

February 23, 2022

The Honorable Kumar P. Barve
Environment & Transportation Committee
House Office Building, Room 251,
6 Bladen St., Annapolis, MD, 21401

RE: HB 649 Environment - Discharge Permits - Inspections and Administrative Continuations

Dear Chairman Barve:

The Maryland Building Industry Association, representing 100,000 employees statewide, appreciates the opportunity to participate in the discussion surrounding **HB 649 Environment - Discharge Permits - Inspections and Administrative Continuations**. **MBIA Supports with Amendments.**

This bill would limit the period of time for which the Department of the Environment may administratively extend water pollution discharge permits. MBIA respectfully opposes this measure. Builders and developers have to navigate a difficult and often changing regulatory landscape. This will be made even more difficult if the regulatory entities who's job it is to monitor and enforce compliance with the law no longer have the authority to work with developers and are instead constrained by a series of ever tightening regulations. Penalties for non-compliance are already in place to deter bad actors, and this bill will just make it more expensive to build and develop in the State of Maryland for good actors making a good faith effort to comply with the law.

This bill also lacks the specificity as to which General Permits will be affected. The Department of the Environment lists 6 different general permit categories and it is unclear which of these permits will be affected by the new fines and regulations. MBIA requests that this language be amended for the purposes of providing clarity and guidance to the regulated entities.

For these reasons, MBIA respectfully requests the Committee give this measure a favorable report with the above amendments. Thank you for your consideration.

For more information about this position, please contact Lori Graf at 410-800-7327 or lgraf@marylandbuilders.org.

cc: Members of the House Environment & Transportation Committee