

**MAURA HEALEY**  
GOVERNOR



**LAYLA R. D'EMILIA**  
UNDERSECRETARY OF  
CONSUMER AFFAIRS AND  
BUSINESS REGULATION

**KIM DRISCOLL**  
LIEUTENANT GOVERNOR

**SARAH R. WILKINSON**  
COMMISSIONER, DIVISION OF  
OCCUPATIONAL LICENSURE

**Commonwealth of Massachusetts  
Division of Occupational Licensure  
Office of Public Safety and Inspections  
Architectural Access Board**

One Federal Street, Suite 600 • Boston • MA • 02110  
V: 617-727-0660 • www.mass.gov/aab • Fax: 617-979-5459

**ERIC PALEY**  
SECRETARY, EXECUTIVE OFFICE  
OF ECONOMIC DEVELOPMENT

**Subcommittee on Regulations Meeting Minutes January 28, 2026**  
**Remote Teams Meeting**

This meeting was open to the public and began approximately at 10:03 AM.

Subcommittee member attendance:

Jeff Dougan (JD)- Chairperson  
Carol Steinberg (CS)- Vice Chairperson  
Ana Julian (AJ)  
Mike Kennedy (MK)  
Paul Logan (PL)  
Elizabeth Myska (EM)  
Deborah Ryan (DR) – joins at 10:06 AM

Division of Professional Licensure Employees in attendance:

William Joyce –Executive Director (WJ)  
Jamie Dalton- Board Counsel (JaD)  
Molly Griffin – Program Coordinator (MG)

JD opened the meeting for Roll Call:

CS, AJ, MK, PL, EM, DR

- CS: I want to add a statement to the public record and on the minutes.
- JaD: Was this on the agenda, can you tell me the subject matter?
- CS: It's about an editorial that was in the Boston Globe.
- JaD: Do you feel that it is important to discuss at the top of the meeting?
- CS: Yes, because I wanted to ask a question about it after.
- JD: I'm just not sure as a public body I want to comment on that (the editorial).

- JaD: I would advise that if you want to provide this document, that you can share it with the Subcommittee today and discussion can happen at a later meeting. I think we do have public comment listed today, so maybe you can make a comment to the subcommittee as a member of the public and then it wouldn't be an action of the subcommittee is that okay?
- CS: Yes.
- JD: When I get to public comment time at the end, please just yell at me to remind me so you can go first.
- WJ: Ok, so the Board on Monday has voted to fill the vacant seat with David Johnson so hopefully he will join us at the next meeting. His expertise will certainly be invaluable.
- JD: Okay let's start with 207 versus 206.
- WJ: Shares 207 Draft sheet. Did everyone get a chance to look this over?
- CS: I did not, sorry.
- WJ: Okay, this is relatively short. We define means of egress as a route leading to a public way, area of refuge, or an exterior area of rescue assistance. I have looked through the appropriate areas of 780 CMR so the citations are correct in this draft.
- JD: For 207.3 and things like that this isn't necessarily telling you the accessibility needs but what they look like and how many you need, etc.?
- WJ: Yes.
- WJ: The 780 language here is quite good, I think.
- JD: Is this making this a little bit stronger for existing buildings?
- WJ: Those exceptions are going away, and this language is much clearer.
- CS: It sounds good- where did this come from?
- WJ: I wrote it.
- CS: What is stand-by power?
- WJ: So, if the building power goes out it has a battery back-up. It's a common industry term and is covered by the elevator code.
- AJ: For the elevators and platform lifts what would be the requirements and is there an explanation for when you can use an elevator and platform lift as a means of egress?
- WJ: Under current codes you can use it, so this is not changing that it is just making it more explicit and stating that you need standby power.
- MK: No questions, but I like what I see.
- PL: I agree with MK and CS, and for CS think of a generator for standby power.
- EM: I have no questions or comments.
- DR: No comments.
- JD: Motion or thoughts?

Motion to Approve Section 207 by PL

2<sup>nd</sup> by AJ

Roll Call Vote

CS- yes

AJ- yes

MK- yes

PL- yes

EM- yes

DR- yes

JD- yes

7 yes, 0 no, 0 recusals- Motion Passes

- WJ: Okay 206.9 is largely lifted from PROWAG sections R200 and R300. When we put this into the regs, then I will update all the citations in this section.
- JD: I only had a couple things that I had questions on. 206.9.1-is this replacing the current requirement of accessible route around a construction zone?
- WJ: These are general requirements for walkways in general. What you are thinking of is tucked away; this helps make it much more explicit. It is replacing it.
- CS: Does it say somewhere that it applies to private as well?
- WJ: I just stripped away references to public or private ways.
- CS: So, this applies to everything.
- WJ: Yes.
- JD: What about the “Parallel and On-Street” parking?
- WJ: Statutorily we do not have jurisdiction over those, I need to drop those from the draft.
- JD: So, we are not going to address PROWAG’s work about on-street parking.
- WJ: It would take a statutory change to adopt those rules.
- JD: It really would have changed our streetscapes and made it easier for some of the electric vehicle stuff.
- WJ: Our statute only gives us jurisdiction over parking that is off-street and has 15 or more spaces.
- PL: No on-street parking can be discussed in the regulations correct?
- WJ: That is my understanding of our statute yes.
- CS: I feel like before I vote I should look at it – can I have a minute break to look?
- WJ: Most of these are similar or slightly more defined than our current regulations. We are covering crosswalks for the first time. It helps deal with some places where we receive tons of variances a year.
- CS: Are there also signals for crosswalks for people who cannot see?
- WJ: There are activated devices.
- JD: Why don’t we take a 10-minute break.
- CS: Is there anything about snow?
- WJ: That would be covered by our existing requirement that accessible features be maintained.

10-minute break at 10:42 AM- Meeting Resumes at 10:52 AM

- JD: Are there any questions, comments, or concerns about these items?
- CS: Is transitional segment when they put plastic on the ground- what is that?
- DR: It connects adjacent surfaces to provide a smooth transition.
- WJ: This is a variance we receive regularly.
- CS: 206.9.7.1 looks unfinished.

- WJ: Yes, it should name the section below at the end.
- CS: Apex curb cuts look like these are broader than current 521?
- WJ: I think it is stricter. These are lifted straight from the existing regs.
- CS: I had a question about the exception in 206.9.11.1- can you explain the exception?
- WJ: This exists in PROWAG saying you do not need a detectable warning for connections into specific locations (passenger loading zones, on street spaces ).
- CS: EM, what do you think about this?
- EM: I am a white-cane user, but in a parking lot, I know I am in a parking lot.
- CS: What about raised crosswalks?
- JD: 206.9.5 refers to just crosswalks, not raised ones.
- WJ: Raised sidewalks would just get treated like regular sidewalks in our regs. They don't need any special rules- regular sidewalk rules apply.
- CS: So, there is nowhere we could add an encouragement for raised crosswalks?
- WJ: Our regs do not encourage things. You could theoretically do a raised crosswalk, a curb cut, a blended transition.
- CS: Does PROWAG say anything about them?
- WJ: No.
- PL: We cannot offer any opinions in our regs, is that correct?
- WJ: We say what you must do and what you must not do.
- PL: Is there a state regulation for the color for the some of those detectable warnings?
- WJ: The current regs currently only require them to be high contrast.
- PL: Do you get variance requests for those?
- WJ: No.
- PL: Does the AAB distinguish between white and yellow?
- WJ: It just must be high contrast. It depends on the color of the road surface.
- PL: It would be great to have one color- yellow.
- EM: I wanted to comment on the Federal Red color in Beacon Hill and Boston. On October 24, 2025, a group of us (visually impaired people and Mass DOT employees) were doing training and one of the individuals could not see the detectable warning panel. The cast-iron and Federal Red are not enough contrast. For me, yellow is noticeable, and my concern is as they change from plastic to something like cast-iron- it will be harder to discern. I advocate for yellow.
- WJ: The standard currently adopted in PROWAG and our draft – WJ reads the language. If it stopped being high contrast you could file a complaint with us in the future, but not today.
- CS: Is the settlement between the City of Boston and Beacon Hill written down somewhere?
- WJ: It does not matter to us. The big change is we will require detectable warnings, and they will have to be maintained.
- PL: Yellow on light gray is or is not high contrast?
- WJ: I would say it is not. If you have a light base, you need a dark color to contrast it and vice-versa.

- DR: I have seen dark gray on a light concrete walkway; I think that yellow is the best contrast whatever you are putting it against. I'm not a contrast expert, but if I see a clear contrast I think it is fine. Yellow, I think is fine universally.
- PL: The big thing is the gray on the black asphalt.
- DR: Yes, I don't think that is contrast. I don't think red against brick is contrasting at all.
- PL: Could we change the language?
- WJ: I think it would be difficult to change it.
- PL: If we put on next month's agenda and say that the high contrast lines must be yellow, can we do that?
- WJ: I would not recommend that. If we pick a color, we need to get into the specifics of the color, how we define that color, etc.
- PL: I have no problem seeking out the brightest yellow.
- WJ: Is having white lines against a black background not sufficient? We can put it on the agenda, but I would just come with some draft language and have a fallback provision.

Motion to Put this issue (High Contrast Color) on the agenda for next time by CS  
2<sup>nd</sup> by PL

Roll Call Vote

DR- yes

EM- yes

PL- yes

MK- yes

AJ- yes

CS- yes

JD- yes

7 yes, 0 no, 0 recusals- Motion Passes

- CS: 206.9.7.1.2- what does this refer to? What do A and B mean? And "not intended" is a little vague- it seems subjective.
- WJ: We have always deferred to local public safety commissions.

Motion to Approve 206.9.7 by PL  
2<sup>nd</sup> by CS

- DR: Am I reading correctly that 206.9.7.1.2 would require a curb cut at every accessible on street spot? That would not happen in the City of Boston.
- WJ: Do we want to drop 206.9.7.1.2 and leave 206.9.7.1.3?
- JD: I have some hesitation on whether we should include this.
- WJ: I think if we strike 206.9.7.1.2 and leave 206.9.7.1.3 that could work, if not 206.9.7.1.2 would need a complete re-write.
- JD: Right now, the motion on the table accepts everything.
- WJ: Do we want to strike .1.2 and leave .1.3?

- JD: To me that makes more sense.

Motion to Approve 206.9 striking 206.9.7.1.2 by PL

2<sup>nd</sup> by DR

Roll Call Vote

CS- yes

AJ- yes

MK- yes

PL- yes

EM- yes

DR- yes

JD- yes

7 yes, 0 no, 0 recusals- Motion Passes

5 Minute break called at 12:00- Meeting resumes at 12:09 PM

- WJ: Okay, we skipped over section 210 Stairways (scoping), so we can go back to that.
- JD: So, what would you like?
- WJ: I think we need to talk about this. We should probably cut out the language about means of egress.
- JD: We want to cover all stairs.
- WJ: As for the exceptions, I think they are generally fine we can add “or 30% rule section has been triggered” to exception 1.
- CS: Are these exceptions in our regs now?
- WJ: No, but this is a variance that we always end up granting.
- JD: Usually with these, we require a compliant wall-side handrail.
- DR: Maybe that is what we should say.
- WJ: Do you guys want to put in the exception about stair center rails?
- DR: Have you ever denied a handrail request because they are interrupted by a newel post?
- JD: Very rarely.
- WJ: You can cut this out and make it a separate exception.
- DR: My concern is most of the stairways that have winders will also have newel posts in the center.
- CS: How can you say in all situations one-side handrails are sufficient? There are people that need handrails on both sides and won't use the elevator.
- DR: It doesn't mean there won't be handrails on both sides.
- CS: I think it could be interpreted that way.
- WJ: Re-writes exception
- CS: I think making a blanket statement is not helpful.
- WJ: In cases where the Board always grants variances, it is better to write it as an exception.
- DR: Where you see this (winder stairs with newel posts) all the time is in existing schools.

- CS: Do you have any examples?
- WJ: Here's an example of a newel post. WJ shows an image of a residential staircase with newel posts.
- WJ: Okay, let's briefly talk about the other two exceptions.
- CS: I think exception 2 is confusing. I think if you are getting rid of the minimum there is a problem, but if you are getting rid of the uniformity that is fine.
- DR: I found an example of a non-continuous center rail in schools.
- WJ shows image.
- WJ: We give relief almost every meeting for this on the condition that they have a compliant wall-side handrail.
- CS: Can we table this until next time?
- WJ: Exception 3 is easy- it is just stairs that just connect play components in playgrounds.
- CS: I feel incapable of voting on this right now.
- MK: If there are accessibility features, I personally would not have a problem with what is being proposed.
- AJ: Does this section also apply to social stairs?
- WJ: Yes, because we consider those assembly areas.
- JD: Okay so we will pick up on 210 Stairways next meeting.

#### Public Comment

Michael Muehe, BCIL: I feel strongly that the language needs to be tight on handrails. Regarding the idea that there is one compliant handrail, I advocate that it should be the outside handrail. Newel posts are a problem. I would like the language to reflect that. I emailed WJ a draft of a promising design, which maybe could be discussed at the next meeting. I appreciate MK's acknowledgement of John Kelly. I appreciate the discussion of emergency egress as well, when a fire alarm is set off, I am not sure if you all know, the elevators shut off as well in many high-rise buildings. There needs to be an area of safe refuge on each floor. DCR has some good examples of on-street angled parking on Memorial Drive in Cambridge and in downtown Northampton MA. Raised crosswalks and intersections are very important for traffic calming, and these elements need detectable warnings. I think cast-iron detectable warning panels can be designed to be high contrast. Climate crises have led to lighter paving materials being developed, which could lead to issues with high-contrast materials and colors.

Carol Steinberg: reads a letter she wrote regarding the Boston Globe Editorial from December 14, 2025. I would like to write an op-ed about this if I can, but I can't if I am representing the subcommittee's position.

PL: I highly recommend that Michael submit his recommendations to WJ and suggest CS submit her letter as well.

Motion to Approve the Minutes of the October 22, 2025 meeting by PL  
2<sup>nd</sup> by MK

Roll Call Vote

JD- yes

CS- yes

AJ- yes

MK- yes

PL- yes

EM- abstains

DR- yes

6 yes, 0 no, 1 abstention- Motion Passes

Motion to Adjourn by PL

2<sup>nd</sup> by CS

Roll Call Vote

JD- yes

CS- yes

AJ- yes

MK- yes

PL- yes

EM- yes

DR- yes

7 yes, 0 no, 0 abstentions- Motion Passes