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Maryland

Promoting Maryland Architecture Since 1965

9 March 2020

Delegate Dereck E. Davis
Chair of the Economic Matters Committee
Room 231
House Office Building
Annapolis, Maryland 21401

Re: Letter of Opposition for HB 1087
Business Occupations and Professions - Architects - Scope of Licensure

Dear Chairman Davis and members of the Economic Matters Committees:

On behalf of AIA Maryland and the nearly 2,000 Architects we represent, we ask for your opposition to this bill that modifies regulations to increase from \$5,000 to \$50,000, the maximum estimated cost in labor and materials for the alteration of a certain existing building or structure for which a person is not required to employ a licensed architect under certain circumstances.

We have serious reservations that if this legislation is adopted harm could come to the safety, health and welfare of the citizens of our communities. The proposed legislation increases the threshold amount tenfold, much higher than inflation and has triggered our concern.

This legislation would allow significant modifications to buildings by contractors, building owners and others who are not educated, who are not trained and who are not professionally responsible to protect health, life safety and the welfare of the public.

For example a builder or carpenter could be engaged to make HVAC modifications to a structure and in the course of their work eliminate code required access to an exit corridor or stairs while working on a scope under the new proposed limit. Or a builder could be engaged to modify a room that is now used as assembly and the provision of adequate egress door capacity and or appropriate egress/panic hardware may be overlooked, exposing users of the space to potential harm in an emergency. We are concerned that work could be completed that exposes building users to improvements that do not comply with building codes and / or life safety codes when an architect has been excluded from the project.

The proposed legislation is extraordinarily broad, the limitations are practically endless as the language "interior alterations or repairs" and "storefronts and facades" covers an extensive range of work for buildings and this has a great potential for impact to the public's welfare.

The Maryland Rehabilitation Code (COMAR 09.12.58) clearly defines alteration scopes of work from repairs to varying levels of scope alterations. Architects routinely interpret these regulations on projects. This

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legislation has the potential to redefine projects presently managed and scoped by well defined applications of the building code. This has the potential to create confusion for all involved in the design and review of proposed improvements for buildings throughout the state.

Architects are committed to maintain and protect the health, safety, and welfare for the persons and in the buildings and projects in which we work. We take great pride in maintaining and enhancing environments where occupants live, work and play. We care deeply about the health, safety, and welfare of Maryland residents, and for the reasons noted above we therefore respectfully ask your committee to oppose HB 1087.

Sincerely



Matthew Ormsby, AIA
President



Laurence A. Frank, AIA
Director, Past President



Daniel L. Bailey, AIA
Director, Past President



Chris Parts, AIA
Director, Past President

cc:

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