

## **SB 436**

Uploaded by: Brandon Scott

Position: FAV



**BRANDON M. SCOTT**  
MAYOR

*Office of Government Relations  
88 State Circle  
Annapolis, Maryland 21401*

**SB 436**

February 20, 2025

**TO:** Members of the Senate Education, Energy, and the Environment Committee

**FROM:** Nina Themelis, Director of Mayor's Office of Government Relations

**RE:** Senate Bill 436 – Maryland Department of Labor - Study on Building Code Requirements for Single-Staircase Buildings

**POSITION: Support**

Chair Feldman, Vice Chair Kagan and Members of the Committee, please be advised that the Baltimore City Administration (BCA) **supports** Senate Bill (SB) 436.

SB 436 would require the Maryland Department of Labor to study building code requirements for single-staircase buildings in the State and other States and analyze best practices when drafting building code requirements. The bill would require the Department to make legislative and regulatory recommendations for the purpose of increasing the affordable housing supply by reducing barriers to multifamily housing development and require the Department to report to the Governor and certain committees of the General Assembly by December 1, 2025.

The BCA supports SB 436 as there is ongoing discussion between the Administration, City Council members and impacted agencies, regarding the feasibility of enacting local provisions that would allow a single exit stairway in certain multifamily residential buildings up to a certain height. There is great interest in the subject of regulation related to “Single-Staircase Buildings” in Baltimore City tied to the preservation and adaptive re-use of historic buildings and the affordability of new multi-family construction.

A State Study regarding potential legislative or regulatory changes to authorize the construction of single–staircase buildings up to six stories above grade plane would be useful in guiding the City as we consider additional options to encourage the development of affordable housing.

Every three years, Baltimore City is required to update its Building Fire and Related Codes pursuant to the directive of the General Assembly by and through the Maryland Department of Labor (DLR). Any amendments to the Maryland Building Performance Standards or recommendations from the State Study could be easily incorporated into our next local BFRC update. Using Study recommendations as a basis, we may mandate additional requirements to augment for increases in height, number of stories, and types of construction allowances.

It is important to look at best practices from across the country with similar building stock and it is beneficial to have State wide guidance for local jurisdictions to refer to for both safety and consistency. SB 436 may help to empower local jurisdictions to reduce barriers to multifamily housing development and increase the affordable housing supply.

For these reasons, the BCA respectfully request a **favorable** report on SB 436.

# **CSG Testimony SB436 Maryland Department of Labor –**

Uploaded by: Carrie Kisicki

Position: FAV

February 20, 2025

The Honorable Senator Brian J. Feldman  
Chair, Education, Energy, and the Environment Committee  
2 West Miller Senate Office Building  
Annapolis, Maryland 21401

**SB 436, Maryland Department of Labor – Study on Building Code Requirements for  
Single–Staircase Buildings — Support**

Carrie Kisicki, Montgomery County Advocacy Manager

Dear Chair Feldman and Committee Members,

Thank you for the opportunity to testify. My name is Carrie Kisicki, and I am the Montgomery County Advocacy Manager for the Coalition for Smarter Growth. We advocate for walkable, bikeable, inclusive, and transit-oriented communities as the most sustainable and equitable way for the metro D.C. region to grow and provide opportunities for all.

**We ask for your support of SB 436.** Single-staircase buildings offer a potential solution to several of the housing challenges Maryland faces. Modern fire safety requirements and building materials make it possible to build single-staircase buildings safely, and this study will help us update our state’s housing policies to reflect these advances.<sup>1</sup>

Single-staircase buildings unlock the potential of small or irregularly-sized lots for multi-family housing production. Because these kinds of lots are often infill lots located in and near downtowns, this would help create more housing opportunities near jobs and amenities.

Single-staircase buildings can also help provide more homes for families. The flexibility of the single-staircase layout allows for larger, family-sized multi-bedroom units to be built even in buildings on smaller or irregular lots.<sup>2</sup>

Thank you for your consideration.

Sincerely,



Carrie Kisicki  
Montgomery County Advocacy Manager

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<sup>1</sup> Niskanen Center, “[Building code reform moves forward in Virginia](#)”

<sup>2</sup> Virginia Conservation Network, “[New Laws: Single Staircases Encourage Sustainable Housing](#)”

# **SB0436 Maryland Department of Labor - Study on Bui**

Uploaded by: Cecilia Plante

Position: FAV



**TESTIMONY FOR SB0436**  
**Maryland Department of Labor - Study on Building Code Requirements for**  
**Single-Staircase Buildings**

**Bill Sponsor:** Senator Waldstreicher

**Committee:** Education, Energy, and the Environment

**Organization Submitting:** Maryland Legislative Coalition

**Person Submitting:** Aileen Alex, co-chair

**Position:** FAVORABLE

I am submitting this testimony in favor of SB0436 on behalf of the Maryland Legislative Coalition. The Maryland Legislative Coalition is an association of activists - individuals and grassroots groups in every district in the state. We are unpaid citizen lobbyists, and our Coalition supports well over 30,000 members.

Within the last year, Governor Wes Moore identified housing as a priority, with an estimated shortage in Maryland of 96,000 units and growing. The state's housing crisis has resulted in over 5,000 unhoused people in Maryland, including 2,000 living as families, according to the World Population Review. This shortage has led to unjustifiable rent increases. Higher rents result in more homelessness and increases in other poverty markers. This is unacceptable to MLC members.

SB0436 builds on the housing legislation Governor Moore signed last year by assessing the feasibility of single-staircase buildings in multifamily units. Reducing barriers to multifamily housing development would increase the affordable housing supply. Specifically, the Maryland Department of Labor is tasked with conducting this study and making legislative and regulatory recommendations based on their findings by December 1, 2025.

The emphasis on higher-density housing does not mean that human elements would be compromised. Concepts to be evaluated by this effort include existing building codes and best practices, fire safety, water supply, and economic impact — within the context of urban development and adaptive reuse potential.

More multifamily housing units would be a powerful response to our housing shortage and affordability crisis.

The Maryland Legislative Coalition supports this bill and similar initiatives that help mitigate our housing problems and requests a **FAVORABLE** vote in Committee.

# **GGWash Comments on SB 436, Single-Stair Study.pdf**

Uploaded by: Dan Reed

Position: FAV



Chair Brian Feldman  
and Members, Education, Energy, and the Environment Committee  
2 West, Miller Senate Office Building  
Annapolis, Maryland 21401

February 20, 2025

Dear Chair Feldman and Members of the Education, Energy, and the Environment Committee:

My name is Dan Reed and I serve as the Maryland Policy Director for [Greater Greater Washington](#), a nonprofit that works to advance sustainability and equity in housing, land use, and transportation throughout Greater Washington and beyond. **GGWash strongly supports House Bill 489**, which could help address our chronic housing shortage while increasing access to fire-safe homes.

This bill is simple: it would direct the Department of Labor, which is responsible for building codes, to identify ways that Maryland could legalize single-stair residential buildings up to six stories and make legislative and regulatory recommendations by December 1, 2025.

Today, the state requires that even small apartment buildings with as few as four units have two internal staircases connected by a hallway. This makes it harder to difficult and expensive to build apartments in constrained settings, like infill lots in older neighborhoods or the retrofit of a historic building, or to create larger, family-sized apartments<sup>1</sup>. One consequence is that most apartments get built in large complexes, which require more land and expensive materials, driving up costs. It also means fewer homes get built, contributing to our housing shortage and increasing the cost of existing homes.


Fewer new homes mean fewer homes that adhere to modern fire safety requirements. Two-thirds of homes in Maryland were built before 1990, when the state began requiring sprinklers in new homes<sup>2</sup>. In Baltimore City, the median home was built in 1948, the third-highest median home age in the nation<sup>3</sup>. The United States, which requires two stairs, has worse fire safety outcomes than many countries in Europe that only require one stair, while

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<sup>1</sup> <https://vcnva.org/single-staircases-encourage-sustainable-housing/>

<sup>2</sup> 2023 American Community Survey.

<sup>3</sup> <https://www.citybiz.co/article/311527/baltimore-has-the-3rd-highest-median-home-age-in-the-u-s/>

The Washington, DC region is great  and it can be greater.





jurisdictions in the US that allow single-stair buildings, like Seattle and Honolulu, require additional fire protection measures<sup>4</sup>. Virginia conducted its own study of single-stair building codes last year that highlighted several of those interventions, like early smoke detection, mechanical smoke ventilation systems, and limiting the number of units per floor<sup>5</sup>.

This issue is personal for me: I grew up in a 900-unit, 1960s-era high-rise apartment complex in Montgomery County without sprinklers, where fires were a regular occurrence<sup>6</sup>. Two years ago this month, a catastrophic fire displaced hundreds of people and took the life of a young woman trying to flee the building. The fire marshal's report found that a single sprinkler could have prevented this tragedy<sup>7</sup>.

Maryland needs more homes, and Marylanders deserve to have access to homes with modern fire safety protections. This bill will help us figure out how to make that happen as soon as we can. We ask the Environment and Transportation Committee for a favorable report.

Sincerely,

Dan Reed  
Maryland Policy Director

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<sup>4</sup> <https://www.niskanencenter.org/understanding-single-stair-reform-efforts-across-the-united-states/>

<sup>5</sup> <https://rga.lis.virginia.gov/Published/2024/RD845/PDF>

<sup>6</sup> <https://ggwash.org/view/88804/it-shouldnt-have-happened-again-but-it-did>

<sup>7</sup>

<https://www.sourceofthespring.com/silver-spring-news/2803718/maryland-fire-marshall-sprinklers-could-have-prevented-fire-at-silver-spring-apartment-complex/>

# **JulianFrost\_Testimony\_HB0489.pdf**

Uploaded by: Julian Frost

Position: FAV

**Written Testimony (FAVORABLE) for HB0489  
Julian Frost**

HB0489 stems from a few architects and housing experts with perspective from abroad realizing that requiring two stairwells for any building above three stories, as we do in the US, is rare, extremely onerous, doesn't help with fire safety as much as one might think, and profoundly bloats the form of newly-constructed buildings. This bill takes steps to raise the story limit for single-stair buildings from 3 stories to 6 stories, bringing Maryland in line with international best practice.

Single-stair buildings offer better natural light, natural ventilation, and are more suited for family-sized units than conventional apartment buildings with two stairs and a long hallway.

Single-stair buildings are slim and make urban infill possible, especially on small lots. This bill will transform countless infill lots across the state from undevelopable to developable.

Single-stair buildings allow for small and mid-sized developments that add density to communities in a gentle, gradual manner. This means a lower-risk investment that is more approachable to local, small-scale developers.

Single-stair buildings in excess of six stories are the norm in wealthy, developed nations -- the US and Canada are exceptions. If the US can't do this safely, no one can.

Six-story single-stair buildings have legal precedent in Seattle, WA, where they've been legal and abundant since the 1970s.

Single-stair buildings already exist in Maryland, mostly in the form of renovated rowhouse apartments, garden apartment complexes, and apartments built before the double-egress rule -- like the Mount Vernon apartment building where I currently live, on the 8th floor. What's key to understand is that this bill puts in motion a formal, data-driven, expert-led process to safely increase the height limit of the single-stair building type from 3 stories to 6, with enhanced fire safety measures.

In comparison to double-loaded corridor multifamily buildings, single-stair buildings have many fewer units/residents per stairwell, and have much shorter travel distances from front door to stairwell.

The safest buildings are new buildings, which are required to have sprinklers. If six-story single-stair buildings are legalized, there will be more new, safe, sprinklered buildings (not to mention in central, urban locations).

I am in favor of HB0489 because it fixes a tiny detail in our building code that has been holding back untold growth and development potential. Maryland -- let's join the growing ranks of states and jurisdictions who have taken on single-stair reform, and fix it.

**MBIA Letter of Support SB 436.pdf**

Uploaded by: Lori Graf

Position: FAV

February 18, 2025

The Honorable Brian J. Feldman  
Chairman, Senate Education, Energy, and the Environment Committee  
2 West Miller Senate Office Building  
Annapolis, MD 21401

**RE: SB 436 Maryland Department of Labor – Study on Building Code Requirements for Single–Staircase Buildings**

Dear Chairman Feldman:

The Maryland Building Industry Association (MBIA), representing 100,000 employees of the building industry across the State of Maryland, appreciates the opportunity to participate in the discussion surrounding **SB 436 Maryland Department of Labor – Study on Building Code Requirements for Single–Staircase Buildings**.

This bill requires the Department of Labor to study and make recommendations regarding building code requirements for single-staircase buildings. The study will specifically recommend amendments to the Maryland Building Performance Standards to authorize the construction of single-staircase buildings up to six stories above grade plane. We believe this begins the conversation about much-needed building code reforms in our state. Other jurisdictions around the country have changed their building codes to allow for the development of more single-staircase properties above three stories and Maryland is making the right decision in following suit. The code change will open up more opportunities for small lot infill development, which focuses on construction on underutilized or subdivided lots in constrained urban areas. These buildings are built with a central staircase instead of an extended corridor, which reduces the overall footprint of the building. Encouraging more of this type of development will allow jurisdictions that don't have a lot of developable land to use it more efficiently and will get more affordable units built in the State of Maryland.

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

For more information about this position, please contact Lori Graf at 410-800-7327 or [lgraf@marylandbuilders.org](mailto:lgraf@marylandbuilders.org).

cc: Members of the Senate Education, Energy, and the Environment Committee

# **sb436test - Study on Building Code Requirements f**

Uploaded by: Marcus Jackson

Position: FAV



*The Voice of Merit Construction*

February 20, 2025

**Mike Henderson**

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Beltsville, MD 20705  
(T) (301) 595-9711  
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TO: EDUCATION, ENERGY, AND ENVIRONMENT COMMITTEE  
FROM: ASSOCIATED BUILDERS AND CONTRACTORS  
RE: S.B. 436 – MARYLAND DEPARTMENT OF LABOR – STUDY ON BUILDING CODE REQUIREMENTS FOR SINGLE-STAIRCASE BUILDINGS  
POSITION: SUPPORT

The Associated Builders and Contractors of Maryland support S.B. 436 which is before you today for consideration.

The current building code requirements, while prioritizing safety, may inadvertently hinder the construction of more affordable housing options. Single-staircase buildings, historically prevalent in older buildings, offer a potential pathway to reducing construction costs and increasing housing density, particularly in urban infill and redevelopment projects.

S.B. 436 mandates a thorough examination of building codes in other states, analysis of best practices, and consideration of critical factors such as fire safety, water supply, and the impact on housing costs. This evidence-based approach will ensure that any recommendations for code changes are grounded in sound data and prioritize both affordability and public safety.

The requirement for the Department to consult with a fire engineer from a public institution and a representative of a firefighters' union is essential. Their expertise will be invaluable in ensuring that any proposed changes to the building code maintain the highest standards of fire safety and protect both residents and first responders.

Furthermore, the bill's focus on increasing the affordable housing supply is timely and critical. Maryland faces a significant shortage of affordable housing, and this study offers a promising avenue for exploring solutions that can increase housing options for residents across the state.

The findings and recommendations resulting from this study will provide valuable guidance for future legislative and regulatory action. With that in mind, the over 1,500 member companies of ABC Maryland, respectfully request a favorable report on S.B. 436.

Marcus Jackson, Director of  
Government Affairs

# **Maryland single-stair testimony.pdf**

Uploaded by: Stephen Smith

Position: FAV





# Center for Building in North America

Stephen Smith

Executive director, [Center for Building in North America](#)  
[stephen@centerforbuilding.org](mailto:stephen@centerforbuilding.org)

My name is Stephen Smith, I am the executive director at the Center for Building in North America, a nonprofit organization that conducts research about building codes in the U.S. and Canada.

I founded this organization to build on zoning reform that is happening all around the country. Zoning rules around issues like density and parking have been the focus of a lot of housing advocacy over the past decade or so, and for good reason. However, I've heard from a lot of architects, developers, and residents that, even after reforming zoning rules, there are still other code-related challenges. You can change rules to allow taller buildings on commercial streets, even apartment buildings in single-family neighborhoods, but our building codes are not written with this type of small-scale infill in mind. Construction costs are high, buildings are filled with studios and one-bedroom apartments that aren't workable for families, and big new apartment buildings tend to fit poorly into the fabric of single-family and low-rise neighborhoods.

Building codes and standards are complex documents, but the height limit for small single-stair apartment buildings stands out as a major and relatively simple issue. For a small building with two to four apartments per floor, the requirement to add a second stair if the building rises to four, five, or six stories adds about 10 percent to the cost of construction. In an industry where small shifts in interest rates or a slightly larger accessible bathroom can kill the viability of a small project, 10 percent is an enormous amount of money. Land use and zoning reform is desperately needed, but it can only affect the price of land, which is maybe 30 percent of the total cost of development. The remainder is in the so-called hard and soft costs of construction, which is what single-stair reform can bring down.

Currently, the model building code that Maryland adopts limits heights to just three stories. These rules were developed at a time when huge swaths of American cities burned routinely, and we had few other tools to address the problem of fire. Over the years, technology has changed, but codes have not. The U.S. now has one of the lowest single-stair height limits in the developed world. Only Canada and a few African countries are lower. Places like Germany,

South Korea, and Italy allow skyscrapers of 20 stories or more with a single stair, with good fire safety outcomes – typically better than those in the U.S.. More conservative places like Australia or the U.K. limit single-stair buildings to six or eight stories. The U.S. remains at three.

But you don't have to look even abroad to find examples of codes that allow taller buildings. New York City and Seattle have allowed small buildings to rise to six stories with a single stair for decades, with no stair-related fatalities that we could find, and no major stair-related incidents having come to light. Vermont, Georgia, and Puerto Rico allow four stories. States and cities around the country are rethinking rules limiting heights to three stories – Maryland would be far from the first, or even the 10th. The organization of building and fire officials that writes the model code that Maryland uses is also reconsidering the model code's rules. This fall, they approved an incremental boost in height to four stories, with everybody acknowledging that taller buildings will likely come during the next code cycle. It's a slow-moving and conservative body though, and if Maryland is interested in exploring any reforms for adoption before the decade is up, this bill is your best bet.

Please don't hesitate to get in touch if you have any questions. My email is [stephen@centerforbuilding.org](mailto:stephen@centerforbuilding.org).

**SB0436 PresMD FAV W AMENDMENTS.pdf**

Uploaded by: Nicholas Redding

Position: FWA



# PRESERVATION MARYLAND

February 20, 2025

Hon. Brian J. Feldman  
Education, Energy, and the Environment Committee  
2 West Miller Senate Office Building  
Annapolis, Maryland

**RE: SB0436 FAVORABLE WITH AMENDMENTS**

**Chairperson Feldman,**

On behalf of the staff and Board of Directors of Preservation Maryland and our thousands of statewide supporters, I thank you for the opportunity to provide written testimony in **SUPPORT of SB0436**— a piece of legislation that would require the Maryland Department of Labor to study building code requirements for single-staircase buildings in Maryland and that of other states and analyze best practices when drafting building code requirements.

Preservation Maryland is the nonprofit, statewide voice for historic preservation that harnesses the power of historic places by revitalizing and reinvesting in communities, advocating, and building the historic trades workforce for the benefit of all Marylanders. (Learn more at: [presmd.org](http://presmd.org))

We are supportive of this legislation as we believe it will pave the way for updated building code requirements for single-staircase buildings in Maryland. These structures, which are disproportionately historic in age, could provide a source of affordable housing if updates to the building code are made, consistent with the highest levels of life safety.

*RE: Amendments Request:* We and our partners at the *Downtown Frederick Partnership* provided friendly amendments that we ask to be considered. These would 1) add a requirement to consult with the state fire marshal, 2) require the study to include recommendations on potential incentives to support fire suppression systems, 3) and add a representative of the preservation and main street communities on the list to be consulted.

Sincerely,

Nicholas A. Redding, President & CEO

**Letter for SB436.pdf**

Uploaded by: Mike McKay

Position: UNF

**MIKE MCKAY**  
*Legislative District 1*  
Garrett, Allegany, and Washington Counties



*Annapolis Office*  
James Senate Office Building  
11 Bladen Street, Room 416  
Annapolis, Maryland 21401  
410-841-3565 • 301-858-3565  
800-492-7122 Ext. 3565  
Mike.McKay@senate.state.md.us

Judicial Proceedings Committee  
Executive Nominations Committee

*Cumberland Office*  
100N Mechanic Street  
Cumberland, Maryland 21502  
240-362-7040

**THE SENATE OF MARYLAND**  
**ANNAPOLIS, MARYLAND 21401**

*Joint Committees*  
Administrative, Executive,  
and Legislative Review  
Children, Youth, and Families  
Program Open Space and Agricultural  
Land Preservation

*Williamsport Office*  
2N Conococheque Street  
Williamsport Town Hall  
Williamsport, Maryland

January 24, 2025

RE: Fire/EMS Coalition Opposition for SB436

Dear Chairman Feldman, Vice Chair Kagan, and Members of the Committee,

The Fire/EMS Coalition would like to express their opposition for Senate Bill 436:  
**Maryland Department of Labor – Study on Building Code Requirements for Single-Staircase Buildings.** This bill will require the Maryland Department of Labor to study building code requirements for single-staircase buildings in Maryland and other States and analyze best practices when drafting building code requirements.

The Fire/EMS Coalition opposes Senate Bill 436 because we believe this could potentially make our fire/building code weaker and create a precedent where citizens could be at risk.

Sincerely,

A handwritten signature in blue ink that reads "Mike McKay".

Senator Mike McKay  
Representing the Appalachia Region of Maryland  
Serving Garrett, Allegany, and Washington Counties

**Voting Organizations:**

**Maryland Fire Chief's Association (MFCA)**  
**Maryland State Firefighter's Association (MSFA)**  
**State Fire Marshal (OSFM)**  
**Maryland Fire Rescue Institute (MFRI)**  
**Maryland Institute for Emergency Medical Services System (MIEMMS)**  
**Metro Fire Chief's Association**  
**Professional Firefighters of Maryland**

**Our Mission Statement**

The Maryland Fire/EMS Coalition unites Republicans and Democrats in support of fire/emergency services legislation that benefit all first responders. Becoming a member does not require taking positions on legislation; rather Coalition members are asked to offer support in a way that best benefits fire/emergency services in their respective Legislative Districts.

**SB436 testimony.pdf**

Uploaded by: Robert Phillips

Position: UNF



# MARYLAND STATE FIREFIGHTERS ASSOCIATION

*Representing the Volunteer Fire, Rescue and Emergency Medical Services Personnel  
-a 501(c)3 Organization*



## **Legislative Committee**

17 State Circle  
Annapolis MD, 21401  
Chair: Robert Phillips  
Email: rfcchief48@gmail.com  
Cell: 443-205-5030  
Office: 410-974-2222

## **SB 436: Maryland Department of Labor – Study on Building Code Requirements for Single–Staircase Buildings**

My name is Chief Robert Phillips, and I am the Legislative Committee Chair for the Maryland State Firefighters Association (MSFA)

I wish to present testimony in opposition to **Senate Bill 436: Maryland Department of Labor – Study on Building Code Requirements for Single–Staircase Buildings**

The MSFA opposes this bill because we feel the standard and code are correct in their present form. The present code allows for a single stairway up to four floors and a second stairway above that. WHY? Right now if a fire company arrives to an emergency and we need to remove people from a building with the ground ladders carried on the average engine then we are limited to the first four stories. If we need to assist above the fourth floor then we need to get an aerial device next to the building to assist the people above the fourth floor. This bill seeks to extend the number of floors or stories to six before we need to install a second stairway. With the passage of this bill we will not be in compliance with the fire code, why would we do this. With the passage of this bill, history tells us that we are not becoming more safe, it tells us that we are lowering the safety factor for our citizens and guests to the state of Maryland. As a fire chief and fire ground commander I have never seen forward progress by lowering the standards. Lowering the standards is not the future it is a recipe for disaster.

The MSFA asks that you return a NOT-FAVORABLE vote on SB 436

Thank you and I would be glad to answer any questions you might have.

Respectfully:

*Robert Phillips*



# **SB 901**

Uploaded by: Scott Schloegel

Position: UNF



**MOTORCYCLE  
INDUSTRY  
COUNCIL®**



February 20, 2025

Senate Committee on Education, Energy, and the Environment Committee  
11 Bladen St  
Miller Senate Office Building  
Annapolis, MD 21401

**Re: MIC, SVIA, and ROHVA Oppose EPR Applicability to Powersports: SB 901**

Dear Chair Feldman and Members of the Committee:

The Motorcycle Industry Council (MIC)<sup>1</sup>, the Specialty Vehicle Institute of America (SVIA)<sup>2</sup>, and the Recreational Off-Highway Vehicle Association (ROHVA)<sup>3</sup> represent several hundred companies in the powersports industry. MIC, SVIA, and ROHVA oppose the applicability of extended producer responsibility (EPR)-related requirements to powersports products, including motorcycles, off-highway vehicles (OHVs), EV batteries, replacement parts, accessories, and protective gear and clothing.

Many powersports dealers and retailers are small businesses who can ill afford increased cost and regulatory requirements. Erecting additional barriers and cost requirements through legislation only serves to create an environment for powersports businesses where options become more limited to respond to economic challenges. Ultimately, when the cost of doing business increases, it hurts everyone – consumers, manufacturers/distributors, and dealers – and Maryland residents will likely seek alternatives such as purchasing from neighboring states/communities where goods won't be subject to expensive compliance costs.

SB 901 would implement EPR-related requirements for packaging. MIC, SVIA, and ROHVA urge caution when seeking to implement a similar program in Maryland. It remains unclear what the financial responsibility of our member companies will be as the few programs that are currently required by law are still in their implementation phases. Our concern is that the costs of these programs will be significantly higher than what may have been predicted. We urge you to take an incremental approach and limit any new programs only to producers that have the largest footprint through online retailers and not apply any requirements to powersports products, which are relatively lower volume, durable goods.

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<sup>1</sup> The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing several hundred manufacturers, distributors, dealers and retailers of motorcycles, scooters, motorcycle parts, accessories and related goods, and allied trades.

<sup>2</sup> The Specialty Vehicle Institute of America (SVIA) is the national not-for-profit trade association representing manufacturers and distributors of all-terrain vehicles (ATVs) in the United States. SVIA's primary goal is to promote safe and responsible use of ATVs.

<sup>3</sup> The Recreational Off-Highway Vehicle Association (ROHVA) is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. More information on the standard can be found at <https://rohva.org/ansi-standard/>.

Thank you for your consideration of these comments. Should you have any questions, please do not hesitate to contact me at [sschloegel@MIC.org](mailto:sschloegel@MIC.org) or 703-446-0444 x 3202.

Sincerely,



Scott P. Schloegel  
Senior Vice President, Government Relations

Cc: Sen. Sara Love

# **Maryland State Police Position Paper - SB0436.pdf**

Uploaded by: Owen Traynor

Position: INFO



**State of Maryland**  
**Department of State Police**  
Government Affairs Unit  
Annapolis Office (410) 260-6100

**POSITION ON PROPOSED LEGISLATION**

**DATE:** February 20, 2025

**BILL NUMBER:** Senate Bill 436                      **POSITION:** Letter of Information

**BILL TITLE:** Maryland Department of Labor-Study on Building Code Requirements for Single-Staircase Buildings

**REVIEW AND ANALYSIS**

This legislation requires the Maryland Department of Labor to conduct a study on building code requirements for single-staircase buildings in the state and other states. The Department of Labor shall consult with a fire engineer from a public institution of higher education and a representative of a union that represents firefighters.

The matter of single-exit residential buildings has been addressed by action of the International Code Council at the Council's second round of public hearings for the 2027 edition of the International Building Code. The revised wording to that code would permit buildings up to and including four stories in height to be constructed with a single exit stair with certain other protective features. That arrangement was agreed upon by all interested parties, including the original proponent for the six-story design, except for the IAFF which was opposed to any building more than three stories in height to be served by a single exit.

Since NFPA 101, as currently referenced by the State Fire Prevention Code, already permits a residential building of four or fewer stories to be served by a single exit, these latest actions by the International Code Council would correlate the requirements of the building code with those already stated in the fire code. The only action needed in Maryland to correlate these requirements would be to amend the 2021 edition of the International Building Code as currently referenced by the Maryland Building Performance Standards to recognize the revisions to the building code authorizing a four-story building to be served by a single exit.

Any study regarding changing the fire code or Maryland Building Performance Standards should include a consultation with the Office of the State Fire Marshal. as such, the Department of State Police recommends the following amendment; Insert on page 2 in line 24, (3) The State Fire Marshal or their Designee.

Adding this amendment to the bill would allow the Office of the State Fire Marshal to provide their collective expertise in both state and national building performance standards as it relates to any recommendations required by Senate Bill 436.

The Office of the State Fire Marshal and the Department of State Police look forward to working with the committee on amendments should they wish to move forward with Senate Bill 436.