From: Tom Haller
To: onlinesignup; Brown, Donna J.; Butler, Tina T.; Walker-Bey, James T.; Kumar, Rajesh A.
Subject: Revisory Petition for Blue Line Corridor Sectional Map Amendment
Date: Wednesday, August 19, 2026 4:53:26 PM
Attachments: image001.png
Revisory Petition 8.19.26.pdf

CAUTION: This email originated from an external email domain which carries the additional risk that it may be a phishing email and/or contain malware.

Please find attached a Revisory Petition related to the adoption of the Blue Line Corridor Sector Plan and Sectional Map Amendment on July 21, 2026. An original of the Revisory Petition will be hand delivered tomorrow.

Please let me know if you have any questions.

Tom

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EDWARD C. GIBBS, JR.
THOMAS H. HALLER

August 19, 2026

Ms. Donna J. Brown,
Clerk of the County Council
Wayne K. Curry County Administration Building
Largo, Maryland 20774

RE: Central Avenue-Blue/Silver Line Sector Plan and SMA
RA+A LLC LLC and Gray Graphics Corporation; Zoning
Change ZC-61; Petition for Revision

Dear Ms. Brown:

I represent RA+A LLC ("RA+A") and Gray Graphics Corporation ("Gray Graphics"). RA+A is the owner of property located at 8601 and 8605 Central Avenue in Capitol Heights, Maryland. Gray Graphics owns property located at 8607 Central Avenue. The total area of the three properties is 6.0 acres. The property at 8601 Central Avenue is improved with an industrial building containing approximately 19,619 square feet ("8601 Central"). 8601 Central is more particularly described as Parce "B-1" as depicted on a plat of subdivision entitled "Hampton Park", which plat is recorded among the Land Records of Prince George's County at Plat Book 91 Plat No. 47. The property at 8607 Central Avenue is improved with an industrial building containing approximately 49,080 square feet ("8607 Central"). 8607 Central is more particularly described as Parce "D-1" as depicted on a plat of subdivision entitled "Hampton Park", which plat is recorded among the Land Records of Prince George's County at Plat Book 91 Plat No. 47. The property at 8605 Central Avenue ("8605 Central") is improved with a paved parking area which is used for parking in conjunction with the buildings located at 8601 and 8607 Central Avenue. 8605 Central is more particularly described as Parce "J" as depicted on a plat of subdivision entitled "Hampton Park", which plat is recorded among the Land Records of Prince George's County at Plat Book 91 Plat No. 47. I am enclosing, marked as Exhibit "A" a copy of an image from PG Atlas and have outlined my client's properties in red. I

am also enclosing, marked as Exhibit "B", a copy of the pertinent portion of the Zoning Map which I have printed from Prince George's Atlas. As you can see, the Zoning Map depicts the property as being zoned IE.

The Preliminary Master Plan and Sectional Map Amendment for the Blue Line Corridor Sector Plan proposed a downzoning of my client's property from the IE Zone to the CGO Zone. The downzoning was designated as part of Change No. ZC-61. It was described on page 122 of the text document and an accompanying map appeared on page 123 of the text document. Copies of these two sheets from the text document are marked Exhibits "C-1" and "C-2" and attached hereto.

On behalf of my client, I filed a letter protesting the proposed downzoning with the Clerk of the County Council. A copy of this letter, bearing a date of March 25, 2026, is marked Exhibit "D" and attached hereto.

As to my client and its properties, the Blue-Line Corridor Sector Plan has been a discouraging experience of institutional bias and dishonesty. The properties have been zoned industrially for decades. As noted in the written testimony previously submitted, my client's family has owned the properties for over 30 years, having operated the family printing business at 8607 Central Avenue until it closed in 2022 due to the effects of the pandemic. Plan Prince George's 2035, adopted in 2014, recommended that the property remain industrial. My client had no reason to believe that there was any desire or proposal to change the zoning of the property. **AT NO TIME** during planning process that led up to the release of the Sector Plan did anyone with the Maryland-National Capital Park and Planning Commission reach out to my client to advise him that the property would be downzoned. His only notice was a single letter sent in January 2026 notifying him of the public hearing scheduled for March.

Despite my client's efforts to retain its zoning, when the Blue Line Corridor Sector Plan and Sectional Map Amendment were enacted pursuant to the adoption of CR-76-2026 and CR-77-2026, on July 21, 2026, my client's property was downzoned from IE to CGO. Pursuant to Section 27-3503(a)(7)(D) of the Zoning Ordinance, my client is now filing this Petition for Revision of the Blue Line Corridor Sectional Map Amendment. The required contents of a petition for revision are set forth in Section 27-3503(a)(7)(D)(ii)(aa)-(cc). Specifically, this petition includes a map and other information which clearly identifies the property. Further, this Petition is being filed less than 30 days after the

date of final action on the Sectional Map Amendment (July 21, 2026).

My client submits that more than ample facts exist to support this Petition for Revision. The criteria for a revision are set forth in Section 27-3503(a)(7)(D)(iii) of the Zoning Ordinance. The initial criterion requires that the property be reclassified to a zoning category other than that which existed prior to the approval of the Sectional Map Amendment. This requirement is met and satisfied in this instance since my client's property was zoned IE and it has now been downzoned to CGO.

The second applicable criterion for the approval of a petition for revision requires proof that a factual error occurred in the record of the Sectional Map Amendment proceedings setting forth facts relating to the property. When the correct facts are presented, they must be sufficient to justify the District Council making a different decision. In this instance, I believe four factual errors exist which support the approval of this Petition for Revision.

First, the CGO zone imposed on the Subject Property is a less intense zone than the IE zone. Section 27-3503(a)(5)(B) states:

"No property may be zoned to a less intense category, if:

> (B) Based on existing physical development at the time of adoption of the sectional map amendment, the zoning would create a nonconforming use. This zoning may be approved, however, if there is a significant public benefit to be served by the zoning based on facts peculiar to the subject property and the immediate neighborhood. In recommending the zoning, the Planning Board shall identify these properties and provide written justification supporting the zoning at the time of transmittal. The failure of either the Planning Board or property owner to identify these properties, or a failure of the Planning Board to provide the written justification, shall not invalidate any District Council action in the approval of the sectional map amendment.

The Zoning Change at issue, ZC-61, covered over 48 acres of land. In the description of ZC-61 (See Exhibit "C-1"), the Sector Plan specifically notes that the proposed rezoning creates nonconforming uses—but only refers to consolidated storage uses

and drive through restaurants. The Sector Plan never noted that the existing uses in the Subject Property would become nonconforming nor did it justify doing so. As the statute requires, the justification for creating a nonconforming use is to be "based on facts peculiar to the subject property and the immediate neighborhood." This requirement has not been complied with. The Planning Staff and the Planning Board never proposed or adopted language to either identify the nonconformity being created or how there were facts peculiar to the Subject Property to justify doing so. While this failure would not invalidate the actions of the District Council, it is an error by not accurately identifying and describing the property and was not considered by the District Council in its action.

Second, during the work session before the Planning Board on May 14, 2026, Staff provided false and inaccurate information to the Planning Board to downplay the impact of rezoning the Subject Property to the CGO Zone. Specifically, Mr. William Skibinski, in his testimony to the Planning Board (occurring at 2:15:15-2:16:10 of the audio) stated as follows:

Skibinski: **Staff is recommending no change and supports the zoning of the properties to the CGO zone. Because the sector plan provides more detail for the specific framework for this area, rezoning to the CGO allows existing industrial uses to continue including the print shop use, which is permitted by special exception in the CGO zone while also expanding longer-term commercial and employment opportunities, and supporting a coordinated land use strategy along the Central Avenue corridor.**

The owner's family operated a printing business at 8607 Central Avenue for decades, but the business ceased operation in 2022 and no longer occupies the Subject Property. Staff was well aware of this, as it was stated in the written testimony and communicated verbally in meetings with Staff. The clear intent was to imply that the downzoning was not impactful because the owner could continue to operate its business. However, since the business no longer operates, the concern expressed by the owner was about the inability to tenant both of the existing buildings with industrial uses when being placed in a zone which does not permit them. This is an egregious misrepresentation, one which the property owner could not correct, since the Planning Board would not take testimony during its work session.

Third, also at the May 14, 2026 Planning Board work session,

the Chairman, Daryll Barnes, read a statement following the staff presentation to explain why the downzoning of the Subject Property was not negatively impactful to the property owner. Chairman Barnes full statement(occurring at 2:29:28-2:30:57 of the audio) is as follows:

> **Barnes: I would also like to acknowledge that there are requests to retain IE zone for 8601, 8605, 8607 Central Ave. I understand that these families own properties that have operated as an industrial site for many years. And that the owners are concerned about the ability to retain the site if is placed in the proposed commercial general office zone. I would like to address that concern directly. Even with the rezoning, the property owner will retain several options to re-tenant the properties. Existing industrial zone may continue and the property may be re-tenanted with industrial use permitted under the prior zoning ordinance until 2032. In addition, uses allowed under the commercial general office will also become available. I view the proposed rezoning to commercial general office zone as maintaining appropriate flexibility for industrial use at this property while also providing additional use options that are consistent with the draft sector plan vision for central Avenue. (emphasis added)**

This statement is also misleading to the point of being false because it implies that the property owner has access to the full 1-1 use list until 2032. That is not the case. Although the Subject Property was previously zoned I-1, it was in a Development District Overlay Zone which prohibited most of the viable industrial uses typically permitted in the I-1 Zone. Thus, having access to the prior use list in the prior Zoning Ordinance did not benefit the property owner. Even if this statement had been accurate, the buildings useful life will not end in 2032 and does not sufficiently protect the economic interest of the applicant. Again, this is information which had been provided to staff, but this omission could not be corrected on the record because no testimony was permitted.

Finally, during the Committee of the Whole work session held by the District Council on July 7, 2026, Mr. Skibinski made another false statement to the Council when referring to the Subject Property, once again to downplay the impact of changing the zoning category. Mr. Skibinski's comments (occurring at 2:47:13-2:48:10 of the audio), are as follows:

Skibinski: **The Planning Board endorsed staff recommendation to maintain the proposed SMA zoning to rezone the properties to the CGO zone. This action reflects the Sector Plan's more detailed corridor specific framework and the transition provisions allow existing IE uses to continue by right for six years or until 2032. The CGO zone also allows certain uses by special exception, such as printing and similar reproduction facilities and small engine repair shops while expanding long-term commercial and employment opportunities and supporting a coordinated land use strategy along the Central Avenue corridor. (emphasis added)**

The highlighted language above is a complete falsehood and misrepresentation of the transitional provisions. While the transitional provisions give access to the use list of the zoning category which existed prior to the adoption of the Countywide Map Amendment, but do NOT give the right to access the use list of the zoning category being taken away. As noted above, having access to a limited use list for less than six years does not ameliorate the devastating impact of the downzoning.

The property owner clearly stated its concerns to Staff both in writing and in meetings. The buildings were designed as and could only be used by industrial or service commercial uses which are either not permitted in the CGO zone. Not only did staff ignore those concerns, throughout the SMA process, they downplayed the concerns by making inaccurate and misleading statements in public forums where the owner could not participate. These are substantive statements in the record which could not be corrected because neither the Planning Board nor the Council permitted owners to participate in the work sessions. Staff justified the change in zoning with the statements above—all of which were false or misleading and intended to dissuade the District Council from retaining the IE zone. The applicant submits that there is not sufficient justification to downzone a property when the correct facts are presented and considered. The applicant has maintained throughout that downzoning the Subject Property will eventually cause them to become vacant, which is counter to the goal of revitalizing the Central Avenue corridor.

Given the above facts, I submit that the criteria for approval of a Petition for Revision are more than amply satisfied in this case. My client has been a longstanding property owner who has

diligently maintained its properties for many years and relies on the rental income these properties produce to support their families. On behalf of my client, I request that the Petition for Revision be granted as requested and that the Sectional Map Amendment for the Blue Line Corridor be revised to reinstate the IE zoning for my client's property.

Thank you for your consideration.

Very truly yours,

GIBBS AND HALLER

Thomas H. Haller

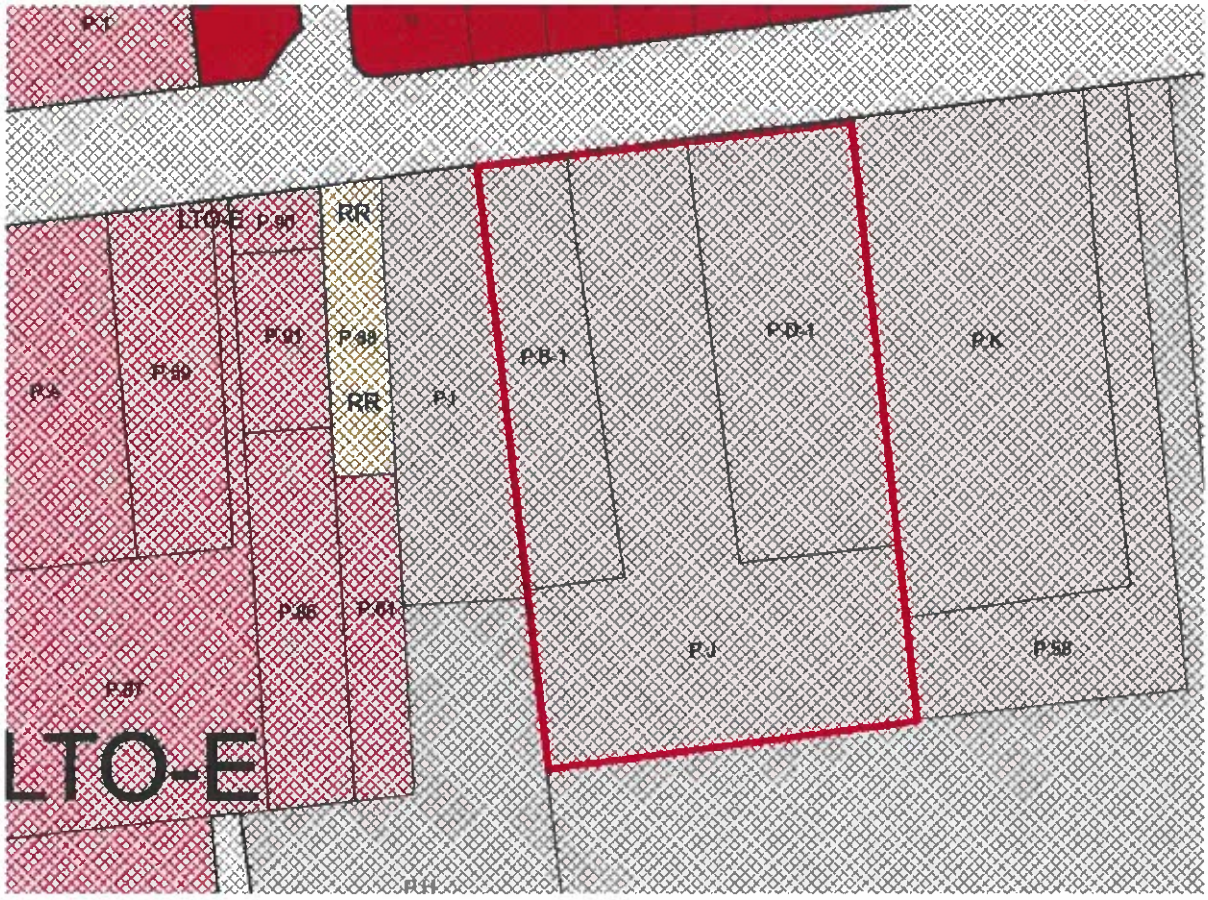
Enclosures

cc: Mr. Abrahem Helal
Rajesh A. Kumar, Esq.

S:\Helal\Brown.wpd

EXHIBIT "A"

EXHIBIT "B"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P-86
P-81
P-J
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P-87
LTO-E

EXHIBIT "C-1"

Zoning Change 61 (ZC 61): IE to CGO

Zoning Change No	Current Zone	Proposed Zone	Area of Change	Focus Area	Applicable Policy	200' Scale Index Map
ZC 61	IE	CGO	48.50 Acres	Established Communities	LU 1, LU 3, EP 1, EP 2	201NE08, 201SE08

Future Land Use	Commercial
Does the rezoning create nonconformance?	Yes

Justification: These properties are within the General Plan designated Employment Areas. The General Plan recommends continuing to support business growth in these geographic areas—in the targeted industry clusters—concentrating new business development near transit where possible, improving transportation access and connectivity, and creating opportunities for synergies (Page 19).

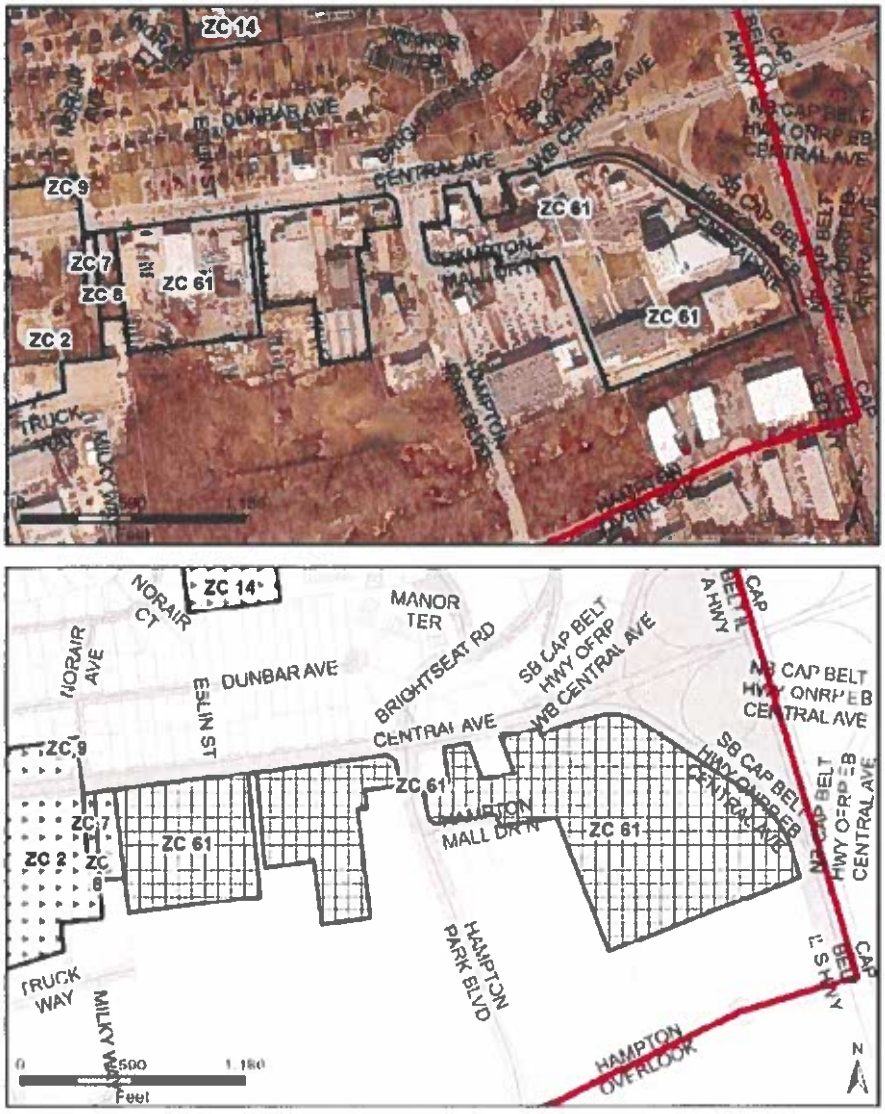
This rezoning creates nonconforming uses on properties because consolidated storage uses, and drive-through restaurants are prohibited in the CGO Zone. As noted above, a downzoning that creates a nonconforming use may be approved "if there is a significant public benefit to be served by the zoning based on facts peculiar to the subject property and the immediate neighborhood." Zoning Ordinance § 27-3503(a)(5)(B). Additionally, gas stations are only allowed in CGO by special exception. Rezoning these properties will ensure that the desired commercial land use is possible.

This recommendation is supported by Policy LU 3 which calls for the rezoning of industrial areas to create conditions where business uses can thrive. Additionally, this rezoning helps to achieve Policies EP 1 and EP 2 by providing the appropriate zoning to develop varied businesses and economic generators while supporting entrepreneurs. The current IE Zone, which primarily supports industrial uses, cannot implement these policies. Based on the foregoing, there is a significant public benefit to this rezoning.

Tax Accounts

1536077, 1442664, 1441120, 1504034, 1440965, 1544121, 1554146, 1441237, 1441229, 1440916, 1441443, 1441484, 1441476, 2925766, 5626841, 5625972, 5626852, 5625983, 5629343, 5625994, 5626863, 5626874, 5626885, 5626008, 5626010

EXHIBIT "C-2"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MANOR TER
NORAIR AVE
ESLIN ST
DUNBAR AVE
BRIGHTSEAT RD
CENTRAL AVE
SB CAP BELT HWY OFRP
WB CENTRAL AVE
NB CAP BELT HWY ONRP EB
CENTRAL AVE
ZC 9
ZC 7
ZC 8
ZC 2
ZC 61
HAMPTON MALL DR N
HAMPTON PARK BLVD
TRUCK WAY
MILKY WAY
HAMPTON OVERLOOK
0
500
1,160
Feet
N

EXHIBIT "D"

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THOMAS H. HALLER

JUSTIN S. KORENBLATT

March 25, 2026

Ms. Donna J. Brown,
Clerk of the County Council
Wayne K. Curry County Administration Building
Largo, Maryland 20774

Re: Central Avenue-Blue/Silver Line Sector Plan and SMA
RA+A LLC LLC and Gray Graphics Corporation; Zoning Change ZC-61

Dear Ms. Brown:

A joint public hearing was held on March 10, 2026 to receive comments on the Central Avenue-Blue/Silver Line Sector Plan and SMA. The record was held open until March 25, 2026 to submit written comments. These comments are submitted on behalf of RA+A LLC ("RA+A") and Gray Graphics Corporation ("Gray Graphics"). Both entities are owned by the Helal family, which operated a printing business at 8607 Central Avenue for decades. Please note that the properties which are addressed in this letter are proposed to be downzoned to the CGO Zone by the Sector Plan. The Owner is requesting the existing IE Zoning be retained. Per Section 27-4102(b)(1), the IE zone is more intense than the proposed CGO Zone. As a result, Ethics Affidavits were previously submitted to the Clerk's office through the e-comment portal. Copies of those Ethics Affidavits are attached to this letter.

RA+A is the owner of property located at 8601 and 8605 Central Avenue in Capitol Heights, Maryland. Gray Graphics owns property located at 8607 Central Avenue. The total area of the three properties is 6.0 acres. The property at 8601 Central Avenue is improved with an industrial building containing approximately 19,619 square feet ("8601 Central"). 8601 Central is more particularly described as Parce "B-1" as depicted on a plat of

subdivision entitled "Hampton Park", which plat is recorded among the Land Records of Prince George's County at Plat Book 91 Plat No. 47. The property at 8607 Central Avenue is improved with an industrial building containing approximately 49,080 square feet ("8607 Central"). 8607 Central is more particularly described as Parce "D-1" as depicted on a plat of subdivision entitled "Hampton Park", which plat is recorded among the Land Records of Prince George's County at Plat Book 91 Plat No. 47. The property at 8605 Central Avenue ("8605 Central") is improved with a paved parking area which is used for parking in conjunction with the buildings located at 8601 and 8607 Central Avenue. 8605 Central is more particularly described as Parce "J" as depicted on a plat of subdivision entitled "Hampton Park", which plat is recorded among the Land Records of Prince George's County at Plat Book 91 Plat No. 47.

For 50 years, Gray Graphics operated a printing business. For most of that time, the business operated out of the building located at 8607 Central, serving local businesses and employing many Prince George's County residents. The family purchased the building in 1993. 8605 Central was acquired shortly thereafter, in 2006, because it provided more parking area needed for the use. Changes in the printing industry, the rise of large corporate competitors and ultimately COVID 19 led to the closure of the business in 2023. Since that time, the family has continued to own 8607 Central and it is currently leased as a warehouse to Ocean Infinity. 8601 Central was also constructed as an industrial building in or about 1972 and was purchased by the family under the entity RA+A in 2011. 8601 Central was acquired for investment purposes due to the family's presence at the abutting property and has been leased to a variety of industrial tenants over the years. 8601 Central is currently leased to Caliber Collision.

As a preliminary comment, the Sector Plan and SMA seek to encourage new development and appropriate redevelopment in the Central Avenue Corridor. However, there are several properties located within the corridor which either have existing development or development approvals which do not in any way impede the implementation of the Sector Plan's goals. However, in many instances, including the properties owned by RA+A and Gray Graphics, the zoning category recommended by the SMA is inconsistent with the existing use and development and threatens to negatively impact the ability to utilize these properties as currently improved. RA+A and Gray Graphics are not requesting that the long-term goal of the Sector Plan be altered in any way but do request that the future land use and zoning category recommended by the SMA be amended to better align with the current

use applicable to these properties.

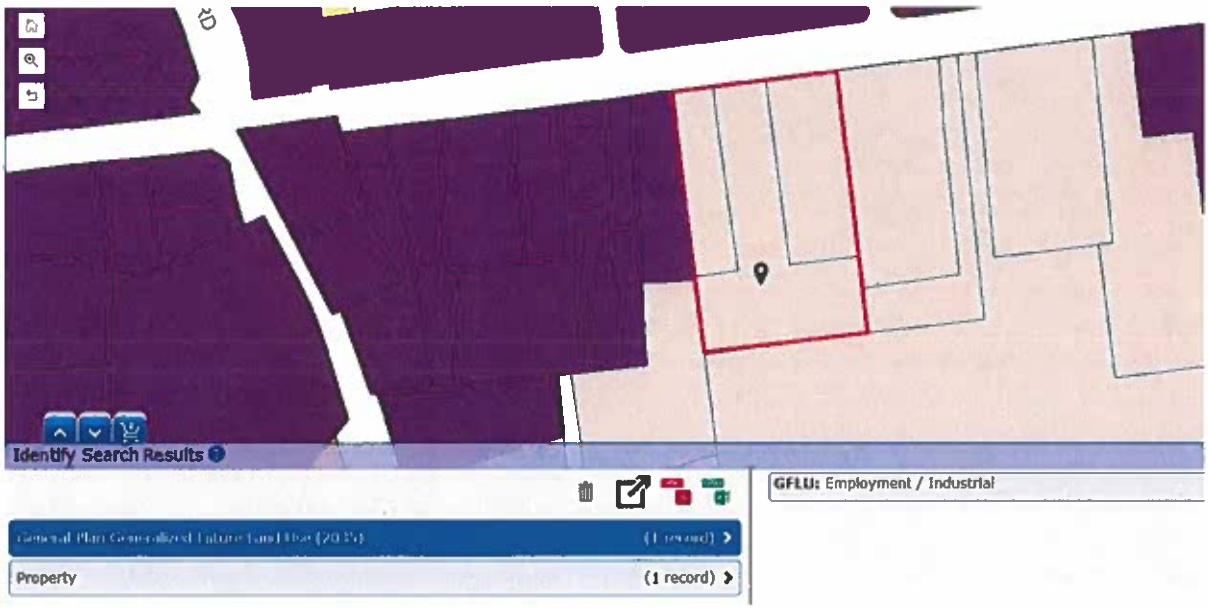
As noted above, all three properties have been zoned industrially for decades. The last comprehensive rezoning was the 2010 Subregion 4 Master Plan and Sectional Map Amendment, which retained the I-1 zoning for the Subject Property and established a Development District Overlay Zone to guide future development. When the Countywide Map Amendment ("CMA") was implemented on April 1, 2022, all three properties were rezoned to the IE Zone, which was the most similar zone in the current Zoning Ordinance. The current zoning can be seen on the image below with the three properties outlined in red:

The IE Zone preserved the ability for RA+A and Gray Graphics to continue to lease the property to industrial tenants. However, Zoning Change ZC-61 in the Sector Plan proposes to downzone all three properties to the CGO Zone, which does not permit industrial uses. Downzoning the properties as proposed would have a disproportionate impact on the current owners and greatly diminish the value of the properties.

Proposed Zoning Change ZC-61 applies to 48.5 acres of land extending from the Capital Beltway to 8601 Central, all of which is proposed to be rezoned from the IE Zone to the CGO Zone. Including 8601-8607 Central Avenue in this Zoning Change is misplaced. First, over half of the land being rezoned consists of the Hampton Park development. Hampton Park was in the M-X-T zone

prior to the CMA and was under development as a mixed-use project when the CMA was adopted. Notwithstanding, the CMA placed Hampton Park in the IE zone. This zone was diametrically opposed to the entitlements in place and the mixed-use development which had commenced and should never have occurred. The recommendation to place Hampton Park in the CGO Zone corrects this error (although that is not acknowledged in the discussion justifying ZC-61). Including 8601-8607 Central Avenue with Hampton Park defies logic. These properties have no commonality.

The justification for Zoning Change ZC-61 state that "[T]hese properties are within the General Plan designated Employment Areas. The General Plan recommends continuing to support business growth in these geographic areas—in the targeted industry clusters—concentrating new business development near transit where possible, improving transportation access and connectivity, and creating opportunities for synergies (Page 19)." This is a correct Statement. The General Plan does include all three properties within an area designated for "Employment/Industrial", as can be seen from the image from PG Atlas below:



Downzoning the properties owned by RA+A and Gray Graphics to a zoning category which conflicts with the uses for which the buildings were constructed, contrary to the General Plan future land use does not "support business growth." As discussed below, the downzoning does just the opposite.

The Sector Plan notes that "[T]his rezoning creates nonconforming uses on properties because consolidated storage

uses, and drive-through restaurants are prohibited in the CGO Zone." However, these uses will not be substantially affected by the proposed downzoning. Consolidated storage facilities and fast food restaurants are built for specific uses. They will always be what they are until the property is redeveloped. While the downzoning may make the existing uses nonconforming, no change of occupant will result in a change of use. Further, there are administrative processes to allow modifications to certified nonconforming uses which allows property owners to maintain the viability of such uses. Thus, downzoning these properties has minimal effect on their ability to continue operating. That is not the case with the three properties owned by RA+A and Gray Graphics, which is not acknowledged by the discussion regarding ZC-61. The uses in their buildings will also be made nonconforming, but these buildings were constructed for general industrial uses and they have had multiple tenants over the years. If these buildings are downzoned, a change in use will not be allowed. If either building remains vacant for more than 180 days, the building will remain vacant and unable to be leased, devastating its property value and jeopardizing the ability of the owner to maintain it. Thus, the downzoning of 8601-8607 Central Avenue has a disproportionate impact on the owner, unlike the other industrially zoned properties targeted for downzoning.

Finally, RA+A and Gray Graphics would like to emphasize that these properties, and the parcel on the north side of Central Avenue addressed in a separate letter, represent the family's life's work and investments. These properties are the manifestation of years of saving and constitute their sole source of income and retirement. They were never contacted about the proposed rezoning, despite representations about community outreach. The proposed rezoning threatens everything that they have worked for and they strongly believe adequate attention has not been considered to the impact this will have longstanding corporate citizens and County residents.

Based on the above, RA+A and Gray Graphics respectfully request that their properties be retained in the IE Zone and not downzoned to the CGO Zone. For the reasons outlined above, it is not appropriate to lump these properties into the same category as the other properties included in ZC-61. Retaining the properties in the IE Zone, where general industrial uses are permitted, the buildings can be re-tenanted when the existing tenants vacate. Both buildings are well built and well maintained and have not outlived their useful life. They are not candidates for redevelopment at this time and neither building detracts in any way from the goals of the Sector Plan. RA+A and Gray Graphics

also object to the future land use map designation of "commercial" and request that the future land use map designate the properties as "employment/industrial" consistent with the General Plan land use designation. This will allow the buildings to continue to operate, allow improvements to the buildings as needed and allow a change of use upon the expiration of the existing leases. The investment made by RA+A and Gray Graphics and the businesses that lease from them should be protected by the Sector Plan—not endangered. If the properties cannot be leased because industrial uses are not permitted in the CGO Zone, their value will fall and inevitably prevent reinvestment. It is not in the best interest of the County for properties to deteriorate because they cannot generate sufficient income to support necessary property maintenance and upkeep.

Thank you for the opportunity to provide these comments. Please feel free to reach out to me in the event there are any questions.

Very truly yours,

Gibbs and Haller

Thomas H. Haller

Enclosure: Ethics Affidavits

cc: Andrea Gilles
Kierre McCune
William Skibinski