

AIA Vermont

A Chapter of The American Institute of Architects

May 9, 2013



Mr. Robert Patterson
Deputy Director
Vermont Department of Public Safety, Division of Fire Safety
1311 U.S. Route 302, Suite 600
Barre, Vermont 05641

Dear Bob:

As president of AIA Vermont (AIAVT), I'm writing to offer our organization's position regarding an aspect of Vermont's 2012 Access Rules: namely, the requirement for vertical access in public spaces of as little as 1,000 SF. AIAVT believes this requirement, which is far stricter than the national level requirement, is likely to bring about unintended, negative consequences for our state. We urge you to consider our opinion while modifications to the 2012 Vermont rules are being made. We support maximizing accessibility and reducing barriers, but believe that the carefully considered ADA standard (3,000 SF) for vertical access is appropriate for Vermont.

AIAVT believes the state's unique requirement for vertical access in public buildings between 1,000 to 2,999 SF is impractical. Under this rule, in a 1,000 SF structure, two sets of stairs and one elevator easily use up 500+ SF, leaving merely 500 SF (the equivalent of a two-car garage) of usable space. Even a multi-story infill with a footprint of 40'X70' (2800 SF) would not be economically viable due to the new access requirement. The rule thus renders plans to build or rebuild/renovate/adaptively reuse/restore on small town lots virtually unfeasible; the costs to purchase, operate, and service an elevator become too great for such projects.

The significant, undesirable effects of the new access rule on potential development in our state will likely be multiple. One or a combination of three scenarios is likely. In order to afford the costs of an elevator, development will likely tend towards large buildings not in keeping with the character of rural Vermont villages. A second consequence may be the migration of development to suburban and rural areas where one-story buildings with large footprints, but requiring no elevator, can more easily proliferate. Yet a third consequence is likely to be an increase in townhouse developments. Since the 2012 Vermont rules (Chapter 11.4(c)) eliminate the requirement for elevators in such developments, this might become the only or most common typology affordable to developers.

In sharing the scenarios described above, it is AIAVT's hope to make you aware that desires to increase accessibility in Vermont may lead to patterns of development that are not aligned with state and regional planning goals. Such patterns will encourage suburban sprawl.

Again, AIAVT believes that the ADA 3000 SF threshold represents a reasonable balance between maximizing accessibility and minimizing development costs. Our membership of over 250 architects are eager maintain the pattern of small buildings and village scale that most Vermonters enjoy and appreciate.

Warm Regards,

A handwritten signature in cursive script, written in a reddish-brown ink. The signature reads "Tom W. Bachman" and is written in a fluid, personal style.

Tom W. Bachman
President, AIA Vermont

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