
CITY OF BALTIMORE

BRANDON M. SCOTT
Mayor



DEPARTMENT OF LAW
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March 22, 2022

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 22-0200 – Urban Renewal – Central Business District – Amendment 2

Dear President and City Council Members:

The Law Department has reviewed City Council Bill 22-0200 for form and legal sufficiency. It would amend the existing Urban Renewal Plan (“URP”) for the Central Business District to change its provisions concerning signs. The City has separately approved an Area of Special Signage Control for the Central Business District.

The Urban Renewal Plan, created about twenty years ago, still contains language on temporary signs in Section 4b, which would no longer be effective since the Supreme Court’s decision in *Reed v. Town of Gilbert Arizona*, 135 S. Ct. 2218 (2015). For this reason, the City’s Zoning Code does not regulate signage based on content of the message or the temporary nature of the sign. City Code, Art. 32, Title 17. The last two sentences in URP Section 4b that provide temporary signs must be approved according to the Zoning Code could be removed to reflect this change in the law. However, the removal is not legally necessary because the Zoning Code does not actually require separate approval of signs based on duration.

Any changes in an Urban Renewal plan, such as these changes, must be made by ordinance. City Code, Art. 13, § 2-6(g)(1). Since this is not a technical amendment, it requires the same notice as that required to adopt the original ordinance that created the Plan. City Code, Art. 13, § 2-6(g) (2), (3). Thus, notice of the City Council hearing must be posted in the neighborhood of the area involved at least ten days prior to the hearing. City Code, Art. 13, § 2-6(d)(3)(i). Additionally, notice of the City Council hearing must be published once a week for two consecutive weeks in a newspaper of general circulation in Baltimore City. City Code, Art. 13, § 2-6(d)(3)(ii).

Additionally, any notice and hearing requirements in the Plan itself must be followed. Paragraph N.2 of the Plan requires that the City Department of Housing and Community Development “notify affected site occupants and developers of all proposed amendments to the Renewal Plan at least 30 days prior to the public hearing.”

Assuming these notice requirements are met, the Law Department can approve City Council Bill 22-0200 for form and legal sufficiency.

Very truly yours,



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Chief Solicitor

cc: James L. Shea, City Solicitor
Matthew Stegman, Mayor's Office of Government Relations
Elena DiPietro, Chief Solicitor, General Counsel Division
Victor Tervalo, Chief Solicitor
Ashlea Brown, Assistant Solicitor