



Issue Date:	June 10, 2008, Revised April 2019
Developed by:	David McCarthy, Plumbing Code Consistency Coordinator
Approved by:	Technical Review Team

**Options Available to Customers in the Building Code
For the Number of Toilet Fixtures and Type of Restroom Facilities**

Code Requirements: The 2024 International Building Code Amended (IBC), Section 2902.2, states the following. *“Where plumbing fixtures are required, separate facilities shall be provided for each sex.”*

All occupied buildings require toilet rooms. The number of toilet fixtures is based on the number of occupants associated with various occupancy groups as outlined in the IBC, Table 2902.1. Exceptions to the above requirements are that a single unisex toilet room may be used in lieu of separate toilet rooms where: 1) the occupant load for any occupancy group is 15 or less, or 2) in mercantile occupancies where the occupant load is 100 or fewer and business occupancies where the occupant load is 25 or less.

The occupant load is calculated based on the occupant load factors outlined in IBC, Table 1004.5. This calculation consists of determining the floor area for a function in a space of the building and dividing that area by the appropriate occupant load factor.

Option 1: An exception to the calculation method found in the IBC, Section 1004.5, the actual number of occupants for the space may be used as approved by the Building Official. To use this exception, statistical data must be submitted by the owner of the space. This option may eliminate the need for additional toilet fixtures.

Option 2: Provide a bank of toilet fixtures in a campus setting to meet the minimum number of toilet fixtures. The number of toilet fixtures required in the bank of toilet fixtures would be based on the total number of occupants combined from the various occupancy groups and the distance to the toilet fixture is less than 500 feet (IBC, Section 2902.3.3). This option would satisfy restroom requirements for a group of businesses.

Note: When additional restroom facilities are required based on occupant load at least one accessible fixture of each type is required per IBC, Section 1109.2 for all new restroom facilities to be used by public.

Note: When alterations are being made to the area of primary function, the route (from accessible parking to building entrance, to primary function areas in the building) and facilities along the route are required to be made accessible. Cost need not exceed 20% of costs affecting the alteration to the primary function per IEBC, Section 305.7, Exception 1. A *primary function* is a major activity for which the facility is intended as defined in the IEBC, Section 202.

For more information or for a copy of this publication in an alternate format, contact Planning & Development at 602-262-7811 voice or TTY use 7-1-1.

Note: IBC Section 2902.1.1 exception states, *“The total occupant load shall not be required to be divided in half where approved statistical data indicate a distribution of the sexes of other than 50 percent of each sex.”*

Note: The City of Phoenix on August 1, 2025, amended Section 2902.2, Exception (3) of the 2024 International Building Code, which states the following: *“Separate facilities shall not be required in mercantile and business occupancies in which the maximum occupant load is 50 or fewer.”* These amendments aid smaller business occupancies in adaptive reuse by allowing one unisex restroom instead of separate facilities for each sex.

This policy applies to Tiers 1, 2, and 3 for structures permitted prior to 2000.

Tier 1: 5,000 square foot maximum. This can include an addition to the existing building. The addition cannot exceed 50% of the square footage of the existing building and a combined total of 5,000 square feet.

Tier 2: Greater than 5,000 square feet to 25,000 square feet.

Tier 3: Greater than 25,000 square feet to 100,000 square feet and Large-Scale Commercial Retail as defined in the Zoning Ordinance “big box” (Mercantile Occupancy).