Critical Area Commission

STAFF REPORT
December 3, 2025

APPLICANT:	University of Maryland, Baltimore
PROPOSAL:	Donaldson Brown Pavilion
JURISDICTION:	Cecil County
COMMISSION ACTION:	Vote
STAFF RECOMMENDATION:	Approval
STAFF:	Margaret White
APPLICABLE LAW/ REGULATIONS:	COMAR 27.02.06 Conditional Approval of State or Local Agency Programs in the Critical Area

DISCUSSION:

Project Description

The University of Maryland, Baltimore (UMB) is proposing improvements to the Donaldson Brown Riverfront Event Center, located at 200 Mt. Ararat Farm Road in Port Deposit, Cecil County (see Attachment 1: Existing Conditions). The proposal is to install a pavilion on the rear lawn of the mansion that will serve as a permanent structure to accommodate the events that occur at this site including weddings, conferences, and other special events. The property is 23.4 acres in size and is located almost entirely within the Critical Area on land designated as Resource Conservation Area (RCA). The grandfathered event center use is deemed nonconforming to the land use characteristics of the RCA.

The entire limit of disturbance (LOD) associated with this project is located within the Critical Area Buffer which is expanded for steep slopes. The project requires conditional approval from the Commission under COMAR 27.02.06 due to the proposed nonwater-dependent impacts to the Buffer and expansion of a nonconforming use in the RCA. A site plan is attached to this staff report (Attachment 2: Site Plan).

Background and Existing Conditions

The Donaldson Brown Mansion was built in 1938, and UMB was willed 20 acres of Donaldson Brown's estate, including the mansion, in 1965. UMB has kept the mansion in its original condition, and the estate is used as an event venue for weddings, guided history tours, education, and conferences. Approximately 55 events were held at the Donaldson Brown Mansion in 2024, and the prime seasons for outdoor events are spring, early summer, and fall. Indoor events are

held year-round with a maximum headcount of 65 people. Outdoor events with a headcount of over 49 people require tents to be set up on the lawn.

The riverfront estate sits high on a cliff overlooking the Susquehanna River. The estate is comprised of manicured lawns surrounded by forest and agricultural fields. The site is developed with the mansion, accessory buildings, driveway and parking areas.

Proposed Impacts and Mitigation

UMB proposes to construct a 45' by 95'(4,275 sf) pavilion in the expanded Buffer for special events. An additional 576 sf of grading is required to tie into the existing grade. The construction of the pavilion (which includes a concrete floor, roof, and open sides) would eliminate the need to set up temporary tents for special events. The proposed pavilion is not considered an expansion of the mansion; however, the pavilion will formalize the event space that is currently used for special events and would allow UMB to increase its scheduling capacity for special events.

Buffer Impacts

The proposed LOD for the pavilion is located entirely within the expanded Buffer and totals 4,851 sf (0.11 acres). There is no tree removal associated with this project and the total lot coverage on the site will comply with the 15% lot coverage limit.

Mitigation for the permanent impacts to the expanded Buffer is required at a 3:1 ratio. The total required Buffer mitigation is 0.33 acres (or 14,553 sf).

UMB is proposing to meet the Buffer mitigation requirement by planting 14,553 sf of native canopy and understory species on site. The planting plan includes a combination of cluster plantings, individual plantings, and a filter strip to satisfy the required mitigation.

The proposed planting consists of 41 tree/shrub clusters (each with one 3/4" tree and three shrubs) and six 3/4" trees within the expanded Critical Area Buffer. Selected native species, including pin oak, northern red oak, scarlet oak, northern bayberry, common witch hazel, and red chokeberry, will be planted adjacent to an existing forested area to promote natural integration and expansion of the forest canopy. Additionally, a filter strip containing 70 individual 18" shrubs will be installed at the front of the pavilion to help control erosion and mitigate runoff from the cliff edge (Attachment 3: Mitigation Plan).

Critical Area 10% Stormwater Management

The 10% pollutant removal requirement for this project is 0.18 pounds of phosphorus per year (lb P/yr). UMB is proposing to plant 36 trees on site strategically placed adjacent to the driveway to provide further stormwater benefits by intercepting stormwater runoff (see Attachment 3:

Mitigation Plan for the location of the stormwater plantings).

Permits and Review by Other Agencies

U.S. Fish and Wildlife Service (USFWS)

A letter from the U.S. Fish and Wildlife Service dated September 15th, 2025, indicated that the following species may be located within the project vicinity: Green Floater mussel, Northern long-eared bat, Tricolored Bat, and Monarch butterfly. However, it was also noted that there are no critical habitats, refuge lands, or fish hatcheries within the project area. UMB is required to further coordinate with USFWS should the scope of the project change in a manner that may have effects on the aforementioned species.

Tidal and Nontidal Wetlands (MDE)

There are no impacts to tidal or nontidal wetlands proposed.

Stormwater Management and Erosion and Sediment Control (MDE)

The project is exempt from stormwater management and erosion and sediment control review by MDE since it disturbs less than 5,000 sf.

Maryland Department of Natural Resources (DNR)

The Department's Wildlife and Heritage Service (WHS) letter, dated September 30, 2025, identified no rare or threatened species of concern at the project site and therefore no design restrictions.

Maryland Historical Trust (MHT)

Per comments dated October 29, 2025, MHT determined this project will have no adverse effects on historic properties.

Public Notification Requirements and Comments

In accordance with the provisions of COMAR 27.03.01.03, a public notice was published in the *Cecil County Whig* on Friday, November 14, 2025. Signage was posted prior to November 14th and will remain until after the Commission has voted on the project. As of the date of this staff report, no public comments have been received. Any comments received after the date of this staff report will be noted at the Commission meeting.

Climate Resiliency

The project site is located outside of the 100-year floodplain, does not overlap with mapped wetland adaptation areas, and is located outside of Category 1 – 4 storm surge (see Attachment 4: Climate Resiliency Figures). Furthermore, the site is outside the Maryland Coast Smart Climate Ready Action Boundary (CS CRAB). The pavilion's expected design lifespan exceeds 25 years, and resiliency measures, including planting resilient native species, have been incorporated.

CONDITIONAL APPROVAL PROCESS (COMAR 27.02.06.01)

To qualify for consideration by the Commission for conditional approval, it shall be shown by the proposing or sponsoring agency that the project has the following characteristics. Responses were supplied by the applicant and summarized here by Commission staff:

B. (1) That there exists special features of the site or there are other special circumstances such that the literal enforcement of these regulations would prevent a project or program from being implemented;

The University of Maryland, Baltimore (UMB) proposes the 4,275 sf Donaldson Brown Pavilion Project for special events use, which requires construction within the expanded Critical Area Buffer. The entirety of the event space, as well as the majority of the mansion, are located within the expanded Critical Area Buffer. Currently there are temporary tents set up on the site in the area used as event space. The construction of this pavilion would replace the need for these temporary tents. The placement of the pavilion is on the western side of the mansion overlooking the Susquehanna River, and the size and placement of the structure were selected to maximize the event space while minimizing impacts on existing trees and tree canopy. The existing turfgrass area adjacent to the proposed pavilion will remain available for lawn games, special event tents, and other outdoor activities. UMB has minimized impacts by reducing the pavilion's size and eliminating a sidewalk; however, literal enforcement of regulations would prevent the project's implementation because avoiding all impacts to the Critical Area buffer would not allow UMB to expand their venue and implement their intended program, as the entire project site is located within the expanded Critical Area Buffer.

B. (2) That the project or program otherwise provides substantial public benefits to the Critical Area Program;

The project provides public benefits consistent with Critical Area program goals by enhancing the Donaldson Brown Mansion as a venue for environmental education, heritage tourism, and appreciation of the Chesapeake Bay region. Environmental impacts were minimized through careful siting on previously disturbed grounds, and mitigation will be provided via on-site cluster plantings of trees and shrubs to expand the forested Buffer and intercept runoff from the existing road to improve water quality. Furthermore,

these plantings will create a filter strip between the turfgrass area and the cliff overlooking the Susquehanna River, aiding in stormwater management and erosion control, and enhancing habitat.

B. (3) That the project or program is otherwise in conformance with this subtitle;

Other than the expanded Buffer impacts and a minor expansion of use, this project is otherwise in conformance with the Critical Area development standards. Additionally, mitigation for the expanded Buffer impacts is being provided at a 3:1 ratio which is being met through onsite plantings. The project also meets the 10% phosphorus reduction requirement through additional onsite plantings. The project will involve no tree or canopy removal and total lot coverage for the site will remain under 15%.

The conditional approval request shall, at a minimum, contain the following:

C. (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;

Strict enforcement of the provisions of this subtitle would prevent UMB from implementing the proposed project. The Donaldson Brown Pavilion Project supports UMB's mission by enhancing the use of the Donaldson Brown Mansion as a venue for educational programs, heritage tourism, and community events that promote environmental awareness and public appreciation of the Chesapeake Bay region. Without approval for this limited development activity, UMB would be unable to carry out a State-supported initiative that directly advances education opportunities and stewardship related to the Chesapeake Bay and its natural resources. A Buffer management plan was developed for the site to fully mitigate the nonwater-dependent Buffer impacts..

C. (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;

The UMB Donaldson Brown Pavilion project conforms with COMAR 27.02.05 criteria insofar as possible by completing all required documentation, including the State Checklist, Mitigation Planting Plans and Agreement, Public Notice Postings, and obtaining all necessary Local/State/Federal Agency approvals. The Mitigation Planting Plan utilizes cluster plantings, individual trees, and shrubs placed to expand forested areas and intercept stormwater runoff from the existing road. The project is exempt from stormwater management (SWM) and erosion and sediment control (ESC) requirements because the LOD is under 5,000 sf.

C. (3) Measures proposed to mitigate adverse effects of the project or program or an approved local Critical Area program or, if on State-owned lands, on the criteria set forth in COMAR 27.02.05

Critical Area impacts include permanent ground disturbance from new lot coverage and grading within the expanded Critical Area Buffer. The total mitigation requirement for the proposed project is 0.33 acres which will be satisfied by planting trees and shrubs both on site within the expanded Critical Area Buffer and adjacent to the Buffer to expand the existing forest canopy. The Critical Area pollutant removal requirement for the project is 0.18 lb P/yr. The mitigation for the 0.18 lb P/yr will be satisfied by planting 36 trees on site.

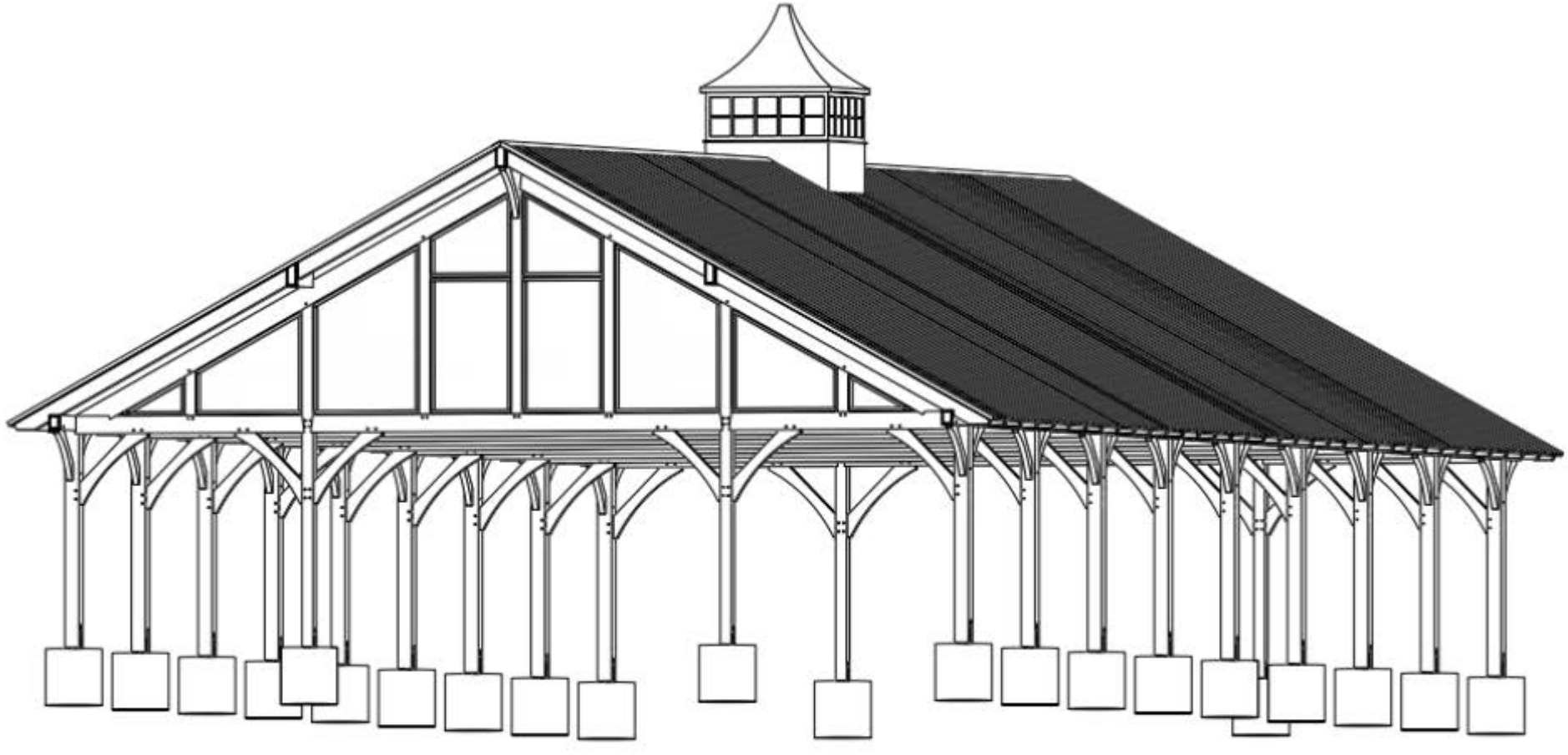
STAFF RECOMMENDATION

Commission staff recommend approval as this project appears to meet the baseline conditional approval requirements of COMAR 27.02.06. The Project Committee may wish to have the applicant provide additional clarification regarding the substantial public benefits that the project provides, as outlined in B.(2) on Page 4.

Attachments:

Attachment 1: Existing Conditions
Attachment 2: Site Plan
Attachment 3: Mitigation Plan
Attachment 4: Climate Resiliency Figures


Susquehanna River
Proposed pavilion location
Expanded CA Buffer
Event space



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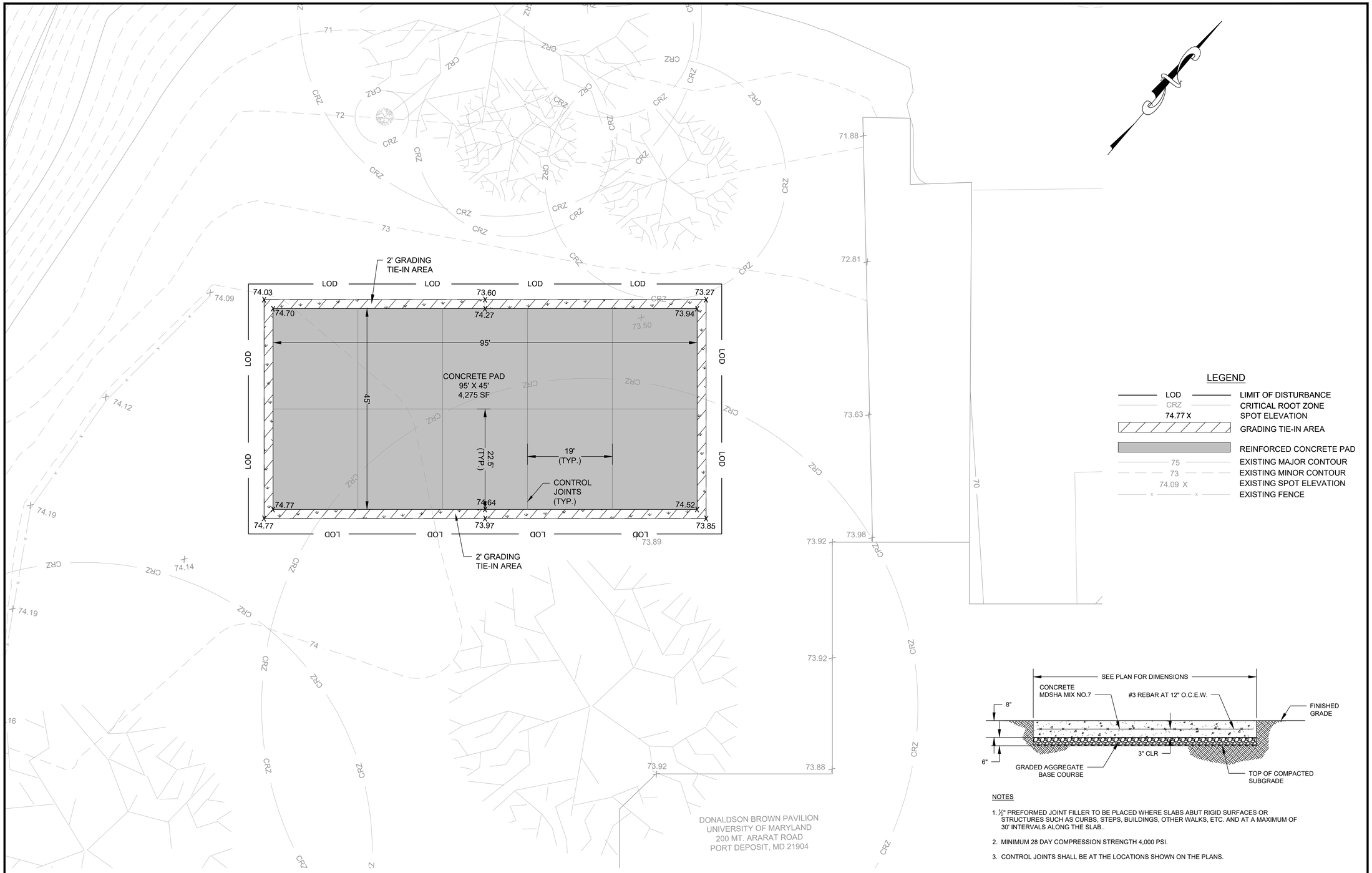
Scale: **NONE**



DONALDSON BROWN PAVILION
UNIVERSITY OF MARYLAND
200 MT. ARARAT ROAD
PORT DEPOSIT, MD 21904

LEGEND

LOD	LIMIT OF DISTURBANCE
CRZ	CRITICAL ROOT ZONE
74.77 X	SPOT ELEVATION
	GRADING TIE-IN AREA
	REINFORCED CONCRETE PAD
75	EXISTING MAJOR CONTOUR
73	EXISTING MINOR CONTOUR
74.09 X	EXISTING SPOT ELEVATION
x x	EXISTING FENCE

NOTES

1. ½" PREFORMED JOINT FILLER TO BE PLACED WHERE SLABS ABUT RIGID SURFACES OR STRUCTURES SUCH AS CURBS, STEPS, BUILDINGS, OTHER WALKS, ETC. AND AT A MAXIMUM OF 30' INTERVALS ALONG THE SLAB..
2. MINIMUM 28 DAY COMPRESSION STRENGTH 4,000 PSI.
3. CONTROL JOINTS SHALL BE AT THE LOCATIONS SHOWN ON THE PLANS.

REINFORCED CONCRETE PAD
NOT TO SCALE

10' 5' 0 10' 20'
SCALE: 1"=10'

UNIVERSITY of MARYLAND BALTIMORE

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PROFESSIONAL CERTIFICATION. I HERE BY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MARYLAND,

LICENSE No. _____,
EXPIRATION DATE: _____.

REGISTRATION/STAMP

PROJECT TITLE :

UMB DONALDSON BROWN PAVILION

UMB BUILDING NO. :	
UMB Project NO. :	25-313
A/E PROJECT NO. :	25023
CAD FILE NO. :	
DATE :	10/20/2025

SHEET TITLE :

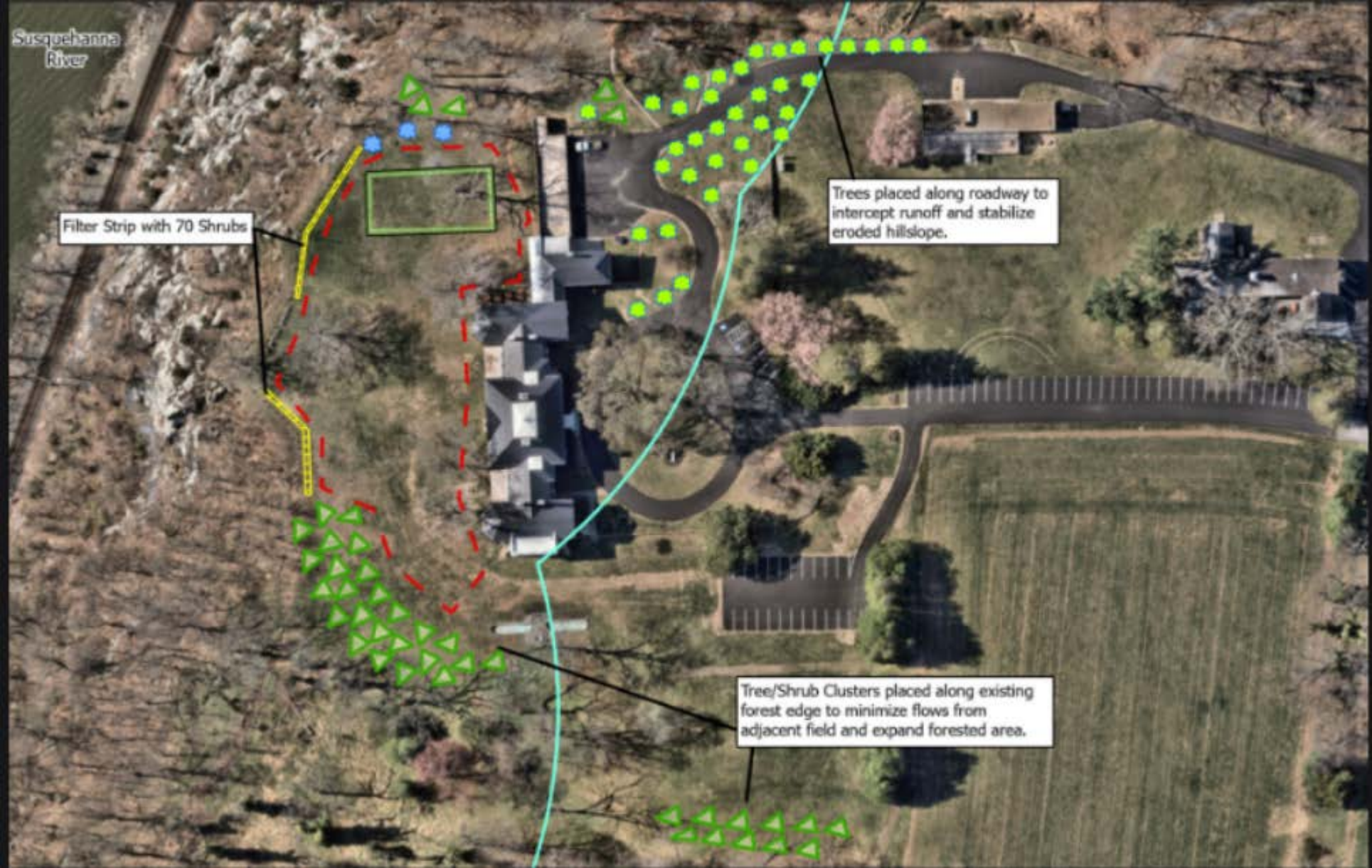
SITE PLAN & DETAILS

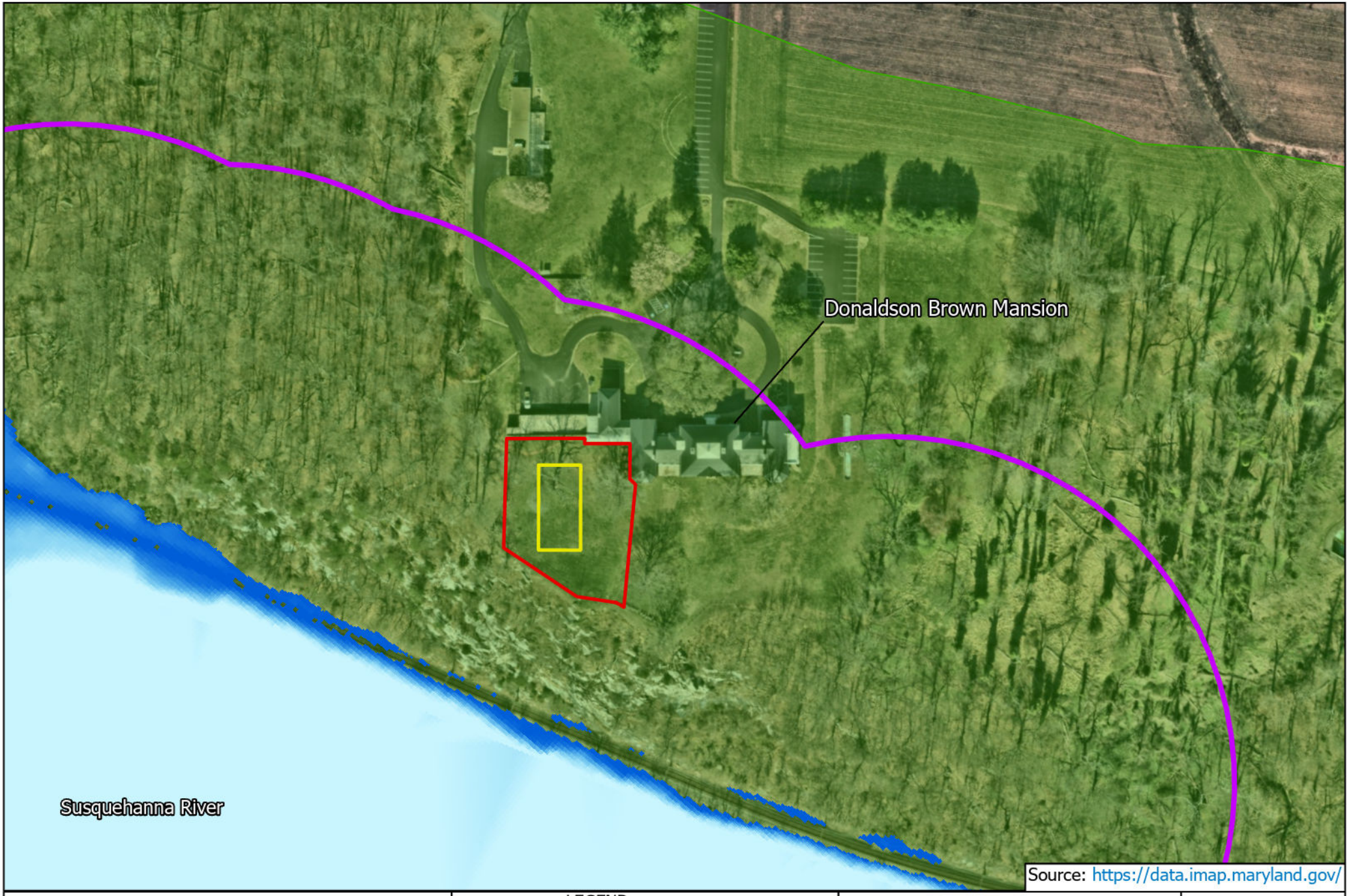
REVISIONS

NO	DATE	ITEM

SHEET NO.
C-100
3 OF 8

Location (Impact Category)	Permanent Impact (SF)	Mitigation Type	Mitigation Requirement	Mitigation Rate	Proposed Mitigation
Critical Area	4,275 (0.10 AC)	10% Rule	0.18 lb P/yr per	2 lb P/yr per 400 stems/acre	36 Canopy Trees
Expanded Buffer (New Impervious/Ground Disturbance)	4,275 (0.10 AC)	3:1 ratio	12,825	Tree/Shrub Clusters (1-3/4" Tree + 3 Shrubs) = 300 SF of Credit Individual trees (2" Cal) = 200 SF of Credit	41 Tree/Shrub Clusters (12,300) 3 Trees (600)
Expanded Buffer (Grading/Ground Disturbance)	576 SF (0.01 AC)	3:1 ratio	1,728	Shrub (18" Ht.) = 25 Credits	70 Shrubs – Filter Strip (1,750)
				Total Canopy Trees	**39**
				Total Tree/Shrub Clusters	**41**


Susquehanna River
Filter Strip with 70 Shrubs
Trees placed along roadway to intercept runoff and stabilize eroded hillslope.
Tree/Shrub Clusters placed along existing forest edge to minimize flows from adjacent field and expand forested area.



UMB Donaldson Brown Pavilion Project

Climate Ready Action Boundary (CRAB) Map

Cecil County, MD

October 2025

LEGEND

Maryland Coast Smart - Climate Ready Action Boundary (CRAB) Flood Depth Grid

Value

11.83

0.000984192

Project Area

Limits of Disturbance

Critical Area Buffer Expansion

1000' Critical Area Boundary

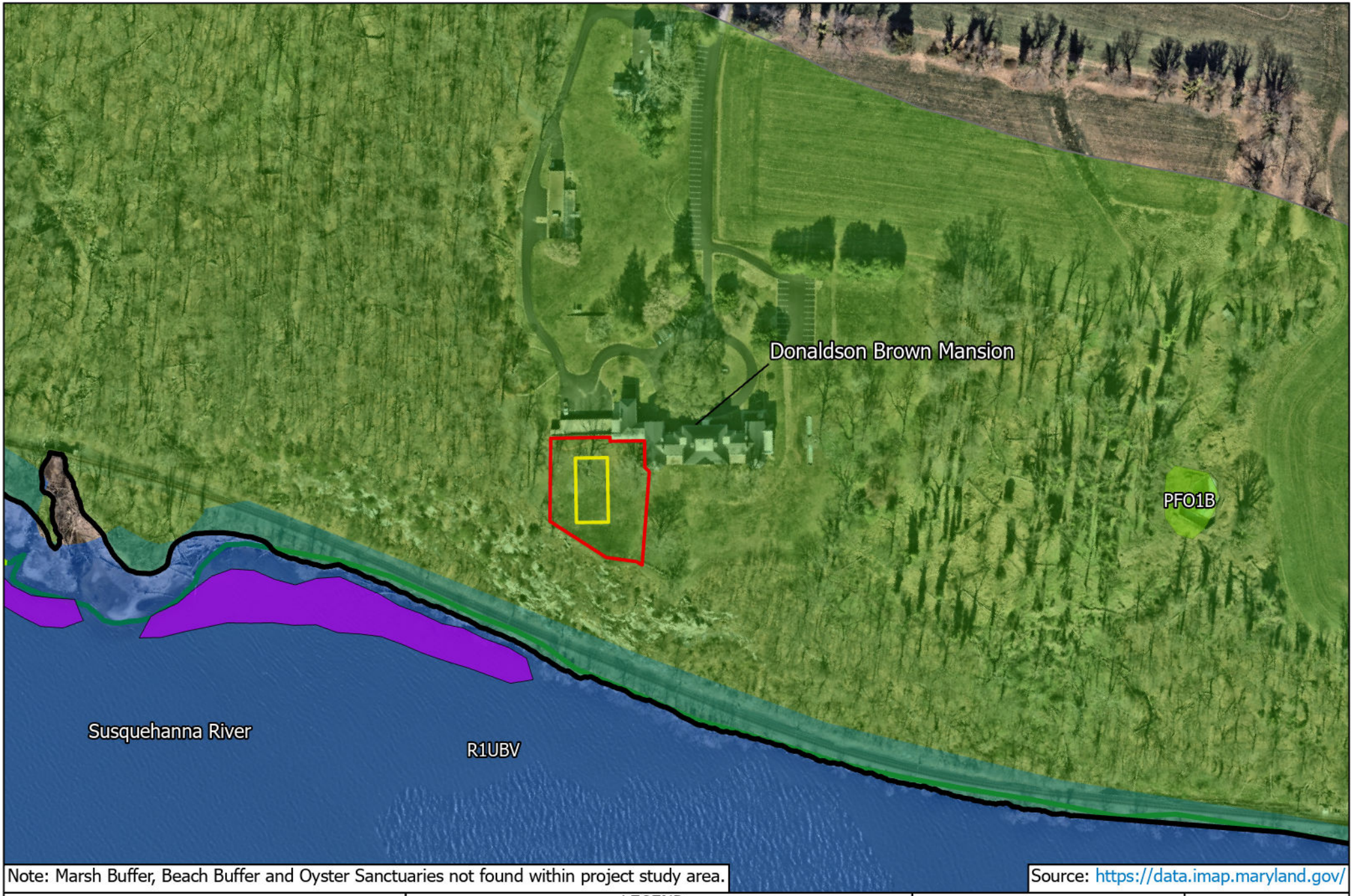
N

0 50 100 200 Feet

1 inch = 146 Feet

University of Maryland Baltimore

RK&K



Note: Marsh Buffer, Beach Buffer and Oyster Sanctuaries not found within project study area.

Source: https://data.imap.maryland.gov/

UMB Donaldson Brown Pavilion Project

Ecosystem Resiliency Features Map

Cecil County, MD

October 2025

LEGEND

- Project Study Area
- Submerged Aquatic Vegetation
- Limits of Disturbance

Beach Buffer
- Yes- Erosion
- Yes- No Erosion

Marsh Buffer
- Yes- Erosion
- Yes- No Erosion

Bank Cover
- partial
- bare
- total

Wetlands - National Wetlands Inventory
- Estuarine
- Lacustrine
- Marine
- Palustrine
- Riverine

- Critical Area Expanded Buffer
- Mean High Water Line
- 1000' Critical Area Boundary

N

0 125 250 Feet

1 inch = 250 Feet

University of Maryland Baltimore

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UMB Donaldson Brown Pavilion Project

Historic Shoreline Erosion Map

Cecil County, MD

October 2025

LEGEND

- Historic Shorelines 1946 to 1976
- Historic Shorelines 1989 to 1998
- Project Study Area
- Limits of Disturbance
- Critical Area
  - Resource Conservation Area
  - Critical Area Expanded Buffer

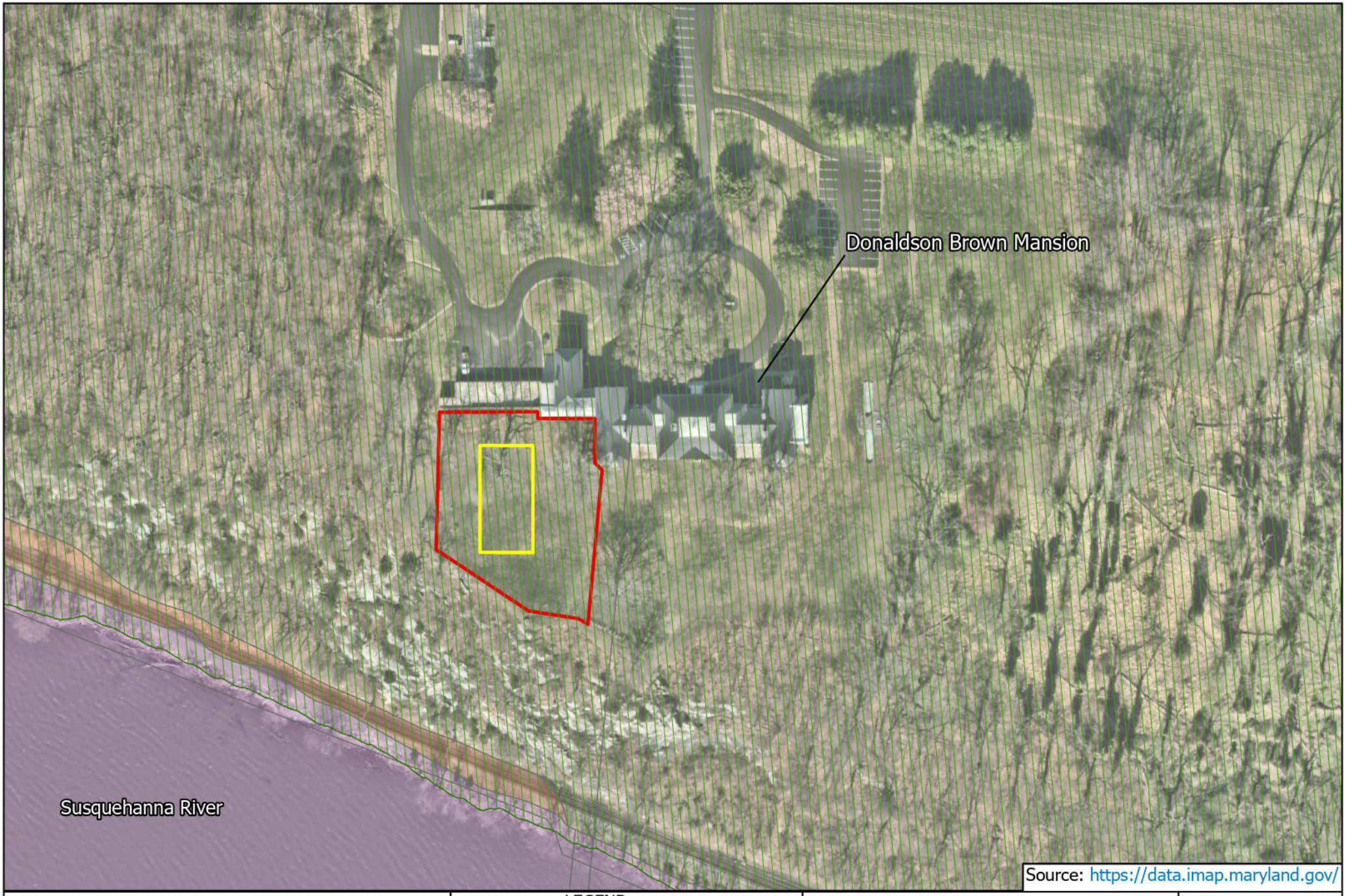
N

0 75 150 Feet

1 inch = 167 Feet

University of Maryland Baltimore

RK&K



UMB Donaldson Brown Pavilion Project

Floodplain Map

Cecil County, MD

October 2025

LEGEND

Effective FEMA Floodplain

- 100 Year Floodplain (1% Chance)
- 500 Year Floodplain (0.2% Chance)
- Upland (Zone X)

- Project Study Area
- 1000' Critical Area Buffer
- Limits of Disturbance

N

0 62.5 125 250 Feet

1 inch = 150 Feet

University of Maryland Baltimore

RK&K

Source: https://data.imap.maryland.gov/

UMB Donaldson Brown Pavilion Project

Wetland Migration Areas Map

Cecil County, MD

October 2025

LEGEND

Sea Level Rise - Wetland Adaptation Areas

1	5	9
2	6	10
3	7	11
4	8	12

- Project Study Area
- Limits of Disturbance
- 1000' Critical Area Buffer

N

0 200 400 Feet

1 inch = 250 Feet

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UMB Donaldson Brown Pavilion Project

Storm Surge Inundation Zone Map

Cecil County, MD

October 2025

LEGEND

- Hurricane Storm Surge - Category 1
- Hurricane Storm Surge - Category 2
- Hurricane Storm Surge - Category 3
- Hurricane Storm Surge - Category 4
- Project Study Area
- Limits of Disturbance
- 1000' Critical Area Buffer

N

0 100 200 400 Feet

1 inch = 250 Feet

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