

Last Updated January 22, 2025

# MBTA Bus Operator Restroom Access and Implementation Guidelines

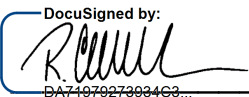
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## I. Summary

Recognizing the importance of restroom access for MBTA Bus Operators, these guidelines establish a metric by which the MBTA will measure the quality of adequate restroom access for bus operators and outlines the actions which the MBTA can take to improve restroom access.

## II. Purpose and Scope of these Guidelines

The MBTA strives to provide adequate access to restrooms for all Operations staff working in the field. When Bus Operators end their bus route at terminal locations without nearby access to an MBTA restroom, and without adequate time to return to another point in the route near a restroom, the MBTA will attempt to formalize and improve restroom access.

The Bus Operator Restroom Access Guidelines define adequate access to restrooms for on-duty MBTA Bus Operators; provide clear standards for the MBTA to prioritize capital investments and establishes a metric to track improvement.

## III. Background

Today, restroom access for bus operators can be difficult, informal, or nonexistent. Most MBTA bus routes begin or end at or near MBTA rail stations, where the bus operator often has time and space to park the bus, take a break, and use the restroom before their next trip. However, some bus routes terminate at locations or times with no nearby restrooms – particularly in residential or more suburban locations. If this happens on a long route, bus operators may wait a long time before they reach a restroom again.

When a restroom is available, operators use a mix of MBTA, public, and quasi-public restrooms at municipal buildings and retail stores. Many bus routes are short enough that the operator has frequent access to an MBTA restroom at a rail station, but some are not. As a result, gaps in restroom access occur, which can put operators in uncomfortable situations: the retail store may close before bus service stops running for the night, a door may be locked abruptly, or the operator might feel obligated to buy something at a store before asking to use the restroom.

Operators have long expressed concern about tight schedules, difficulty finding layover space, and the general inability to find and access a restroom. Many operators said this during outreach as Bus Transformation proposed new and longer routes as part of the Bus Network Redesign (BNR), but this included dissatisfaction with existing (non-BNR) situations as well. Operators don't want to feel penalized for restroom use and have asked for less scheduling pressure to allow time for restroom breaks. One finding from the MBTA's 2023 employee survey noted "dissatisfaction with facilities and working conditions including...bathrooms and other facilities, inadequate bathroom access for operators." The latest Local 589 Collective Bargaining Agreement (CBA) also includes a call to action to improve restroom access:

"The parties share a goal in assuring, wherever practical, that safe and clean restroom facilities are available to all employees during all on-duty working hours – i.e., including after normal business hours. The parties shall jointly identify locations where this goal is not met in order to provide an adequate resolution."

These guidelines seek to measure, and minimize, situations where bus operators struggle to access a restroom comfortably – and to move the MBTA towards better restroom access. Just as the MBTA provides adequate restrooms to **all** MBTA employees at work sites such as rail

yards, administrative offices, and construction sites, these guidelines set forth how the MBTA will strive to provide adequate restrooms at the **bus operator's** work site – the route's terminal location.

## IV. Definition of Restroom Access for Bus Operators

The MBTA strives to provide Bus Operators with scheduled access within 120 minutes throughout the course of their scheduled shift. Specifically, we define restroom access *as the percent of scheduled bus trip ends where the Operator's access to a restroom meets the following conditions*, as the bus operator is ending a given trip:

1. The Bus Operator's next scheduled trip gives the Operator access within 120 minutes at the subsequent trip end location.
2. The Bus Operator has sufficient time before their next scheduled trip to gain access to a restroom.
3. The restroom must be within 500 feet of the route's terminal area, or provide sufficient time for an operator to reach the restroom (up to 1000 ft)
4. The restroom must be:
  - a. In good working order and clean;
  - b. Generally locked, and accessible with an MBTA P Key, or unlocked and available to the general public with enough capacity that the operator can reasonably expect to gain access;
  - c. In line with the MBTA's Restroom Design Guidance outlined in Section VI.
5. The facility must be open during the time in which the MBTA has scheduled bus service.
6. The MBTA seeks to secure formal, written permission for Bus Operators to use the restroom when the restroom is not owned by the MBTA.

When the MBTA schedules service, and facilities are available, such that the above conditions are not met, this scheduled bus trip end is considered inadequate.

These guidelines are not a guarantee of 100% adequate access to restrooms; instead, they measure the MBTA's adherence to the guidelines, and track systemwide progress towards improvement.

In the event where a Bus Operator requires immediate restroom access and there is no designated restroom at the time of need, the operator may divert from their regular route. The Bus Operator must notify the OCC Dispatcher and inform customers of the diversion.<sup>1</sup> The Bus Operator will properly secure their vehicle while unattended.<sup>2</sup>

## V. Current Restroom Access for Bus Operators

The MBTA's performance metric on operator restroom access is the percent of scheduled bus trip ends where the Operator has access to a restroom every 120 minutes or less, and the restroom is reasonably close and available to the operator.

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<sup>1</sup> Per the MBTA's Rules for Operations Employees, Section 5, Rules for Employees of Bus Operations, Section B36 -- Diversions

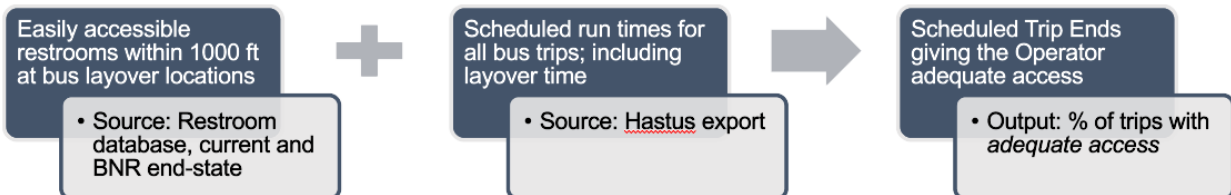
<sup>2</sup> Per the MBTA's Rules for Operations Employees, Section 5, Rules for Employees for Bus Operations, Section B28, Unattended Vehicles

**Figure 1. Proposed Measure of Bus Operator Restroom Access**

**Definition:**

Percent of Scheduled Bus Trip Ends where the Operator has Adequate Access to a Restroom within 120 minutes

**Calculation:**



Based on the proposed measure, an analysis of MBTA's Winter 2025 schedule data found:

- 96% of scheduled weekly bus trips meet the proposed definition for adequate restroom access
- Of the remaining 4% (2,966) of trips with inadequate restroom access:
  - Most (89%) simply lack a nearby restroom at one or both ends of the trip.
  - Only a small number of trips (11%) have inadequate access because bus service starts before, or ends after, a restroom is available.
- All scheduled bus trips are less than 120 minutes.

These findings suggest that addressing most of the bus operator restroom access challenges facing the MBTA today, will involve **gaining new access to an existing restroom, or constructing a new restroom**, at approximately 15 locations in the bus system. These findings tell us that the 89% of trips without adequate restroom access are all-day barriers, and **not** largely because of weekday/weekend mismatches, or caused by very early morning or late-night bus service.

## VI. Tools for Improving Restroom Access

Bus terminals in the MBTA service area vary widely, from busy busways at rail stations, to remote stops in retail centers or residential neighborhoods. The MBTA may take the following approaches when planning to ensure adequate restroom access for bus operators:

- **Improve existing restrooms.** This is the preferred solution when an existing MBTA restroom simply needs more capacity or repairs.
- **Build new restrooms.** The MBTA may consider this solution when there are no existing nearby facilities that can be considered adequate. These restrooms can be permanent or temporary. New restrooms should be considered when existing options do not cover span of service, there is public/MBTA right-of-way (ROW) available and anticipated high demand (>4 trips/hour at peak). Temporary restrooms should only be considered if a permanent restroom is being constructed or is expected to replace the temporary facility within a reasonable time (no longer than 24 months).
- **Guaranteed access to an existing third-party restroom** nearby through a written agreement. This solution is appropriate when there is no available MBTA restroom

nearby, but bus operators may access restrooms at nearby establishments, public buildings, or other facilities and there is low demand (<4 trips/hour at peak). The MBTA will seek a written agreement with the restroom operator in a form similar to Appendix A with details outlined in Section V below.

- **Change scheduled bus service.** The MBTA should consider changing bus service schedules only when all other options for providing operator restroom access have been exhausted. Changes may include shortening or re-routing the scheduled bus route to ensure the operator can make a round-trip back to a terminal with restrooms within 120 minutes, and/or lengthening or terminating the route at a different location with adequate restrooms.

## 1. Building New Restrooms

**Permanent facilities** are restrooms designed for long-term use. They typically require connections to water, electricity, and sewage systems, and can be prefabricated units, standalone restroom buildings, or facility retrofits. These restrooms should be considered when existing options do not cover span of service, there is public/MBTA ROW available, and demand is high (>4 trips/hour at peak).

When building new restrooms, the MBTA should adhere to federal, state, and local design guidelines.

All new standalone restroom facilities should meet the following codes and regulations:

- Meet accessibility requirements under the Americans with Disabilities Act (ADA) explicit from [521 CMR](#)
- Satisfy Massachusetts Codes: Massachusetts Building Code ([780 CMR](#)), Massachusetts Plumbing Code ([248 CMR](#)), Massachusetts Electrical Code ([527 CMR](#)), and Massachusetts Energy “[Stretch Code](#)”
- Satisfy relevant Code of Federal Regulations: [249 CFR 1910.141](#), [29 CFR 1926.51](#), adopted from OSHA and [29 CFR 1928.110](#), including OSHA Letters of Interpretation about it.
- Meet MBTA’s [Design Standards and Guidelines](#)

Sites selected for new structures should include a water source, a waste removal source, an electric power source, and be accessible by a P key or employee badge. The water source may involve connecting to existing municipal water systems or installing a refillable water tank. Waste disposal may be a connection to a sewer/septic system or a holding tank.

## 2. Use of Temporary Restrooms

**Temporary facilities** are portable restroom facilities designed for temporary use. Commonly referred to as porta-potties, porta-johns, and restroom trailers, these facilities do not require connection to a sewage system and should only be considered if a permanent restroom is being constructed or is expected to replace the temporary facility within a reasonable time. The MBTA will strive to replace any temporary facility with a more permanent restroom within 24 months.

Consistent with [OSHA guidance on portable restrooms](#), temporary structures without a water source may be used if the lack of water or temporary nature of the installation makes water carriage systems impracticable, but temporary restrooms should have adequate lighting, be secure, and have heating as necessary. Site selection for any restroom must consider safety, site lighting, privacy, ventilation, and parking and access for maintenance.

## 3. Third Party Access Agreements

When working with third parties to formalize an agreement for bus operators to access restrooms, the MBTA should negotiate written agreements that address the following:

- a. An address for the restroom to which the facility owner grants access, and any access instructions
- b. Span (hours, days of the week, and holidays) when bus operators can have access
- c. Commitment to maintain clean and stocked facilities
- d. Expiration date
- e. Compensation – amount, terms, schedule, process

- f. Process to remedy a failure to maintain adequate access
- g. Process for terminating agreement by either party

Vendors will be paid \$650 per quarter, payable at the end of each quarter by check.

## VII. Inventory, Annual Review of Restroom Access, and Oversight

MBTA Bus Transformation will maintain an inventory of existing restrooms that are accessible to MBTA staff within 1,000 feet of all bus terminals including information on:

- Restroom size/capacity
- Access instructions
- Hours of operation
- How the facility meets the MBTA's adequate restroom standards

At least once every calendar year, MBTA Bus Transformation will review the restroom inventory to confirm adequate restrooms remain available near all bus terminals and to identify any bus route terminals needing improved restroom access. Bus Operators will be provided a copy of the inventory each Summer and Winter rating.

If a Bus Operator or other MBTA staff believes that there is insufficient time or an inadequate restroom at a route terminal, then they may submit a request for action through the Restroom Coordinator. If the MBTA determines that there is no adequate restroom access for a route, the Restroom Coordinator will convene relevant stakeholders to resolve the issue.

1. MBTA employee identifies an issue with adequate restroom access at a route's terminal
2. MBTA Employee informs the Restroom Coordinator
3. Restroom Coordinator investigates issues and identifies alternatives
4. An alternative is selected to address adequate access
5. MBTA's Bus Inventory is updated, and the Bus Operator is informed of the course of action

## IV. Roles and Responsibilities

Role	Responsibilities
Bus Transformation	<ul style="list-style-type: none"> <li>• Restroom Coordinator responsibilities</li> <li>• Maintain and update MBTA's restroom inventory and evaluate progress on an annual basis</li> <li>• Construction of new restrooms at route terminals impacted by BNR</li> <li>• Maintain documentation of third-party access agreements at route terminals impacted by BNR</li> </ul>
Engineering	<ul style="list-style-type: none"> <li>• Ensuring restroom designs and associated guidance meet MBTA, State, and Federal standards</li> </ul>
Service Planning	<ul style="list-style-type: none"> <li>• Managing layover time for restroom access</li> <li>• Routing and scheduling changes as necessary to address inadequate restroom coverage</li> </ul>

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Bus Operations	<ul style="list-style-type: none"><li>• Distribution and awareness of Operator Restroom Access Guidelines and Restroom Inventory in the Winter and Summer ratings</li></ul>
Transit Facilities Maintenance	<ul style="list-style-type: none"><li>• Cleaning and facility maintenance for restrooms</li></ul>
Labor Relations	<ul style="list-style-type: none"><li>• Coordination with union leadership, especially on CBA requirements related to operator restroom access</li></ul>
Safety	<ul style="list-style-type: none"><li>• Advising on best practices for safety considerations in design and siting of permanent restrooms</li></ul>
Legal	<ul style="list-style-type: none"><li>• Development of third-party use agreements</li></ul>
Procurement	<ul style="list-style-type: none"><li>• Issuing Notice for Letters of Interest for third-party use agreements</li></ul>



## Appendix A – Sample Restroom Access Agreements and Payment Terms

THIS AGREEMENT, made and entered into this [Nth] day of [month] [year], by and between the MASSACHUSETTS BAY TRANSPORTATION AUTHORITY, a body politic and corporate and a political subdivision of the Commonwealth of Massachusetts (“MBTA”) located at 10 Park Plaza, Boston, MA 02116 and [third-party entity] (“Vendor”) located at [address of vendor].

WITNESSETH:

For and in consideration of the sum of **\$625 per quarter**, payable at the end of each quarter via check, vendor grants a license to MBTA for the following privileges at the premises indicated below for bus route(s) X, Y, Z at [route terminal name] until [expiration date]:

1. **Location:** Premises are located at [address of the vendor] and can be accessed by [access instructions]
2. **Privileges and Responsibilities:** The Vendor will provide clean and stocked toilet and washroom facilities for use by employees of MBTA. Facilities are to be stocked with toilet paper, hand soap, and hand towels by the vendor.
3. **Failure to Maintain Terms:** If the Vendor fails to provide a clean and stocked toilet/washroom facilities, the MBTA will contact [Building and/or Business Manager] and will pursue termination if necessary.
4. **Termination:** This agreement shall continue in effect until terminated by either party by ninety (90) days’ notice in writing, from one party to the other.

IN WITNESS WHEREOF, the parties hereto have executed this agreement the day and year first above written.

**Vendor:**

Name:

Business Hours:

Address:

Telephone:

Taxpayer ID#:

Signature:

Vendor #:

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**MASSACHUSETTS BAY TRANSPORTATION AUTHORITY**

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BY [First Name, Last Name, Position]

[MBTA Department]

[Contact Information]

[Date]

[First Name, Last Name, Position of Third-Party Rep]

[Third-Party Org]

[Address of Third-Party]

Dear [Third-Party Rep],

I appreciate the opportunity to meet with [third-party rep] to discuss the use of the restroom at [location of the third-party restroom] by MBTA Bus Operators. To summarize our discussion, MBTA Bus Operators are permitted to use the facilities at [address of the third-party restroom].

Our meeting covered the following:

- 1) Operating Hours
- 2) Instructions for Bus Operators to Access the Building
- 3) Responsibility for cleaning and supplies
- 4) Expiration date

We will share this information with the affected staff. We appreciate your support of MBTA Bus Operators.

## Appendix B. Examples of Permanent and Temporary Restrooms

### Permanent Facilities

The following is a non-exhaustive list of types of permanent facilities for reference in considering whether and how to build a new restroom.

#### Prefabricated/Modular Structure

These restrooms are prefabricated or modular standalone restroom buildings. Depending on the manufacturer, the buildings can be customized to provide additional space beyond a restroom (ex. break room). They can be installed by crane or built on site.

These facilities do not need additional design work for the building itself, however, need to be sited in proximity to water, sewer, and electricity connections. There may be additional site preparation needed to ensure these facilities can be accommodated due to their prefabricated nature.

*Example: SL3 Chelsea Restroom Trailer*



#### Waterless Eco-Restrooms

These structures are designed for use in areas where access to water and/or sewage systems is difficult. These facilities are often used as public restrooms in remote areas such as parks or campgrounds. Because they do not connect to water or sewer systems, they require the construction of a holding tank that needs to be periodically emptied. These toilets can be used to create compost, which may require additional maintenance. These restrooms need an electricity source for lighting.

*Example: City of Waltham Composting Toilets*



### Custom Design

In contrast with prefabricated structures, restrooms can be customized to match the aesthetics of their surroundings. These facilities may need water, sewage, and electricity connections. These restrooms will vary in cost but could be considered in locations where design compatibility is a concern.

### Facility Retrofits

Restrooms can be constructed or expanded through a station re-design, or even through transit-oriented development. These restrooms would likely have access to water, sewage, and electricity through the facility it is located in.

If the restroom is not located in a MBTA-owned facility, the restroom should be accessible to MBTA Bus Operators and employees via P Key. In addition, the maintenance and cleaning responsibilities of the restroom should be negotiated with the property owner and documented with a memorandum of understanding (MOU).

*Example: Union Square Operator Break Room*



### Temporary Facilities

The following is a non-exhaustive list of temporary facilities that may be considered. These facilities are intended to be used as an interim solution until a permanent solution is determined or built.

## Portable Restrooms

Portable restrooms, also known as Port-a-Potties or Johnnies on the Spot are facilities constructed of molded plastic or fiberglass and do not require sewer or water connection. Human waste is held in a holding tank that requires periodic pumping. These facilities can be rented or purchased from vendors.

Portable restrooms, without additional support, are prone to misuse and poor conditions. Locks are easily broken from the plastic units. Construction of a fence with roofing or similar around portable restrooms should be considered to reduce access and misuse by outside parties. These restrooms *at a minimum* should be accessible by P-Key only.

Steps must also be taken to ensure that portable restrooms meet minimum sanitation standards.

*Example: Waltham Commuter Rail Portable Restroom*



## Restroom Trailers

Restroom trailers are temporary facilities similar to portable restrooms. However, restroom trailers require electricity, water, and sewage connections which may be available through an existing electrical outlet and/or plumbed water source or a via a generator and/or water tank. Human waste is held in a holding tank that requires periodic pumping. These facilities can be rented or purchased from vendors.

Restroom trailers should be located in areas near water/electric connections or provided additional space for water tanks/generators. They must be accessible to a pump truck for servicing.

*Example: Temporary Restroom Trailers*

## Appendix C: Top 15 Locations with Inadequate Access in Today & in BNR

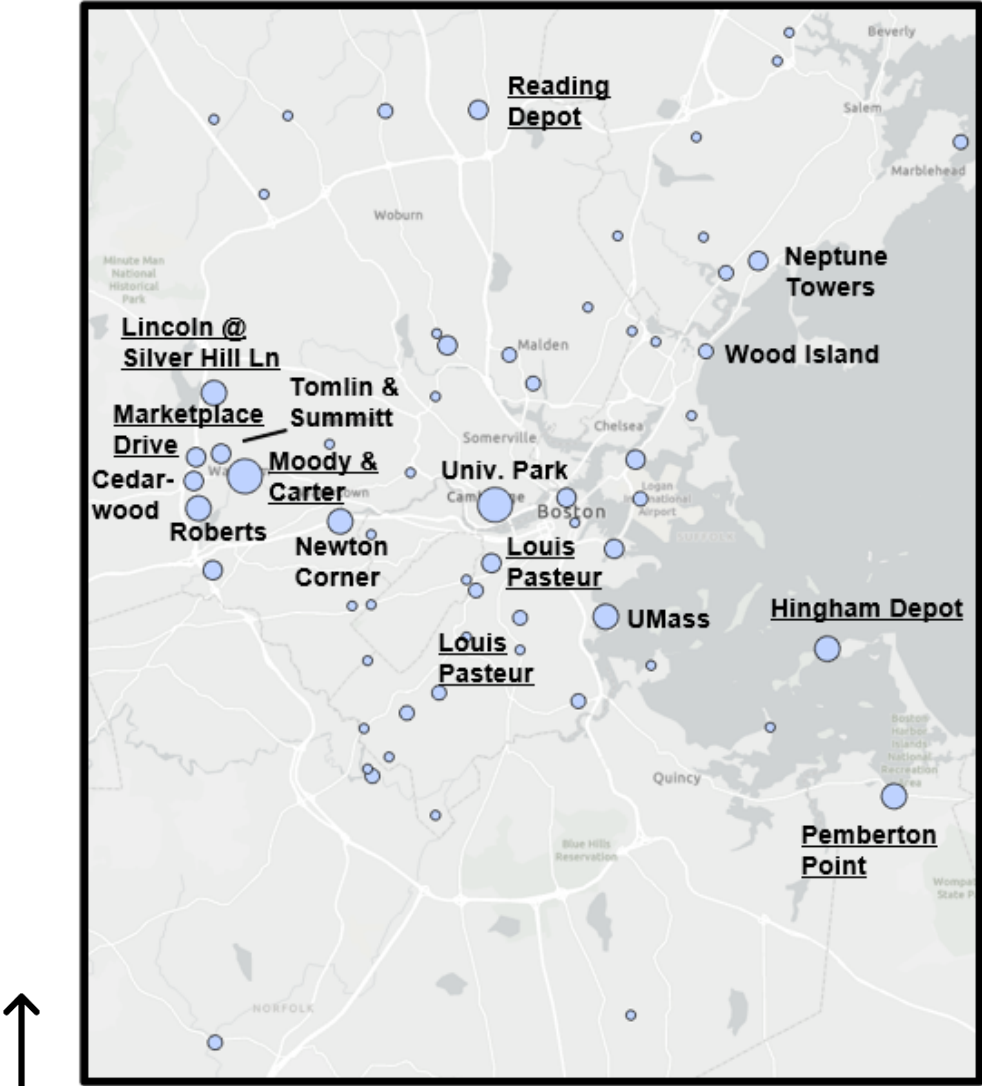
### Top 15 Locations with Inadequate Access in Current Network (Winter 2025)

Route Terminus	Routes	Estimated Weekly Trips w/o Access	Problem in BNR?
University Park (Cambridge)	64,70	752	N
Moody & Carter Streets (Central Square, Waltham)	61,70	540	Y
Newton Corner	553,556,558	365	N
UMass / Harbor Point	8	223	N
Hingham Depot	714*	222	Y
Pemberton Point (Hull)	714*	222	Y
Roberts	553	220	N
Lincoln Street @ Silver Hill Lane	61	206	Y
Neptune Towers	429,435	145	N
Market Place Drive (Waltham)	70	115	Y
Reading Commuter Rail Depot	137	115	Y
Avenue Louis Pasteur (Boston Latin School)	Several (supp. trips)	95	Y
Cedarwood	70	90	N



Wood Island Station	112	90	N
Tomlin & Summitt	556	80	N

\* Contracted bus service



Underlined stop names are locations with restroom access issues in the current and future network.

Top 15 Locations with Inadequate Access in BNR

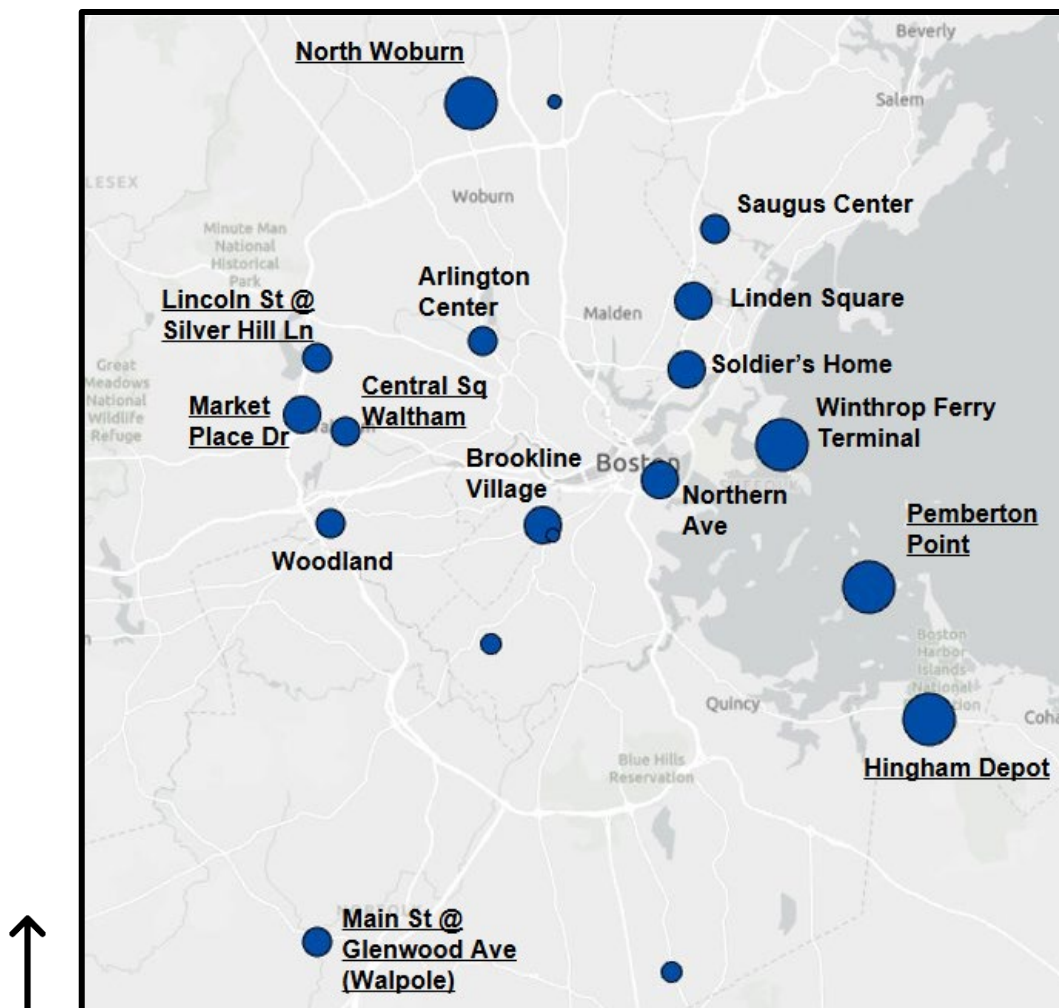
Route Terminus	BNR Routes	Estimated Weekly Trips w/o Access	Current Problem?
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North Woburn	134	298	Y
Hingham Depot*	220, 714	276	Y
Pemberton Point (Hull)*	714	276	Y
Winthrop Ferry Terminal	119, 120	256	New layover
Soldiers Home, Chelsea	112	138	New layover
Brookline Village	12	92	New layover
Northern Ave, Seaport	12	92	New layover
Linden Square (Malden)	108, 109, 119	91	N
Market Place Drive (Waltham)	53, 56, 58, 61	81	Y
Saugus Center	105	56	N
Main Street @ Glenwood Ave	34E	56	Y
Moody & Carter Streets (Central Square, Waltham)	54, 70	47	Y
Arlington Center	54, 87, 95	47	N
Woodland Stop - Green Line	53	43	New layover
Lincoln Street @ Silver Hill Lane	61	38	Y

\*Contracted bus service





Underlined stop names are locations with restroom access issues in the current and future network.

## Layover Locations with Runtimes Near 120 Minutes

Some layover locations without 24/7 restroom access were not flagged in the analysis as needing a restroom because the scheduled roundtrip time is less than 120 minutes. In some cases, these roundtrip times are ~100 – 119 minutes, and exceed 120 minutes due to traffic or other roadway conditions. This table lists locations that will need a restroom if roundtrip times increase marginally.

Layover location	BNR Routes	Trips with runtime 100-120 minutes
Mcgrath Highway @ Washington St	47,96	630
Wren Street	38	270
Reading Commuter Rail Depot	137	161
Avon Square	238,240	156
Holbrook/Randolph Commuter Rail Depot	238,240	135
Cobbs Corner (Canton)	716	122
Montello Commuter Rail Station	230	115
Pleasant St, Marblehead	442	115
Chestnut Avenue (Burlington)	354	107
Medford Square	101	96

## Appendix D: Internal Review Process

### Meeting with Bus Operations – October 8, 2024

- No edits

### Meeting with Office of the Controller – August 28, 2024

- No edits

### Meeting with Legal – August 13, 2024

- Advised on procurement procedures for third party use agreements
- Added proposed payment rate and schedule

### Meeting with CAO and Labor Relations – June 28, 2024

- Recommended sharing findings and guidelines with COO

### Meeting with OPSS Leadership – June 14, 2024

- Proposed performance measure for adequate restroom access
- Included section with high-level findings of the current state of restroom access

### Meeting with OPSS Leadership – April 9, 2024

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- Recommendation to develop a performance measure for adequate restroom access
- Recommendation to assess current state of restroom access as a baseline

#### **Meeting with Policy and Strategic Planning - April 5, 2024**

- Added an executive summary to declare the importance of operator restroom access, what we are committing to fix, and what the anticipated timeline is for bringing non-BNR route terminals into compliance
- Added a section on roles and responsibilities
- Added an appendix documenting meetings with different stakeholders and changes resulting from their feedback

#### **Meeting with Service Planning - March 27, 2024**

- Removed section on medical accommodations based on Service Planning feedback on implementation challenges
- Service Planning suggested incorporated restroom access as a field in HASTUS so operators could be aware of the restroom access (or lack thereof) on each route
- Potential challenge is that layover times are not guaranteed -- operators may turnaround to make up time, not exactly guaranteed