

MEMORANDUM

To: AIA MA GAC
From: John Nunnari
Date: 10/15/25
Re: Legislative and Regulatory Update

Legislative Update:**Since the last Update**

Throughout September and early October 2025, state leaders grappled with tightening fiscal conditions and growing pressure to set policy priorities before the end of the legislative session. Early in the month, the administration focused on stabilizing spending in response to slowing revenue growth and the need for midyear adjustments to the FY26 budget. Legislative leaders emphasized infrastructure and transportation investments, while also beginning to shape economic development and housing proposals aimed at addressing regional disparities. Informal negotiations on pending bond and tax legislation signaled the start of a more active fall agenda, with lawmakers positioning key bills for advancement before winter recess.

By early October, fiscal realities had overtaken earlier optimism. Administration officials acknowledged potential multibillion-dollar revenue shortfalls, compounded by reduced federal support and uncertainty in local aid formulas. Municipal leaders and advocacy groups pressed for clarity on Chapter 90 transportation funding, affordable housing incentives, and workforce development initiatives. At the same time, lawmakers faced increasing political and public scrutiny over competing priorities—from cost-of-living relief to climate-related infrastructure spending. The tone at the State House shifted markedly toward urgency, as both branches sought to balance budget constraints with demands for visible progress ahead of the next legislative deadlines.

Looking Forward

Facing declining federal support and slowing revenue growth, the Healey administration is preparing to revise its fiscal outlook in accordance with state finance law, which requires updated revenue estimates for the remainder of FY26 and for FY27 by October 15. Administration and Finance Secretary Matt Gorzkowicz must account for changes in tax receipts, economic growth, and anticipated federal funding, with projections showing a potential \$3.7 billion shortfall that could trigger midyear spending cuts under Section 9C unless offset by rainy-day fund withdrawals, new taxes, or borrowing. While both legislative chambers have criticized federal funding reductions, the House paired additional spending with calls for caution, and the Senate prepared to consider \$70 million in veto overrides and advance several policy bills, including measures on menstrual product access, highway safety, and removal of outdated and discriminatory statutes.

AIA MA Bill Tracking

To view the current status of all AIA MA tracked legislation, [please click here](#)

A schedule of all Legislative Events can be found on the [Legislative Events](#) of AIA MA's website.

To review previous Legislative or Regulatory Reports or minutes from GAC meetings, please click [here](#)

Regulatory Update:

A schedule of all construction board regulatory meetings can be found on the [Regulatory Events Calendar](#) of AIA MA's website.

Notices of Public Review of Prospective Regulations (09/10/25 – 10/15/25)**225 CMR – Department of Energy Resources**

- September 26, 2025 – **225 CMR 29.00:** Small Clean Energy Infrastructure Facility Siting and Permitting.– [Notice of Public Hearing](#) – Hearing to be held on 10/15/25 @ 7:00 p.m. Written comments accepted until 10/17/25 @ 5:00 P.M.

New Regulations (09/10/25 – 10/15/2025)**310 CMR – Department of Environmental Protection:**

- September 26, 2025 – **310 CMR 6.0** – Ambient Air Quality Standards for Commonwealth of Massachusetts– [Permanent Regulations](#) – **Effective Date: 09/26/2025**
- September 26, 2025 – **310 CMR 7.0** – Air Pollution Control – [Permanent Regulations](#) – **Effective Date: 09/26/2025**
- September 12, 2025 – **310 CMR 80.0** – Underground Storage Tank (UST) Systems – [Notice of Correction](#) – **Effective Date: 10/01/2021**

CMR's tracked include: 105 CMR – State Sanitary Code; 225 CMR 22.00 – 26.00 – Energy Codes; 248 CMR – Plumbing/Gas Fitting Code; 257 CMR – Water Treatment; 271 CMR – Sheet Metal; 310 CMR – DEP; 314 CMR – Water Pollution Control; 521 CMR – Architectural Access; 522 CMR – Boiler Rules; 524 CMR – Elevator; 527 CMR – Fire Code; 528 CMR – Pipefitter and Refrigeration; 780 CMR – Building Code

Copies of all codes listed above can be found on the [State Boards and Construction Regulations](#) page of AIA MA's website

Board of Building Regulation and Standards

At the October 14th BBRS meeting, members approved prior subcommittee minutes and received updates from counsel and staff on several key fronts. The Energy Advisory Committee is being reactivated to resume work on energy code updates, and recent statutory changes now explicitly authorize BBRS to consider greenhouse gas reduction in future code development. Subcommittees reported steady progress: the FPPF recommended recognizing NFPA 72 (2019) as equivalent to NFPA 720 (2015) for carbon monoxide detection, the Residential Code group confirmed that solar setback amendments will move forward under the 10th Edition, and the 11th Edition work is underway with additional committees launching in early 2026. Two code interpretation requests were discussed—one on lab control areas, which was referred to the FPPF for further study, and another from the City of Somerville on vegetative roofs, which raised legal questions about municipal authority under state law and was also referred for review. The next BBRS meeting, which will include a required public hearing on new code proposals, will be scheduled for mid-November.

MA Board of Registration of Architects (MBRA)

At its September 30th meeting, the Board approved amendments to 231 CMR 3.02, updating the state's education requirements for initial registration by examination. The changes replace references to "alternatives to education requirements" with the "NCARB Education Standard," allowing candidates without NAAB-accredited degrees to pursue licensure directly in Massachusetts. Additional edits modernize terminology—substituting AXP for IDP, adopting gender-neutral language, and improving readability. Although some educators expressed concern that the Board voted on new language without broader stakeholder review, they generally supported the move toward multiple licensure pathways and alignment with national standards. Final promulgation is anticipated by the end of 2025.

At its October 14 meeting, the Board welcomed new member Kerry Dietz and approved prior minutes before reviewing and approving a reciprocity application from a Missouri architect. The Board devoted much of its discussion to the growing problem of fraudulent use of architects' seals on plans circulated through online freelance sites, noting that Massachusetts faces more cases than most states. Staff are preparing a joint guidance memo with the BBRS and building officials to help inspectors identify fraudulent submissions, and AIA Massachusetts offered to collaborate with the Massachusetts Federation of Building Officials on outreach and prevention. The Board also received a licensing update showing reduced application backlogs, noted ongoing phishing scams targeting architects, and learned that long-time Board Counsel Lynn Read will retire in November. Finally, members confirmed that recent regulatory updates will align terminology with NCARB standards—replacing “IDP” with “AXP” and adopting gender-neutral language—before entering executive session to review confidential licensing matters.

Board of Fire Prevention Regulations (BFPR)

The next meeting of the board is November 6, 2025.

Board of Elevator Regulation

The next meeting of the board is October 21, 2025.

Massachusetts Sheet Metal Board

The next meeting of the board is November 19, 2025.

Bureau of Pipefitters, Refrigeration Technicians, and Sprinkler Fitters

The next meeting of the board is November 19, 2025.

Board of State Examiners of Plumbers and Gas Fitters

The next meeting of the board is November 5, 2025.

MAAB

At its October 6th meeting, the Massachusetts Architectural Access Board reviewed and acted on a full slate of variance requests ranging from sidewalk reconstruction in Salem to major residential and institutional projects in Boston and Cambridge, generally approving minor deviations where physical or cost constraints were justified. The Board also held a lengthy complaint hearing concerning Dedham High School, where a resident alleged long-standing ADA noncompliance and the tuitioning-out of wheelchair-bound students. Town officials acknowledged that the main elevator remains out of compliance but is scheduled for full modernization in 2026, and that a key-operated LULA is currently used for gym access. The Board reaffirmed that lifts must remain operable whenever spaces they serve are occupied, urged Dedham to update its ADA transition plan and signage, and clarified that ongoing access restrictions may require a formal variance filing.

- END -