

March 5, 2026, 1:30pm - Cross Building, Room 206

Public Comment by Justin Brown on behalf of Maine Building Officials and Inspectors Association (MBOIA) Neither in Support nor Opposition to LD 2225 An Act to Support Municipal Enforcement of Residential Construction Laws, Codes and Regulations

Senator Curry, Representative Gere, and distinguished members of the Housing and Economic Development Committee:

My name is Justin Brown. I have served as a Code Enforcement Officer for approximately 20 years and currently serve as Vice President of the Maine Building Officials and Inspectors Association (MBOIA). I submit these comments on behalf of MBOIA. MBOIA represents municipal code enforcement officers and building officials responsible for administering and enforcing the Maine Uniform Building and Energy Code (MUBEC) at the local level.

MBOIA takes neither a position in support of nor in opposition to LD 2225. We appreciate the Committee's work to address regulatory barriers to housing construction and offer the following comments for consideration.

1. Adoption of the ICC/MBI 1200 Off-Site Construction Standard

LD 2225 proposes adding the International Code Council and Modular Building Institute 1200-2021 Standard for Off-site Construction to the codes incorporated into MUBEC.

MBOIA agrees that industrialized and off-site constructed housing should be governed by a nationally recognized ICC standard. Ensuring consistency between site-built and off-site construction is a reasonable policy goal.

However, we remain cautious about the potential impact on municipal workload. The ICC/MBI 1200 standard governs planning, design, fabrication, and assembly processes that occur largely outside the municipality. As training requirements expand to include familiarity with industrialized housing, we respectfully request clarification regarding the anticipated role of municipal code enforcement officers.

Specifically:

- What additional responsibilities, if any, will municipalities assume?
- Will local officials be expected to conduct additional review of third-party inspections or manufacturing documentation?
- Has consideration been given to the cumulative impact on already limited municipal staff capacity?

Our concern is not with the standard itself, but with ensuring that any expansion of responsibility is clearly defined and manageable at the local level.

2. Clarification Regarding Working Group Recommendations

The bill summary indicates that LD 2225 implements recommendations of the working group convened to address regulatory barriers to housing construction.

MBOIA would appreciate clarification as to whether this proposal reflects the results of the consultant study recommended by that working group regarding consistency between site-built and off-site construction standards, or whether this legislation precedes that analysis.

Additional clarity on this point would assist municipalities in understanding the broader policy framework behind the proposed changes.

3. Reference to Specific Code Edition

MBOIA respectfully suggests that if the ICC/MBI 1200 standard is incorporated into MUBEC, it may be preferable to reference the standard as adopted by the Technical Building Codes and Standards Board, rather than tying it to a specific year edition.

Referencing a particular edition in statute may require future legislative action for updates that would otherwise be handled through the Board's established rulemaking process. A more flexible reference would maintain consistency with how other codes within MUBEC are typically updated and administered.

4. Regionalization

MBOIA also supports the concept of regionalized code enforcement as a practical strategy to address staffing shortages, improve consistency, and strengthen professional capacity across municipalities. Many communities, particularly smaller municipalities, would benefit from shared services and coordinated enforcement structures. However, we respectfully suggest that a 3-year pilot program does not represent a durable long-term solution. Regionalization requires stability, predictable funding, and sustained administrative support to be successful. If the Legislature determines that regional code enforcement is a priority, MBOIA believes a fully funded, long-term framework would provide municipalities with the certainty necessary to invest in staffing, training, and intermunicipal agreements that make regionalization truly effective.

MBOIA supports efforts to promote housing development while maintaining clear and effective building code enforcement. Our comments are offered to ensure that:

- Municipal responsibilities are clearly defined
- Workload implications are carefully considered
- Code adoption mechanisms remain consistent and administratively workable

We appreciate the opportunity to provide input and look forward to continuing to work with the Committee and stakeholders on this important issue.

Respectfully,

Justin Brown

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