



March 9, 2026

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

RE: Letter of Opposition
HB 1217 Climate Solutions Affordability Act

Dear Chair Korman and Members of the Committee,

As a board member representing nearly 2,000 architects, on behalf of AIA Maryland, I write to express strong opposition to House Bill 1217, which proposes an exemption for buildings that received an occupancy permit before June 1, 2022 to comply with Building Energy Performance Standards (BEPS) or energy use intensity (EUI) targets developed in accordance with the Climate Solutions Now act, until it becomes necessary to replace HVAC systems, or other major components of the building due to component failure or the end of useful life of those components.

The BEPS standards were established with a goal of a reduced carbon footprint for the state, and a process of transition that does not create undue hardship, but one that allows for a transition toward our zero carbon goal by 2040. Several blanket exemptions were added to the bill that passed in 2025, which directly reduces the number of buildings affected, and it allowed onsite renewable energy generation to be sued against the EUI standards. The standards were set to give owners flexibility in achieving goals, but eventually track toward zero carbon. The reduced carbon goals were established with the goal of trying to minimize the adverse effects to the shoreline/sea level rise and reduce the number of asthma-related health effects that disproportionately impact low to moderate income communities.

Modifying the narrative of the GHG reduction requirements in the Climate Solutions Act for buildings with occupancy permits prior to 2022 only creates one more exemption, and encourages a longer line of those seeking special exemption from the regulations. Providing a loophole like the proposed language diminishes the incentive for compliance with the greenhouse gas emissions and would almost certainly lead to more appeals for leniency and yield lower achievement of GHG emission reductions, affecting our statewide goals. With the average useful life of most commercial building mechanical systems being in the range of 15-25 years, properties with an occupancy permit prior to 2022, will be 18 years old by 2040 and their equipment will likely be in need of replacement, or nearing the end of its useful life by the time we reach 2040.

The Maryland Clean Buildings Hub has compiled resources to help property owners navigate through energy reporting, sharing of information to help make well informed energy investments and identify technical resources to answer specific questions. Compliance with the standards will lead to long term cost benefits for properties who do align with the BEPS guidelines and accommodations in the regulations were set to enable a transition to happen when it makes economic and practical sense. Properties with similar requirements in at least 30 other jurisdictions are meeting similar or higher thresholds. These jurisdictions include Washington DC, Montgomery County, Boston, New York City, Colorado, Washington state and many others. There is nothing unique to Maryland that would make projects any more economically challenged here than these other jurisdictions where properties are required to comply.

We urge you to hold fast to the regulations established in the Climate Solutions Act. Do not grant a change that allows more properties to simply opt out of compliance because they state that it is economically impracticable. Please **reject House Bill 1217** in favor of maintaining the well-considered goals of the Climate Solutions Act.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Parts", with a long horizontal stroke extending to the right.

Chris Parts, AIA

Director, Past President, AIA Maryland