



February 6, 2023

Routt County Regional Building Department
136 6th Street, Suite 201
Steamboat Springs, CO 80477-5088
Attn: Todd Carr

RE: Code Modification Request for Basecamp Commercial re: Restroom Configuration

Dear Todd,

This code modification request is being submitted in accordance with IBC code section 104.10 Modifications.

The applicant received the following review comment to the Basecamp Commercial plans on 1/17/2023:

IBC Chapter 29 regulates the minimum number of plumbing fixtures that must be provided for every type of building. The regulations in this chapter come directly from Chapters 3 and 4 of the International Plumbing Code (IC). The approved plans shall show drinking fountain location(s) that are to be provided to include "HI-LO" provisions for accessibility (as applicable per ICC A117.1- 2009 for all required fixtures and service sinks. Additional protection for the building occupants includes requirements to maintain the plumbing in a safe and sanitary condition, as well as privacy for those occupants. Where there are practical difficulties involved in carrying out the provisions of this code, the code official shall have the authority to grant modifications for individual cases, upon application, provided that the code official shall first find that special individual reason makes the strict letter of this code impractical and the modification conforms to the intent and purpose of this code and that such modification does not lessen health, life and fire safety requirements. The details of action granting modifications shall be recorded and entered in the files of the plumbing inspection department as per IPC Section 105.1 Modifications. Please compose a Code Modification Request letter under Section 104. 10 of the IBC for the Building Official to review with respect to the Uni-Sex Restrooms and Showers and total plumbing fixtures provided in comparison to what the code would require for male/female fixtures in the restroom/shower areas.

The applicant is requesting a code modification specifically to the quantities of plumbing fixtures required in table 2902.1 of the IBC.

The applicant is proposing a shared "core" restroom scenario, which would serve two of the three demised retail tenants contemplated. The third demised space, A101, will be leased out as existing with one existing unisex restroom to be reused and included within the space. This shared restroom scenario would work something like a retail mall, in that it is not specifically part of any of the tenant spaces and has its own egress path directly out to the exterior of the building, in case of emergency. Restroom users cannot get stuck inside the restroom if all tenants decide to close.

The proposed current uses are a fitness studio (3,493 SF) and general retail/mercantile (2,550 SF). Per table 2902.1, a total of three water closets and two lavatories would be required, broken down as follows:

FITNESS STUDIO – 1/50 Gross → 70 max occupants. W/C – 1:65 → **2 WC**, LAV – 1:200 → **1 LAV**

MERCANTILE/RETAIL – 1/60 Gross → 43 max occupants. W/C – 1:500 → **1 WC**, LAV – 1:750 → **1 LAV**

**No showers are required per 2902.1*

**Reviewed for
Code Compliance**

02/13/2023

**Reviewed and
Approved by Todd
Carr, Building Official
per Architect/Owners
request to provide
unisex facilities.**

While the uses are currently planned as fitness studio and general retail, this could potentially change due to unforeseen circumstances. Therefore, the Applicant wants to maintain some flexibility in the event a more fixture-intensive use ends up as a tenant to ensure enough water closets and lavatories are provided. While only three combined water closets and two combined lavatories are required per table 2902.1, the applicant is proposing four water closets and four lavatories. The applicant is also proposing two showers, due to the fitness studio use.

As this is a shell building permit, and future Tenant Improvement permit applications are forthcoming, if any new use increases the requirement enough to necessitate an additional Water Closet or Lavatory, the Tenant Improvement design will provide such bathroom fixtures.

The code flexibility being requested is primarily regarding the sharing of these facilities by gender. Instead of dividing up Men's and Women's requirements separately, we have taken the strictest of these two requirements (women's) and used it throughout our calculations. One shared multi-gender facility is being proposed so that maximum efficiency of fixtures may be achieved. Each water closet will be separated within a private, fully enclosed and lockable room, with a shared waiting space containing two lavatories outside of each toilet room. Two of the water closet rooms also contain their own lavatory and shower. The code is silent on a shared "unisex" configuration, and thus the applicant is requesting flexibility from the Building Official to achieve the proposed configuration. This modification/flexibility does not lessen health, life, and fire safety requirements and is comparable to several new bathroom configurations being built.

Thank you for your consideration regarding this Code Modification request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gabriela Riegler', with a stylized, flowing script.

Gabriela Riegler