

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 Open Meeting Minutes February 25, 2026
Remote Teams Meeting

INFORMATIONAL NOTE: All votes were taken by roll call

This meeting was open to the public and began approximately at 10:05 AM.

Subcommittee member attendance:

Jeff Dougan (JD)- Chairperson
Carol Steinberg (CS)- Vice Chairperson
Patricia Mendez (PM)
Mike Kennedy (MK)
Paul Logan (PL)
Elizabeth Myska (EM)

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, MK, PL, PM, EM

210 Stairways (needed wider discussion)

- WJ: Okay, we left off at 210 Stairs and specifically the exceptions.
- JD: Is it only exception 1 where we have the question?
- WJ: That is just where we left off.
- WJ: Reads notes from previous subcommittee meetings.
- JD: Okay, what do people think?

- PM: Did we already discuss the social stair design or is that within this chapter?
- WJ: We don't consider social stairs to be stairs, so those would be considered assembly areas.
- JD: They were also called Google stairs.
- WJ: Like bleachers, you can only have accessible routes to the top and bottom levels of them.
- WJ: We can go through the exceptions one by one. WJ reads exception 1.
- JD: So, this allows within an existing building, non-uniform tread depth because of the extensive work it would take to fix those?
- WJ: Yes.
- CS: Does this mean we leave stairs that are dangerous? How narrow can they be?
- WJ: This does not set a minimum, and our current regs do not set a minimum. The Board always gives this variance.
- CS: I don't think I can vote for leaving dangerous stairs.
- JD: This is comparable to an elevator. You must do so much more to the building to make changes to the stairs like you would have to do with an elevator.
- WJ: Winders would not meet a minimum tread depth if we put one in.
- CS: My memory of being on the Board is we never allowed winders.
- WJ: In new construction yes, but this would be in existing buildings. This is only in buildings that have an elevator.
- JD: Maybe we add something about having signage to the accessible route.
- PL: That is a good solution.
- WJ: Adds language about signage indicating the accessible route.
- CS: That does not address if someone is visually impaired.
- WJ: This would be subject to our signage rules.
- CS: Can it reference that section?
- WJ: Yes.
- JD: Do we want to vote on exception 1?
- PL: With appropriate signage I think this exception works fine.
- PM: I can confirm on the Board we grant this variance a lot.

Motion to Accept the changes made to Exception 1 of 210.1 by PL

2nd by MK

Roll Call Vote

EM- yes

PM- yes

PL- yes

MK- yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Reads exception 2. This exists because stairs in assembly areas serving seating have different needs than stairs in a regular staircase.
- CS: I think this is dangerous.
- JD: 780 CMR sets the actual tolerances.
- WJ: People can talk about the next exception while I look up some references. Exception 3 exempts play equipment to comply with the stair rules.
- CS: Why?
- WJ: Because they are usually designed differently to comply with the entire play experience.
- JD: They are usually industry standard, and they build in accessibility.
- CS: We are telling designers to do whatever you want.
- WJ: This exception only exists because we are starting to regulate play equipment.
- PL: CS, do you have a recommended idea on how we can change it?
- CS: I think we should not adopt the exception.
- JD: CS, have you seen recently uneven depths? They have been complying with the ADA requirements in recent years.
- PL: What's the next step moving forward?
- JD: I would like to hear from others.

Motion to Approve exception 3 as written by PL

2nd by EM

Roll Call Vote

CS- no

MK- yes

PL- yes

PM- yes

EM- yes

JD- yes

5 yes, 1 no, 0 abstentions- Motion Passes

- CS: Did people know that the requirements were stairways generally and not just tread depth?
- PL: Yes
- WJ: Okay going back to exception 2.
- CS: Unlike exception 1, this does not have the provision that an accessible route is within the building.
- WJ: This is only in assembly areas. It is much more limited.

Motion to Accept exception 2 with the additional language from the building code by CS

2nd by PL

Roll Call Vote

EM- yes

PM- yes

PL- yes
MK- yes
CS- yes
JD- yes
6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Reads last exception.
- CS: Can we put in signage language?
- WJ: I don't think we need it here.
- WJ: This reg is only exempting you from a very narrow thing.
- JD: This is just saying you don't have the continuity through the landings.
- WJ: I am worried about diluting the effect of warning signage by including it in too many places in the code.

Motion to Accept exception 4 with the signage language by CS
2nd by PL

- JD: The MUTCD notes signage fatigue, which I understand, but for elevators they are going to have their own signs for the elevators. In renovations, this would allow for non-continuity.
- CS: I often object when there is no signage as a wheelchair-user.
- JD: I agree, it is important to know where the elevator is, and is part of wayfinding but I am not sure if it is up to us to say where to place a sign at every single staircase.

CS- yes
MK- yes
PL- no
PM- no
EM- no
JD- no
2 yes, 4 no, 0 abstentions- Motion Fails

Motion to Approve exception 4 as written by PL
2nd by PM

Roll Call Vote
EM- yes
PM- yes
PL- yes
MK- yes
CS- no
JD- yes

5 yes, 1 no, 0 abstentions- Motion Passes

- WJ: Okay, so now we are done with 200, I think.
- JD: How about a break right now?

10 Minute break called at 11:24 AM

Meeting resumes at 11:33 AM

606.2

- WJ: Okay we can move on to things that you had previously tabled and never got back to. So, this is 606.2 Clear floor space for sinks, and specifically the exceptions, especially exception 1.
- JD: Reads exception 1.
- WJ: We were looking at 1, 3, and 4.
- WJ: This is trying to capture sinks not primarily intended for hand washing.
- JD: We want a side mounted faucet, right?
- WJ: Yes
- JD: Reads exception with new language WJ wrote.
- CS: Does the ADA say this?
- WJ: I think the ADA's exception is even broader.
- WJ: writes new language. We need sinks in commercial kitchens included because ADAAG does not cover them.
- JD: How about in commercial kitchens that are open to the public that have a wash sink? What if we remove the kitchen sink language and keep the other language?
- CS: I agree.
- MK: I am leaning towards what you offered, JD.
- PL: I would agree also.
- PM: It makes sense to me.
- WJ: A wet bar is a small bar space with a small drink that is intended for preparing drinks.
- CS: Where do we find those?
- WJ: Hotels sometimes, certain amenity spaces.
- CS: Why should wet bars be included?
- WJ: They are there so you can dump something out of a glass or run water over something. It is usually a brief interaction.
- WJ: We can make it so that this exception only applies to wet bars not in accessible rooms or units in transient lodging.
- JD: This does not cover multiple dwellings, right?
-

Motion to Accept exception 1 to 606.2 with new language by PL

2nd by CS

Roll Call Vote

CS- yes
MK- yes
PL- yes
PM- yes
EM- yes
JD- yes
6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Exception 2, for 606.2 – WJ reads exception 2. This explains what removable means.
- JD: Any questions?
- WJ: This is the same as current regs, just better explained.

Motion to Approve exception 2 to 606.2 by PM
2nd by PL
Roll Call Vote
EM- yes
PM- yes
PL- yes
MK- yes
CS- yes
JD- yes
6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Reads exception 3 to 606.2.
- PL: We didn't approve of this already?
- WJ: We tabled this.

Motion to Approve exception 3 of 606.2 by PL
2nd by PM
Roll Call Vote
CS- yes
MK- yes
PL- yes
PM- yes
EM- yes
JD- yes
6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Okay, exception 4 is the most complicated one. There are two conflicting objectives here, which makes this difficult.
- WJ: Our regs do not separate this out.
- CS: The child in the wheelchair wouldn't be able to use the sink here.
- WJ: They would have to make the side approach, which is awkward.

- JD: Maybe we limit this to side control sinks? For these sinks in classrooms.
- WJ: That might be a good compromise.
- CS: The soap and towels are always still too high even when we have side controls.
- PL: That is a good point.
- CS: Does anything govern that?
- WJ: Dispensers are covered under the current regs, and they will have to be lower. Side controls are just for the sink itself. We have a separate section about dispensers.
- PM: I agree with you CS, the soap dispensers are an issue.
- WJ: We can talk about those later, but this section is just about sinks themselves.
- CS: Would it be appropriate to say the side approach for the faucet controls and the rules for the dispensers?
- WJ: We have rules for the dispensers as well as for children. It would not be in the section we are talking about right now.

Motion to Approve exception 4 with modifications by PM

2nd by PL

Roll Call Vote

EM- yes

PM- yes

PL- yes

MK- yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: I think the last two exceptions to 606.2 are relatively non-controversial. WJ reads both exceptions.
- JD: Okay anything on exception 5?

Motion to Accept exception 5 to 606.2 by CS

2nd by PL

Roll Call Vote

CS- yes

MK- yes

PL- yes

PM- yes

EM- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

Motion to Accept exception 6 to 606.2 by CS

2nd by PL

Roll Call Vote

EM- yes

PM- yes

PL- yes

MK- yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

608

- WJ: Okay, I think we can talk about the exception to 608.4
- CS: Do we have to do this now? I have to think about that one.
- WJ: I would prefer to do this today. This is the same as the current regulations.
- CS: All these things for the adaptable units, my main question is would the landlord charge you? Can we write anything about that?
- WJ: No, we do not have any legislative authority over that.

Motion to Approve the exception to 608.4 as written by PL

2nd by PM

Roll Call Vote

PL- yes

MK- yes

EM- yes

PM- yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: 608.7 – the exception we can cover this quickly. WJ reads the exception.
- JD: Do we need the exception?
- WJ: Yes, because the new regs are stricter.
- WJ: We can circle back on this it is 12:47 PM

Motion to Approve the January 2026 minutes by PL

2nd by MK

Roll Call Minutes

CS- abstain

MK- yes

PL- yes

PM- abstain

EM- yes

JD- yes
4 yes, 0 no, 2 abstentions- Motion Passes

Public Comment
None

Motion to Adjourn by PL
2nd by CS
Roll Call Vote
JD- yes
CS- yes
MK- yes
PL- yes
PM- yes
EM- yes
6 yes, 0 no, 0 abstentions- Motion Passes