

1867 convention spent less than a day on the subject. The composition of the Senate was continued unchanged, confirming the added representation for Baltimore City. It was different for the House of Delegates, for limitations were again placed on the total representation that could be given to Baltimore City or to any county. This was accomplished by the following weighted apportionment formula:

For each county not exceeding 18,000 population, 2 delegates.

For each county over 18,000 but less than 28,000 population, 3 delegates.

For each county of 28,000 but less than 40,000 population, 4 delegates.

For each county of 40,000 but less than 55,000 population, 5 delegates.

For each county of 55,000 or more population, 6 delegates.

For each legislative district in Baltimore City, no more delegates than the number held by the most populous county.<sup>68</sup>

As before, an interim apportionment was provided until the next census could be taken and the permanent apportionment plan implemented. The interim apportionment plan gave each of the legislative districts of Baltimore City, Baltimore County, and Frederick County, 6 delegates each; Allegany and Washington, 5 delegates; Carroll, Cecil, and Harford, 4 delegates; Anne Arundel, Dorchester, Montgomery, Prince George's, Somerset, and Worcester, 3 delegates; and Calvert, Caroline, Charles, Howard, Kent, Queen Anne's, Saint Mary's, and Talbot, 2 delegates.<sup>69</sup>

<sup>68</sup> MD. CONST. art. III, § 4 (1867).

<sup>69</sup> MD. CONST. art. III, § 3 (1867).

It will be noted that this temporary apportionment was basically the same as that provided by the interim apportionment under the 1864 Constitution, except that representation for the smaller counties was doubled from one delegate to two delegates, ending Baltimore City's equality in representation ratios.

The 1867 Constitution has, of course, continued in effect until the present time, but with significant amendments insofar as apportionment is concerned. A constitutional amendment, ratified in 1901, gave Baltimore City a fourth legislative district,<sup>70</sup> but Baltimore's population had almost doubled to 508,957 since the permanent apportionment formula had gone into effect following the 1870 census. Relatively speaking, the city with 43 per cent of the total state population, had lost ground, even after the amendment, from where it stood in 1870.

In 1918 provision was made for expansion of the territorial size of Baltimore to its present boundaries.<sup>71</sup> In 1920 Baltimore's population reached 733,826, an approximate 50 per cent increase since 1900 when the city acquired its fourth legislative district, giving the city 51 per cent of the total state population. The gross disproportionment between the city's size and its representation led to an extensive campaign to increase its representation. This succeeded in 1922 when the city was given two more legislative districts.<sup>72</sup>

The amendments of 1901 and 1922, however, merely ameliorated some of the consequences of the 1867 apportionment

<sup>70</sup> MD. CONST. art. III, § 2 (1901).

<sup>71</sup> Md. Laws of 1918, ch. 82, at 135.

<sup>72</sup> MD. CONST. art. III, §§ 2, 4 (1922).