

290 West Mount Pleasant Avenue, Suite 3260  
Livingston, NJ 07039  
(973) 287-0966

535 Fifth Avenue, 4th Floor  
New York, NY 10017  
(646) 374-0255

Rosemary Stone-Dougherty, Partner  
Direct Phone: 973-348-6370  
Email: [rstonedougherty@aystrauss.com](mailto:rstonedougherty@aystrauss.com)

April 25, 2024

Via Federal Express

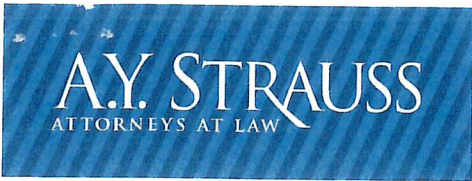
Attn: Kathleen Miesch, Zoning Board Secretary  
Township of Verona  
880 Bloomfield Avenue  
Verona, NJ 07044

**RE: 110 Linden Avenue  
Zone R-50  
Block: 901, Lot: 29  
Applicant: Cristina Queiroz  
C -Variance**

Dear Sir/Madam:

Please be advised our office represents Cristina Queiroz in connection with the her application for Bulk (c) Variance for the property located at 110 Linden Avenue, Verona, New Jersey, for installation of brick paver sitting area/patio in the rear yard. Enclosed please find seventeen (17) submission sets which contain the following:

- (x) Board of Adjustment Application Package;
  - i. Affidavit of Ownership;
  - ii. Authorization;
  - iii. Zoning Data – variance information;
  - iv. Amendment to Application;
  - v. Photo of Property from 9/2013 showing side walkway existed;
  - vi. Property Photos;



- vii. Aerial Photos;
- viii. Tax Certification; and
- ix. 200 ft. Property Owners List.

(x) Location Survey prepared by Vincent Manno, P.L.S. dated 7/7/2023.

Also, enclosed please find the following:

- (x) Application fee of \$150.00 (check #86464177-7);
- (x) Escrow deposit fee of \$500.00 (check #864641788);
- (x) W-9 form.

Please process this application and advise if same can be deemed "complete." If you have any questions or require any further information, please feel free to contact this office. Thank you for your assistance.

Very truly yours,

A handwritten signature in blue ink, which appears to read "Rosemary Stone-Dougherty", is written over the typed name. The signature is fluid and cursive, with a large initial 'R' and 'D'.

ROSEMARY STONE-DOUGHERTY

RSD:ab

TOWNSHIP OF VERONA  
BOARD OF ADJUSTMENT APPLICATION

DATE APPLICATION \_\_\_\_\_

CASE # 2024-16

PROPERTY ADDRESS 110 Linden Avenue

BLOCK 901 LOT 29 ZONE R-50

APPLICANT'S NAME Cristina Queiroz

PHONE # 973-946-4447 CELL PHONE # 973-946-4447

EMAIL criscamarotto@gmail.com

PROPERTY OWNER'S NAME Cristina Queiroz

PROPERTY OWNER'S ADDRESS 110 Linden Avenue

PROPERTY OWNER'S PHONE # \_\_\_\_\_ CELL # 973-946-4447

PROPERTY OWNER'S EMAIL criscamarotto@gmail.com

RELATIONSHIP OF APPLICANT TO OWNER same

REQUEST IS HEREBY MADE FOR PERMISSION TO DO THE FOLLOWING:

installation of a side walkway paver path to rear paver patio area for outdoor seating

CONTRARY TO THE FOLLOWING:

side yard setback and improved lot coverage

LOT SIZE: EXISTING 7,000 sq.ft. PROPOSED No Change TOTAL 7,000 sq.ft.

HIEGHT: EXISTING 2 stories/ 21' PROPOSED No Change

PERCENTAGE OF BUILDING COVERAGE: EXISTING 19.6% PROPOSED No Change

PERCENTAGE OF IMPROVED LOT COVERAGE: EXISTING 52.9% PROPOSED 52.9%

PRESENT USE single family residential PROPOSED USE single family residential

SET BACKS OF BUILDING:	REQUIRED	EXISTING	PROPOSED
FRONT YARD	<u>30'</u>	<u>33.58'</u>	<u>33.58'</u>
REAR YARD	<u>30'</u>	<u>57'</u>	<u>57'</u>
SIDE YARD (1)	<u>8'</u>	<u>5.86'</u>	<u>5.86'</u>
SIDE YARD (2)	<u>18'</u>	<u>9.26'</u>	<u>9.26'</u>

DATE PROPERTY WAS ACQUIRED 6/28/2006

TYPE OF CONSTRUCTION PROPOSED:

installation of a side walkway paver path to rear paver patio area for outdoor seating

SIGN INFORMATION (if applicable): supply details on location, dimensions, height and illumination

N/A

AREA PER FLOOR (square feet):	EXISTING	PROPOSED	TOTAL
BASEMENT	<u>N/A - no change to dwelling</u>		_____
FIRST FLOOR	_____	_____	_____
SECOND FLOOR	_____	_____	_____
ATTIC	_____	_____	_____

NUMBER OF DWELLING UNITS: EXISTING 1 PROPOSED No Change

NUMBER OF PARKING SPACES: EXISTING 2 PROPOSED No Change

History of any previous appeals to the Board of Adjustments and the Planning Board

OPRA found no results - N/A

What are the exceptional conditions that warrant relief from compliance with the Zoning Ordinance?

see attached amendment

Supply a statement of facts showing how relief can be granted without substantial detriment to the public good and without substantially impairing the intent and purpose of the Zone Plan and the Zoning Ordinance

see attached amendment

History of any deed restrictions:

None

A legible plot plan or survey to scale (not less than 1"=100') of the property indicating the existing and/or proposed structure and scale drawings of the existing and/or proposed structure must be provided.

A copy of any conditional contract relating to this application must be filed with this application.

If the applicant is a corporation or partnership, the names, addresses and phone numbers of those owning a 10% or greater interest in the corporation shall be provided.

Name <u>N/A</u>	Address _____	Phone # _____
Name _____	Address _____	Phone # _____
Name _____	Address _____	Phone # _____
Name _____	Address _____	Phone # _____



Expert witness(es) that will present evidence on behalf of this application:

Attorney: Name Rosemary Stone-Dougherty, Esq. - A.Y. Strauss LLC  
Address 290 West Mount Pleasant Avenue, Suite 3260, Livingston, NJ 07039  
Phone # 973-348-6370  
Fax # \_\_\_\_\_  
Email rstonedougherty@aystrauss.com

Architect/Engineer: Name Vincent Manno, P.E. - Manno Surveying Inc.  
Address 543 Post Avenue, Lyndhurst, NJ 07071  
Phone # 201-438-7454  
Fax # \_\_\_\_\_  
Email vlevel42@gmail.com

Planner: Name N/A  
Address \_\_\_\_\_  
Phone # \_\_\_\_\_  
Fax # \_\_\_\_\_

AFFIDAVIT OF OWNERSHIP

STATE OF NEW JERSEY  
COUNTY OF ESSEX

Cristina Queiroz OF FULL AGE, BEING DULY SWORN ACCORDING TO LAW ON  
OATH DEPOSED AND SAYS, THAT DEPONENT RESIDES AT 110 Linden Avenue, IN THE CITY OF  
Verona IN THE COUNTY OF Essex AND STATE OF New Jersey AND THAT  
Cristina Queiroz IS THE OWNER IN FEE OF ALL THAT CERTAIN LOT, PIECE OF LAND,  
SITUATED, LYING AND BEING IN THE TOWNSHIP OF VERONA AFORESAID AND KNOWN AND DESIGNATED AS  
BLOCK 901 AND LOT 29 AS SHOWN ON THE TAX MAPS OF THE TOWNSHIP OF VERONA.

*Rosemary Stone Dougherty*  
*Mrs Queiroz*

NOTARY



OWNER Cristina Queiroz

AFFIDAVIT APPLICANT

COUNTY OF ESSEX  
STATE OF NEW JERSEY

Cristina Queiroz OF FULL AGE, BEING DULY SWORN ACCORDING TO LAW, ON  
OATH DEPOSED AND SAYS THAT ALL OF THE ABOVE STATEMENTS CONTAINED IN THE PAPERS SUBMITTED  
HEREWITH ARE TRUE. SWORN TO AND SUBSCRIBED BEFORE ME ON THIS 25<sup>th</sup> DAY OF April

20 24

*Rosemary Stone Dougherty*

NOTARY



APPLICANT Cristina Queiroz

AUTHORIZATION

IF ANYONE OTHER THAN THE OWNER IS MAKING THIS APPLICATION, THE FOLLOWING AUTHORIZATION MUST BE EXECUTED.

TO THE BOARD OF ADJUSTMENT

Cristina Queiroz IS AUTHORIZED TO MAKE THE WITHIN APPLICATION.

SWORN AND SUBSCRIBED BEFORE ME THIS 25<sup>th</sup> DAY OF April 2024

*Rosemary Stone*  
*Notary Public*

APPLICANT Cristina Queiroz



Cristina Queiroz

Property Address:

110 Linden Avenue, Verona, New Jersey

Block 901, Lot 29

Zoning Data – Variance Information

110 Linden Avenue, Verona, New Jersey - Essex County

# ZONING DATA

BLOCK : 901	LOT: 29	
ZONE : R-50	REQUIRED	PROVIDED
LOT AREA ( SQ.FT)	5,000	7,000
LOT WIDTH (FT.)	50	50
FRONT YARD SETBACK (FT.)	30'	33.58'
SIDE YARD SETBACKS:		
ONE (FT.)	8'	5.86'**
BOTH (FT.)	18'	9.26'**
BOTH (% OF LOT WIDTH)	25%	28%
REAR YARD SETBACK	30'	57'
HEIGHT (STORIES/FEET)	2.5/30'	2/21'
LOT COVERAGE	30%	19.6%
IMPROVED LOT COVERAGE	40%	52.9%##
FLOOR AREA RATIO	N/A	

\*\*PRE-EXISTING NON-CONFORMITY

##NON-CONFORMITY

Cristina Queiroz

Property Address:

110 Linden Avenue, Verona, New Jersey

Block 901, Lot 29

Amendment to Application

AMENDMENT TO BOARD APPLICATION

Block 901, Lot 29

Applicant: Cristina Queiroz

Zone: R-50

Subject Property: 110 Linden Avenue

Reason for Application:

Applicant replaced an existing asphalt side walkway with brick pavers and installed a new rear brick paver outdoor patio area with fire pit to have additional exterior "living space" for her and her children. Applicant's rear property is completely screened with a 6 ft. vinyl fence and mature trees.

Variance(s) Requested/Required (along with any other relief that may be required)

1. Minimum side yard setback of 8 ft required and 5.86 ft was pre-existing and remains;
2. Minimum total both side yard setbacks of 18 ft required and 9.26 ft was pre-existing and remains; and
3. Maximum improved lot coverage permitted of 40%, wherein 39% was pre-existing and 52.9% is proposed.

Applicant's Argument(s) as to Why the Variances Requested Should be Granted:

- 1 The plan allows for adequate light, air and open space as it involves the addition of a rear brick patio and fire pit that is not visible from any surrounding property. 40:55D-2(c)
2. The plan fits within the general scheme and requirements of the neighborhood and will contribute to the well-being of the neighborhood by fitting within the accessory uses permitted in the neighborhood and R-50 zone. 40:55D-2(e)
3. The property in question provides sufficient space for the applicant's plan. 40:55D-2(g)
4. The plan does not promote traffic congestion or blight as the property as it is proposes a rear yard brick paver patio for the applicant's own use. 40:55D-2(h)
- 5 The plan promotes a desirable visual residential environment. 40:55D-2(i)
6. Finally, the plan will make more effective use of the property. 40:55D-2(m)

Cristina Queiroz

Property Address:

110 Linden Avenue, Verona, New Jersey

Block 901, Lot 29

Photo of Property from September 2013

Showing side walkway did exist already



Google Maps 110 Linden Ave

Verona, New Jersey

Google Street View

Sep 2013

See latest date

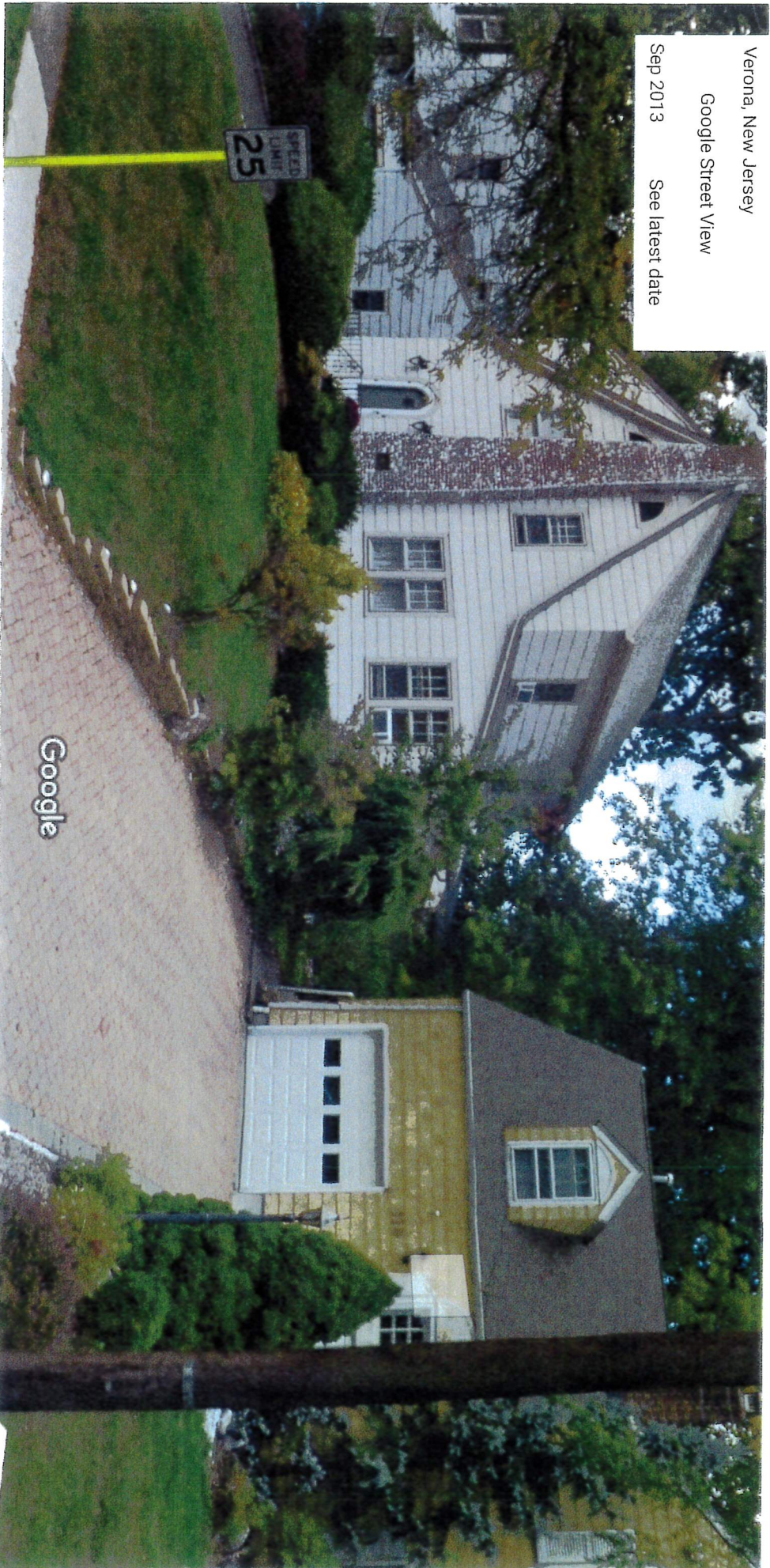


Image capture: Sep 2013

© 2024 Google

Franklin St CURT  
Brentwood Dr  
Newman Ave

Cristina Queiroz

Property Address:

110 Linden Avenue, Verona, New Jersey

Block 901, Lot 29

Property Photos







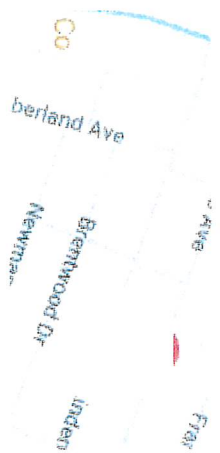
Google Maps 110 Linden Ave

Verona, New Jersey

Google Street View

Aug 2021

See more dates





Verona, New Jersey

Google Street View

Aug 2021

See more dates



Franklin St  
Cruz Rd  
Brentwood Dr  
Newman Ave

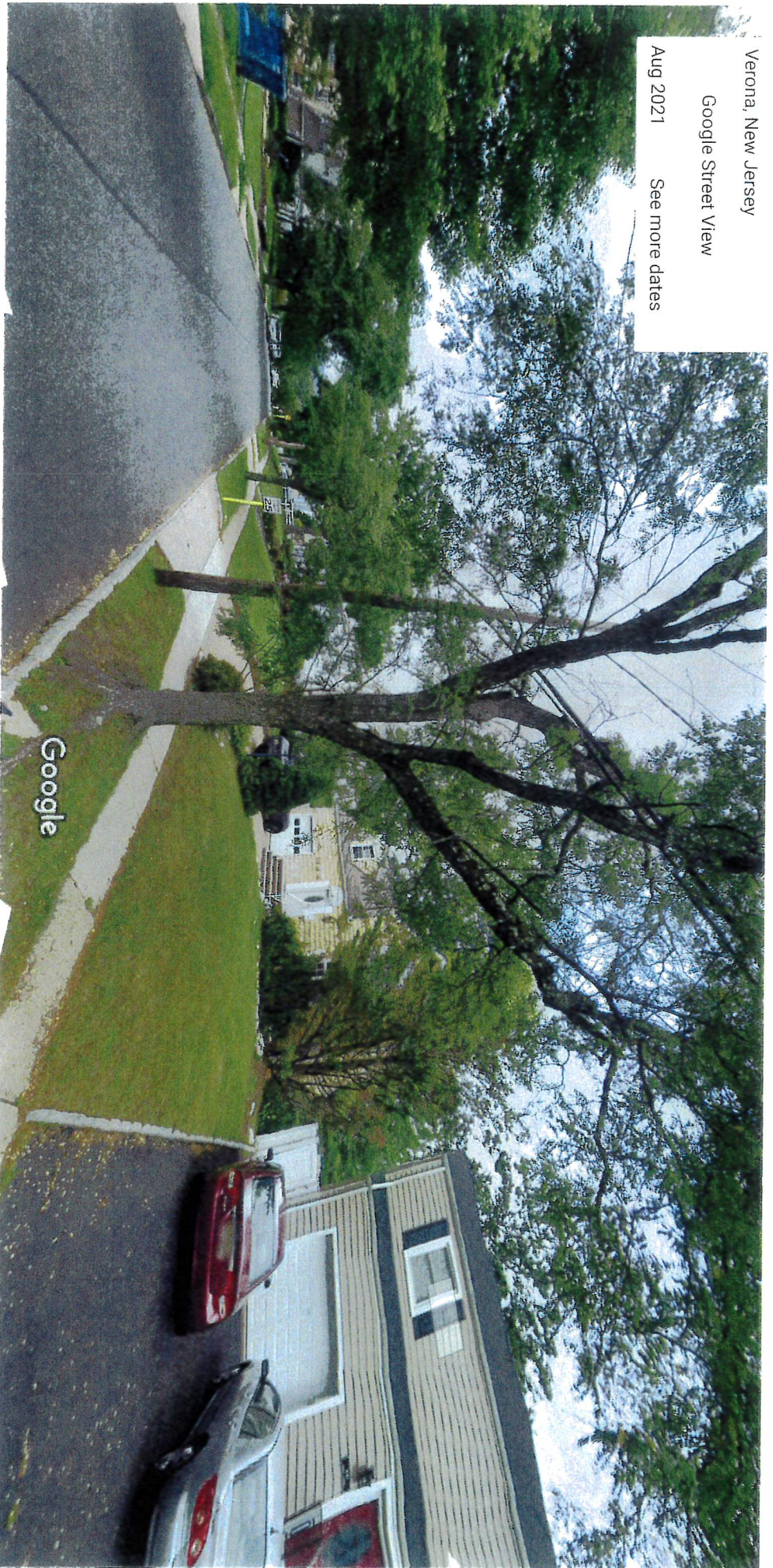


Verona, New Jersey

Google Street View

Aug 2021

See more dates



Franklin St  
Cruik  
Rd  
Brentwood Dr  
Newman Ave

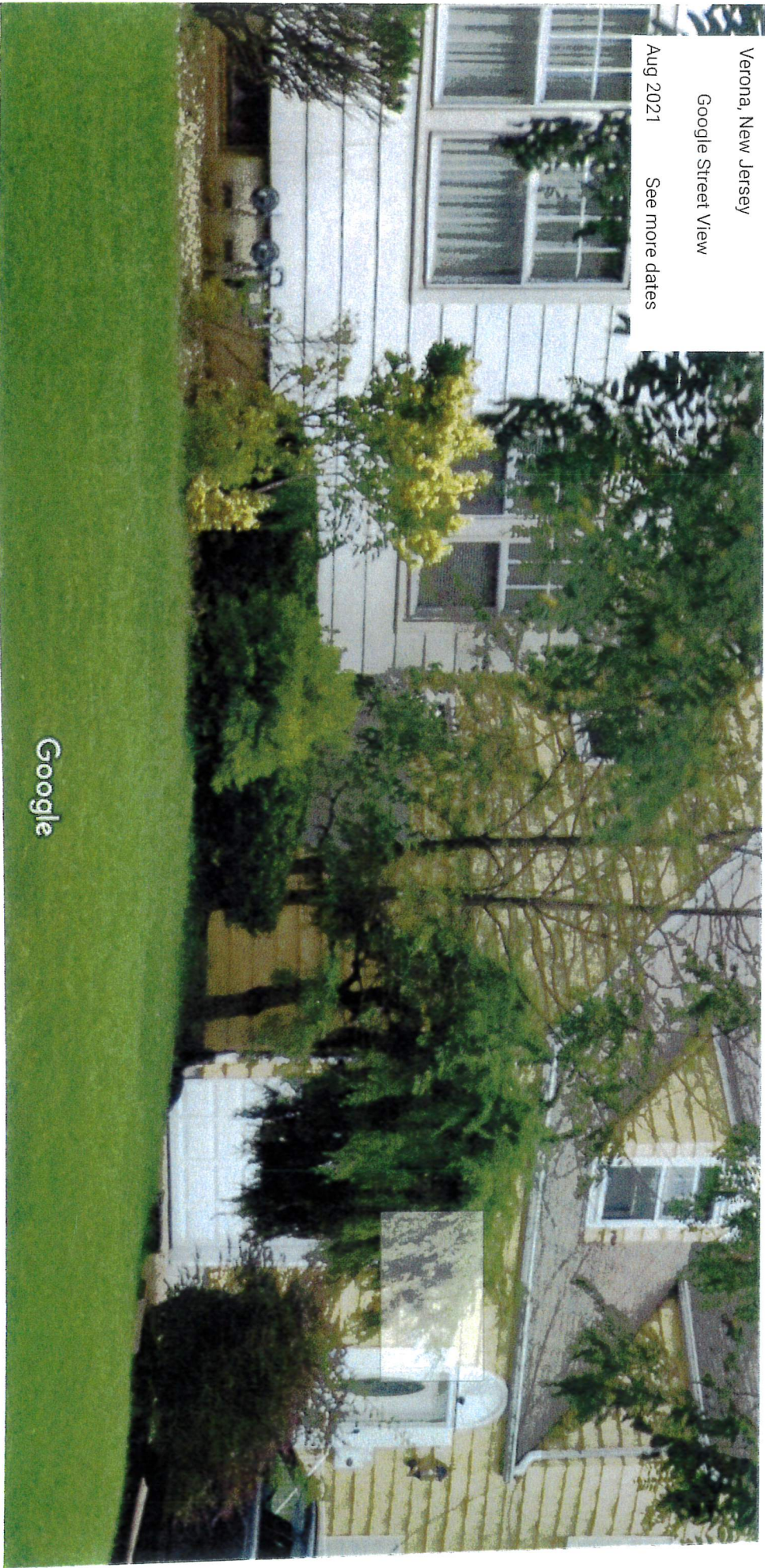


Verona, New Jersey

Google Street View

Aug 2021

See more dates



Google

Image capture: Aug 2021

© 2024 Google

Franklin St  
Cruikshank Rd  
Brentwood Dr  
Newman Ave



Verona, New Jersey

Google Street View

Aug 2021

See more dates

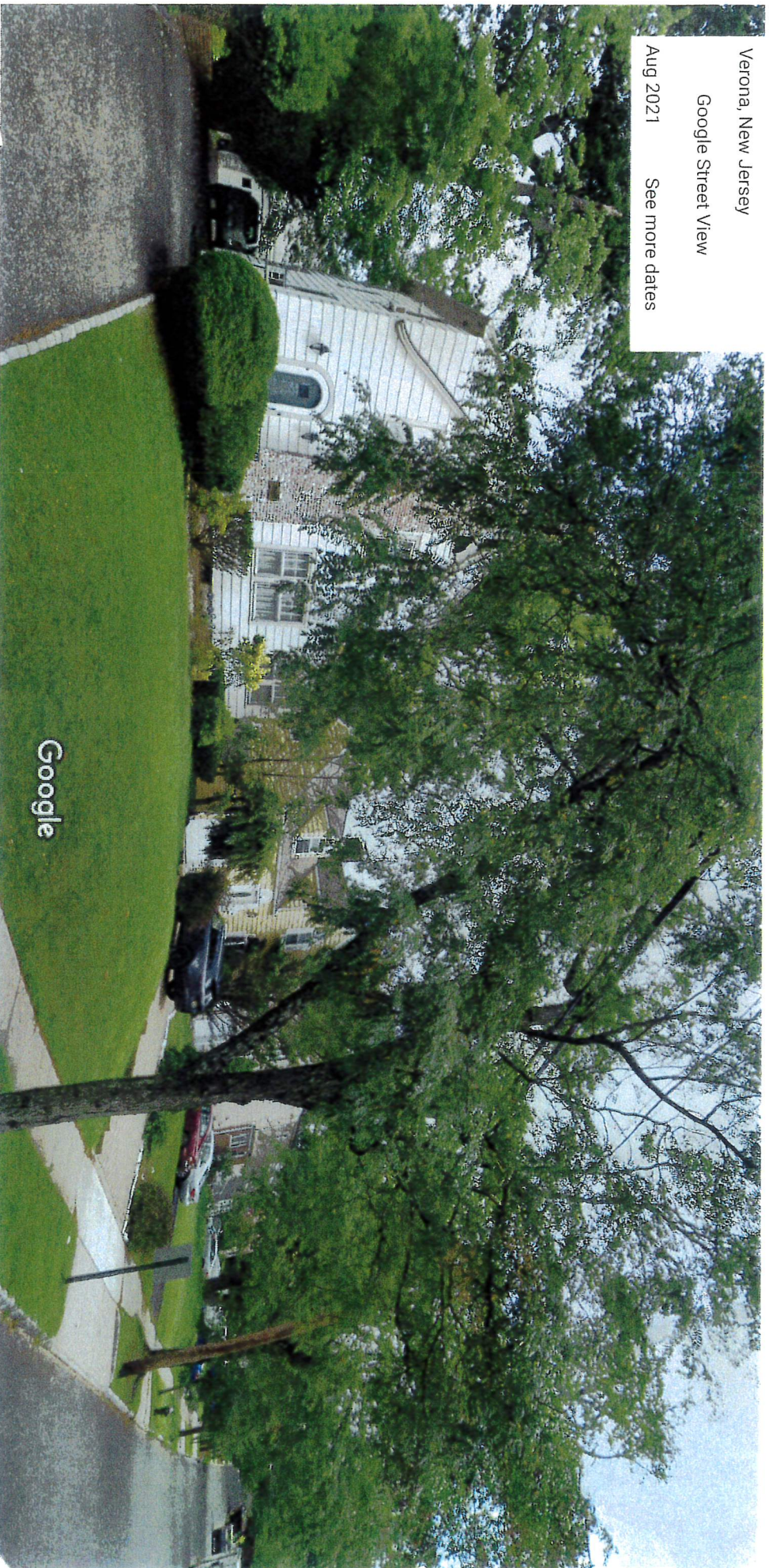


Image capture: Aug 2021 © 2024 Google

Franklin St CTU  
Brentwood Dr  
Newman Ave



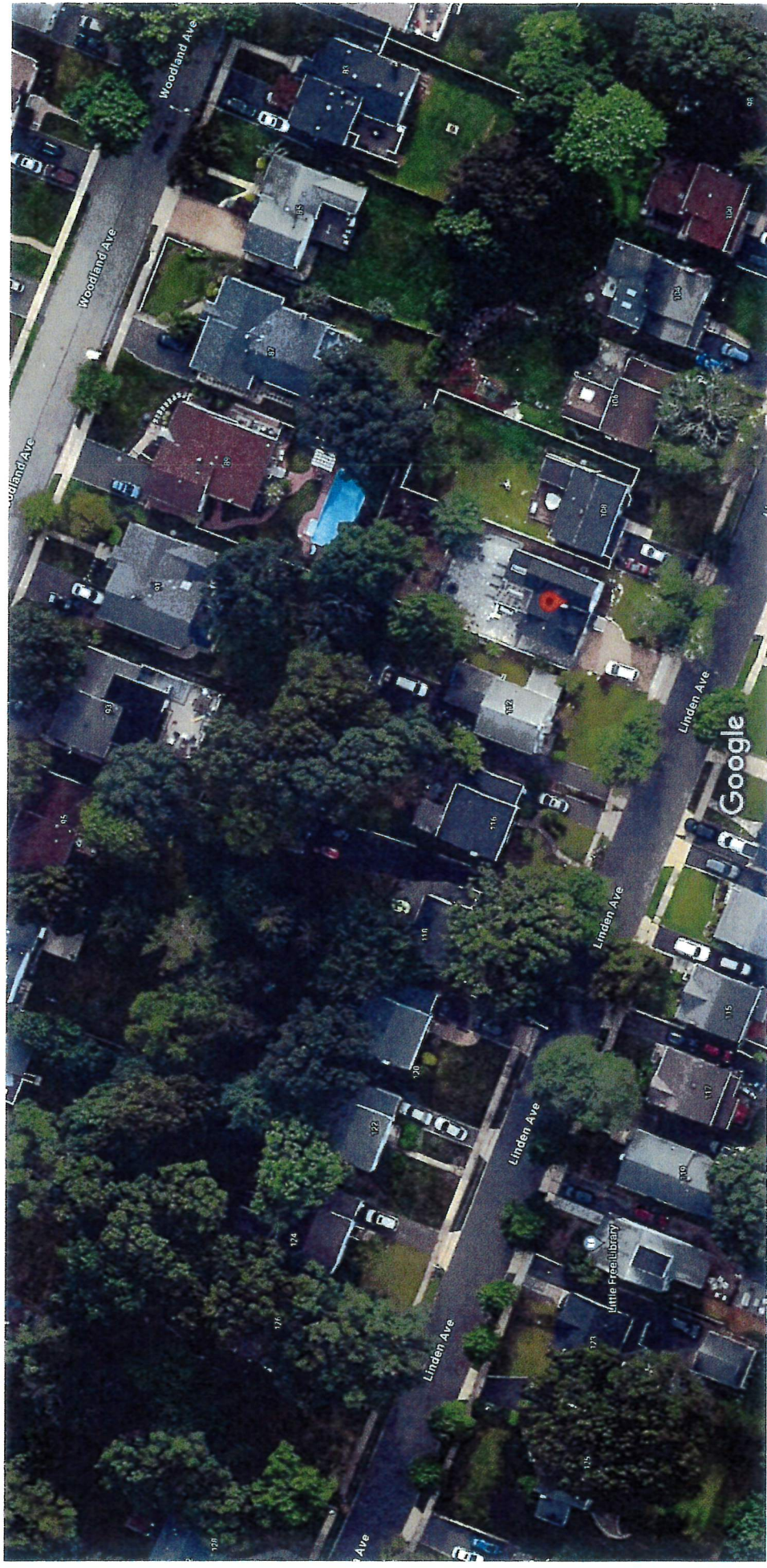
Cristina Queiroz

Property Address:

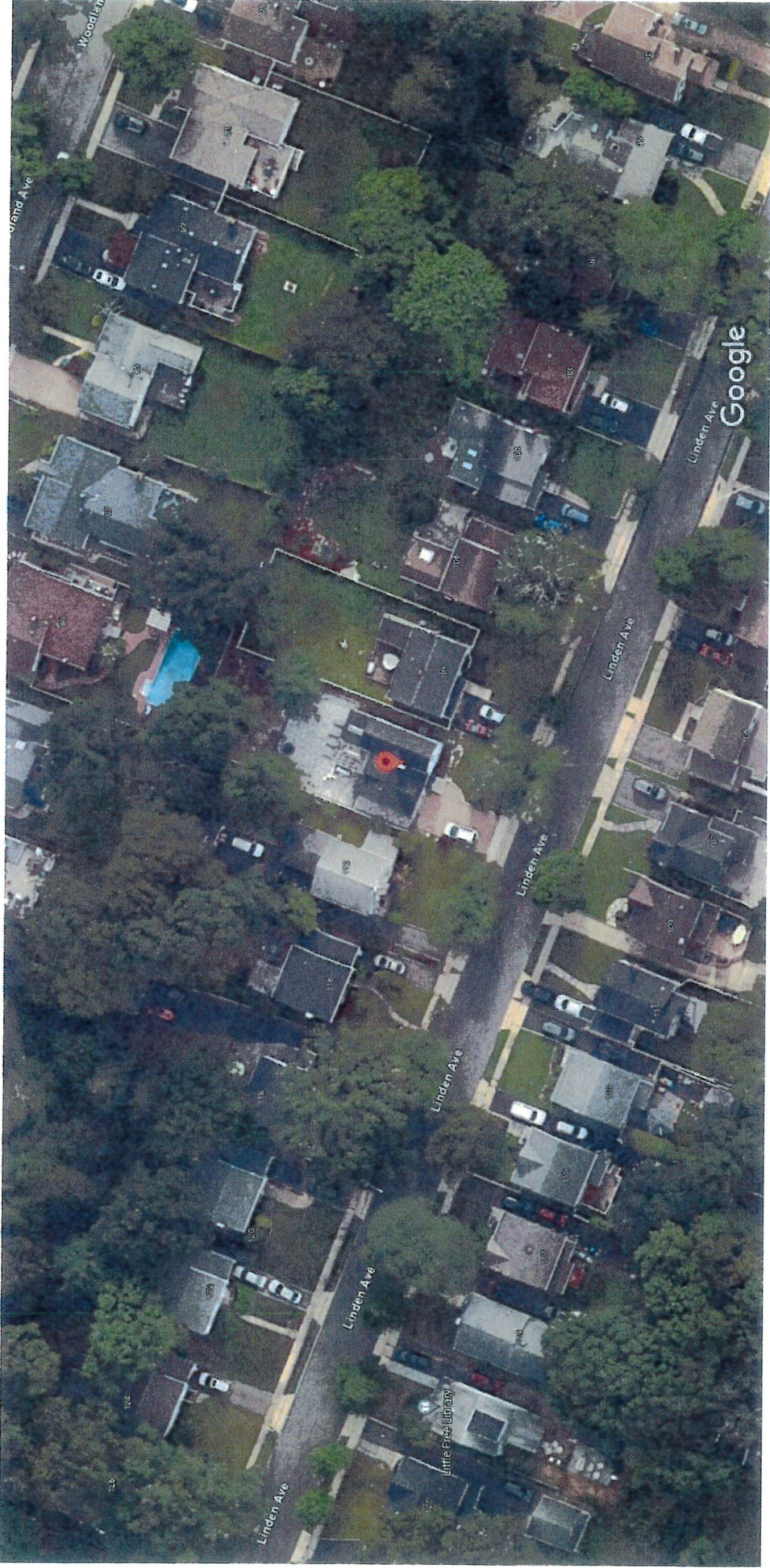
110 Linden Avenue, Verona, New Jersey

Block 901, Lot 29

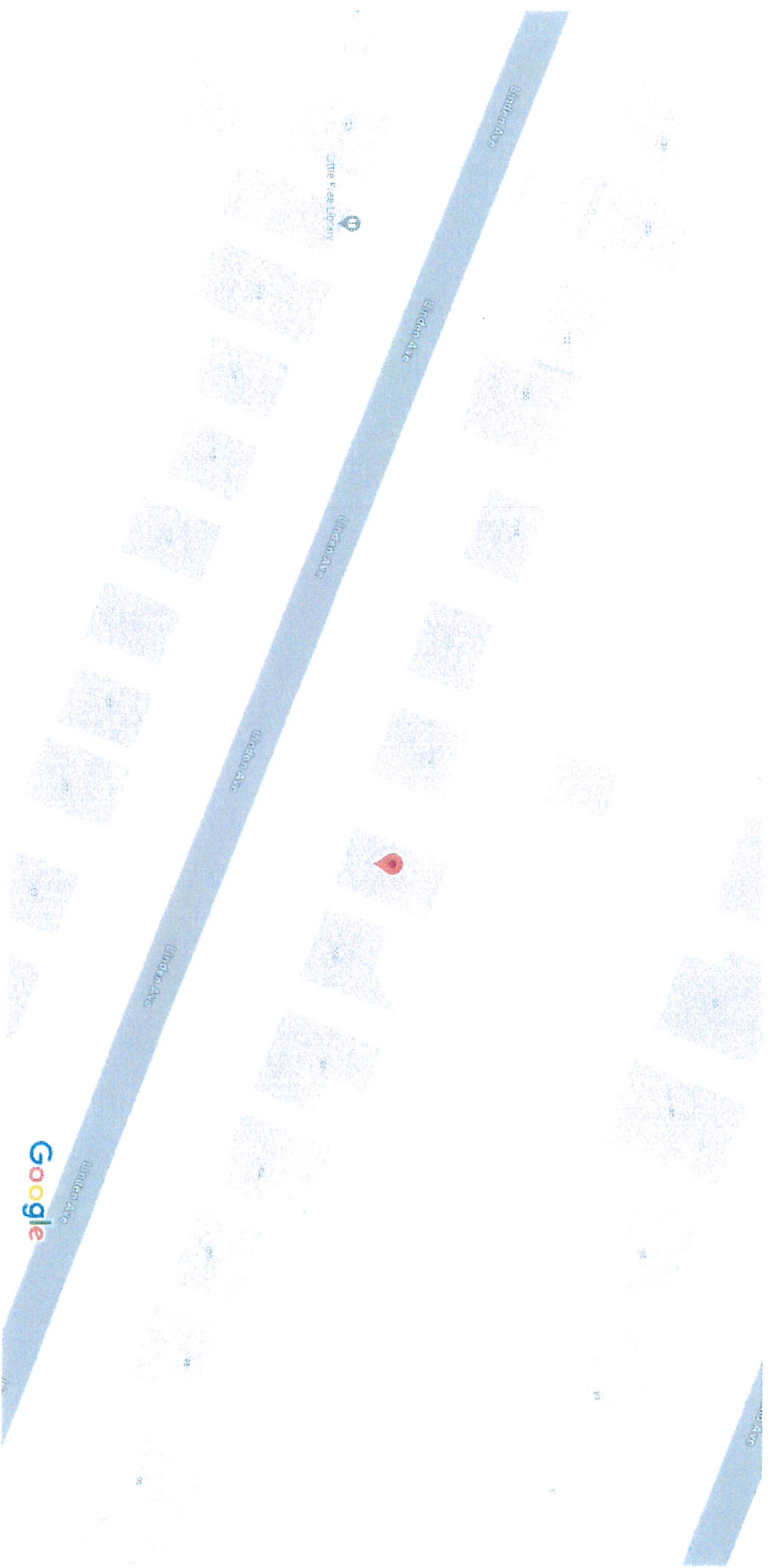
Aerial Photos







Google Maps 110 Linden Ave



Map data ©2024 Google 20 ft

Cristina Queiroz

Property Address:

110 Linden Avenue, Verona, New Jersey

Block 901, Lot 29

Tax Certification





290 West Mount Pleasant Avenue, Suite 3260  
Livingston, NJ 07039  
(973) 287-0966

535 Fifth Avenue, 4th Floor  
New York, NY 10017  
(646) 374-0255

Rosemary Stone-Dougherty, Partner  
Direct Phone: 973-348-6370  
Email: [rstonedougherty@aystrauss.com](mailto:rstonedougherty@aystrauss.com)

April 4, 2024

**VIA EMAIL ONLY: [JMUSCARA@VERONANJ.ORG](mailto:JMUSCARA@VERONANJ.ORG)**

Attn: Jennifer Muscara, Tax Collector  
Township of Verona  
600 Bloomfield Ave  
Verona, New Jersey 07044

**RE: Carr, Steven and Queiroz, Christina  
110 Linden Avenue  
Verona, New Jersey 07044  
Block 901, Lot 29**

Dear Ms. Muscara:

Please be advised this office represents Christina Queiroz and Steven Carr in connection with its zoning application for the above-referenced property. Kindly sign below certifying the property taxes are current through end of 1<sup>st</sup> quarter 2024 and email same to [rstonedougherty@aystrauss.com](mailto:rstonedougherty@aystrauss.com) and [abranco@aystrauss.com](mailto:abranco@aystrauss.com)

If you have any questions, please feel free to contact this office.

Very truly yours,

*/s/ Rosemary Stone-Dougherty*

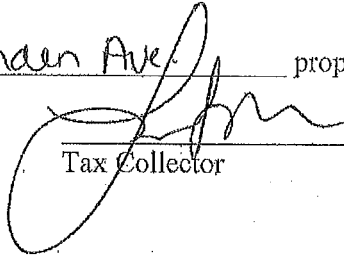
ROSEMARY STONE-DOUGHERTY

RSD/ab  
Enclosures

I hereby certify that the 110 Linden Ave. property taxes are current.

Date

4/4/2024

  
Tax Collector

Cristina Queiroz

Property Address:

110 Linden Avenue, Verona, New Jersey

Block 901, Lot 29

200 ft Property Owners List

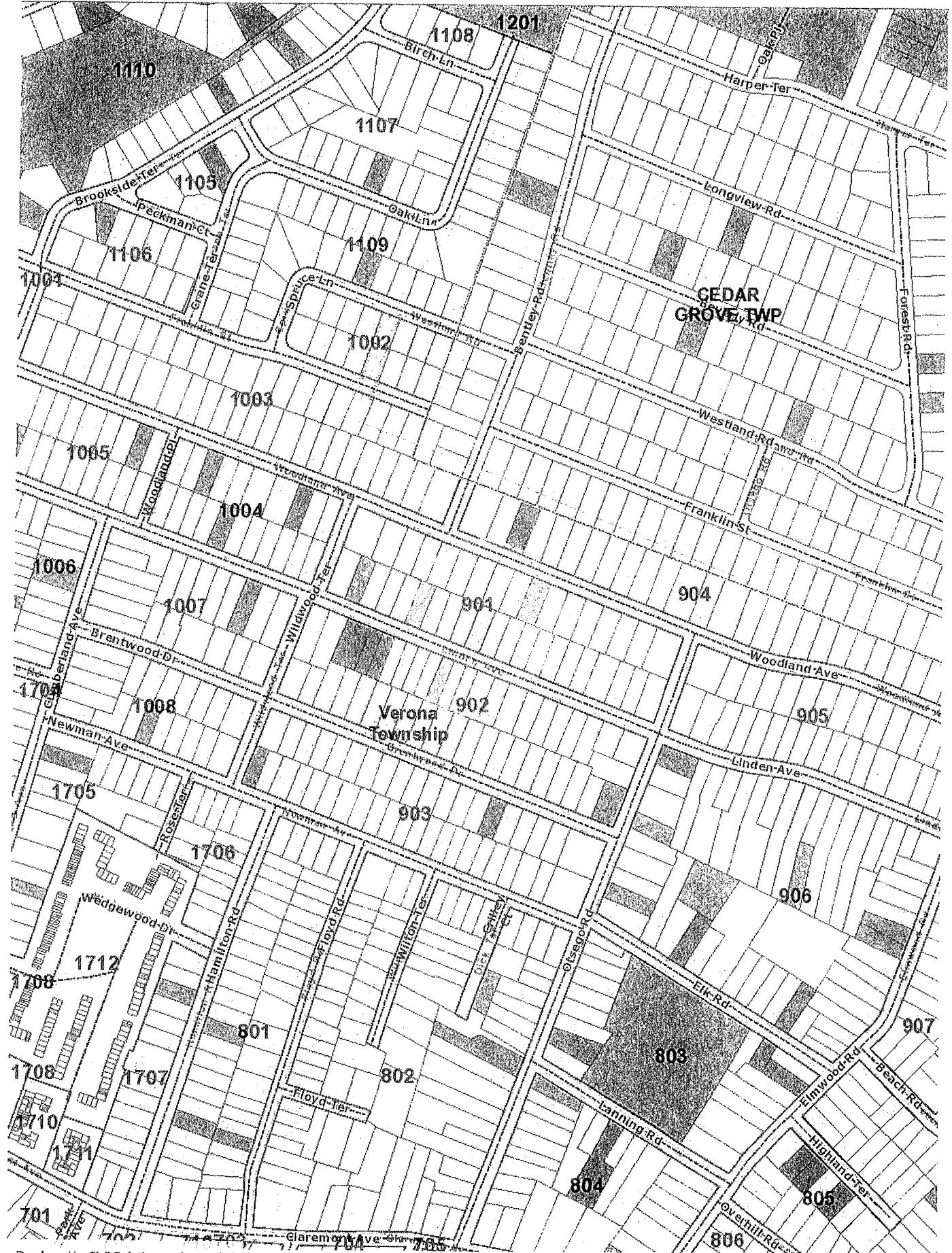












## **LIST OF UTILITIES TO BE NOTIFIED**

**•New Jersey Bell Telephone Co. Attn: Corporate Secretary  
540 Broad Street Room 1005, Newark, NJ 07101**

**•American Telephone & Telegraph Co. Attn:Karl Grossmann  
50 Patricia Drive, Flanders, NJ 07836**

**•Public Service Electric & Gas Co. Attn: Manager Corporate Properties  
80 Park Place, T6B, Newark, NJ 07102**

**•Passaic Valley Water Commission Attn: Corporate Secretary  
1525 Main Avenue, Clifton, NJ 07011**

**•MCI 10 Marcello Ave., Attn: John Scoccola  
West Orange, NJ 07052**

**•Comcast Cable  
800 Rahway Avenue, Union, New Jersey 07083**

**TOWNSHIP OF VERONA**  
**COUNTY OF ESSEX, NEW JERSEY**

**TOWNSHIP MANAGER**  
**JOSEPH O. D'ARCO**  
**TOWNSHIP CLERK**  
**JENNIFER KIERNAN**



**DEPUTY MANAGER**  
**KEVIN O'SULLIVAN**  
**TOWNSHIP ATTORNEY**  
**BRIAN J. ALOIA, ESQ.**

**VERONA COMMUNITY CENTER**  
880 BLOOMFIELD AVENUE  
VERONA, NEW JERSEY 07044

**MUNICIPAL BUILDING**  
600 BLOOMFIELD AVENUE  
VERONA, NEW JERSEY 07044  
(973) 239-3220  
WWW.VERONANJ.ORG

**DEPARTMENT OF PUBLIC WORKS**  
10 COMMERCE COURT  
VERONA, NEW JERSEY 07044

**Zoning Office      880 Bloomfield Avenue, Verona, NJ 07044      973-857-4772**

**September 25, 2024**

**Zoning Permit #2024-112 – DENIED – Patio (Constructed without Permits)**

**Applicant /Owner:    Cristina Queiroz**  
**110 Linden Street**  
**Verona, NJ 07044**

**Property:                110 Linden Street; Block 901, Lot 29**  
**Zone:                      R-50 (High-Density Single-Family) Zone District**

**Submittals:**

This office is in receipt of the following:

- Survey by Manno Surveying, Inc., signed and sealed by Vincent Manno, PLS dated 07/07/2023

**ZONING REQUEST:**

Applicant is seeking approval for a patio that has already been constructed without permits. No other requests have been requested or shown and therefore have not been considered in this departments review.

**ZONING DETERMINATION:**

- The property is located in the R-50 (High-Density Single-Family) Zone District;
- Per § 150-17.5 A. (1) Single-family homes are permitted – Compliant;
- Per § 150-17.5 D. (1) Minimum lot size: 5,000 square feet where existing is 7,000 square feet – Compliant;
- Per § 150-17.5 D. (2) Minimum lot width: 50 feet where existing is 50 feet – Compliant;
- Per § 150-17.5 D. (3) Maximum lot coverage: 30%, allowable is 2,100 square feet; existing is 1,438 or 20.5% - Compliant;
- Per § 150-17.5 D. (4) Maximum improved lot coverage: 40%, allowable is 2,800 square feet; non-permitted, existing coverage is 3,620.88 or **51.7% - A Variance is required;**
- Per § 150-17.5 F. (1) Minimum side yard setback for accessory structures is (one): eight feet. The submitted survey shows a 49 square foot shed on the SW property line. **No record of a permit has been located. Owner shall produce a permit or a Variance is required;**

- Per § 150-17.5 F. (2) Minimum rear yard setback: 10 feet where survey shows the shed's closest point to rear property line as 15 feet – Compliant;
- Per § 150-17.5 F. (4) Maximum aggregate area covered by accessory structures in the yard it is located in: 15%. Rear yard is 3,125 square feet where allowable coverage is 468.75 square feet; non-permitted, existing coverage is 1,039 square feet or **33.2%** - **A Variance is required;**
- Per § 150-5.3 (6) Patios may be located in any side or rear yard; provided, that they are not closer than five feet to any property line. The unpermitted patio has the following:
  - Rear setback of 34 feet – Compliant;
  - SW side setback of 3 feet - **A Variance is required;**
  - NE side setback of 1 foot - **A Variance is required;**
- Per § 150-12.3 D. No driveway shall be less than one foot from an adjacent property line. Driveway is 4 feet from the NE property line and 27 feet from the SW property line – Compliant;
- Per § 150-12.4 B. (2) Access drives or driveways for one-family dwellings shall be not more than 14 feet wide at the curblin for single driveways or 16 feet for double driveways; **existing is a pre-existing non-conforming driveway of 19 feet;**
- A 6 foot high, vinyl fence is shown running from the rear property line along 105 feet of the NE property line which is compliant with § 150-7.3 Fences. **No record of a permit has been located. Owner shall produce a permit or apply for a Zoning permit.**
- Should a variance be granted for the proposed work, an Engineering review **would be required** as the total disturbance is over 400 square feet;
- The proposed limit of disturbance is below 5,000 square feet, so HEPSCD certification will **not** be required.
- Please note that no tree is shown on the plans to be removed.

Based on the reviewed submitted items, the applicant's request for a Zoning Permit has been **DENIED** by this office

**Please Note:** No electrical, plumbing or building codes were reviewed as part of this application.

Please feel free to contact this office should you have any questions.

Respectfully Submitted,

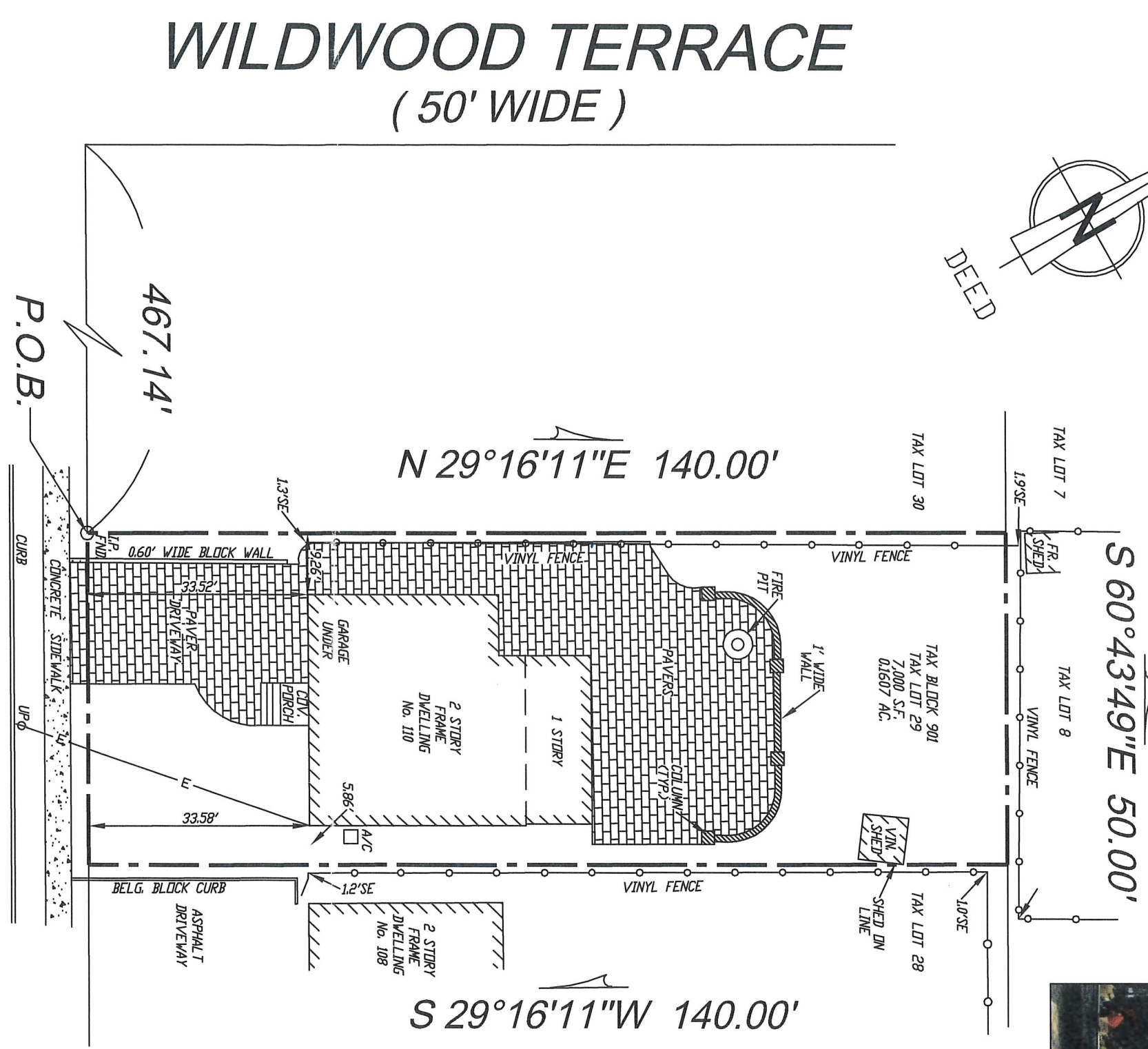
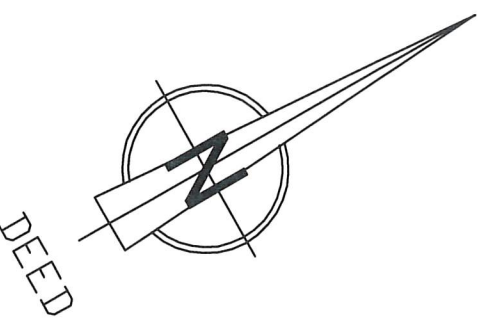


**Kathleen Miesch**  
Zoning Official

cc: Tom Jacobsen, Construction Official  
Kristin Spatola, Technical Assistant



NOTE: GRASSES SHOWN HEREON ARE FOR TITLE PURPOSES ONLY. ALTHOUGH ABSOLUTE, GRASS DIMENSIONS ARE NOT TO BE USED FOR PERMANENT CONSTRUCTION. THIS CERTIFICATE OF LIABILITY IS ASSUED BY SURVEYOR FOR USE OF SURVEY FOR ANY OTHER PURPOSE INCLUDING BUT NOT LIMITED TO THE USE OF SURVEY FOR SURVEY AFFAIRS, RESULTS OF PROPERTY, OR TO ANY OTHER PERSON NOT LISTED IN CERTIFICATION, EITHER DIRECTLY OR INDIRECTLY. THIS SURVEY IS INVALID WITHOUT THE EMBOSSED SEAL OF THE SURVEYOR, SUBJECT TO ALL EASEMENTS OR RIGHT-OF-WAYS OF RECORD, SUBJECT TO ANY FACTS THAT A TITLE SEARCH WOULD DISCLOSE. SUB-SURFACE UTILITIES HAVE NOT BEEN LOCATED OR OTHERWISE INDICATED.

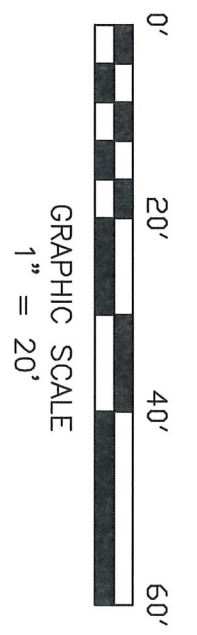


**WILDWOOD TERRACE**  
( 50' WIDE )

**LINDEN AVENUE**  
( 50' WIDE )

**IMPERVIOUS COVERAGE:**

DWELLING	1,375 SF (19.6%)
PDRCH	46 SF (0.7%)
PAVER DRIVEWAY AND REAR PAVERS	2,221 SF (31.7%)
SHED	47 SF (0.7%)
WALLS W/COLUMNS	61 SF (0.9%)
<b>TOTAL:</b>	<b>3,750 SF (53.6%)</b>



LOCATION SURVEY OF PROPERTY OF  
CRISTINA QUEROZ  
BOROUGH OF VERONA, ESSEX COUNTY, N.J.

CERTIFIED TO:  
CRISTINA QUEROZ

SCALE:	1" = 20'	DATE:	07/07/2023
TAX MAP LOT:	29	TAX MAP BLOCK:	901
FILE MAP LOT:		FILE MAP BLOCK:	

MAP REFERENCE:  
BEING KNOWN AND DESIGNATED AS LOT 29 IN BLOCK 901 AS SHOWN ON THE TAX MAP IN THE BOROUGH OF VERONA, ESSEX COUNTY, STATE OF NEW JERSEY.

Job No. 23-273

**MANNNO SURVEYING, INC.**  
PROFESSIONAL LAND SURVEYORS & PLANNERS  
543 POST AVE. LYNDBURST, N.J. 07071  
TEL. (201) 438-7454 FAX (201) 460-0132  
EMAIL: VLEVEI.42@gmail.com

Vincent Manno, Professional Land Surveyor  
Lic. No. 24GS03538400  
Anthony J. Manno, Founder 1936-2011

CERTIFICATE OF AUTHORIZATION NO. 24GA28191300