

MEMORANDUM

To: AIA MA GAC
From: John Nunnari
Date: 09/05/25
Re: Legislative and Regulatory Update

Legislative Update:**Since the last Update**

During July and August 2025, Beacon Hill politics reflected a blend of urgency, recurring challenges, and routine process management. Early July began with legislators urged to prepare for upcoming action on key bills during the holiday recess. As committees faced tight deadlines, mid-July emphasized rapid responses and swift decision-making. Familiar disputes resurfaced in budget talks and policy debates, producing a sense of déjà vu. By month's end, leaders leaned on standard operating procedures to manage bottlenecks and guide member expectations.

August opened with heightened focus on the rising costs of legal counsel and the strain such expenses place on state resources. Soon after, debates sharpened over who should rightfully shape policy—elected legislators, regulatory agencies, or the courts. With many officials stepping away for summer recess, some matters were left pending for when they returned, underscoring unresolved priorities. Cultural and sporting events briefly lightened the atmosphere, providing distraction from legislative pressures. By late August, attention turned squarely to energy, as concerns about infrastructure, supply, and rising costs highlighted long-term challenges of sustainability and demand management.

Together, the two months revealed a legislature balancing preparation, pressure, and persistence while navigating both familiar debates and emerging issues.

Looking Forward

After Labor Day, Beacon Hill slowed as attention shifted to Washington, with federal politics shaping state priorities. Lawmakers face only eight full weeks before the November 19 deadline for formal business, leaving major bills—including Gov. Healey's supplemental budget—pending. Committees are active on issues from real estate transfer taxes to PFAS contamination, but floor action remains limited. Tensions are rising over immigration, offshore wind, and federal intervention in Boston. Meanwhile, the Boston mayoral race begins to take shape, and Democrats prepare for their Springfield convention to reset priorities after national setbacks, underscoring a fall marked by urgency and uncertainty.

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 (07/08/25 – 09/05/25)

225 CMR – Department of Energy Resources

- July 25, 2025 – **225 CMR 20.00:** Solar Massachusetts Renewable Target (SMART) Program and **225 CMR 28.00:** Solar Massachusetts Renewable Target (SMART) Program 3.0 – [Notice of Public Hearing](#) – Hearing to be held on 07/25/25 @ 1:00 p.m. Written comments accepted until 7/25/25 @ 5:00 P.M.

248 CMR – Board of State Examiners of Plumbers and Gas Fitters

- August 27, 2025 – **248 CMR 3.00 and 11.00:** Administrative and Licensing provisions – [Notice of Public Hearing](#) – Hearing to be held on 08/27/25 @ 9:00 a.m.. Written comments accepted until 8/25/25 @ 5:00 P.M.

310 CMR – Department of Environmental Protection

- August 27, 2025 – **310 CMR 7.00:** Appendix C Operating Permit and Compliance Program – [Notice of Public Hearing](#) – Hearing to be held on 09/30/25 @ 6:00 p.m... Written comments accepted until 10/10/25 @ 5:00 P.M.

New Regulations (07/08/25 – 09/05/2025)

No new regulations promulgated

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

The next meeting of the board is September 9, 2025.

MA Board of Registration of Architects (MBRA)

At its August 12 meeting, the Board held a public hearing to receive comments on proposed amendments to **231 CMR 3.00** that govern eligibility for initial registration, examination procedures, and continuing education exemptions. These updates are intended to align state requirements with NCARB standards and improve regulatory clarity and flexibility. Key updates include:

- **Section 3.02:** Expands eligibility for initial licensure to include non-accredited programs evaluated under NCARB's alternatives and other flexible pathways.
- **Section 3.03:** Clarifies that candidates may begin the ARE while enrolled in or having completed a qualifying program and are registered in the IDP.
- **Section 3.06:** Streamlines continuing education exemptions for out-of-state architects by removing the "substantial equivalency" test.

The Board is expected to meet in closed session during the month of September to consider any amendments, based on public comments, they may want to implement. The Board is expected to vote to promulgate the regulations at their meeting on October 14th.

Board of Fire Prevention Regulations (BFPR)

The next meeting of the board is October 2, 2025.

Board of Elevator Regulation

At its July 15 meeting, the Massachusetts Board of Elevator Regulations reviewed multiple variance requests, including one from 250 Water Street in Cambridge, where the building owner sought relief from the requirement for mid-hoistway emergency access doors in a vivarium elevator. The applicant cited operational hardship due to the building's sensitive laboratory use and risk of contamination. After extensive discussion, the Board granted an extension of the temporary certificate of operation to October 29, 2025, to allow time for a feasibility study and proposal for compliant access. The Board also heard a variance request related to fire recall compliance at 28 Edmonds Road in Framingham, ultimately approving a conditional variance allowing temporary elevator use once certain fire safety upgrades are completed and subject to 90-day inspections. The next meeting of the board is September 16, 2025.

Massachusetts Sheet Metal Board

The next meeting of the board is September 17, 2025.

Bureau of Pipefitters, Refrigeration Technicians, and Sprinkler Fitters

At its July 16 meeting, the Bureau of Pipefitters, Refrigeration Technicians, and Sprinkler Fitters approved several applicants to sit for licensure exams, including out-of-state candidates seeking to work legally in Massachusetts. The Bureau also granted a final apprentice renewal in a unique case where the applicant demonstrated near-completion of training. Applications were denied for repeated absences. The Office of Public Safety reported 45 compliance jobs completed in June and \$1,250 in fines issued, with a 12-month rolling average of \$65,250. Nicole West was introduced as the new District Engineer for the Northeast region. The next meeting of the board is September 9, 2025.

Board of State Examiners of Plumbers and Gas Fitters

The Plumbing Board held a public hearing on August 27, 2025, to review proposed amendments to 248 CMR 3.00 and 11.00. Chair Joseph McNamee emphasized the intent to reduce regulatory burdens while maintaining safety. Public comments were received, including testimony from Columbia Academy regarding apprentice licensing issues, historical coordination with the Secretary of State, and concerns about clarity in journeyman supervision language. Additional testimony highlighted inconsistencies in partial credit provisions for related trade experience. Written comments were also submitted. The Board reiterated that only the proposed amendments were under consideration and formally closed the hearing after all testimony. The next meeting of the board has not been scheduled.

MAAB – Subcommittee on Regulations

The MAAB Subcommittee on Regulations met on July 30, 2025, to refine proposed accessibility regulation changes, focusing on exempted work under the 30% rule, monetary thresholds, and unit accessibility requirements. Members confirmed updating thresholds for inflation and endorsed a 120% building value cap as more precise than a 75% framing, while maintaining exemptions for accessibility-only work. They debated but rejected adopting IEBC alteration levels and extending the lookback period. The group also reviewed aligning requirements with IBC classifications and stressed addressing shortages of affordable, accessible housing. The next meeting of the board is September 24, 2025.

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