## City and County of San Francisco Department of Building Inspection



## Daniel Lurie, Mayor Patrick O'Riordan, C.B.O., Director

## INFORMATION SHEET

NO. P-04

**DATE** : July 11, 2025

**SUBJECT**: Plumbing

TITLE : Plumbing fixture counts based upon occupancy load

**REFERENCES**: Current California Building Code (CBC)

Current California Plumbing Code (CPC)

California Health and Safety Code

**DISCUSSION:** The California Plumbing Code Section (CPC) 422.0 is used to determine the minimum number of plumbing fixtures required for each type of building occupancy. CPC 422.1 states, "The total occupant load and occupancy shall be determined in accordance with the California Building Code (CBC)." The Department of Building Inspection has received multiple requests from design professionals and developers to allow an alternate method for calculating occupant load in existing and new buildings to determine plumbing fixture counts. San Francisco's unique topography and smaller, denser lot developments often create the need to develop with smaller floor plates, limiting opportunities for common area plumbing facilities.

CBC Chapter 3 determines the occupancy classification and use of a building or its spaces throughout a building. CBC Table 1004.5 provides the occupant load factor for functional use of space. Frequently, different load factors may be used within the same occupancy. An example would be a restaurant with multiple load factors for fixed seating, non-fixed seating, kitchen and food preparation areas, and storage. When calculating occupant load for the plumbing fixture count, the net area for each independent space and its corresponding occupancy classification shall be used.

CPC Table 422.1 Footnote 6 states that, "In accordance with CPC Section 301.3 the Authority Having Jurisdiction may approve alternative design criteria when determining the minimum number of plumbing fixtures." As the City of San Francisco does adopt the California Plumbing Code, this allows for the use of CPC Table 4-1, occupant load factor, when calculating plumbing fixture count in San Francisco.

Architects or engineers may choose to use the occupant load factor from California Building Code Table 1004.5 or CPC Table 4-1 for determining occupant loads for plumbing fixture counts only. Should an architect or engineer choose to use CPC Table 4-1 for occupant load

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related to plumbing fixture counts, they shall note this choice in the code information section of the index sheet for the plan submittal. Additionally, the architect or engineer should include a completed AB-005 form as part of their plan submittal documents, linked here: AB-005 Request for Alternate Method. The San Francisco Fire Department does not need to approve AB-005. DBI plan checkers will default to choosing CBC Table 1004.5 in occupant load determinations for calculating plumbing fixtures if this alternate code path is not called out on the plan submittal by the design team and if the AB-005 is not received as part of the plan submittal.

According to CPC Table 422.1, Minimum Plumbing Facilities, plumbing fixture count calculations are required for all new buildings, first time tenant improvements, tenant enlargements, changes in occupancy and additions. Existing plumbing fixture counts are not required to be recalculated when the above scenarios do not apply.

Patrick O'Riordan, C.B.O.

Director

Department of Building Inspection

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Date

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