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**BOARD OF BUILDING REGULATIONS AND STANDARDS**  
**NOTICE OF VIRTUAL MEETING**

Fire Prevention and Fire Protection Subcommittee

In accordance with the provisions of G.L. c. 30A § 20, notice is hereby given that the Fire Prevention and Fire Protection Subcommittee of the Board of Building Regulations and Standards (BBRS) convened a meeting in accordance with G.L. c143 § 97 on:

**Meeting called to order on Wednesday, December 10, 2025 at 9:37 AM**  
**Meeting Minutes**

Roll Call

David LeBlanc, Chair, Fire Protection Engineer	<input checked="" type="checkbox"/> present <input type="checkbox"/> absent
Luke McKneally, BBRS Member	<input checked="" type="checkbox"/> present <input type="checkbox"/> absent
Jake Nunnemacher, BBRS Member	<input checked="" type="checkbox"/> present <input type="checkbox"/> absent
Carissa Lisee, DOL Appointee	<input checked="" type="checkbox"/> present <input type="checkbox"/> absent
Tom Farland, Municipal Fire Official	<input checked="" type="checkbox"/> present <input type="checkbox"/> absent
Michael Yanovitch, Building Contractor	<input type="checkbox"/> present <input checked="" type="checkbox"/> absent
Eric Svahn, Architect	<input checked="" type="checkbox"/> present <input type="checkbox"/> absent
Matthew Bourque, Developer	<input type="checkbox"/> present <input type="checkbox"/> absent
Vacant, Municipal Building Official	

1. **Review/Vote** Meeting Minutes for October 29, 2025, and November 12, 2025

Luke McKneally motioned to accept October 29, 2025, meeting minutes, seconded by Jake Nunnemacher. Jake Nunnemacher noted typos for correction. A roll call vote was held incorporating the changes, none opposed, none abstained. Motion passed unanimously for the amended meeting minutes.

Jake Nunnemacher motioned to accept November 12, 2025, meeting minutes, seconded by Luke McKneally. Matt Bourrque and Jake Nunnemacher noted corrections to be made. A roll call vote was held incorporating the changes, none opposed, none abstained. Motion passed unanimously for the amended meeting minutes. Tom Farland was absent for vote.

2. **Review** Assigned Code Sections – Chapters 4, 7, 9, 33, A2L and code proposals from the 10<sup>th</sup> Chair LeBlanc reported that the BBRS approved the interpretation the PFPF rendered regarding hazardous material control area question. Chair LeBlanc will forward to staff the commentary language out of the 2021 IBC regarding hazardous material control areas for review.



Chair LeBlanc asked staff to extend invite to DOER representatives for the next FFP meeting as they indicated interest in the A2L discussions. Staff responded in the positive and stated all meetings are subject to open meeting laws and posted on webpage. There was minor discussion about the role of other subcommittees with regards to A2Ls. Discussion concluded with the consensus that it is more in FP/FP's purview.

The subcommittee then moved on to Chapter 33 Safeguards During Construction, Section 3303 Demolition. Discussion ensued about 3303.1 Construction Documents. Chair LeBlanc noted verbiage recommended includes what someone is expected to pass in. The construction documents need to include a fire safety program because it is required by NFPA 241 and by citing Chapter 16 of 527 CMR 1.00 it is clearer. Jake Nunnemacher added commentary noting after certain fires, more light was placed onto NFPA 241 safeguarding construction. He stated the Fire Marshall thought it was important that both the fire official and building official receive these documents. If it needs to go to Fire, it will go to the Fire Official. It is now included to be part of the submission for the building code as well. If the Fire Official rejects it, Fire is required by law to notify the building official. Board Counsel Kilb suggested some minor verbiage changes.

Jake Nunnemacher motioned to accept the recommended change in verbiage to 3303.1 Construction Documents to include "Construction documents is as follows: Construction documents and a schedule for demolition shall be submitted pursuant to 780 CMR Chapter 1. The construction documents shall include the fire safety program, as required by Chapter 16 of 527 CMR 1.00 and shall be submitted to the fire code official and building official. Where such information...", seconded by Luke McKneally.

No further discussion. No objections. No abstentions. Motion passed by unanimous vote.

The next section reviewed was Section 3311 Standpipes and adding more for the fire service. The insertion discussed "and are labeled to indicate if they are temporary or permanent, and with a water supply or without a water supply".

Luke McKneally motioned to accept the change in verbiage to 3311.3 Detailed requirements and the exception, seconded by Jake Nunnemacher.

No further discussion. No objections. No abstentions. Motion passed by unanimous vote.

The next section reviewed was Section 3313 Water Supply for Fire Protection 3313.1 Where required. There was much discussion about the verbiage in this section to make clear the water supply for fire protection needs approval by the fire code official.

Jake Nunnemacher stated building code officials have approved this in the past, yet it should be the fire official.

Counsel Kilb indicated some confusion as to how a building official would be able to enforce this requirement, such as by looking for a tag or certificate.

Chair LeBlanc stated the code is also for design teams and others involved in building not just for building officials and that in his opinion this verbiage would make it helpful for users of the code. He further indicated he did not believe this language would change any authority but make it clear on who the approval is from.

Jake Nunnemacher noted this is all before the building permit is submitted to the building department. Board Counsel Kilb reiterated that if place in 780 CMR it must be enforced by the building official. He noted can refer to another law but not note two different approvals.

Chair LeBlanc referenced the unamended language in the exception.

Jake Nunnemacher spoke to who the designated authority being referenced is. He stated that Fire wants the building official to be involved in this as well.

Counsel Kilb indicated it is appropriate for the building code to reference when a Fire Official is making a determination and the Building Official needs to recognize that determination in

conjunction with their approvals. He noted that the BBRS has sought to require more specificity than generic citations to 527 CMR 1.00 and should have pinpoint citations, however the focus needs to be what the code requires the building official to do and approve.

He also noted he has problems with a listed exception giving a fire official exception authority, he noted that if 527 CMR 1.00 governs such an exception, it shouldn't be in the building code, if the fire official is already authorized to waive something under 527 CMR, they have that authority. If they don't have that authority, the building code can't give them that authority. The building code needs to specify exactly what the building official is looking for, what they are approving, and what they want the fire official to have approved.

Chair LeBlanc walked through a hypothetical scenario after questions from Luke McKneally. It was discussed that the Building Official is not in the loop yet as a building permit has not been submitted. The submitter is working on the building packet and working out the water supply with the fire official. He noted you would want the building official in the know even though there is nothing for them to approve of.

Carissa Lisee added and agreed that it was her understanding that this process is before a building permit. She explained the process that applicants must go through for either planning or zoning purposes and they meet with a lot of departments beforehand not just the fire department but also the water department. She noted a lot of times that cities and towns will have an internal site committee, like a subcommittee, put together to review these projects. By the time it gets to the building department, usually the water supplies are already approved.

Jake Nunnemacher commented and agreed that this process is done before a building permit usually. The fire code requires the fire department access road, the fire lanes and water supply to be up and running prior to the start of construction.

Counsel Kilb thereafter asked the subcommittee to discuss the purpose of even having this section if the building code is not regulating them. There were further comments on this being redundant.

Chair LeBlanc stated it is more complicated than just removing the verbiage. Jake Nunnemacher called upon Matt Bourque to speak and to share his expertise and experiences.

Matt Bourque stated that for the permanent fire protection supply, within the documents for the permit set that goes to municipality, there are hydrant flow tests and other tests calculating pressure before the permit is issued. Then secondary to that for standpipes that might be required during construction, this analysis happens post permit submission from the sprinkler contractor who performs individual hydraulic calcs with the manual dry standpipe system. These are submitted to the fire department for approval.

Luke McKneally motioned to amend this language for the sentence to read "an approved water supply for Fire Protection in accordance with 527 CMR 1.00 Chapter 16..." and also to include the addition of 3313.1.1 where the fire safety plan indicates a water supply or fire flow exceeding the minimum, seconded by Matthew Bourque. In discussion Counsel Kilb asked the subcommittee consider as part of those motion the concerns raised with the exception where it says what the fire code official is authorized to do. He reiterated he did not believe the building code can legally give the fire official an authority and then give the official an ability to waive it if they don't have that authority under the fire code, 527 CMR 1.00 Chapter 16. He also noted the unamended IBC exception is legally problematic.

Jake Nunnemacher indicated the matter was worth addressing and additionally noted his problem with the proposal is that it gives authority to the building official to approve the water flow.

Board Counsel Kilb agreed.

Luke McKneally motioned to amend the proposal to say a water supply for Fire Protection, approved by the Fire code official in accordance with 527 CMR 1.00 Chapter 16. The motion also includes the 3313.1.1 amendment and to strike the exception. This was seconded by Matthew Bourque.

A roll call vote was taken. Tom Farland was absent for the vote. None opposed. The motion passed unanimously.

The next section reviewed was 3313.2 Combustible Building Materials. There was discussion about potential verbiage added for apparatus access lanes compliant with provisions of 527 CMR

1.0 Section 16. This was discussed in length to not be kept and by unanimous consensus was changed back to original verbiage.

The next review was Section 3314 Fire Watch During Construction. 3314.1 Fire watch during construction. It was noted this was an amendment in 10th edition. Board Counsel Kilb expressed concerns with this verbiage of building official or fire official. He stated if the Fire Code allows a Firewatch, then we should be citing this as well. Carissa Lisee recommended the verbiage should state that a Firewatch shall be provided as required in provisions of 527 CMR 1.00. Jake Nunnemacher recommended to add Chapter 16 to bring the reader to the chapter.

Carissa Lisee motioned to accept 3314.1 as amended, seconded by Jake Nunnemacher. None opposed. None abstained. Motion passed by unanimous vote.

The code change proposal process was next reviewed. Luke McKneally noted there was a request to have each section have its own code proposal change form, but this may not be as beneficial as once thought.

Executive Director Gropman agreed with Luke McKneally and explained the process would be to submit one proposal for Chapter 33, fill out the form, but include the changes in one large, all-encompassing document noting the markups.

Board Counsel Kilb stated that the Secretary of the Commonwealth does require front end amendments. The BBRs wants a package they can vote on but what needs to ensure what is filed is not different as the ICC language is copyrighted and cannot be filed as a tracked changes version. He went on to state that the BBRs did not want hundreds of pages of code proposal forms but wanted to see major concepts. If referring to something, this can be included on one form, include attachment and state in these areas and then list the areas. He noted there is some flexibility in this process, he also suggested hearing from the BBRs members on the subcommittee.

Luke McKneally noted the limitation of the code proposal form. He spoke to having the BBRs see the doc with markups only. Then, have a supplemental summary document that is only the front-end changes so that both the subcommittee and the BBRs can look and make sure they have caught everything, it makes sense in the code language and that the front-end amendments make sense by themselves. It was noted the front-end amendments is the only document that can be public facing. Luke McKneally continued to state the substantiation should include a pro, a con and an impact on life safety and cost for each of our change proposals. He noted that in most cases, they would all be more or less the same, so could possibly have one code proposal. Yet, if we have specific concerns or a major benefit, for instance, might highlight that one section.

Luke McKneally stated he would take on the responsibility of creating a document with the approved changes as a front-end amendment and make a placeholder for the pros and cons. He would produce a couple of documents as examples; one that's in the full blended version and then a separate version which we could review at our next meeting. See what works best and move that forward.

Chair LeBlanc will share the word document approved by the subcommittee with Executive Director Gropman to place in the packet. She agreed to create one folder per chapter to include in the subcommittee folder.

### **3. Discuss** Future meetings scheduled for January

Chair LeBlanc reported that the next meeting is scheduled for next Wednesday, December 17, 2025. The focus will be on A2Ls. He noted there will be a presentation given and these documents have been shared with the subcommittee. Executive Director Gropman stated the info has been placed in the public board packet. The presentation and information sheet has been placed in the folder entitled 12/17/25. She also mentioned there are two new code proposals received from the BBRs 12/9/25 meeting and these have been added. Executive Director Gropman stated she will make edits to the public folder to make it easier for subcommittee

members to access key items. She welcomes feedback on how best to structure this packet going forward.

Luke McKneally shared his screen to show the late added items to the BBRs that are the code change proposals sent to FP/FP. The AHRI code change proposal refers to the ASHRAE document which is backing up the code change proposal.

He noted the code change proposal from HTS/DXS New England is an updated version of all their 10th edition code change proposals. It addressed all of the 2024 code language and is 11<sup>th</sup> edition specific.

AHRI also provided a FAQ doc which was added to the packet. Luke McKneally recommended that the substantiation document from JS Rancourt be placed with the code proposal from him. This was completed during meeting. ICCTSG toto ASHRAE document is in code change proposals folder because it goes with the AHRI code change proposal form.

Chair LeBlanc next spoke to future meetings scheduled for January. The subcommittee discussed and rescheduled the January 14<sup>th</sup> meeting to January 16<sup>th</sup>. This will be Chapter 33 follow up meeting to review all the forms and have a better process going into other meeting.

Luke McKneally asked about emailing with the Chair directly. Board Counsel Kilb answered that this can be done but to cc Tammy and keep it to transferring documents.

- 4. Discuss** Other matters not reasonably anticipated 48 hours in advance of meeting  
Jake Nunnemacher asked Chair LeBlanc to give a brief synopsis of what happened at BBRs meeting as there were several additional code proposals that the BBRs passed on to FP/FP.

Chair LeBlanc reported that there was one related to single means of egress in residential buildings, change of the high-rise definition for Massachusetts to be in line with the IBC, exit signage in chapter 10.

Chair LeBlanc provided he asked the BBRs a clarifying question on what code proposals should the subcommittee focus on because some of the code proposals are within chapters in our purview and others that are not. The direction given by the BBRs was to first focus on the chapters the subcommittee was assigned and then once those are complete to move onto the others. He went on to state that single exits for residential buildings is a huge topic even nationally. The big push for this is housing costs and affordability. The provisions are looking to extend the number of stories that you could do a single exit beyond what the IBC currently has. This will be discussed at a future meeting.

Jake Nunnemacher motioned to adjourn meeting, seconded by Tom Farland. A roll call vote was held, none opposed, none abstained. Motion passed unanimously.

Meeting adjourned at 12:20 PM.

Items relied upon

- Agenda
- Meeting Minutes
- Code Change Proposals