CITY OF BALTIMORE
MAYOR BRANDON M. SCOTT

TO	The Honorable President and Members of the Baltimore City Council
FROM	Amber Greene, Chief Equity Officer and Director Office of Equity & Civil Rights
ANALYST	Zachary Wellman, OECR Equity Division Policy Analyst
CC	Mayor's Office of Government Relations
DATE	October 15, 2025
SUBJECT	OECR Report on Baltimore City Council Bill 25-0095 Commercial Motor Vehicle Repair on City Streets

POSITION: Favorable

BILL SYNOPSIS

The Office of Equity and Civil Rights (OECR) has reviewed and is herein reporting on City Council Bill 25-0095 – *Commercial Motor Vehicle Repair on City Streets.*

This is an ordinance that accomplishes the following:

- Define motor vehicle repair services.
- Prohibit identified motor vehicle repair behavior and locations.
- Establish penalties for the violation of said prohibition in the amount of $25-100 for the first offense and $100-200 for each subsequent offense.

The bill would effectively ban motor vehicle repair services from conducting business on the public rights-of-way (streets and sidewalks).

SUMMARY OF POSITION

Council Bill 25-0095 seeks to outlaw commercial motor vehicle repair on city streets and sidewalks to prevent mobile repair services from conducting business in a manner that obstructs the public right-of-way. The bill is intended to specifically target informal, unpermitted, and/or unlicensed commercial operators within the city. Council Bill 25-0095 does not, however, outlaw emergency repair services (such as AAA) from conducting motor vehicle repair services on public streets, nor does it restrict/prohibit Baltimore City residents from performing non-commercial repairs on vehicles on public streets so long as they do not:

1. Obstruct a lane of traffic, in whole or partially.

2. Conduct any work or place any tool on a sidewalk in connection with the repair of a motor vehicle.

While the expressed purpose of Council Bill 25-0095 is to mitigate obstructions to the public right-of-way and to limit the dangers presented by mobile vehicle repair service (such as oil slicks in residential areas), and the office has no concerns related to this endeavor, the OECR has identified a concurrent equitable impact of the legislation. By prohibiting mobile commercial vehicle repair services on public rights-of-way, the bill incentivizes service providers to establish and operate licensed/permitted motor vehicle service and repair businesses in stationary locations that adhere to Baltimore's zoning code.

Baltimore's zoning code has been meticulously written to identify and mitigate all potential negative externalities associated with the broad range of land uses. For example, a plot may reside in an area with many rowhouses because it is located in a densely packed neighborhood. In this circumstance, the zoning code may identify the plot as R-8, rowhouse residential zoning, in which commercial and industrial uses are prohibited because they pose significant health and/or safety risks to many residents concurrently. For reasons such as the above, motor vehicle service and repair land uses have been limited to the following zoning districts:

<u>Motor Vehicle Service and Repair: Major</u>

P: C-4, PC-2, PC-3
CB: I-1, I-2

<u>Motor Vehicle Service and Repair: Minor (Fully Enclosed Structure)</u>
P: C-2, C-3, C-4, C-5, PC-2, PC-3, PC-4, IMU-2
CB: I-1, I-2
CO: IMU-1

<u>Motor Vehicle Service and Repair: Minor (Outdoor Vehicle Storage)</u>
P: C-3, C-4, PC-2, PC-3, IMU-2
CB: C-2, I-1, I-2
CO: IMU-1

As seen above, motor vehicle service and repair is limited within the City to zoning districts intended for commercial, industrial, and industrial mixed-use, all of which are to be separate from residential dwellings. Mobile vehicle service and repair businesses circumvent Baltimore's zoning code, allowing operators to conduct business in zoning districts specifically meant to disallow such operations due to several risks, hazards, and environmental consequences.

Not only do the prohibitions enacted by Council Bill 25-0095 mitigate negative externalities on residential zones associated with commercial mobile motor vehicle repair services, improving equity for city residents who wish to keep their communities safe and healthy, but it also improves equity for lawful commercial motor vehicle repair service providers.

According to Article 32 – Zoning, § 14-326(a) of the Baltimore City Code:

> *(a)* ***Lot size.***
>
> > *(1) Major motor vehicle service and repair shops must have a lot size of at least 20,000 square feet, except in a PC Subdistrict.*
> >
> > *(2) Minor motor vehicle service and repair shops must have a lot size of at least 10,000 square feet, except in a PC Subdistrict.*
>
> *(d)* ***Operations to be enclosed or screened.***
>
> > *(1) All repair operations must be fully enclosed.*
> >
> > *(2) Wrecked or junked vehicles must be kept within an enclosed structure or otherwise screened from public view in accordance with the requirements of the Baltimore City Landscape Manual.*

Therefore, currently, operators who choose to follow the proper channel of establishing business within Baltimore by: (1) Obtaining applicable licensing/permitting, (2) Establishing a legal stationary business location, (3) Operating in accordance with the Baltimore City Code, are faced with an undue burden that mobile equivalents are not beholden to.

This undue burden includes significant time and capital investment into renting/buying a facility with the appropriate lot size, the licensing/permitting process in Baltimore, and limiting the amount of business an operator can accept at any one point in time due to the limitations of space associated with the Code's requirement to operate fully enclosed. These undue burdens create inequity for residents attempting to start or maintain a local business and disincentivize them from following the appropriate process of establishing said business, as opposed to the much less capital/time-intensive mobile motor vehicle repair services, which are more dangerous to the public and less beneficial to the Baltimore economy.

The explicit prohibition of commercial mobile motor vehicle repair service on public rights-of-way is equitable in that it holds all service providers to the same zoning restrictions, standards, and licensing/permitting under the Baltimore City Code. It also incentivizes business operators to meaningfully invest in Baltimore's economy and commercial development.

FISCAL IMPACT

City Council Bill 25-0095 is not expected to have any direct operational, investigatory, or enforcement outcomes that involve the OECR. As such, the OECR does not identify any foreseeable fiscal impacts to the office associated with the legislation.

CONCLUSION

Council Bill 25-0095 intends to stop commercial mobile motor vehicle repair services from unlawfully conducting business throughout the city by explicitly outlawing such practices and empowering the city with the ability to levy penalties for such behavior. The OECR discerns no inequity in the bill's intent, purpose, or impact; rather, the legislation is likely to have affirmative impacts on residents' health and safety as well as lawful stationary commercial motor vehicle repair services. As such, the Office of Equity and Civil Rights respectfully requests a **favorable** committee report on City Council Bill 25-0095.

Respectfully Submitted,

Amber Greene

Amber Greene
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