House Bill 1484



Position: Information Committee: House Environment and Transportation Date: March 11, 2025

Founded in 1968, the Maryland Chamber of Commerce (the Chamber) is the leading voice for business in Maryland. We are a statewide coalition of more than 7,000 members and federated partners working to develop and promote strong public policy that ensures sustained economic health and growth for Maryland businesses, employees, and families.

House Bill 1484 (HB 1484) introduces an additional environmental review requirements for permits associated with projects within 1.5-mile radius from an at-risk census tract identified as having potential adverse community and public health impacts. It would require applicants to submit an environmental impact analysis and, in some cases, a burden report if the project is near an at-risk community. The Maryland Department of the Environment (MDE) must evaluate these factors and may deny permits if a project is determined to contribute to increased environmental burdens. Additionally, if a permit is deemed essential despite its potential impact, permit holders must pay ongoing fees into a mitigation fund.

While the Chamber supports environmental equity and transparency in the permitting process, HB 1484 introduces several challenges that could disrupt project timelines and discourage investment in Maryland. Changes to the regulatory and permitting process must prioritize efficiency and reliability. Maryland already has long permit wait times compared to many other states.

There is concern over how the impact analysis will be conducted. The bill calls for input from multiple agencies, elected officials, and community representatives, adding many additional layers to the permitting process. The requirement that three different state departments, local elected officials, and other environmental or public health entities must review burden reports before finalization raises questions about how efficiently these reviews can be completed. Businesses rely on timely permitting decisions to plan and execute projects, and prolonged delays could hinder economic growth and development in Maryland. We suggest outlining a defined timeline in the bill for MDE to inform the applicant of their decision.

Further, HB 1484 imposes the payment of fees into a fund in certain situations, but the bill does not define what constitutes a reasonable fee or cap, leaving businesses uncertain about the potential financial burden. Clear cost parameters must be established in the legislation.

The bill also allows MDE to consider many different impacts when conducting a climate and equity evaluation or a health impact assessment. This evaluation reaches beyond the impact of

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the permit itself and extends to how the permit could add to existing conditions. Additionally, the scope of the bill raises concerns for many industries as minor permits would be included, requiring them to go through an extended review process. It remains unclear whether MDE can adequately analyze the cumulative impacts as advocated for, given the broad range of permits covered.

HB 1484 allows MDE to assess a "reasonable fee" to the permit applicant to fund the administration and implementation. What will MDE consider a reasonable fee? We suggest outlining the cost of the fee or setting a cap so potential permit applicants have clarity on the cost.

Lastly, we are concerned that HB 1484 overhauls existing frameworks rather than building upon state and federal permitting processes, including the National Environmental Policy Act review, creating additional complexity and uncertainty for developers and businesses without clear benefits.

The Maryland Chamber of Commerce urges the committee to carefully consider the potential impacts on Maryland's business community and future economic development. We appreciate your consideration of these comments on HB 1484.