



**AIA**  
Maryland

*Promoting Maryland Architecture Since 1965*

12 February 2021

Delegate Kumar P. Barve, Chair  
House Environment and Transportation Committee  
Room 251  
House Office Building  
Annapolis, Maryland 21401

Re: Letter of Support with amendment for HB 0877  
Workgroup on Adaptive Reuse of Vacant Commercial Spaces

Dear Chairman Barve and members of the Environment and Transportation Committee:

I am writing to voice AIA Maryland's support of House Bill 0877 with the proposed friendly amendment to the bill. Architects work every day to help create the built environment in which we live. We work to be good stewards of the built environment, and we acknowledge that one of the most sustainable means to build is to re-purpose a building that already exists. We fully agree with the aim of this bill to establish a workgroup to study the feasibility and limitations of converting underutilized commercial spaces into residential and commercial spaces, to increase the availability of affordable housing in the State. The composition of the work group encompasses a good representation of elected officials, staff of relevant agencies and those who build, own and operate buildings, but it did not include an architect who would be a key part of any team to convert such buildings. A change of use in a building will often impact life safety requirements for occupants and when a building is converted to residential use, elements that impact the health, safety and welfare of occupants need to be considered. Architects are the prime point of responsibility for finding means to meet building code requirements for a new use, and implement them in the proposed design. We believe not having an architect on the workgroup was an oversight and one should be added to the member list of the workgroup. We have attached a proposed amendment to the bill that adds an architect to the composition of the group.

Architects are regularly involved in projects to assess opportunities for site and building development, to help assess issues of site capacity and to understand what key infrastructure would need to be modified or replace to accommodate the proposed use. One example of a code requirement that differs between uses is the required travel distance to a fire egress stairwell in a fully sprinklered building. A multifamily

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residential property would require your travel distance to an exit to be 50 feet shorter than that required of a business occupancy. In some cases, like this example, a building may require an additional stair to meet the travel distance requirements to safely exit a building in case of fire. Planning for a building to be occupied for a use other than its original intended purpose requires the skills of someone who understand implications of building codes and life safety requirements, as well as how to make the space function for those who would occupy the building. Architects are trained and licensed with that unique skill set and they would bring a valuable and objective focus to the proposed work group.

Personally, I have done several office or commercial property conversions to housing in Baltimore alone and each has a unique set of circumstances that requires creative understanding of building codes, structures and systems to make them successful. My experience includes high rise office conversion to housing, conversion of an office building that survived the 1904 Baltimore fire, conversion of a full block deep garment warehouse building east of downtown and a parcel post handling building that was the first air rights structure in Baltimore. It is wonderful to see underutilized structures take on a new life with residential occupants, but understanding how to get there and how to make it safe for those who will live there is critical to their success.

We want to make sure our state can be successful if in finding means to provide affordable housing for all who live in Maryland. We also want to see smart use of our existing structures to re-purpose buildings to support needs and take advantage of critical utility infrastructure that is already in place. We hope you will support HB 0877 and our proposed amendment to enable Maryland to put its best foot forward toward increasing the availability of affordable housing stock for our residents.

Sincerely,



Chris Parts, AIA

Director, Past President, AIA Maryland

cc:

Environment and Transportation Committee:

Dana Stein, Vice Chair

Barrie S Cilberti

Andrea Fletcher Harrison

Jay Jalisi

Charles S. Otto

Jen Terrasa

Marlon Amprey

Jerry Clark

Anne Healey

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