



February 16, 2026

The Honorable, Marc Korman, Chair
House Environment and Transportation Committee
250 Taylor House Office Building
Annapolis, Maryland 21401

Unfavorable: HB 517 – Emissions Standards – Ambient Air Quality Standards – Local Authority

Dear, Chair Korman and Committee Members:

The NAIOP Maryland Chapters, representing more than 700 companies involved in all aspects of commercial, industrial, and mixed-use real estate, recommend your unfavorable report on HB 517 which would alter the provisions of law related to local authority to set emissions standards or ambient air quality standards.

NAIOP supports coordinated, statewide implementation of air-quality and climate-mitigation strategies. HB 517 would undermine that coordination and lead to fragmentation. Our position is based on the following rationale:

- **State-wide Consistency** - Uniform state-wide standards prevent a patchwork of differing local rules that complicate compliance and create bureaucratic confusion for businesses operating across multiple counties.
- **Expertise and Policy Development Resources** - The Maryland Department of the Environment (MDE) possess financial resources and access to analytical tools needed to develop and implement complex policies. Local governments generally do not.
- **Interstate & Inter-jurisdictional Policy Reach** – Progress on air quality and emissions often involves downstream sources and requires the use of policy tools related to vehicles, utilities and energy generation that are outside of local jurisdiction and lie instead with state agencies, the Public Service Commission, or federal authorities.

For these reasons, NAIOP respectfully recommends an unfavorable report on HB 517.

Sincerely,

A handwritten signature in blue ink, appearing to read "T.M. Ballentine".

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

cc: Environment and Transportation Committee Members
Nick Manis – Manis, Canning Assoc.