



Issue Date	February, 2010. Revised August 2025.
Code/Section	2024 International Existing Building Code
Approved:	Technical Review Team

**Interpretation to Achieve Occupancy Equivalency
In Adaptive Reuse Projects for B and M Occupancies**

The purpose of this document is to interpret requirements for B and M occupancies used interchangeably under the city of Phoenix Adaptive Reuse Program. This interpretation applies to Tiers 1, 2, 3.

<u>Allowable Areas</u>	All B and M occupancies are equivalent in all construction types with regard to basic allowable building height and basic allowable floor areas.
<u>Exterior Walls</u>	All B and M occupancies have the same exterior wall rating requirements.
<u>Exiting</u>	An exiting analysis shall be provided for all tiers.
<u>Plumbing Facilities</u>	Existing plumbing facilities shall be accepted as is in all tiers if owner provides a signed notarized letter stating that existing facilities will adequately service their business/occupancy.
<u>Accessibility</u>	Requirements for accessibility compliance shall be based on the extent of alterations impacting the area of <i>primary function</i> . The cumulative cost of providing the accessible route, toilet facilities and drinking fountains are not required to exceed 20% of the cost of the alterations affecting the area of primary function. Section 306.7.1 of the International Existing Building Code does not apply to projects eligible for this policy.
<u>Ventilation</u>	Ventilation shall be reviewed for all tiers.
<u>Smoke and Heat Venting</u>	Same requirements in both occupancies. No additional requirements.
<u>Sprinklers</u>	In Tier 1 only, an automatic fire sprinkler system that undergoes a change of occupancy to a Group B or M is not required when all the following requirements are met: <ul style="list-style-type: none">• The fire area containing the occupancy has a total of 5,000 square feet or less, and• The fire areas are separated by a minimum 2-hour fire resistance rated assemblies, and• The occupancy does not store, handle or use hazardous materials over the exempt amount, and• Only one control area is allowed for the building.
<u>High-Piled Combustible Storage B to M Occupancy</u>	High-Piled Combustible Storage shall comply with requirements of the current city of Phoenix Fire Code.

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).