



Issue Date	May 3, 2010 - Revised: June 11, 2025
Code/Section	2024 IBC, Sections 1004.5, Exception; Section 2902.1
Developed By:	Mechanical & Plumbing Committee
Revised By:	Plumbing and Mechanical Plan Review Staff, June 2025

Issue:

Develop a policy and procedure for using the exception to IBC section 1004.5 for the purpose of determining minimum plumbing fixtures per IBC section 2902.1.

Interpretation:

As an exception to the calculation method found in IBC section 1004.5, the actual number of occupants for a space may be used, as approved by the Building Official. In order to use this exception, statistical data must be submitted by the owner of the space.

The owner must submit a letter requesting the actual occupant load to be permitted for the plumbing design occupant load. The following items must be met with the letter and architectural cover sheet for reduced plumbing fixtures:

- ☐ Occupancy classification
- ☐ Area in square feet of the proposed occupancy
- ☐ Calculated occupant load, per code, for both men and women
- ☐ Proposed occupant load, per code, for both men and women
- ☐ Calculated minimum plumbing fixture count for both men and women
- ☐ Proposed minimum plumbing fixture count for both men and women
- ☐ The reason why the request for reduced plumbing fixtures is being submitted
- ☐ Letter must be signed by the owner under notary seal and signature
- ☐ Notarized letter must be affixed to the architectural cover sheet for field evaluation and record keeping purposes

The letter shall be submitted to the plan reviewer. The plan reviewer will forward it to the Plumbing Code Consistency Coordinator for review and acceptance. If accepted, the permit scope of work description shall state that the actual occupant load, per the owner, is being used for plumbing only, per their letter dated _____. The letter shall be scanned for Records with the building permit.