

MMHA - 2026 - HB 848 - Valet Trash.pdf

Uploaded by: Aaron Greenfield

Position: FAV



Bill Title: House Bill 848, Public Safety - State Fire Prevention Code - Trash and Recyclable Materials

Committee: House Environment & Transportation Committee

Date: February 25, 2026

Position: Favorable

This testimony is offered on behalf of the Maryland Multi-Housing Association (MMHA). MMHA is a professional trade association established in 1996, whose members consist of owners and managers of more than 210,000 rental housing homes in over 958 apartment communities. Our members house over 538,000 residents of the State of Maryland. MMHA also represents over 250 associate member companies who supply goods and services to the multi-housing industry.

House Bill 848 incorporates sections 30.7.5 and 31.7.5 of the National Fire Prevention Association (NFPA) Life Safety Code (2024 Edition) into the State Fire Prevention Code. This legislation will enable the placement of trash and recycling materials in corridors and exits in accordance with the NFPA Life Safety Code, allowing for the implementation of valet trash services in multi-family housing communities.

MMHA strongly supports this bill because it will have a positive impact on the operational efficiency, resident satisfaction, property cleanliness, and financial performance of our member properties. By permitting valet trash services, property owners and managers can shift waste collection responsibilities from their staff to trained service personnel, reducing the burden on onsite teams and allowing them to focus on leasing, resident services, and maintenance priorities.

Valet trash services also provide numerous benefits to residents, including increased convenience, improved overall experience, and enhanced satisfaction. This amenity can be a differentiator for properties, attracting and retaining residents who value the simplicity and ease of doorstep collection. Furthermore, structured collection windows and centralized waste handling help prevent trash from accumulating in common areas, promoting compliance with disposal rules and maintaining community standards and appearance.

In addition to these operational and resident-focused benefits, valet trash services can provide measurable return on investment for property owners and managers. By supporting rent premiums or amenity fees, reducing maintenance and cleanup costs associated with improper trash disposal, and helping protect property value, these services can contribute to the financial performance of a property.

Finally, professional collection reduces risks tied to waste handling, including safety hazards, sanitation issues, and resident complaints. Standardized procedures and trained



personnel can help ensure waste is properly transferred to designated disposal areas, reducing liability exposure for property owners and managers.

House Bill 848 will enable the implementation of valet trash services in multi-family housing communities, promoting operational efficiency, resident satisfaction, property cleanliness, and financial performance.

For these reasons, we respectfully request a favorable report on House Bill 848.

Aaron J. Greenfield, MMHA Director of Government Affairs, 410.446.1992

AOBA HB848 FAV.pdf

Uploaded by: Brian Anleu

Position: FAV



Bill: **HB 848 - Public Safety - State Fire Prevention Code - Trash and Recyclable Materials**

Committee: **Environment and Transportation**

Date: **February 25, 2026**

Position: **Favorable**

The Apartment and Office Building Association (AOBA) of Metropolitan Washington is a nonprofit trade association representing the owners and managers of more than 23 million square feet of commercial office space and 167,000 apartment rental units in Montgomery and Prince George's counties. AOBA submits the following testimony in support of House Bill 848.

HB 848 incorporates Sections 30.7.5 and 31.7.5 of the National Fire Protection Association (NFPA) Life Safety Code (2024 Edition) into Maryland's State Fire Prevention Code. NFPA develops its codes through a rigorous, ANSI-accredited consensus process that includes fire officials, engineers, building owners, insurers, and public safety experts. All proposed changes are publicly vetted, debated, and subject to formal appeals before final adoption, ensuring transparency, technical integrity, and balanced stakeholder input.

HB 848 does not diminish fire safety protections; rather, it modernizes the code to reflect established best practices that are already in effect in other jurisdictions. By incorporating the relevant provisions of the NFPA Life Safety Code, this legislation will allow for the placement of trash and recyclable materials in corridors and exits in accordance with nationally recognized fire safety standards, thereby enabling the continued use of valet trash services in multifamily communities.

AOBA strongly supports this legislation because it aligns Maryland's fire code with national standards while supporting modern residential operations in a safe and structured manner. Valet trash service is already a meaningful amenity to multifamily residents in Montgomery and Prince George's Counties with 4,873 and 7,263 units utilizing this service in each county, respectively. HB 848 provides important statutory clarity to ensure these services can operate in compliance with nationally recognized safety protocols.

From an operational standpoint, valet trash services improve efficiency by shifting waste collection responsibilities from tenants and onsite property management staff to trained third-party personnel operating within defined collection windows. This allows management teams to focus on core responsibilities such as maintenance, leasing, compliance, and resident services, while ensuring waste is handled in an orderly and timely fashion.



For residents, valet trash service offers convenience and improved quality of life. Structured collection times and standardized procedures reduce the likelihood of trash accumulation in common areas and encourage consistent compliance with disposal policies. This is particularly important for high-rise buildings with trash chutes that are often out of service due to clogs or damage.

Additionally, valet trash service supports the financial sustainability of rental housing communities by offsetting operational costs; reducing maintenance and cleanup expenses associated with improper disposal; and supporting long-term asset preservation. This flexibility is essential to maintaining quality housing stock in a challenging operating environment marked by rising costs and regulatory pressures.

For these reasons, AOBA respectfully requests a favorable report on House Bill 848. For more information, please contact Brian Anleu at banleu@aoba-metro.org.

Stein Testimony HB 848.pdf

Uploaded by: Dana Stein

Position: FAV

DANA M. STEIN
Legislative District 11B
Baltimore County

Environment and Transportation
Committee

Chair
Environment Subcommittee

Joint Committee on Legislative Ethics



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The Maryland House of Delegates

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Delegate Stein's Testimony in Support of House Bill 848 Public Safety - State Fire Prevention Code - Trash and Recyclable Materials

Chair Korman, Vice Chair Guyton, and Fellow Members of the Environment and Transportation Committee:

House Bill 848 is a short bill that aligns Maryland's Fire Prevention Code with the requirements of the National Fire Protection Association's *101 Life Safety Code*, 2024 Edition, as it relates to valet trash services.

First, what is valet trash collection? Valet trash is a waste management solution for multi-family housing communities that allows residents to place their trash outside their unit doors for scheduled pickup by professional service providers.

This bill is needed to enable these services to continue in Maryland.

In the 2024 Edition of *101 Life Safety Code*, the National Fire Protection Association (NFPA) adopted standards to regulate valet trash collection services. However, last year Maryland's Fire Prevention Commission, when adopting the 2024 Edition, deleted the sections related to valet trash collection services and added specific language to prohibit trash or recyclables from being placed in exits, hallways, or an egress balcony for pickup.

This action has kept apartment buildings, condos, or other multi-family dwellings from utilizing this trash pickup service.

The State should not dismiss the work done by NFPA on this issue. "The NFPA standards development process offers a way to establish codes that are both technically robust, practically applicable—and most importantly—created to help protect lives and property from fire and other hazards." All NFPA standards are revised and updated every three to five years, in revision cycles that begin twice each year. Normally, a standard cycle takes approximately two years to complete which means the NFPA's process is lengthy and well vetted.

Second, what are NFPA's standards for valet trash collection? There are five key components:

- Containers cannot exceed a capacity of 15 gallons in corridors, which is roughly the size of the trash can most of us use in our homes and offices.

- Containers must be of liquid-tight construction and be equipped with lids in fully closed positions.
- Containers must be constructed entirely of noncombustible materials and pass certain safety standards.
- Combustible trash or recycling materials shall not occupy a corridor for a single period exceeding 5 hours.
- Containers cannot obstruct the minimum egress width required by the *Life Safety Code*.

These safeguards are in addition to all others required by the *Life Safety Code*.

Third, why is valet trash collection service important?

1. Residents directly benefit from these services. In buildings without garbage chutes, residents must schlep their trash to an outdoor dumpster in all weather conditions. Valet trash collection is also safer for residents, particularly the elderly or disabled, because they don't have to carry trash bags down flights of stairs to the dumpsters.
2. For property managers and owners, the service provides consistent waste removal and reduces odors and pests when residents do not dispose of waste properly. Since the NFPA sets limits on how containers are stored in corridors and materials must be removed daily, it keeps the corridors clear.
3. These services provide better waste management practices. Since trash is removed daily and placed correctly in the dumpster or recycling containers, the service results in cleaner properties that increase overall appeal and allow environmentally sound recyclable collections.

Given that the NFPA took time and substantial effort to consider the concerns of firefighters, property managers, and the public, when it wrote its regulations for valet trash collection, HB 848 simply ensures that valet trash collection services can continue in Maryland under these national standards. To the best of my knowledge, Maryland is the only state to prohibit this service.

In addition, I want to point out that the Professional Fire Fighters of Maryland submitted written testimony in support of this bill.

Therefore, I ask for support for HB 848.

HB0848_FAV_Valet Living_Public Safety - State Fire

Uploaded by: Danna Kauffman

Position: FAV



House Environment and Transportation Committee
February 25, 2026

House Bill 848 – *Public Safety – State Fire Prevention Code – Trash and Recyclable Materials*
POSITION: SUPPORT

On behalf of our client, Valet Living, we support *House Bill 848: Public Safety – State Fire Prevention Code – Trash and Recyclable Materials*. Valet Living provides valet trash collection services to approximately 122 buildings (33,895 units) throughout Maryland. House Bill 848 addresses valet trash collection services, which are used in apartments and other multi-family buildings where residents place trash and recyclable materials outside their units at designated times for pickup and removal from the building by a service provider. The most recent edition of the National Fire Protection Association 101 Life Safety Code (2024) includes provisions that regulate, not prohibit, this service to ensure that it is conducted safely (Subsections 30.7.5 and 31.7.5). Therefore, House Bill 848 simply aligns Maryland’s Fire Prevention Code with the National Fire Protection Association 101 Life Safety Code (2024 Edition) (NFPA 101).

House Bill 848 is necessary to reverse the State Fire Prevention Commission's (Commission) actions last summer, which would effectively eliminate valet trash services in Maryland. On June 23, 2025, the Commission adopted final regulations incorporating by reference the 2024 edition of NFPA 101. In so doing, however, the Commission made several amendments, including deleting Subsections 30.7.5 and 31.7.5 in their entirety and adding language that prohibits trash or recyclable materials awaiting scheduled collection from being placed in exits, exit access corridors, or on egress balconies.

Prior to the 2024 Edition, the NFPA 101 did not address valet trash collection services. It is important to note that the NFPA did not eliminate the service; instead, given its popularity among residents and property managers, the NFPA set requirements to ensure it is provided safely. The NFPA 101 (2024 Edition) specifies approved container types, maximum storage amounts, placement restrictions to keep hallways, balconies, and stairways clear, and time limits for how long trash and recyclable materials must remain before pickup. Typically, service providers provide this service five nights a week; therefore, clearing materials happens almost daily. The NFPA 101 (2024 edition) also requires containers to be constructed of fire-resistant materials and positioned so as not to obstruct egress or fire protection systems.

Without this collection, residents often leave trash and recyclables outside their units or in a designated room in the building for extended periods. Valet trash collection enhances public safety by keeping hallways, stairwells, and balconies clear of combustible materials, reducing the risk of ignition and fire spread. Using fire-resistant containers and limiting how long trash can accumulate ensures safe evacuation routes and easier access for emergency responders. In addition, ensuring the timely removal of household trash in approved containers promotes cleaner common areas, reduces exposure to pests and odors, supports recycling and waste management initiatives,

and enables property managers to operate more effectively while maintaining public health and safety.

The Commission's action to prohibit this service makes Maryland an outlier. The NFPA gave careful consideration in adopting these standards, and, to the best of our knowledge, there has been no triggering event in Maryland to support their deletion. Therefore, we respectfully request a favorable vote on House Bill 848.

For more information:

Danna L. Kauffman

J. Steven Wise

Andrew G. Vetter

Christine K. Krone

410-244-7000

On Behalf of Valet Living

HB848 FAV Buddle Professional Fire Fighters of Mar

Uploaded by: Jeffrey Buddle

Position: FAV



Written Testimony in Support of HB848

Public Safety – State Fire Prevention Code – Trash and Recyclable Materials

Position: Favorable

The Professional Fire Fighters of Maryland (PFFMD) supports House Bill 848. House Bill 848 simply aligns Maryland's Fire Prevention Code with the standards adopted by the National Fire Protection Association (NFPA) 101 Life Safety Code regarding valet trash collection services. When adopting standards, the NFPA undertakes a rigorous review process. All NFPA standards are revised and updated every three to five years through a public schedule that includes final dates for each stage of the standards development process. A standard's cycle takes approximately two years to complete.

In adopting the 2024 Edition, the NFPA examined valet trash collection services and, for the first time, adopted standards around the service, which included requirements on container type, container size specifics, placement, and time limits for trash and recycling pickup.

However, when the State Fire Prevention Commission adopted the NFPA 101 Life Safety Code, it deleted provisions on valet trash collection and added prohibiting language. Given the work of the NFPA on this issue, the PFFMD supports the work of the NFPA Bill and supports House Bill 848 to return Maryland to the national standards. We respectfully request a favorable vote on House Bill 848.

Submitted respectfully,

Jeffrey Buddle, President
Professional Fire Fighters of Maryland
International Association of Fire Fighters, Local A-19, AFL-CIO

The membership of the Professional Fire Fighters of Maryland includes 23 IAFF local affiliates from the following jurisdictions:

Federal: National Capital Federal Fire Fighters

State: Baltimore / Washington International Airport

Local: Annapolis City, Allegany County, Anne Arundel County, Baltimore City (2 affiliates), Baltimore County, Carroll County, Cecil County, Charles County, Cumberland City, Frederick County, Garrett County, Hagerstown, Howard County, Montgomery County, Ocean City, Prince Georges County, Queen Annes County, Salisbury, Talbot County, Worcester County

Maryland Recycling Network - Favorable - HB848 Sta

Uploaded by: Peter Houstle

Position: FAV



February 25, 2026

**To: Maryland House Environment and Transportation Committee
Re: HB848 Public Safety – State Fire Prevention Code – Trash and Recyclable Materials
SUPPORT**

Maryland Recycling Network members are public and private sectors recyclers and recycling advocates. Our members are county and municipal government sustainability and recycling managers, private sector recyclers, non-profit recyclers and citizens who support recycling. We have direct experience operating recycling and composting programs at the county and municipal government level. We know the ins and outs of recycling in Maryland. Our experience informs our comments.

We promote sustainable reduction, reuse and recycling (the 3 "R's") of materials otherwise destined for disposal and the purchase of products made with recycled material content. We achieve these goals through educational programs, advocacy, technical assistance, and the development of markets to purchase recycled materials and manufacture products with recycled content.

We support HB 848

HB 848 strengthens fire code requirements for recyclables and waste materials while also allowing "valet" trash and recycling services to pick up both types of containers when placed in the corridors and exits of apartment buildings. This approach ensures safety while also making it easier for apartment residents to recycle. If their building offers the valet system, they can leave both recyclables and trash in separate containers for collection instead of taking them to the basement or outside to a collection area. This makes recycling more convenient and user-friendly.

We thank Delegate Stein for introducing this bill and urge its speedy passage.

The Maryland Recycling Network is a resource for legislators and others interested in recycling and waste reduction. Contact us at phoustle@marylandrecyclingnetwork.org, or 301-725-2508, or MRN, PO Box 1640, Columbia MD 21044, if you have any questions or would like additional information regarding our comments.

Sincerely

Chaz Miller
Chair, MRN Legislative Committee

Testimony in support of HB0848 - State Fire Preven

Uploaded by: Richard KAP Kaplowitz

Position: FAV

HB0848_RichardKaplowitz_FAV
02/25/2026

Richard Keith Kaplowitz
Frederick, MD 21703

TESTIMONY ON HB#/0848- POSITION: FAVORABLE

Public Safety - State Fire Prevention Code - Trash and Recyclable Materials

TO: Chair Korman, Vice Chair Guyton, and members of the Environment and Transportation Committee

FROM: Richard Keith Kaplowitz

My name is Richard Keith Kaplowitz. I am a resident of District 3, Frederick County. I am submitting this testimony in support of HB#/0848, **Public Safety - State Fire Prevention Code - Trash and Recyclable Materials**

This bill is personal to me; my daughter-in-law is a Captain in the Montgomery County Fire Department. This is a bill to have Maryland adopt national standards governing placement of trash and recycling in specific locations that support protection of life and safety.

The bill requires the State Fire Prevention Commission to adopt regulations that incorporate by reference sections 30.7.5 and 31.7.5 of the National Fire Prevention Association (NFPA) Life Safety Code (2024 Edition) and authorize the placement of trash and recycling in corridors and exits in accordance with the NFPA Life Safety Code.

To protect our first responders Maryland should use the most up-to-date life safety codes.

I respectfully urge this committee to return a favorable report on HB#/0848.

MSP Position on HB0848.pdf

Uploaded by: Nicole Jordan Jones

Position: UNF

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

POSITION ON PROPOSED LEGISLATION

This legislation also creates regulatory inflexibility by mandating the incorporation of specific sections from a single edition of the NFPA Life Safety Code. Embedding fixed references in statute establishes a rigid framework that may quickly become outdated as model codes evolve to reflect new safety data, technologies, and best practices. Maintaining alignment with current standards would then require repeated legislative action, rather than allowing the Commission to update regulations through its established process.

Residential trash and recyclable materials often contain unknown hazardous contents, including lithium-ion batteries, flammable liquids, and items capable of spontaneous combustion. When placed in egress pathways, these materials increase fire risk and contribute to dangerous fuel loads.

House Bill 848 provides no clear enforcement mechanism to limit the volume or duration of material placement, creating ambiguity for inspectors and enforcement personnel. Determining whether materials are temporarily awaiting collection or being improperly stored would place an undue burden on local jurisdictions and complicate compliance efforts. MDSP and OSFM believe the bill undermines established regulatory processes, reduces flexibility in fire safety standards, and introduces unacceptable risks to occupant and responder safety.

For these reasons, the Maryland Department of State Police urges the Committee to give House Bill 848 an unfavorable report.

HB848 Testimony Public Safety – State Fire Prevent

Uploaded by: Robert Phillips

Position: UNF

MARYLAND STATE FIREFIGHTERS ASSOCIATION, INC.

-a 501(c)(3) organization

Representing the Volunteer Fire, Rescue and Emergency Medical Services Personnel



Legislative Committee

17 State circle

Annapolis, MD 21401

Chair: Chief Robert Phillips

Office: 410-974-2222

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HB848: Public Safety – State Fire Prevention Code – Trash and Recyclable Materials

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 opposed to **House Bill 848: Public Safety – State Fire Prevention Code – Trash and Recyclable Materials**

The MSFA is opposed to this bill. We understand that this type of collection presently takes place and for the most part has had no issues. We feel that given enough time there will be an issue with life safety due to trash/garbage containers being left in the exit ways of buildings when first responders are entering the buildings and people are trying to exit the buildings during an emergency. The MSFA feels that there are ways to make this a more safe situation and that there should be further work and study put into this before passing a bill, then finding out there are life safety problems which could have been avoided. One example would be limiting the use of this service to only buildings that have fully sprinklered hall/exit ways to protect people who are trying to get out of a building while first responders are entering the building.

The MSFA asks that you return an **UNFAVORABLE** report on **HB848**.

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

Respectfully

Robert Phillips

