


FROM	NAME & TITLE	Sandra E. Baker, Esq., Executive Director	CITY of BALTIMORE MEMO	
	AGENCY NAME & ADDRESS	Environmental Control Board 200 E. Lexington Street, Suite 100		
	SUBJECT	CITY COUNCIL BILL NO. 12-0081-Valet Parking		

TO The Honorable Bernard C. Young
 President,
 City Council of Baltimore
 400 City Hall

DATE: May 16, 2012

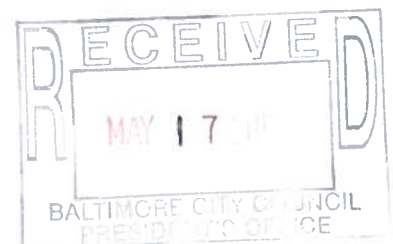
The Environmental Control Board (ECB) has no objections to the bill as written. The bill starts with moving the definitions found Article 31 Section(s) 1-1(m) and 1-2(e) and moves it to Article 31 Section 6-16 (2) and 6-16 (3) respectively. It further moves the current definitions found in Section 6-16 down, (a) moves to (b) and (b) moves to (c). The ECB finds no reason to oppose this re-organization.

The bill also adds Article 31 §14-1 to §14-47 "Valet Parking." This would replace the current §14 which is currently reserved. The part of this new section that applies to the ECB is concerned with the enforcement of this section. Section 14-43 gives the authority of enforcement through an environmental citation, which in turn is heard at the ECB. Violating this section is punishable up to \$1000. This article's main focus is the licensing of those who provide valet services, and to see that their service does not impede the flow of traffic. The ECB sees no reason to object to this new section.

The bill also adds Article 31 §31-108. Currently this section is reserved. The legislative reader provides no §31-108, but §31-107 "Passenger, Freight, or Valet Parking Zones." The current §31-107 refers to a car sharing program. Commenting on what the legislative reader provided or the current §31-107, this section does not mention the ECB, nor does it give the ECB authority in this matter. As a result the ECB has no opinion on this section the bill, as it does not impact ECB's services.

The bill repeals and reordains, without amendments Article 31 sections 36-1, 36-7(1), 37-1, and Article 28 section 22-5(a). None of these sections mention the ECB or gives the ECB any authority. As a result the ECB has no opinion on this section of the bill.

Finally the bill adds Article § 40-14(e)(5). This addition further defines the enforcement of Article 31 §14 by setting a penalty of \$500 for the first offense and \$1000 for each additional offense. The ECB does not object to this so long as the party that issues citations brings evidence of a previous citation to the hearing. If no such evidence is provided, the ECB will assume it is the first offense.



Comments/
no obj -