by the Foundation to cover the costs of the transaction and shall furnish such other documentation as directed by the Foundation.

8. If the Foundation Board approves an agricultural subdivision, the approval shall be void if:

(a) the landowner fails to provide the required funds and documents to the Foundation within three years of the Foundation Board's approval, unless an extension request has been submitted and approved by Foundation staff within three years of the approval; or


(b) any portion of the easement property which is the subject of the requested agricultural subdivision described herein is sold, transferred or otherwise conveyed in any manner to any party before the corrective easement process is complete

In signing this application, the landowner(s) represent and warrant that the contents of this application and attachments are true and correct to the best of his/her/their knowledge, information and belief.

  
TRUSTEE  
Landowner Signature/Date

✓   
Landowner Signature/Date

Rev. 10/2014

  
MANAGER  
FAL Properties LLC

Deborah L. Renwer Trustee

ATTACHMENT TO  
MARYLAND AGRICULTURAL LAND PRESERVATION FOUNDATION  
APPLICATION FOR AGRICULTURAL SUBDIVISION

No. 2: *Do the boundaries for agricultural subdivision follow some physical characteristics of the farm, such as the end of a field or hedge row, a stream, or some other physical feature of the farm? Yes.*

The current boundary between Parcels 221 and Parcel 14 is arbitrary and is incompatible with, and does not provide for, the current uses of the land and the configuration of the pastures. A new boundary line would respect existing fence lines driveways and land uses. The overall result, along with the merger of Parcel 14 and Lot 1 as hereinafter-described, would make both parcels much more functional for agricultural purposes.

No. 4: *Please state the agricultural purpose of the requested subdivision. You should provide as much detail as possible to explain the agricultural purpose of your proposed subdivision. Estate Planning or estate distribution are not agricultural purposes.*

Parcel 14 consists of eighty-one (81) acres, more or less. There is presently no house sited on it. There is an existing home on Parcel 14, Lot 1, which is a one-acre parcel hereinafter referred to as "Lot 1", to distinguish it from the 81 acre parcel.

The current boundary line does not follow existing fence lines and actually splits some of the paddocks in half. The proposed boundary line would correct this problem by respecting the existing fence lines and paddocks.

Parcel 14 currently has one paddock in the rear of the house (see attached photo) and a half paddock in the front. The proposed new line would add several more paddocks to Parcel 14.

Both Parcel 14 and Parcel 221 would be better positioned to function independently of each other after the boundary line had been adjusted as proposed.

A single large-scale horse boarding operation currently leases both Parcel 14 and Parcel 221. Should that operation stop leasing the parcels, however, it is doubtful that another business would be interested in leasing both parcels, and significant portions of both parcels would therefore become unproductive.

No. 5: *How many acres in each resulting divided parcel are classified as USDA Soil Capacity Class I, II, III and/or Woodland Group 1 or 2?*

We reviewed the proposed boundary line adjustment with Howard Soils, which determined that approximately 18.8 acres (including the house lot) would be added to Parcel 14. The analysis by Howard Soils of the soils on those 18.8 acres is attached.

No. 6: *Will any of the resulting divided parcels be added to another parcel to enhance an adjacent agricultural operation? Yes. If yes, please explain which parcel(s) and how it/they will enhance the adjacent agricultural operation, and state whether the adjacent parcel is encumbered by a MALPF Easement or another type of conservation easement.*

Both Parcel 221 and Parcel are subject to MALPF easements. Lot 1 (the one acre lot and residence) is not subject to a MALPF easement. The 17.2 acres that would be transferred from Parcel 221 to Parcel 14 and Lot 1 would be merged into Parcel 14 to increase its size to one hundred (100) acres. For the reasons set forth in Answer No. 4, this transfer enhances the viability of both parcels.

No. 7: *How many existing dwellings (excluding tenant houses) are on the land? How many tenant houses are on the land? Describe where each dwelling or tenant house will be located after the agricultural subdivision (a tax map or boundary survey must be attached depicting the current location(s) of all building(s) as specified under 9 b.iii. below).*

Parcel 14 has no dwelling or tenant homes at present. There is an existing residence on Lot 1. There is a main house and a tenant house on Parcel 221. The location of existing homes and the current tenant house are not affected by this proposal. A map is provided and labeled.

No. 8: *Will the County require any road frontage dedication as a prerequisite for subdivision approval? No.*

We do not believe that the County regulations require there be any road frontage dedication as a prerequisite for approval of instant proposal. The goals set forth herein are reasonable, justifiable, and logical. The simplest and most practical way to effect would be as follows: (1) Allow the owner of Parcel 14 and Lot 1 to "vacate" the recorded plat. (2) Allow the owner of Parcel 14 and Lot 1 to join Lot 1 to Parcel 14. (3) Allow the owner of Parcel 221 to deed the said 17.2 acres to the adjoined Parcel 14 and Lot 1.

No. 9.c. *Please attach the following to this application: A written statement from the landowner indicating:*

*i. the reason for the agricultural subdivision request, including an explanation of how the agricultural subdivision serves the agricultural purpose, how the subdivision will enhance or have no effect upon the agricultural operations, and how the resulting divided parcels will be able to sustain long-term agricultural production, independent from each other;*

*ii. if any rights to a lot or lots have been reserved, but still unexercised, under the easement, a proposal detailing which resulting divided parcel or parcels are to be allocated those rights, provided that family lots that will continue to be reserved and unexercised after the subdivision must be allocated to the resulting divided parcel to be retained by the original grantor of the easement;*

*iii. the name, address, email address and telephone number of all landowners whose lands are involved in this request; and*

*iv. the name of the individual or entity who will pay for the costs of the required corrective easement transaction(s).*

9.c.i. The agricultural subdivision serves the agricultural purpose as follows: The current boundary between Parcels 221 and Parcel 14 is arbitrary and is incompatible with, and does not

provide for, the current uses of the land and the configuration of the pastures. A new boundary line would respect existing fence lines driveways and land uses. The overall result, along with the merger of Parcel 14 and Lot 1, would make both parcels much more functional for agricultural purposes. The current boundary line does not follow existing fence lines and actually splits some of the paddocks in half. The proposed boundary line would correct this problem by respecting the existing fence lines and paddocks. Parcel 14 currently has one paddock in the rear of the house (see attached photo) and a half paddock in the front. The proposed new line would add several more paddocks to Parcel 14. Both Parcel 14 and Parcel 221 would be better positioned to function independently of each other after the boundary line had been adjusted as proposed. A single large-scale horse boarding operation currently leases both Parcel 14 and Parcel 221. Should that operation stop leasing the parcels, however, it is doubtful that another business would be interested in leasing both parcels, and significant portions of both parcels would therefore become unproductive.

The agricultural subdivision enhances the agricultural purpose as set forth in detail above. A new boundary line would respect existing fence lines driveways and land uses. The overall result, along with the merger of Parcel 14 and Lot 1, would make both parcels much more functional for agricultural purposes. The proposed new line would add several more paddocks to Parcel 14. Both Parcel 14 and Parcel 221 would be better positioned to function independently of each other after the boundary line had been adjusted as proposed. A single large-scale horse boarding operation currently leases both Parcel 14 and Parcel 221. Should that operation stop leasing the parcels, however, it is doubtful that another business would be interested in leasing both parcels, and significant portions of both parcels would therefore become unproductive, were the proposed agricultural subdivision to be denied.

The resulting divided parcels will be able to sustain long-term agricultural production, independent from each other, as described in detail above. The overall result, along with the merger of Parcel 14 and Lot 1, would make both parcels much more functional for agricultural purposes. The proposed new line would add several more paddocks to Parcel 14. Both Parcel 14 and Parcel 221 would be better positioned to function independently of each other after the boundary line had been adjusted as proposed.

9.c.ii. Applicants have no desire to preserve any rights should they exist to separate any homes or lots from the existing or newly configured parcels.

9.c.iii. Parcel 14 is owned by FAL Properties, LLC, of which Donald R. Reuwer, Jr. is the managing member; address 8318 Forrest Street, Ellicott City, Maryland 20143; phone number 410-707-7054.

Lot 1 is owned by Donald R Reuwer Jr. as Trustee of the Reuwer Family Holdings Trust u/a dated January 1, 2016; address 4401 Jennings Chapel Road, Brookeville, Maryland 20833; phone number 410-707-7054.

Parcel 221 is owned by Deborah L Reuwer Trustee and Megan Lynn Reuwer, Trustees of the Reuwer Family Resource Trust u/a dated April 23, 2015; Deborah L. Reuwer's address: 4389 Jennings Chapel Road, Brookeville, Maryland 20833; phone 443-878-4822. Megan Lynn Reuwer's address: 4515 Manor Hill Lane, Ellicott City, Maryland 21042; phone 410-960-3755.

9.c.iv. Donald R. Reuwer, Jr. will pay the costs of the corrective easement transactions.

Donald R. Reuwer, Jr.  
4401 Jennings Chapel Road  
Brookeville, MD 20833  
[dreuwer@ldandd.com](mailto:dreuwer@ldandd.com)  
410-707-7054

Joy Levy, Administrator  
Agricultural Land Preservation Program  
Howard County Department of Planning and Zoning  
3430 Court House Drive  
Ellicott City, MD 21043

re: Supplemental Justification to Application for Agricultural Subdivision

Dear Ms. Levy:

With respect to our application, we would like to add the following information:

Parcels 14 and 221 are currently set up for one large-scale horse farm operation to be conducted on both properties. The operation only exists because of cooperation between the owners of Parcel 14 and Parcel 221. In the event that one of the parcels were transferred to a third party, it is unlikely that the current venture would continue to be practical or viable. That operation depends upon the good faith teamwork of the owners of the two parcels.

Moreover, the scale of the operation is a deterrent to assumption of a lease of the business by a third party, even if a new parcel owner were to be as cooperative as the current ones, with the realities of today's marketplace.

It would not be feasible to conduct smaller versions of the same type of operation on each of the two parcels with the boundaries of the parcels as they are now configured, as more fully described in the Application and in the Justification. To restate, the current boundary line does not follow existing fence lines and actually splits some of the paddocks in half. The proposed boundary line would correct this problem by respecting the existing fence lines and paddocks. Parcel 14 currently has only one paddock in the rear of the house and a half paddock in the front. This is insufficient for marketability of the operation to a third party. The proposed new line would add several more paddocks to Parcel 14. Both Parcel 14 and Parcel 221 would be better positioned to function independently of each other after the boundary line had been adjusted as proposed. This would make it practical and realistic for the agricultural uses on both parcels to continue beyond the current ownership.

The existing property line runs directly across the driveway that servicing Lot 1. The reconfiguration would correct this issue.

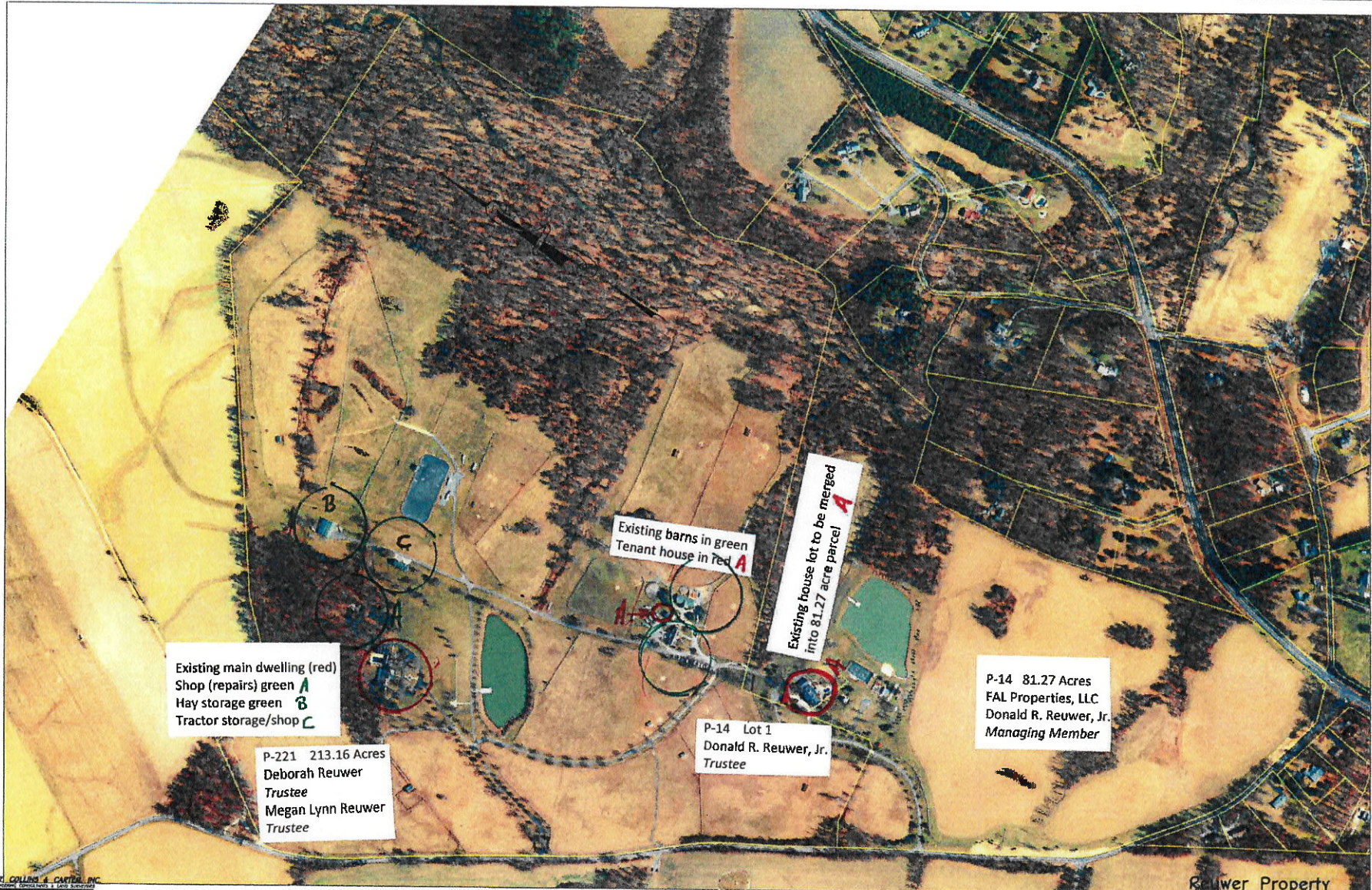
We will resubmit the map with the tenant house indicated and with Lot 1 and the farm buildings clearly marked. We will also resubmit the marked up tax map with a key added.

Thank you for your consideration of our application.

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Donald R. Reuwer, Jr.





Existing main dwelling (red)  
Shop (repairs) green **A**  
Hay storage green **B**  
Tractor storage/shop **C**

P-221 213.16 Acres  
Deborah Reuwer  
Trustee  
Megan Lynn Reuwer  
Trustee

Existing barns in green  
Tenant house in red **A**

Existing house lot to be merged  
into 81.27 acre parcel **A**

P-14 Lot 1  
Donald R. Reuwer, Jr.  
Trustee

P-14 81.27 Acres  
FAL Properties, LLC  
Donald R. Reuwer, Jr.  
Managing Member

Reuwer Property