



**Planning, Development & Transportation Services**  
Community Development & Neighborhood Services

**To:** Fort Collins Stakeholders

**From:** Marcus Coldiron, Chief Building Official

**Date:** September 17, 2025

**File:** Code Interpretation

---

**Title:** Public vs. private toilet facilities

**Code Edition:** 21' International Plumbing Code (IPC)

**Sections:** 202 General Definitions (IPC)  
403.3 Employee and public toilet facilities (IPC)  
403.3.1 Access (IPC)

**Purpose:** Provide clarification on the intent of public vs. private toilet facilities in accordance with the International Plumbing Code.

**Code requirements:**

**PRIVATE.** In the classification of plumbing fixtures, "*private*" applies to fixtures that are not *public*.

**PUBLIC OR PUBLIC UTILIZATION.** In the classification of plumbing fixtures, "*public*" applies to fixtures with unrestricted exposure to walk-in traffic.

**403.3 Employee and public toilet facilities.** For structures and tenant spaces intended for *public* utilization, customers, patrons and visitors shall be provided with *public* toilet facilities. Employees associated with structures and tenant spaces shall be provided with toilet facilities. The number of plumbing fixtures located within the required toilet facilities shall be provided in accordance with Section 403 for all users. Employee toilet facilities shall be either separate or combined employee and *public* toilet facilities.

**Exception:** *Public* toilet facilities shall not be required for:

1. Parking garages operated without parking attendants.
2. Structures and tenant spaces intended for quick transactions, including takeout, pickup and drop-off, having a public access area less than or equal to 300 square feet (28 m<sup>2</sup>).



***Planning, Development & Transportation Services***

Community Development & Neighborhood Services

**403.3.1 Access.** The route to the public toilet facilities required by Section 403.3 shall not pass through kitchens, storage rooms or closets. Access to the required facilities shall be from within the building or from the exterior of the building. The public shall have access to the required toilet facilities at all times that the building is occupied.

**Code interpretation:**

Plumbing fixture calculations utilize occupant load in determining how many fixtures are required. Section 403.3 does provide the ability to separate public and employee toilet facilities. However, employee plumbing fixtures shall also be considered public, as the fixtures still provide unrestricted exposure to walk-in-traffic, unless their use is restricted to an individual, such as those of a private office.

Restrooms in businesses such as doctors' offices, dentists or similar uses that provide limited or appointed based access to certain areas, or the entirety of the space shall be considered public, unless the use is restricted to an individual, such as those of a private office.

A handwritten signature in blue ink, appearing to read "Marcus Coldiron", is written over a light blue horizontal line.

Marcus Coldiron  
Chief Building Official