

CITY OF BALTIMORE

STEPHANIE RAWLINGS-BLAKE, Mayor

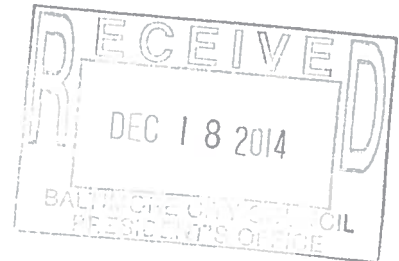


DEPARTMENT OF LAW

GEORGE A. NILSON, City Solicitor  
101 City Hall  
Baltimore, Maryland 21202

December 18, 2014

The Honorable President and Members  
of the Baltimore City Council  
Attn: Executive Secretary  
Room 409, City Hall  
100 N. Holliday Street  
Baltimore, Maryland 21202



Re: City Council Bill 14-0462 – Guilford RPP Area – Amendment

Dear President and City Council Members:

The Law Department has reviewed City Council Bill 14-0462 for form and legal sufficiency. It modifies the Residential Parking Permit (“RPP”) Program for the Guilford Area to include 3705 and 3801 North Charles Street.

Title 10 of Article 31 of the City Code governs RPPs. Section 10-19 provides that RPPs may be amended by ordinance if they were created by administrative regulation. It also states that existing RPPs *may* be modified by the Executive Director of the Parking Authority. City Code, Art. 13, §10-19(b). There is no prohibition in the City Code that would prevent the City Council from modifying an RPP that was created by ordinance, such as the Guilford RPP.

An area is suitable for inclusion in an RPP if it satisfies the 3 requirements in Section 10-12 of Article 31 of the City Code. The two properties proposed to be included in this RPP meet the first two criteria listed in Section 10-12(1) and (2) of Article 31 of the City Code. The third criterion is that the area must “meet any additional criteria that the Authority establishes consistent with the guidelines and standards of this subtitle.” City Code, Art. 31, §10-12(3). Assuming that any such criteria are met, then 3705 and 3801 North Charles would be appropriate inclusions in the Guilford RPP, and the Law Department could approve this bill for form and legal sufficiency.

Very truly yours,

  
Hilary Ruley  
Chief Solicitor

cc: George Nilson, City Solicitor  
Angela C. Gibson, Mayor’s Legislative Liaison  
Elena DiPietro, Chief Solicitor, General Counsel Division  
Victor Tervalo, Chief Solicitor  
Jennifer Landis, Assistant Solicitor

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