

CRITICAL AREA COMMISSION
Project Committee
Information Only
April 8, 2026

Western Sanitation Yard Renovation
Baltimore City
Staff: Margaret White

General Information

Type of Project Change:

☐ Major Development

☐ Memorandum of Understanding

☒ Conditional Approval

☐ Other

Authority:

- COMAR 27.02.06 - Conditional Approval of State or Local Agency Programs in the Critical Area (See Attachment 2)

Summary: The Baltimore City Bureau of Solid Waste (City) is requesting preliminary feedback from the Project Committee on a proposed expansion of the Western Sanitation Yard.

The existing facility is located partially within the Critical Area on land designated as a Resource Conservation Area (RCA). The existing use is considered nonconforming; therefore, any expansion into the RCA requires a Conditional Approval by the Critical Area Commission. The site area is 55 acres, of which 31 acres are located within the RCA. The site also contains an existing capped landfill on the southwest portion of the parcel. Baltimore City cannot disturb the capped landfill, which limits expansion availability outside of the Critical Area.

Commission staff visited the site on February 27, 2026, to better understand the site constraints and the basis for expanding a nonconforming use within the RCA. A site plan showing existing conditions and the proposed expansion is included as Attachment 1.

Project Details

Item	Summary
General Location (jurisdiction and site address)	701 Reedbird Avenue, Baltimore, Maryland
Critical Area Designation	RCA
Project Type	Redevelopment and Expansion of an Existing Nonconforming Use

Site Size	55 acres, 031 within the Critical Area
Habitat Protection Area (HPA) Impacts:	There are no impacts to Habitat Protection Areas associated with this project

The site formerly operated as the Reedbird Avenue Landfill (1933–1977) and later as a Sanitation Yard which was established in the 1960s. Following incinerator decommissioning, the landfill was capped in 1981. Today, the Sanitation Yard provides administrative, maintenance, and waste collection services for southern Baltimore City. The City proposes to redevelop and expand the site to improve parking, staff facilities, and circulation, enhancing safety and traffic flow. The project is intended to modernize the facility, meet growing service demands, and provide a safer, more functional environment for sanitation workers.

Existing Conditions:

- Office trailer
- Administrative building with locker rooms and bathrooms
- Maintenance and storage building
- Truck wash
- Paved 84-space parking lot (accommodates parking for 46 utility trucks, 38 spaces for smaller vehicles)
- Fuel tank (located within the paved parking lot)
- Paved residential waste drop-off area
- Vegetated areas that include the capped landfill, the Critical Area Buffer, and open areas that are vegetated with invasive and non-native species.

Proposed Project:

- Removing the office trailers and demolishing existing storage buildings
- Renovating and expanding the existing administrative building
- Constructing a new elevated residential drop-off wall and recycling area
- Expanding the existing truck wash
- Constructing a new fuel tank and canopy
- Constructing a new covered storage space
- Repaving and expanding the parking lot to accommodate 251 spaces total (provides 89 spaces for utility trucks and 162-spaces for staff and public)
- Constructing new stormwater treatment facilities
- Installing a new site entrance and exit for residential vehicles, workers, and collection vehicles
- Installing utilities (including electrical, water lines, sewer lines, and storm drains)
- Installing a perimeter fence with lockable gates to control site access

Preliminary Understanding of Impacts and Requirements

Limit of Disturbance (LOD): 9.71 acres

Habitat Protection Area Impacts: There are no 100-foot Buffer or other Habitat Protection Area impacts proposed.

Forest/Developed Woodland Clearing: Clearing impacts are unspecified as of right now.

Commission staff are awaiting Baltimore City confirmation that onsite trees (which are possibly planted to meet mitigation requirements for a previous project) are not being disturbed.

Baltimore City's afforestation requirement is 15% of the project LOD if the LOD is less than 20% of the total site area.

Lot Coverage: The proposed development will result in a total of 4.79 acres of lot coverage within the Resource Conservation Area portion of the Sanitation Yard property (or 14.09% of the area within the RCA). This does not exceed the 15% lot coverage limit for the Resource Conservation Area.

10% Phosphorus Reduction Requirement: Baltimore City requires 10% phosphorus reduction for all projects considered "significant" development within the Critical Area. The 10% reduction for this site would be 7.75 lbs/year. The City intends to use a combination of nonstructural and microscale best management practices (specifically micro-bioretenion areas) and fee-in-lieu to meet this requirement.

Proposed Mitigation (Conceptual)

Impact	Required Mitigation	Proposed Mitigation
Afforestation	93 2-inch caliper trees	On-site plantings
Forest and Vegetation Clearing	3:1 mitigation (currently being estimated in coordination with City Office of Sustainability)	- On-site plantings - Additional requirements that cannot be met with on-site plantings will be met through mitigation offset fees
10% Phosphorus reduction	7.75 lbs/years	- Non-structural and micro-scale best management practices: 3.82 lbs/yr - Fee-in-lieu for remainder

In addition to the mitigation measures indicated above, the City also intends to include Critical Area signage to educate residents and workers about the Critical Area and its importance as a

habitat and stormwater buffer for the Chesapeake Bay. This proposed signage will be located near mitigation plantings and micro-bioretenment areas to highlight the efforts taken to protect the Critical Area as part of this renovation project.

Onsite plantings are only possible because the City intends to import clean fill to achieve a minimum of 6-feet of clean fill needed to protect the existing landfill cap. The City is currently working with MDE to develop a list of acceptable plant species that meet Critical Area requirements for native vegetation while also having shallow root systems to avoid damaging the landfill cap.

Commission Staff Considerations

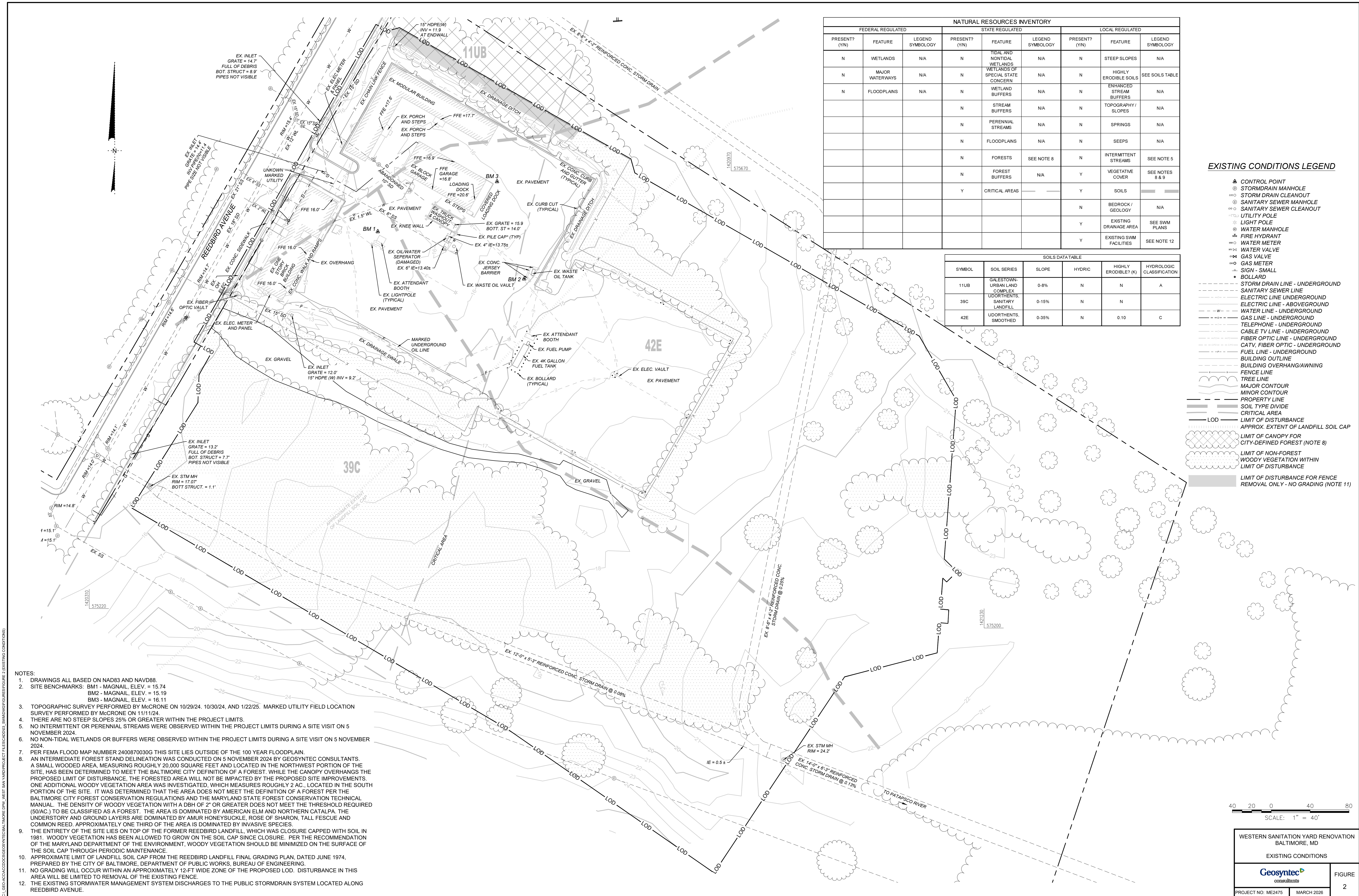
We want to note the following for consideration by the Project Committee during this discussion:

- The capped former landfill creates significant engineering and safety constraints that limit the usable site area. Clean fill will be added to the capped landfill to plant mitigation plantings on site, but excavating the site for grading purposes is not feasible. Vegetation with shallow root systems has been chosen for this reason.
- The City currently operates other recycling facilities on Sisson Street and Bowley's Lane, those facilities are located seven or more miles from the Sanitation Yard and would not be accessible to many residents in South Baltimore, necessitating the need for these upgrades.

Discussion Questions for Consideration

- Is there an opportunity for the City to reduce lot coverage and/or further minimize impacts to the Critical Area to better align with the spirit and intent of the Critical Area law and regulations and the City's Critical Area Program?
- Has the City investigated other options to provide facility needs and adequate parking that would avoid and/or minimize impacts to the Critical Area RCA?
- What type of parking analysis was completed to justify the parking increase by 78 spaces?
- Is permeable paving feasible for this site?

If you have any questions, please feel free to contact Maggie White at margaret.white@maryland.gov or (410) 260-3489.





Attachment 2

Chapter 06 Conditional Approval of State or Local Agency Programs in the Critical Area

.01 Criteria.

- A. If development is proposed to be undertaken or caused in the Critical Area by State or local agency actions and this development is prohibited from occurring by the criteria in this subtitle, the agency proposing the development may seek conditional approval for the project or program from the Commission.
- B. In order to qualify for consideration by the Commission for conditional approval, it shall be shown by the proposing or sponsoring agency that the project or program has all of the following characteristics:
 - (1) That there exist special features of a site or there are other special circumstances such that the literal enforcement of these regulations would prevent a project or program from being implemented;
 - (2) That the project or program otherwise provides substantial public benefits to the Chesapeake and Atlantic Coastal Bays Critical Area Program; and
 - (3) That the project or program is otherwise in conformance with this subtitle.
- C. The conditional approval request shall, at a minimum, contain the following:
 - (1) A showing that the literal enforcement of the provisions of this subtitle would prevent the conduct of an authorized State or local agency program or project;
 - (2) A proposed process by which the program or project could be so conducted as to conform, insofar as possible, with the approved local Critical Area program or, if the development is to occur on State-owned lands, with the criteria set forth in COMAR 27.02.05; and
 - (3) Measures proposed to mitigate any adverse effects of the project or program on an approved local Critical Area program or, if on State-owned lands, on the criteria set forth in COMAR 27.02.05.
- D. The Commission shall hold a public hearing on any request for conditional approval in accordance with the requirements of COMAR 27.02.07.02 and .03.
- E. The Commission shall approve, deny, or request modifications to the request for conditional approval based on all of the following factors:
 - (1) The extent to which the project or program is in compliance with the requirements of the relevant chapters of this subtitle;
 - (2) The adequacy of any mitigation measures proposed to address the requirements of this subtitle that cannot be met by the project or program; and
 - (3) The extent to which the project or program, including any mitigation measures, provides substantial public benefits to the overall Chesapeake and Atlantic Coastal Bays Critical Area Program.
- F. Appeal of the Commission's decision may be made according to the procedures set forth in COMAR 27.02.08.