Appendix 1

Dear Chair Joseph McNamee,

We are writing on behalf of the Graduate Student Council (GSC), which represents the nearly 7,000 graduate students of the Massachusetts Institute of Technology (MIT). We wish to thank the Board of State Examiners of Plumbers and Gas Fitters for granting the 2017 variance permitting the establishment of four multi-fixture, all-gender restrooms and the later indefinite extension of that variance. These restrooms greatly benefited our community and visitors as shown in the report MIT provided the Board. For example, members of the MIT community have written the following personal testimonials on the positive effects the all-gender restroom pilot has had on their experiences on campus:

"It is often difficult for me in public spaces to know which restroom I should use for my own comfort and that of others... As such, I am deeply grateful for this pilot project... Knowing there are now more accessible gender neutral facilities makes [working in many buildings across campus] far less stressful."

"The bathrooms in buildings 4, 5, and E14 have all made it a lot easier to execute my weekly schedule, which helps me give my colleagues the professional courtesy they deserve... The all-gender bathroom pilot program has helped me perform at my best, and made it possible for me to have a strong start on my PhD."

We now would like to inquire if the Board has any intent to revise 248 CMR 10 to permit all-gender, multi-fixture restrooms without a specific variance, and, if the Board does intend to do so, when we should expect such a change.

Such a change would enable MIT to establish more such restrooms without seeking additional variances, better satisfying demand for currently underserved members of our community while minimizing labor for MIT and the Board. By our count, the Board has held at least 25 hearings regarding variance requests for multi-fixture, all-gender restrooms since 2016 and has only voted to deny two of these. In recent years, such variance requests have increased both in total number and in types of organizations applying for them. This also does not include the unknown number of
requests for variances related to single-user, all-gender restrooms that could be obviated by permitting multi-fixture, all-gender restrooms. At this point, surely it is reasonable to set general policy rather than continue to hear an increasing number of specific requests. **It is our understanding that the 2021 International Plumbing Code (IPC) contains a revision to this effect.** While we do not know the full relationship between 248 CMR and the IPC as a whole, we strongly encourage the Board to adopt this specific provision or a comparable one.

Thank you for considering this request and responding to our question. If you would like to discuss this further, please reach out to us at gsc-eab-state@mit.edu. **We are also prepared to formally present this proposal at a Board meeting, if so desired.**

Also prepared by: Rachel Szabo