



## **Construction Code Interpretation 2018-SBC**

**CCI 2018-SBC §2902.1  
Minimum number of fixtures reduction for  
facilities serving R-2 amenity areas**

Release date: 8/9/23

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*The following interpretation is intended to provide guidance to staff for consistency of review and is subject to change without notice. Application of this interpretation to specific projects may vary.*

### **Code Issue:**

Does SDCI permit a reduction in the minimum number of fixtures required for plumbing facilities serving R-2 apartment and condominium building amenity areas used exclusively by residents and their guests?

### **Code Interpretation:**

Yes. Where residential amenity areas requiring plumbing facilities meet the Chapter 2 COMMON USE definition – “Interior or exterior circulation paths, rooms, spaces or elements that are not for public use and are made available for the shared use of two or more people.” – applicants may reduce the minimum number of fixtures required by SBC 2902.1 by 1 water closet (WC) and 1 lavatory (Lav).

In apartment and condominium buildings these common use areas include but are not limited to: lounges, fitness rooms, common rooms and roof decks and terraces.

Depending on how multiple amenity areas and the plumbing facilities serving them are distributed throughout the building, this interpretation may be applied more than once. For example, it may be applied to reduce the minimum fixture count by 1 water closet and 1 lavatory for the plumbing facilities serving a basement fitness room and ground floor lounge AND applied again to reduce the required fixture count by 1 water closet and 1 lavatory for the plumbing facilities serving a top floor common room and roof deck.

Note however that this interpretation’s minimum number of fixtures reduction allowance does not reduce other code requirements, such as those related to providing employee facilities (2902.3) and plumbing facility accessibility (1109.2).

The rationale for this fixture reduction is that common use areas reserved for the exclusive use of residents and their private guests are always occupied as an extension of the primary dwelling or sleeping unit occupancy where 1 water closet and 1 lavatory minimums are already provided.

A Code Modification request per SBC 104.4 must be submitted which includes plans showing the amenity area(s), the minimum fixture calculation(s) without applying the reduction, and the proposed plumbing facilities applying the reduction.



### Reduction examples:

#### Scenario 1 – Reduction from 1 WC and 1 Lav required to 0 WCs and 0 Lav's allowed:

When a small isolated common use amenity area(s) requires only 1 WC and 1 Lav by qualifying for 2902.2 Exception 2 – such as a fitness room of up to 750sf (750sf/50 gross = 15 occupants) or a common room, lounge or roof deck up to 225sf (225sf/15 net = 15 occupants) – this interpretation's 1 WC and 1 Lav fixture reduction allowance has the effect of eliminating the need for any WC's or Lav's for residents and their guests beyond those already provided in each resident's dwelling or sleeping unit.

However, once small amenities are grouped together beyond 2902.2 Exception 2's 15 occupant maximum, their minimum number of fixtures requirement will lead to other scenarios.

#### Scenario 2 – Reduction from 2 WC's and 2 Lav's required to 1 WC and 1 Lav allowed:

When the fixture calculation for plumbing facilities serving a common use amenity area(s) requires only 1 WC and 1 Lav (male) and 1 WC and 1 Lav (female), i.e., 2 WC's and 2 Lav's overall, this interpretation's 1 WC and 1 Lav fixture reduction allowance has the effect of requiring only 1 WC & 1 Lav overall, as would typically be provided in a single-user all-gender accessible toilet room.

#### Scenario 3 – Reduction from 3 or more WC's and 2 or more Lav's required:

When the fixture calculation for plumbing facilities serving a common use amenity area(s) requires 3 or more WC's overall and 2 or more Lav's overall, this interpretation's 1 WC and 1 Lav fixture reduction allowance will not determine whether single-user and/or multiuser facilities are provided, whether separate and/or all-gender facilities are provided or how accessibility compliance is met.

For questions about whether this code solution applies to your project:

- *If you have submitted a permit application, contact the Building Code plan reviewer assigned to your application*
- *If you have not submitted an application, send us a question through the SDCI website*  
<http://www.seattle.gov/sdci/resources/send-us-a-question>.  
*Visit the Applicant Services Center website for more information about hours and location*  
<http://www.seattle.gov/sdci/about-us/who-we-are/applicant-services-center>