



February 24, 2022

The Honorable Paul Pinsky, Chair  
Senate Education, Health and Environmental Affairs Committee  
Miller Senate Office Building, 2 West  
Annapolis, MD 21401

**Oppose SB 552 – Local Climate Action Plans**

Dear Chair Pinsky and Committee Members:

The NAIOP Maryland Chapters represent more than 700 companies involved in all aspects of commercial, industrial and mixed-use real estate. NAIOP opposes SB 552 as introduced.

NAIOP supports coordinated implementation of state climate mitigation plans but opposes SB 552 as introduced because it will lead to a patchwork of inconsistent, uncoordinated energy, transportation and building code requirements across the state.

Since 2009 Maryland has developed and managed climate mitigation and adaptation strategies through the authority and guidance of the Green House Gas Reduction Act. [GGRA]. The General Assembly required that those plans reduce emissions while also meeting performance metrics related to economic benefits, cost-effectiveness, energy price and reliability. The question raised by SB 552 and other climate legislation is whether and how you will require local plans to conform to the requirements of the GGRA.

Plan development is always aided by the use of Integrated Assessment Models [IAMs] that evaluate the emissions reduction potential and economic impacts of policy options. These models are not likely to be part of the local process making adequate policy development difficult to accomplish.

The policy levers that can reduce emissions from automobiles technologies – utility and energy policy - are generally not within the jurisdiction of state government and the Public Service Commission.

**For these reasons we respectfully request your unfavorable report on SB 552.**

Sincerely;

A handwritten signature in blue ink that reads "T.M. Ballentine". The signature is written in a cursive style and is positioned above the typed name of the sender.

Tom Ballentine, Vice President for Policy  
NAIOP Maryland Chapters -*The Association for Commercial Real Estate*

cc: Education, Health and Environmental Affairs Committee Members  
Nick Manis – Manis, Canning Assoc.