

Department of Legislative Services
Maryland General Assembly
2026 Session

FISCAL AND POLICY NOTE
First Reader

House Bill 1268 (Delegate Behler, *et al.*)
Environment and Transportation

**Environmental Permits - Requirements for Burden Analysis, Issuance and
Renewal, and Public Participation (Cumulative Harms for Environmental
Restoration for Improving Shared Health - CHERISH Our Communities Act)**

This bill establishes new Part III (Environmental Permits) of Title 1, Subtitle 7 of the Environment Article; the new part establishes (1) additional permit review and evaluation, public participation, and judicial review requirements related to applications for “covered individual permits” and “covered general permits” and (2) limitations on the issuance of affected permits. Covered individual permits and covered general permits comprise a broad spectrum of projects permitted by the Maryland Department of the Environment (MDE). Among other things, the bill requires a “BURDEN report” to be included in an application for a covered individual permit located within an “at-risk census tract.” Except as specified, MDE may not approve an application for a covered individual permit if it determines that the site or project will contribute to an increased potential for adverse environmental or public health impacts within an at-risk census tract. The bill also establishes enhanced civil penalty provisions for environmental violations in at-risk census tracts.

Fiscal Summary

State Effect: General fund expenditures for MDE increase significantly beginning in FY 2027; general fund revenues increase correspondingly from fees. General/special fund revenues may also increase from enhanced civil penalties. State expenditures (multiple funds) also increase, potentially significantly for some State agencies, beginning in FY 2027. Other effects are discussed below.

Local Effect: Local government finances and operations are likely significantly affected beginning in FY 2027, as discussed below. **This bill imposes a mandate on a unit of local government.**

Small Business Effect: Meaningful.

Analysis

Bill Summary:

New Permitting Requirements for Covered Individual Permits

Definition of Covered Individual Permit: A “covered individual permit” is a permit that is for a site or facility located within an at-risk census tract and is (1) an air quality control permit to construct; (2) a water discharge permit for cement ash, an animal feeding operation (AFO) or hatchery, a fuel facility, a mining operation, or a refuse disposal system; (3) a sewage sludge, hazardous material facility, low-level nuclear waste facility, or refuse disposal system permit, as specified; (4) a State permit to operate an air pollution source that does not require an operating permit issued under Title V of the federal Clean Air Act Amendments of 1990 (Title V operating permit), as specified; or (5) a Title V operating permit, as specified.

“At-risk census tract” means any geographic area within a 1.5-mile radius of the boundaries of any census tract for which (1) the final environmental justice (EJ) Score from the Maryland EJ tool is at or above the 75th percentile (EJ Scores and the Maryland EJ tools are discussed further in the Current Law section); (2) six or more of the environmental health indicators in the definition of “overburdened” are at or above the 75th percentile in the State; (3) the proximity to mining operations, emitting power plants, or a hazardous waste landfill is at or above the 95th percentile in the State; or (4) the proximity to a concentrated animal feeding operation is at or above the 99th percentile in the State.

Implementation Timeline: The bill’s provisions related to covered individual permit applications apply as follows:

- beginning October 1, 2027, if the application proposes a new or increased pollution source;
- beginning October 1, 2028, if the application does not propose new or increased pollution and is (1) required to have certain public participation under §1-601(a) of the Environment Article (an existing provision that lists the permits issued by MDE that are subject to specified public participation requirements) or (2) is a Title V operating permit; and
- beginning October 1, 2029, for any other covered individual permit applications.

BURDEN Reports – Scope and Required Content: An application for the issuance or renewal of a covered individual permit must include a BURDEN report, and MDE may not consider such an application unless MDE determines that the application includes a BURDEN report prepared in accordance with the bill. A “BURDEN report” means the Baseline Understanding of Risk, Disparities, and Environmental Needs report required under the bill.

The bill establishes requirements for developing a BURDEN report. Among other things, the report must describe the existing and potential environmental and public health burdens for the at-risk census tract in which the site or facility requiring the permit is or would be located and how the site or facility might contribute to those burdens, as specified. The bill also establishes several other data points and information – primarily as related to the environmental and public health burdens in and around the at-risk census tract in which the site or facility is located – that must be included (at a minimum) in the report.

Broadly, at a minimum, a BURDEN report must include (1) the EJ Scores from the Maryland EJ tool and a description of the indicators contributing to the EJ Scores for the area surrounding the site or facility, as specified; (2) a comprehensive list of existing pollution sources, or category of sources, impacting the at-risk census tract(s) surrounding the site or facility, and the site or facility’s proximity to existing sources of pollution, as specified; (3) ambient concentrations of regulated air and hazardous air pollutants, existing and anticipated traffic counts, and exposure or potential exposure to contaminated drinking water supplies around the site or facility; (4) the potential or projected pollution burdens that the site or facility might contribute to the at-risk census tract, accounting for the existing burden and the potential health effects of any contribution; and (5) an evaluation of existing and projected environmental and public health stressors and indicators for the surrounding area. Finally, if an applicant maintains that a proposed activity requiring a permit for a new pollution source or a permit that allows for an increase in pollution from an existing source serves a compelling public interest in the at-risk area, a BURDEN report must include a discussion that demonstrates the public interest for the activity and alternatives that could serve the same public interest.

Unless MDE determines otherwise due to the complexity of any additional permit applications, an applicant applying for more than one covered individual permit that will allow for an increase in pollution from a new or existing source only needs to comply with the BURDEN report requirements once.

Determinations Related to BURDEN Reports: With respect to an application for a covered general permit for a site or facility located within an at-risk census tract that is for a new pollution source or will allow for an increase in pollution from an existing source, after reviewing a BURDEN report, MDE must issue a determination on whether approving an application for a covered individual permit will, together with other environmental or public health stressors or indicators affecting the at-risk census tract, cause or contribute to such adverse stressors or indicators in the at-risk census tract that are higher than those borne by other areas within the State.

If MDE determines that approving an application for a covered individual permit will cause or contribute to adverse environmental or public health stressors in the at-risk census tract, MDE must deny the application unless the applicant can demonstrate that the activity

requiring the permit will serve a compelling public interest in the at-risk census tract in which the activity will take place. If MDE determines that an application may be approved, MDE must impose permit conditions to protect environmental and public health.

For an application for a renewal of a covered individual permit for a site or facility located within an at-risk census tract that does *not* allow for an increase in pollution from the existing site or facility, if MDE determines that approving an application for a covered individual permit will cause or contribute to adverse environmental or public health stressors affecting the at-risk census tract, MDE may (1) deny the application for the renewal permit or (2) approve the application only if MDE imposes additional permit conditions to protect environmental and public health.

MDE must prepare a tentative determination of any of the above-required determinations that includes (1) a proposal to issue or renew or not to issue or renew a permit; (2) any proposed permit limitations and conditions; (3) a brief explanation of the tentative determination; and (4) any proposed schedule for compliance.

Before issuing a final determination, MDE must make the following materials available for review and public comment: (1) the permit application; (2) the BURDEN report, as specified; and (3) the tentative determination prepared as described above. After review and consideration of public comments, MDE must issue a final determination, including a written response to each public comment that raises issues of law or fact related to the bill's requirements. All of the above materials – and any public comments submitted to MDE regarding the materials – must be part of the record for judicial review of a determination made under the bill.

New and Expanded Public Participation Requirements and Judicial Review: The bill specifies that a covered individual permit listed under § 1-601 of the Environment Article is subject to the existing public participation requirements under Title 1, Subtitle 6 of the Environment Article (which establishes the general public participation requirements for several permits issued by MDE). The bill applies specified existing requirements (regarding tentative and final determinations for the issuance or renewal of a permit) to covered individual permits that are *not* listed under § 1-601 of the Environment Article and are not Title V operating permits, and MDE may extend the public comment periods, as specified.

A covered individual permit is subject to the provisions for judicial review under Title 1, Subtitle 6 of the Environment Article. However, a contested case hearing may not occur for the issuance or renewal of a covered individual permit issued under the bill's provisions. The bill specifies (1) the information and materials that are part of the record for judicial review and (2) that a person who meets the requirements for requesting judicial review under Title 1, Subtitle 6 of the Environment Article may proceed as a respondent in any

judicial review action for the purpose of defending MDE's final determination on a covered individual permit.

Title V Operating Permits - Public Participation Requirements and Judicial Review

A Title V operating permit must be issued or renewed in accordance with public participation requirements adopted by MDE by regulation. The public comment period must be at least 60 days. MDE may schedule a public hearing on a tentative determination at its discretion unless it receives a request for a hearing, in which case it must schedule a public hearing, as specified.

The bill also repeals existing provisions (1) authorizing an applicant for an air quality operating permit to seek judicial review and (2) specifying that, except for an applicant for such a permit, a person is not entitled to a contested case hearing regarding Title V operating permits.

New Requirements for Covered General Permits

A "covered general permit" is any statewide general permit for (1) air emissions from concrete batch plants or (2) discharges from AFOs, mining operations, or stormwater associated with industrial activity. The term does not include a general permit for stormwater discharges associated with construction activity.

During each renewal of a covered general permit, MDE must (1) incorporate environmental health stressors and indicators into its determination; (2) impose permit conditions to protect public health and reduce environmental harm from individual sites or facilities located within an at-risk census tract; and (3) improve outreach and notice effectiveness to overburdened communities regarding informational and public hearings and public comment opportunities.

Restrictions on Changes to Permit Conditions for Covered Individual and Covered General Permits for Which a Permit Condition is Imposed

A permit may not be renewed, reissued, or modified to remove or replace a permit condition imposed under the bill's provisions with a less stringent permit condition unless (1) the Secretary of the Environment determines that a technical error or misinterpretation of law was made in imposing the condition or (2) a less stringent condition is necessary because of events over which the permit holder has no control and for which there is no alternative remedy.

Enhanced Penalties and Provisions Specific to Enforcement Actions in at-risk Census Tracts

The maximum civil penalty for any violation of any provision of the Environment Article, or any rule, regulation, or order issued in accordance with the Environment Article, that occurs within an at-risk census tract must be increased by 75%. MDE must make information readily available online regarding any enforcement action against a permitted facility located within an at-risk area, as specified.

For an alleged violation in an at-risk census tract, MDE must consider supplemental environmental projects to implement as part of the settlement or enforcement action. MDE must adopt a policy that encourages the implementation of supplemental environmental projects, with a goal of at least 25% of the revenue from an enforcement action against a facility located within an at-risk census tract to be used to assist affected at-risk census tracts.

Fees, Regulations, and Reporting Requirements

In addition to any other fee authorized by law or regulation, MDE may charge a reasonable fee to cover costs associated with the implementation of the new Part III (Environmental Permits) established by the bill, including the cost to MDE to provide technical assistance to permit applicants and residents of at-risk census tracts.

By October 1, 2027, MDE must adopt regulations to (1) implement the new Part III provisions of the bill and (2) define “EJ Score.” MDE must review the definition of EJ Score at least every five years and, (1) if appropriate, revise the definition, as specified, or (2) issue a decision to not revise the definition in accordance with the Administrative Procedure Act.

By January 1, 2028, MDE must report to the General Assembly on whether to incorporate additional specified permits, licenses, and registrations into the definitions of “covered individual permit” and “covered general permit.”

Current Law:

Scope of Title 1, Subtitle 6 of the Environment Article

Title 1, Subtitle 6 of the Environment Article establishes the general public participation requirements for several permits issued by MDE. More specifically, the subtitle establishes the general public notice and hearing requirements for (1) air quality control permits to construct; (2) permits to own, operate, establish, or maintain a controlled hazardous substance facility; (3) permits to own, operate, or maintain a hazardous material facility; (4) permits to own, operate, establish, or maintain a low-level nuclear waste facility; (5) permits to install, materially alter, or materially extend landfill systems, incinerators for

public use, or rubble landfills; (6) permits to discharge pollutants to waters of the State; (7) permits to install, materially alter, or materially extend a structure used for storage or distribution of any type of sewage sludge issued, renewed, or amended; (8) potable water reuse permits; (9) reservoir augmentation permits; and (10) managed aquifer recharge pilot permits.

Notice and Hearing Requirements

Pursuant to § 1-603 of the Environment Article, MDE must cause to be published notice of applications for the permits specified above, and MDE must assure that permit applications are available to the public for inspection and copying. On written request made within 10 working days after publication of a notice of application, or in its own discretion, MDE must provide an opportunity for an informational meeting with respect to the application. The informational meeting may be canceled if all persons who made the requests withdraw those requests prior to the meeting. Unless the notice of application contained a notice of the informational meeting, MDE must publish notice of the informational meeting. MDE may require the applicant to attend an informational meeting or public hearing and present information concerning the application. If the applicant fails to appear, the application may be denied.

Pursuant to § 1-601 of the Environment Article, when MDE is required to hold a public informational meeting or public hearing under Subtitle 6, MDE may hold such a meeting or hearing using teleconference or Internet-based conferencing technology unless (1) a federal statute or regulation requires an in-person meeting/hearing or (2) any person makes a timely request that the meeting/hearing be held in person. If MDE holds an in-person meeting/hearing, MDE must hold the meeting or hearing at a location in the political subdivision and in close proximity to the location where the individual permit applies. MDE is not required to hold an in-person meeting or hearing under specified emergencies.

When more than one public informational meeting or hearing is required, MDE may consolidate some or all of the meetings or hearings for the proposed facility with similar meetings or hearings.

Pursuant to § 1-602 of the Environment Article, when MDE is required to publish notice pursuant to Subtitle 6, the notice must (1) be published at least once a week for two consecutive weeks in a daily or weekly newspaper of general circulation in the geographical area in which the proposed facility is located and (2) include specified items relating to the EJ Score for the census tract where the applicant is seeking a permit. MDE may (1) require notice of an informational meeting or a public hearing by mail to each person requesting the meeting or hearing or to their authorized representatives and (2) provide additional notice by requiring the notice to be posted at the proposed facility or at public facilities in the geographical area of the proposed facility. The applicant must bear

all costs incurred by MDE in providing notice, and MDE may require the applicant to publish and send the required notices.

In addition, when MDE is required to publish notice of a permit application, MDE must (1) electronically post the notice on its website and (2) provide a method for interested parties to electronically request any additional notices related to the permit application. The notice must include specified items, including the EJ Score for the census tract where the applicant is seeking a permit and the EJ score review conducted by MDE.

Tentative and Final Determinations on Permit Applications

Pursuant to § 1-604 of the Environment Article, after MDE receives a permit application, MDE must prepare a tentative determination, which must include (1) a proposal to issue or not issue a permit; (2) any proposed permit limitations or conditions; (3) a brief explanation of MDE's tentative determination; and (4) any proposed schedule of compliance. MDE must publish notice of the tentative determination as specified, and MDE must schedule a public hearing on the tentative determination under specified conditions.

MDE must prepare a final determination on a permit application if (1) written comments adverse to the tentative determination were received by MDE within a specified time period after the publication of the notice of tentative determination; (2) comments adverse to the tentative determination were received at or after the public hearing, as specified; or (3) the final determination is substantively different from the tentative determination and all persons aggrieved by the final determination have not waived, in writing, their right to request a contested case hearing. If MDE is required to prepare a final determination under these provisions, MDE must publish a notice of the final determination. If MDE is not required to prepare a final determination, the tentative determination is a final decision by MDE.

Contested Case Hearings and Judicial Review

For a permit listed under § 1-601(a) of the Environment Article, a contested case hearing may not occur. A final determination by MDE on the issuance, denial, renewal, or revision of any such permit is subject to judicial review at the request of any person that (1) meets the threshold standing requirements under federal law and (2) is the applicant or participated in a public participation process through the submission of written or oral comments, unless an opportunity for public participation was not provided. Judicial review must be on the administrative record before MDE and limited to objections raised during the public comment period, except as specified.

A person petitioning for judicial review in accordance with § 1-601 of the Environment Article or other specified provisions of the Environment Article must file the petition in

accordance with the Maryland Rules, and an action for judicial review must be conducted in accordance with the Maryland Rules. A party to the judicial review action may not challenge a facility's compliance with zoning and land use requirements or conformity with a county water and sewerage plan. However, these provisions must not prevent a party from challenging whether MDE has complied with specified requirements relating to applications for ambient air quality control permits and refuse disposal systems, nor do they prevent a party from contesting the compliance of the facility with zoning and land use or county plan requirements in any proceeding brought in accordance with and under any applicable local laws.

For the affected permits and licenses, any judicial review of a determination must be limited to a record compiled by MDE or the Board of Public Works (BPW), as specified. When a draft permit or license or tentative determination is issued, MDE or BPW must make the following documents available for inspection and copying no later than the date the permit, license, or tentative determination is issued: (1) all permit or license applications; (2) documents submitted with a permit or license application; (3) all documents relied on in making the tentative determination; and (4) a privilege log, as specified. MDE or BPW also must extend the public comment period by 60 days upon request by a person, as specified; however, a public comment period may not be extended more than once.

Judicial Review – Title V Operating Permits

Title V of the Clean Air Act, as amended in 1990, requires major sources of regulated air pollutants to obtain a federally approved operating permit. Except for an applicant who seeks judicial review in accordance with the Administrative Procedure Act, a final decision by MDE on the issuance, renewal, or revision of a Title V operating permit is subject to judicial review by any person who (1) meets the threshold standing requirements under federal constitutional law and (2) participated in a public participation process through the submission of written or oral comments, unless an opportunity for public participation was not required by statute or regulation. Judicial review must be on the administrative record before MDE and limited to objections raised during the public comment period unless the petitioner demonstrates that the objections were not reasonably ascertainable during the comment period or that grounds for the objections arose after the comment period. Unless otherwise required by statute, a petition for judicial review must be filed with the circuit court for the county in which any party resides or has a principal place of business.

An applicant for an air quality operating permit may seek judicial review in accordance with the Administrative Procedure Act. Except for an applicant who seeks judicial review pursuant to that law, a person is not entitled to a contested case hearing regarding Title V operating permits.

Environmental Justice Screening

A person who is applying for a permit listed under § 1-601(a) of the Environment Article must include, as part of the permit application, the EJ Score from the Maryland EJ tool for the census tract where the applicant is seeking a permit, unless the permit requires the applicant to use a tool developed by the U.S. Environmental Protection Agency. On receiving such an application, MDE must review the EJ Score for the census tract where the applicant is seeking a permit using the Maryland EJ tool to verify the applicant's information.

“EJ Score” means an overall evaluation of an area's environment and existing environmental justice indicators, as defined by MDE in regulation, including pollution burden exposure, pollution burden environmental effects, sensitive populations, and socioeconomic factors. “Maryland EJ tool” means a publicly available State mapping tool that allows users to (1) explore layers of environmental justice concern; (2) determine an overall EJ Score for census tracts in the State; and (3) view additional context layers relevant to an area.

State/Local/Small Business Effect:

Maryland Department of the Environment

Administrative Expenditures: MDE advises that, despite its plans to leverage existing resources and staff to assist with implementing the bill, general fund expenditures increase by at least \$211,300 in fiscal 2027 – with future year costs ranging from \$670,300 in fiscal 2028 to approximately \$723,300 in fiscal 2031 – to hire seven employees (one regulatory and compliance engineer and one natural resources planner in fiscal 2027 and three regulatory and compliance engineers and two administrators in fiscal 2028) to (1) effectively manage the increased permitting responsibilities and the corresponding increase in MDE's technical and administrative workload for its permitting programs; (2) review and verify BURDEN reports; (3) handle expanded public participation requirements; (4) update regulations; and (5) generally implement the bill.

MDE also plans to request that DBM repurpose five existing vacant Position Identification Numbers (PINs) for the Office of Environmental Justice (one assistant Attorney General, one regulatory and compliance engineer supervisor, and three regulatory and compliance engineers) to (1) conduct permit reviews, navigate legal challenges, and ensure compliance with existing and new permit requirements and (2) process additional permit applications and handle aspects of the increased technical workload associated with the bill. To the extent that the request to repurpose these vacant PINS is denied, MDE's costs increase further to hire such staff.

The Department of Legislative Services (DLS) concurs that the bill establishes substantial new responsibilities for MDE and that general fund expenditures increase significantly for MDE to hire staff to implement the bill. However, without actual experience under the bill, and without knowing if the request to repurpose PINs will be approved, a reliable estimate of the increase in costs cannot be made at this time. DLS anticipates, however, that general fund expenditures increase significantly, likely by at least \$600,000 on an annualized basis once all staff are hired.

Fee Revenues: The bill authorizes MDE to charge a reasonable fee to cover its costs associated with implementing the bill, including costs to provide technical assistance to permit applicants and residents of at-risk census tracts. The bill does not direct any such fee revenue into a special fund; as a result, it is assumed that fees collected under the bill accrue to the general fund. Thus, this analysis assumes that general fund expenditures increase significantly – likely by at least \$600,000 on an annualized basis once all staff are hired – corresponding with MDE’s increased costs to administer the bill (as described above).

The also bill has broad impacts on MDE’s permitting process and, therefore, may affect special fund revenues from permit fees that MDE collects pursuant to current law. Any such impact cannot be reliably estimated at this time but could also be significant.

Other Related Effects: While the bill may result in an increase in workload for the Office of Administrative Hearings (OAH), the extent to which OAH finances may be affected is unclear at this time.

Penalty Provisions

The bill increases the maximum civil penalty for any violation of any provision of the Environment Article or any rule, regulation, or order issued in accordance with the Environment Article that occurs within an at-risk census tract by 75%. Under current law, for at least several affected permits, statute directs certain penalties to various MDE special funds (such as the Maryland Clean Air Fund and the Maryland Clean Water Fund) to be used for the authorized purposes of those funds. Other penalties go to the general fund (for cases heard in the District Court) or to local jurisdictions (for cases heard in the circuit courts). Thus, State general/special fund revenues and local revenues may increase from the enhanced penalty for violations within at-risk census tracts. However, the magnitude of any such impact cannot be reliably estimated at this time.

The bill also requires MDE to (1) consider supplemental environmental projects as part of a settlement or enforcement action for violations in an at-risk census tract and (2) adopt a policy that encourages the implementation of supplemental environmental projects, with a goal of at least 25% of enforcement revenues from a facility located within an at-risk census

tract to be used to assist affected at-risk census tracts. However, the extent to which the bill affects the distribution of penalties collected pursuant to existing enforcement provisions cannot be reliably estimated at this time.

The bill's penalty provisions are not anticipated to materially affect the workload of the Judiciary or the circuit courts.

Maryland Environmental Service

The Maryland Environmental Service (MES) is a not-for-profit unit of State government that operates environmental facilities and executes environmental projects across the State (such as landfills, material resources facilities, sewage treatment plants, sludge processing facilities, and solid waste transfer stations). MES customers include State agencies and local governments. MES anticipates that the bill results in significant impacts on its projects under the bill and that MES costs increase accordingly. As MES is a fee-for-service entity, any costs incurred by MES resulting from the bill are ultimately borne by the entities that contract for MES services through an increase in fees. As a result, MES nonbudgeted expenditures and revenues increase correspondingly.

Effect on Permit Applicants and Permit Holders

The bill has significant, cascading impacts on any entity that applies for an affected permit or permit renewal (which could include State agencies, local governments, and small businesses). Although the bill's impacts cannot be predicted in advance, due to the significant additional regulatory requirements established, the bill likely increases the amount of time that it takes to obtain such a permit or permit renewal. As a result, affected permit applicants likely experience permitting delays and associated cost increases. As noted above, the bill also authorizes MDE to charge a fee to cover its costs associated with implementing the bill's requirements, which are significant. As such, costs to pay associated permit fees increase. Further, in some cases, the bill may result in the denial of permit applications that would otherwise be approved or the imposition of permit conditions (that generally cannot be reduced).

Broadly, permitting costs are affected by the following: (1) the requirement to include a BURDEN report in applications for covered individual permits; (2) MDE's review of BURDEN reports and any resulting determinations; (3) the requirement for MDE to deny a covered individual permit application if it determines that the site or project will contribute to an increased potential for adverse environmental or public health impacts within a specified surrounding area; (4) the requirement for MDE to impose conditions on affected permits under certain circumstances; and (5) the expanded public notice and participation requirements for certain affected permits.

For reference, the State Highway Administration estimates that it must hire a consultant to develop each BURDEN report and that per-report costs are approximately \$16,000.

Additional Effects on Small Businesses

In addition to the effects discussed above that could affect small businesses as permit applicants and permit holders, the bill may create new opportunities for small businesses that specialize in environmental consulting, compliance, and sustainable practices. Businesses that offer eco-friendly solutions or work in the renewable energy sector may benefit from an increase in the demand for their services that align with the more stringent environmental public health permitting requirements.

Additional Information

Recent Prior Introductions: Similar legislation has not been introduced within the last three years.

Designated Cross File: SB 781 (Senator Brooks) - Education, Energy, and the Environment.

Information Source(s): Maryland Department of the Environment; Maryland Department of Agriculture; Maryland Department of Transportation; Judiciary (Administrative Office of the Courts); Office of Administrative Hearings; Maryland Environmental Service; Maryland Association of County Health Officers; Kent and Worcester counties; Northeast Maryland Waste Disposal Authority; City of Salisbury; Department of Legislative Services

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