



February 25th, 2025

Senator Brian Feldman, Chair
Education, Energy and the Environment Committee
2 West, Miller Senate Office Building
Annapolis, MD 21401

RE: SB 978 – UNFAVORABLE – Environmental Permits – Requirements for Public Participation and Impact and Burden Analyses (Cumulative Harms to Environmental Restoration for Improving Shared Health – CHERISH Our Communities Act)

Dear Chair Feldman and Members of the Committee:

The Maryland Transportation Builders and Materials Association (“MTBMA”) has been and continues to serve as the voice for Maryland’s construction transportation industry since 1932. Our association is comprised of 200 members. MTBMA encourages, develops, and protects the prestige of the transportation construction and materials industry in Maryland by establishing and maintaining respected relationships with federal, state, and local public officials. We proactively work with regulatory agencies and governing bodies to represent the interests of the transportation industry and advocate for adequate state and federal funding for Maryland’s multimodal transportation system.

Senate Bill 978 would require additional public participation and impact analysis for projects with a high potential for adverse environmental and public health effects. It mandates that permit applicants for specified projects conduct environmental impact analyses and, in certain cases, submit burden reports detailing existing environmental stressors. The Department of Environment would assess the reports and deny permits if a project would increase environmental harm. The bill also establishes a cumulative impact mitigation fund.

While we all aim to be good stewards of the environment, there is no way our Association can support a bill like SB 978. It would create an administrative nightmare for all permit review at the Department of Environment, slowing down the process substantially. The bill is too vague and leaves much open to interpretation, resulting in possible legal challenges, project rejections or the imposition of costly mitigation measures. These additional processes would also result in substantial added costs to every transportation project Maryland, which our state cannot afford at this time.

For these reasons, we ask that you vote UNFAVORABLE on Senate Bill 978.

Thank you,

Michael Sakata
President and CEO
Maryland Transportation Builders and Materials Association