

CRITICAL AREA COMMISSION
CHESAPEAKE AND ATLANTIC COASTAL BAYS
1804 West Street, Suite 100
Annapolis, Maryland 21401

MEMORANDUM

To: Project Subcommittee, Critical Area Commission

From: Kate Durant, Natural Resources Planner

Date: April 17, 2024

Subject: M&T Bank Stadium Improvements (Maryland Stadium Authority, Baltimore City)

The Maryland Stadium Authority (MSA) is requesting preliminary feedback from the Project Subcommittee regarding the proposed renovations to M&T Bank Stadium located at 1101 Russell Street in Baltimore. MSA is requesting these renovations as the current parking and commercial facilities are not meeting the needs of the stadium's use for sporting and entertainment events. The project requires approval under COMAR 27.02.05 by the Critical Area Commission because the project is proposed by a State agency on State-owned land. The purpose of this preliminary Project Subcommittee discussion is to provide feedback to the MSA regarding the proposed development plans, including mitigation, and whether the current proposal fully addresses the requirements for approval.

A copy of the proposed site plan is attached.

Background and Existing Conditions

M&T Bank Stadium opened on August 8, 1998. The existing project area includes the stadium structure, an asphalt parking lot, concrete and brick paver pedestrian paths, two bioretention facilities, and a stormwater management pond. The stadium property is partially located within the Critical Area and is designated as an Intensely Developed Area (IDA). The project area is located entirely outside of the 100-foot buffer. There are multiple trees located on the property, and a tree survey will be forthcoming. The site is located within the Patapsco River Watershed.

Proposed Impacts and Mitigation

The entire project consists of multiple site improvements to the existing stadium to improve the experience of fans attending events at M&T Bank Stadium. Within the Critical Area, the proposed development activities include the following: construction of a retail store with associated stadium improvements; new commercial buildings with improvements to the north and south plazas; expansion of the existing parking lot; installation of a new parking garage; and removal of two existing bioretention facilities and a stormwater pond.

Limits of Disturbance

The total limit of disturbance (LOD) for the project is 10.43 acres, with 5.74 acres of LOD within the Critical Area.

Buffer Impacts

The project is not located within the 100-foot Buffer; therefore, there are no impacts to the Buffer.

Tree Clearing and Mitigation

In accordance with the City of Baltimore's Critical Area program, an applicant must provide mitigation for the larger or two mitigation calculations: afforestation or tree clearing. At this time, MSA expects to remove all trees within the Critical Area LOD, which totals 490 diameter at breast height (DBH) inches of trees, which equates to 245 2-inch caliper trees (1.12 acres)¹. The afforestation requirement for the LOD is 15% of the total project area (0.15 x 5.74 acres), which equals 375 DBH inches, or 188 2-inch caliper trees (0.86 acres). Therefore, MSA will need to provide 490 DBH inches of tree plantings, which is equal to planting 245 2-inch caliper trees, or pay into the City's fee-in-lieu fund.

Due to limitations to plant onsite to maximize use of the parking area and commercial facilities, MSA intends to pay a fee-in-lieu to Baltimore City for the tree mitigation requirements. However, at this time, the amount of the fee has not been calculated, nor has the applicant reached out to the City about the fee-in-lieu payment. Critical Area staff has reached out to the City for an official response on this request, and the City is willing to entertain a fee-in-lieu payment for this project. The City charges \$600 per planting unit² for the fee-in-lieu fund; therefore, the estimated fee would be \$147,000 (\$600/tree x 245 trees).

The City of Baltimore has a robust fee-in-lieu program. Most years, the City operates a grant program where local non-profits apply to spend the Critical Area fee-in-lieu monies. The majority of grant projects are completed by Tree Baltimore and Blue Water Baltimore, both of which plant trees throughout the City, especially in the Critical Area and near tributary streams.

Critical Area 10% Phosphorus Reduction/Stormwater Management

The project requires a reduction of 4.83 pounds of phosphorus/year. To meet Maryland Department of the Environment (MDE) stormwater management requirements, a total of 19,019 cubic feet of treatment volume is required, along with 38,806 cubic feet of channel protection.

Two new stormwater management BMPs, which are underground treatment facilities called StormPods, will replace the removed bioretention facilities and stormwater management pond. One will be located in the southwest corner of the parking lot, while the other will be located

¹ Section 6.2.1 of the Baltimore City CAMP Manual states that the following two methods can be used to calculate mitigation for clearing outside of the Buffer: (1) calculation of the square footage of canopy removed; or (2) estimation of the total number of caliper inches (DBH) of trees or woody plants removed. Additionally, Table 2 states that 2 caliper inches (DBH) is equivalent to 1 tree.

² A planting unit is equivalent to one 2-inch caliper tree.

farther north, beneath the existing plaza, outside of the Critical Area. MDE conceptually approved the concept design for stormwater management on February 9, 2024. MDE has also determined that these practices can provide up to 40% phosphorus removal. Using this removal rate, the StormPods will remove 7.85 pounds of phosphorus/year, which exceeds the 10% requirement by 3.02 pounds of phosphorus/year.

Tidal and Nontidal Wetlands

There are no impacts to tidal wetlands, nontidal wetlands, and/or nontidal wetland buffers.

Coastal Resiliency Assessment

The LOD in the Critical Area is located outside of the 100- and 500- year floodplain. The existing stormwater management pond is located within the CS-CRAB and potential storm surge for a Category 3 hurricane, but it will be removed during this project. The proposed StormPods will be located outside of the CS-CRAB and potential storm surge for all categories of hurricanes. The project area itself does not appear to be vulnerable to sea level rise, or coastal flooding.

Permits and Review by Other Agencies

The Department of Natural Resources' Wildlife and Heritage Service (WHS) found no rare, threatened, or endangered species within the proposed project area in a letter dated March 4, 2024.

The Maryland Historical Trust (MHT) stated that the proposed project will have no effect on historic properties in a letter dated March 6, 2024.

The Maryland Department of Environment (MDE) approved the stormwater management concept on February 9, 2024. An Erosion and Sediment Control design has not yet been submitted to MDE for review.

Project Subcommittee Discussion

The purpose of this discussion is to provide MSA an opportunity to present the project and answer any questions that the Project Subcommittee may have regarding the proposed development plans, mitigation, and stormwater management. MSA is hopeful that this project can be submitted to the Commission for an official vote in June 2024 in order to start and hopefully complete the project prior to the start of the 2024 Baltimore Ravens football season in September.

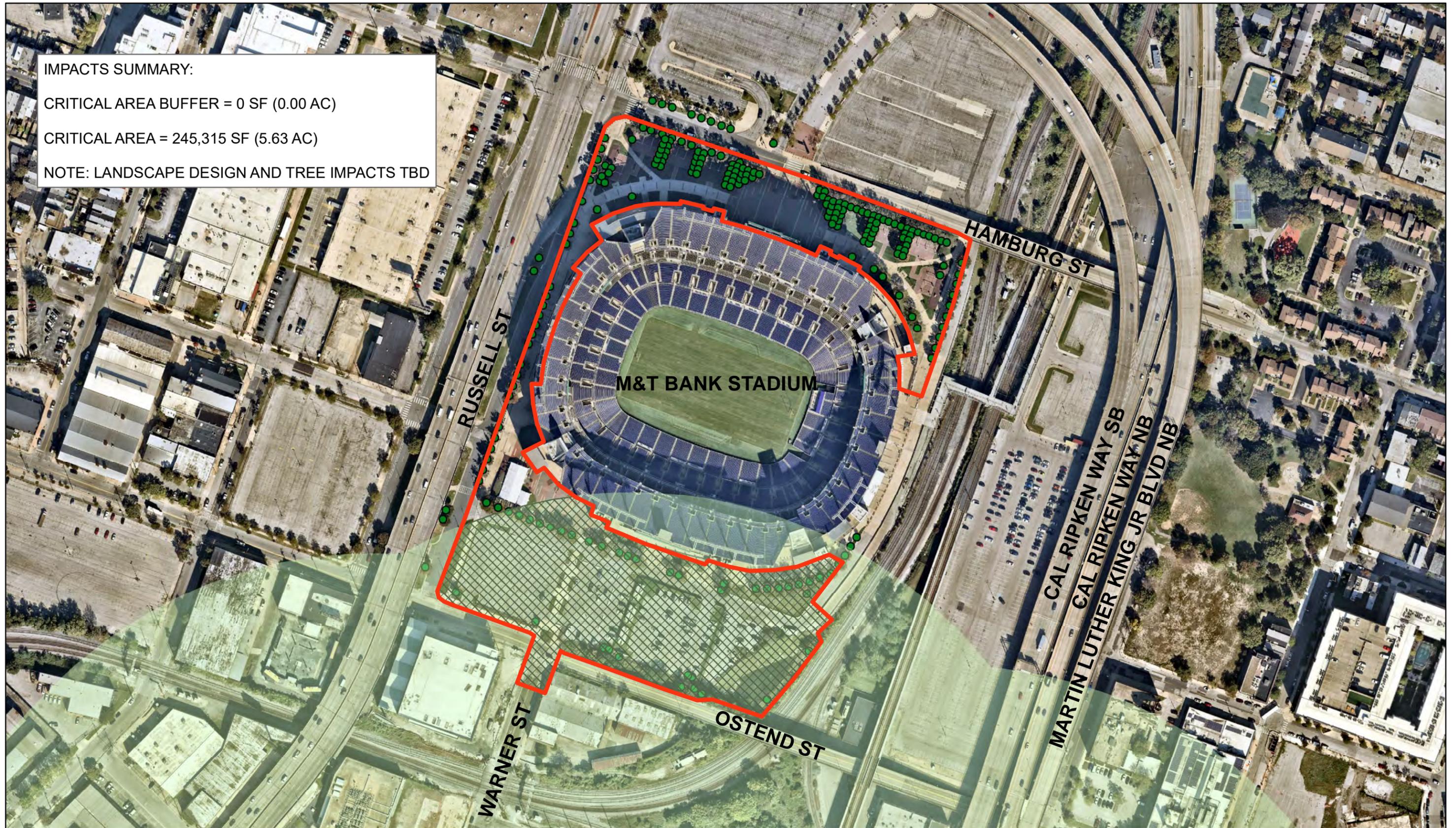
If you have any questions regarding the proposed project prior to the upcoming discussion at the April 17, 2024 Project Subcommittee meeting, please contact Kate Durant at (410) 260-3477 or kathryn.durant@maryland.gov.

IMPACTS SUMMARY:

CRITICAL AREA BUFFER = 0 SF (0.00 AC)

CRITICAL AREA = 245,315 SF (5.63 AC)

NOTE: LANDSCAPE DESIGN AND TREE IMPACTS TBD

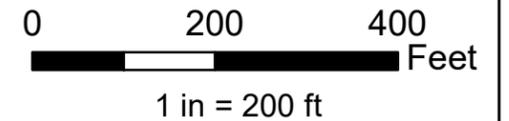


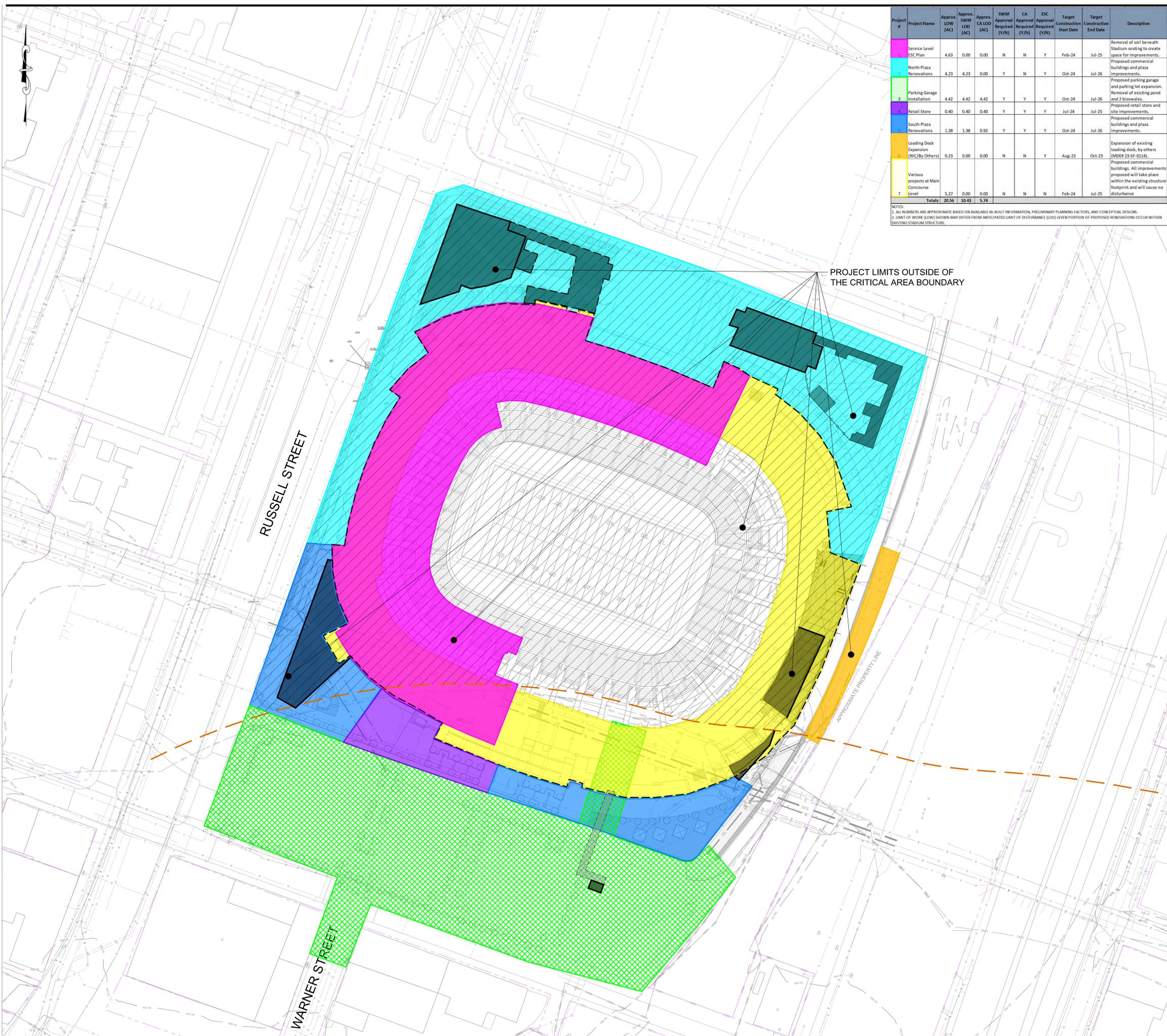
Legend

-  Limits of Disturbance
-  Critical Area Impact
-  Critical Area - Waterfront Industrial Area
-  Existing Trees



**M&T BANK STADIUM
CRITICAL AREA
IMPACTS MAP**





Project #	Project Name	Approx. SWM LDD (AC)	Approx. CA LDD (AC)	SWM Approval Required (Y/N)	CA Approval Required (Y/N)	ESC Approval Required (Y/N)	Target Construction Start Date	Target Construction End Date	Description
1	Service Level ESC Plan	4.63	0.00	N	N	Y	Feb-24	Jul-25	Removal of soil beneath Stadium seating to create space for improvements. Proposed commercial buildings and plaza improvements.
2	North Plaza Renovations	4.23	4.23	Y	N	Y	Oct-24	Jul-26	Proposed parking garage and parking lot expansion. Removal of existing pond and 2 bioswales.
3	Parking Garage Installation	4.42	4.42	Y	Y	Y	Oct-24	Jul-26	Proposed retail store and site improvements.
4	Retail Store	0.40	0.40	Y	Y	Y	Jul-24	Jul-25	Proposed commercial buildings and plaza improvements.
5	South Plaza Renovations	1.38	1.38	Y	Y	Y	Oct-24	Jul-26	Expansion of existing loading dock, by others (MDEB 23-SF-0114).
6	Loading Dock Expansion (NIC/By Others)	0.23	0.00	N	N	Y	Aug-23	Oct-23	Proposed commercial buildings. All improvements proposed will take place within the existing structure footprint and will cause no disturbance.
7	Various projects at Main Concourse Level	5.77	0.00	N	N	N	Feb-24	Jul-25	
Totals:		20.56	10.43						

NOTES:
 1. ALL NUMBERS ARE APPROXIMATE BASED ON AVAILABLE AS-BUILT INFORMATION, PRELIMINARY PLANNING FACTORS, AND CONCEPTUAL DESIGNS.
 2. LIMIT OF WORK (LOW) SHOWN MAY DIFFER FROM ANTICIPATED LIMIT OF DISTURBANCE (LOD) GIVEN PORTION OF PROPOSED RENOVATIONS OCCUR WITHIN EXISTING STADIUM STRUCTURE.

SHEET NOTES

EXISTING CONDITIONS LEGEND

- PROPERTY LINE
- 500-YEAR FLOODPLAIN
- 1000' CRITICAL AREA LIMIT
- APPROXIMATE LIMITS OF EXISTING STADIUM STRUCTURE
- APPROXIMATE LIMITS OF WORK:

PROJECT 1 (Pink)

PROJECT 2 (Cyan)

PROJECT 3 (Green Hatched)

PROJECT 4 (Purple)

PROJECT 5 (Blue)

PROJECT 6 (Yellow)

PROJECT 7 (Orange)

PKG: STORMWATER

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GENERAL NOTES

- THE TOPOGRAPHIC AND UTILITY INFORMATION SHOWN HEREON, WAS OBTAINED FROM AERIAL SURVEY PROVIDED BY HARFORD AERIAL SURVEYS, INC. IN SEPTEMBER 1998, BY OTHER RECORD DRAWINGS/INFORMATION PROVIDED BY THE OWNER, AND SURVEY INFORMATION BY RISK COMPLETED JULY 2016. THIS INFORMATION MAY NOT REFLECT CURRENT CONDITIONS. PROPERTY LINE IS APPROXIMATE, AS OBTAINED FROM GIS DATA.
- HORIZONTAL AND VERTICAL DATUM ARE BASED UPON BALTIMORE CITY GRID MERIDIAN.
- THE LIMIT OF WORK SHOWN ON THIS PLAN IS INTENDED TO BE APPROXIMATE. CONTRACTOR SHALL PERFORM ALL WORK SPECIFIED WITHIN THE CONSTRUCTION DOCUMENTS AND SHALL INFORM THE OWNER IF THE WORK EXTENDS BEYOND THE ANTICIPATED LOW.
- ALL UTILITIES SHOWN ARE EXISTING TO REMAIN, UNLESS OTHERWISE NOTED. THE TOPS OF ALL FRAMES, GRATES, AND COVERS OF ALL EXISTING UTILITIES WITHIN THE LIMITS OF WORK SHALL BE ADJUSTED TO THE NEW GRADES.
- A PORTION OF THIS PROJECT IS LOCATED WITHIN THE 500-YEAR FLOODPLAIN.
- A PORTION OF THIS PROJECT IS LOCATED WITHIN THE CHESAPEAKE BAY CRITICAL AREA.

SITE DATA

- PROPERTY ADDRESS: 1101 RUSSELL ST, BALTIMORE, MD 21203
- PROPERTY OWNER: THE MARYLAND STADIUM AUTHORITY
- ZONING: C-5DC

DATE Description

11.13.2023 STORMWATER CONCEPT SUBMITTAL

NOT FOR CONSTRUCTION

Seal / Signature

Project Name
M&T BANK STADIUM

Project Number

Description
CRITICAL AREA PLAN

Scale
AS SHOWN

APPENDIX A

50 0 50 100
SCALE: 1" = 50'

KEY PLAN

D A
C B

KEY PLAN NORTH

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