



SEATTLE-TACOMA INTERNATIONAL AIRPORT ALL GENDER RESTROOM PLAN

FEBRUARY 2019



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1. EXECUTIVE SUMMARY

All gender restrooms are facilities that anyone can use regardless of gender. They can be single or multi-stall. All gender restrooms benefit a variety of people, including transgender and gender non-conforming individuals. All gender restrooms create a safe space for employees and community members to use the restrooms as it removes stigma or rationale for judgement as to which gendered facilities to use. All gender restrooms also accommodate use by caretakers and parents when assisting someone of the opposite gender.

On May 22, 2018, the Port of Seattle Commission adopted motion 2018-08 to develop a Seattle-Tacoma International Airport (Sea-Tac) gender-inclusive restroom plan to ensure that all existing and future single-occupant restrooms at Sea-Tac, beyond meeting the requirements set by the Washington State Building Code (WSBC), are designated for use by any person, regardless of sex or gender identity.¹ The plan includes a recommended design for restrooms and signage, timelines, costs, alternatives, and implications considered.

A working group, made up of representatives from across the Port, developed this gender-inclusive restroom plan and recommends a compartment design for All Gender Restrooms in existing facilities which features compartments that have a toilet and sink with full height partitions and doors.

The working group identified one location at the head of Concourse D where one single-user compartment-style All Gender Restroom can be added today (which is above and beyond today's WSBC requirements at Sea-Tac). Three additional locations were identified where restrooms may be converted in the compartment-style design at Gate B3, Gate C2/3, and Gate D3 today, however, cannot be assigned as All Gender until the WSBC is updated in the future (these restrooms are not above and beyond today's WSBC requirements at Sea-Tac). The feasibility of converting these restrooms to the compartment-style design is pending further study on throughput, maintainability, and janitorial considerations. Lastly, for new sites (greenfield developments), the working group recommends a multi-user design with All Gender stalls, urinal room, and open handwashing station.

2. PURPOSE

The main purpose of this plan is to provide Port Commissioners a staff recommendation on All Gender restroom design and signage at Sea-Tac and other areas for consideration in order to meet the task as directed in the adopted motion 2018-08.

¹ Gender identity means a person's gender-related identity, appearance, or expression, whether or not traditionally associated with one's biological sex or one's sex at birth, and includes a person's attitudes, preferences, beliefs, and practices pertaining thereto.

Restrooms are often the first and last impression of the facility to the traveling public and frequently identified as the single most important amenity to influence the passenger experience. Restrooms accommodate a basic need for all passengers. As the operator of Sea-Tac, the port recognizes that all persons and groups of people should have access to restrooms and other gender-specific facilities, regardless of sex, gender identity, ability, or parental status. Despite existing protections on the basis of gender identity, transgender and gender non-conforming people often experience harassment, intimidation, refusal of access, and in some cases, violence, when trying to use public restrooms and other gender-specific facilities consistent with their gender identities. These experiences sometimes lead to significant health problems and contribute to emotional stress from having to avoid using public restrooms.

On July 31, 2018, the Port of Seattle working group conducted a focus group with key external stakeholders from the Lesbian, Gay, Bisexual, Transgender and Queer (LGBTQ)-focused organizations, specifically organizations that support the transgender community, to gather feedback on design and signage of all gender restrooms. In addition, on December 4, 2018, the working group conducted a focus group with faith-based community stakeholders. The feedback from stakeholders helped inform the recommendations included in the plan.

In January 2019, the working group received a layout study from consultant Architectural Alliance International on Sea-Tac's restroom program and how all gender restrooms might be incorporated into the program. The study provided information on potential locations at Sea-Tac where all gender restrooms may be added within the current footprint. In addition, a cost estimate was also provided to the working group.

3. RESTROOM DESIGN

a. Restroom Design Requirements

All restrooms at port facilities are designed to meet the current International Building Code and the WSBC. The WSBC sets minimum thresholds for male, female, and family restrooms, quantity of fixtures required, and required signage.² Today, the WSBC does not include specifications and/or guidelines for gender-inclusive/all-gender/or gender-neutral restrooms.

The working group only considered Concourses B, C and D as these concourses that are currently included in the Sea-Tac Restroom Renovation Project and will undergo renovation or expansion.

Below are tables for Concourses B, C and D that depict the following:

1. Code requirements for fixtures for Women (W), Men (M), and Family Restrooms (F)
2. Existing fixture count (Note: Men's Fixture Counts also include urinals)
3. Fixture counts for traditional design

² See Supplement 1: Code Requirements

4. Fixture counts for compartment design

Concourse B	Fixture Counts		
Code Requirements	W: 19	M: 10	F: 1
Existing	W: 19	M: 21	F: 2
Above Code	W: 0	M: 11	F: 1
Traditional	W: 20	M: 18	F: 4
Compartment	W: 29	M: 24	F: 4

Concourse C	Fixture Counts		
Code Requirements	W: 18	M: 10	F: 1
Existing	W: 32	M: 30	F: 1
Above Code	W: 14	M: 20	F: 0
Traditional	W: 31	M: 20	F: 10
Compartment	W: 37	M: 23	F: 3

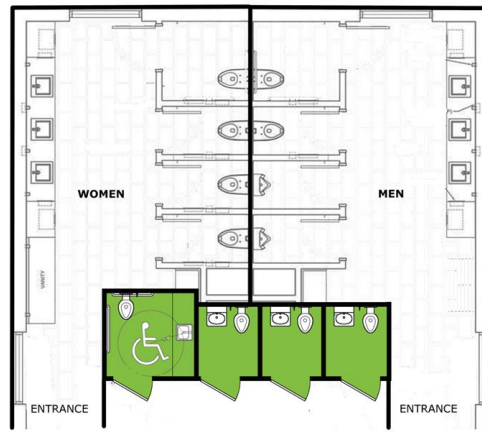
Concourse D	Fixture Counts		
Code Requirements	W: 13	M: 7	F: 1
Existing	W: 25	M: 25	F: 3
Above Code	W: 12	M: 18	F: 2
Traditional	W: 27	M: 22	F: 5
Compartment	W: 30	M: 26	F: 6

Sea-Tac is currently meeting the WSBC requirements for Concourses B, C, and D. The working group does see opportunity to provide All Gender restrooms (above and beyond WSBC requirements).

b. Designs Considered

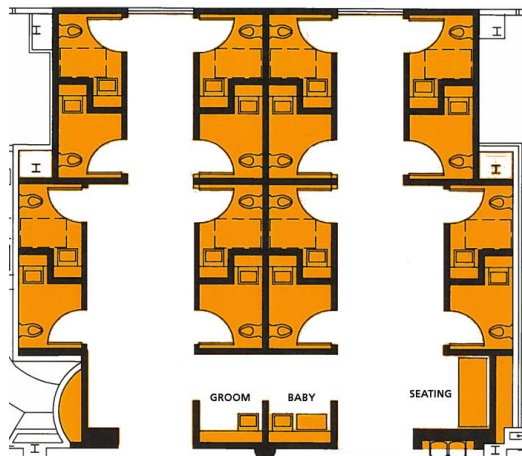
1. Gendered (status quo)
2. Gendered with additional single user restrooms (All Gender/Family Restrooms)
3. Multi-user All Gender Restrooms: Compartment design
4. Multi-user All Gender Restrooms: Stalls, urinal room and open hand washing station

Gendered with Additional Single User Restrooms (All Gender/Family Restrooms)



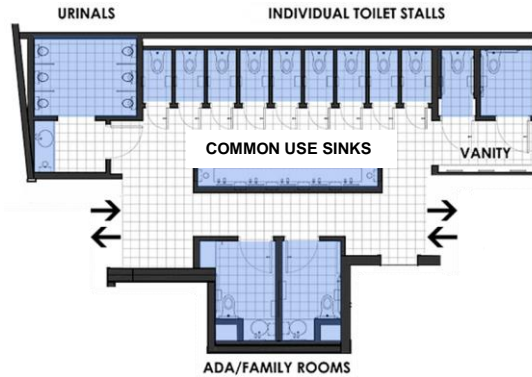
This design features gendered restrooms with additional single user restrooms that can be designated All Gender restrooms.

Multi-user All Gender Restrooms: Compartment Design



This design features compartments where toilet and sink are in one enclosed private space with floor to ceiling doors.

Multi-user All Gender Restrooms: stalls, urinal and open hand washing station

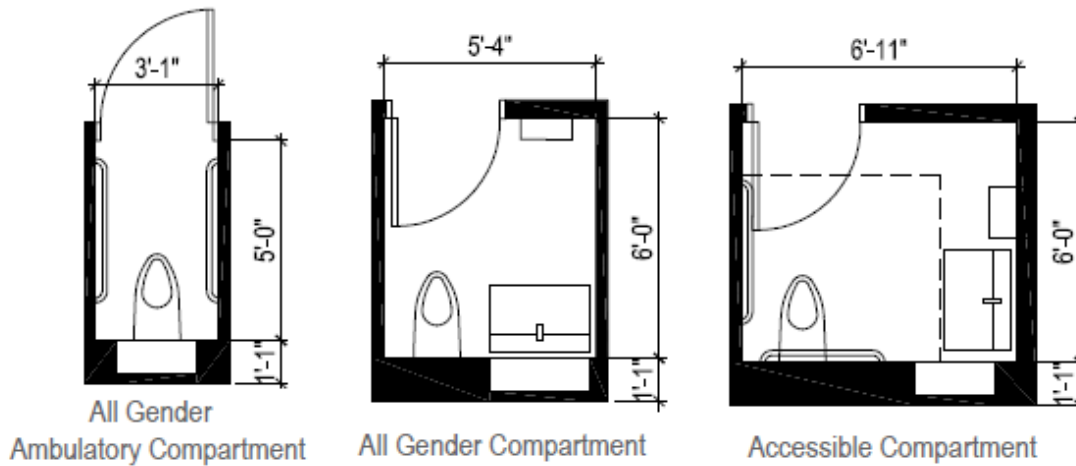


This design features stalls that can be designated All Gender with floor to ceiling doors. In addition, common use sinks/open hand washing station is available to all users. ADA/Family restrooms and urinals are also a feature.

a. Recommended Design

Recommended Design for All Gender Restrooms in Existing Facilities

Compartment design: The compartment design features compartments that have a toilet and a sink (accessible and non-accessible versions) with full height partitions and doors. It is set up for easier cleaning/maintenance because most work can be done in the individual compartments without closing down the entire section.



The designs depicted above include an All Gender Ambulatory Compartment (toilet and grab bars), an All Gender Compartment (sink and toilet) and Accessible Compartment (larger to provide space for a wheelchair, toilet and sink).

The advantages of the compartment designs include more flexibility for future conversion when WSBC is updated for Sea-Tac to include All Gender restrooms as part of the fixture count. Individual compartments may be closed for repairs without affecting other compartments or shutting down the entire restroom facility for maintenance. Compartment designs also provide additional privacy and security. There are also disadvantages to the compartment design to include limited space for lines outside the compartments. Additional sinks and towel dispensers are needed as each compartment requires its own sink and towel dispenser in comparison to traditional design layout which increases costs. It also may require a stall availability indicator in order to see whether a compartment is open or not.

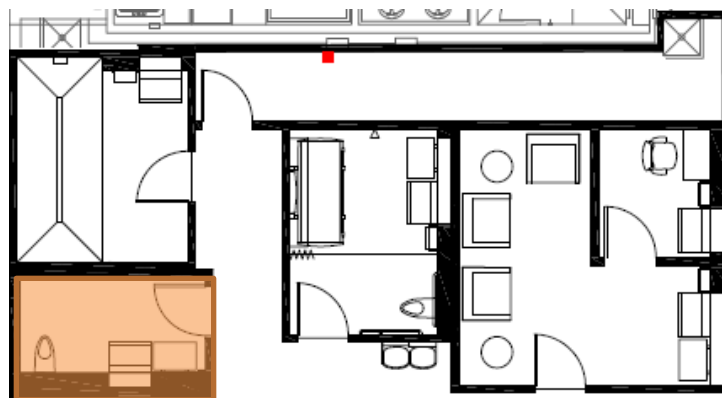
The working group recommends further study on the compartment design to include the following:

- Cost considerations
- Throughput – Compartments may increase dwell time as each individual user will stay in the compartment in order to wash their hands in the compartment versus in communal location (where the individual can free up toilet in order to wash hands)? Compartments may also decrease lines as both men and women are able to use the compartment.
- Maintainability and increased janitorial needs – the compartment design may increase janitorial needs as a mop cannot be easily swept through under this design versus traditional design with stalls. Compartment designs may also limit space for chase for maintenance staff to access the plumbing.
- Safety – As the compartment is enclosed floor to ceiling, it is difficult to know if someone requires medical assistance.
- Can urinal rooms be considered in a compartment set (multiple compartments)
- Can all compartments be ambulatory (include grab bars)?

Potential Locations for All Gender Restrooms

What we can do now (above and beyond WSBC requirement)

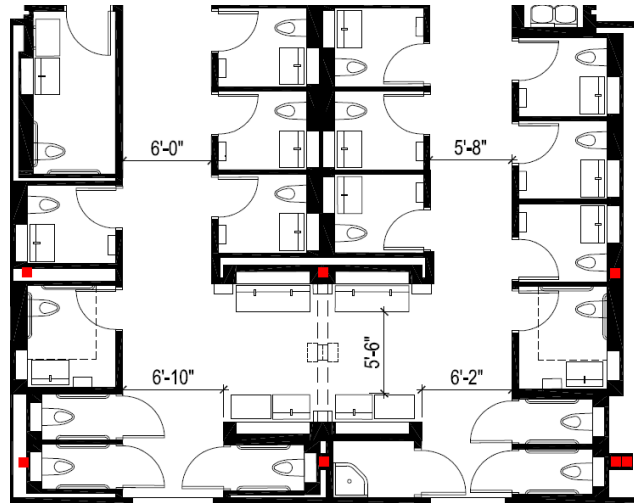
1. GATE D Head – Add one (1) single-user All Gender Restroom using the recommended All Gender Restroom design and signage. This can be incorporated in the current restroom renovation project. This is what we can do today above and beyond today's WSBC requirements. We can use both design and signage for this location.



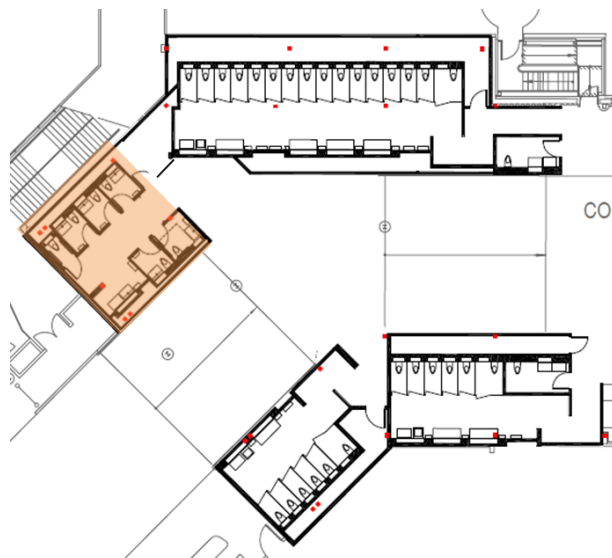
What we can do in the interim (to prepare for when WSBC is updated in 2021)

The following three locations listed below require further study:

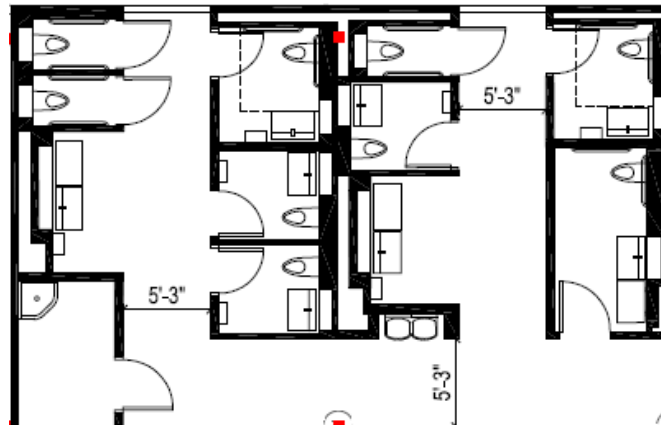
1. GATE B3 – Convert one set of restrooms to single-user All Gender Restrooms using the recommended compartment-style design. This could mean adding up to eighteen (18) compartments at Gate B3. The signage will be gendered (male or female) to accommodate the building code requirements. The gendered signage can be replaced in the future to the recommended All Gender signage once code is updated.



2. GATE C2/3 – Convert one set of restrooms to single-user All Gender Restrooms using the recommended compartment-style design. This could mean up to six (6) compartments at Gate C2/3. The signage will be gendered (male or female) to accommodate the current building code requirements. The gendered signage can be replaced in the future to the recommended All Gender signage once building code is updated.

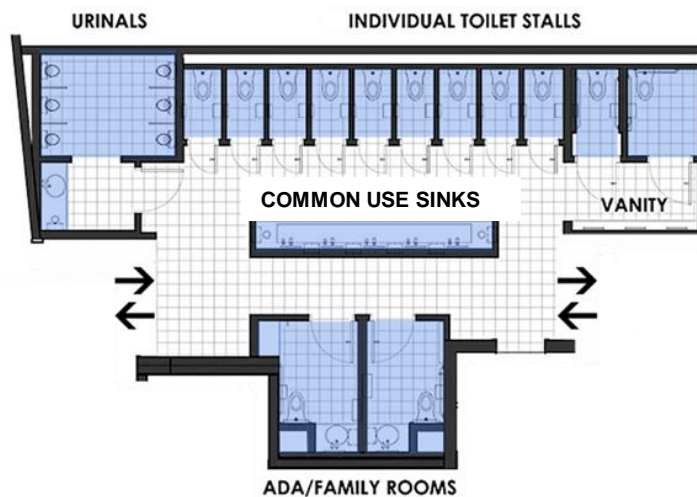


- GATE D3 – Convert one set of restrooms to single-user All Gender Restrooms using the recommended compartment-style design. This could mean up to nine (9) compartments. The signage will be gendered (male or female) to accommodate the current building code requirements. The gendered signage can be replaced in the future to the recommended All Gender signage once building code is updated.



What we can do in the future (new sites/"greenfield development")

- In the future, as new facilities are designed and constructed at new sites, the working group recommends the multi-user All Gender restrooms with stalls, urinal and open hand washing station, vanity and baby changing stations. This design is the most efficient and high throughput with increased maintainability (space for chase).



4. SIGNAGE

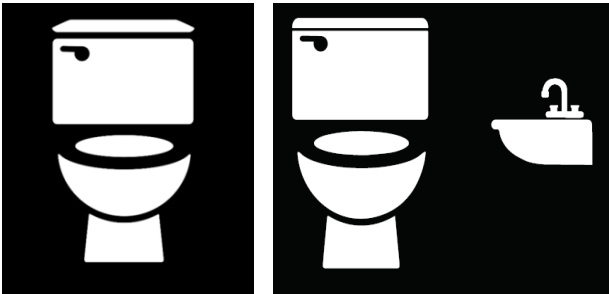
a. Signage Requirements

Single-user restrooms must display the verbiage “Restroom.” In addition, in groups of single user restrooms, the WSBC requires at least 5 percent of the total number of restrooms as ADA compliant with a minimum of one. Therefore, restroom signage must be identified by the International Symbol of Accessibility (ISA) for family or assisted-use toilet and bathing rooms. The standard best practice is to include iconography and braille translation of “Restroom”.

For the restrooms whose plumbing fixtures are counted towards meeting the WSBC, signage is required for public facilities that designate the sex as required by Section 2902.2. Signs shall be readily visible and located near the entrance to each toilet facility. Signs for accessible toilet facilities shall comply with Section 1111. In addition, directional signage indicating the route to the public toilet facilities shall be posted in a lobby, corridor, aisle or similar space, such that the sign can be readily seen from the main entrance to the building or tenant space. Signage details for family restrooms are found in IBC section 1109 and 1111. Also, check chapter 7 of the ANSI A117.1-2009.

b. Signage Considered

Iconography



The iconography of the plumbing fixtures of a restroom is gender-inclusive and universally recognizable. The icon of a toilet is recognizable to both international and domestic travelers. Focus group members were in favor of depicting what was behind the door as it is clear and does not designate who can and cannot use the restroom.



This depicts the traditional male and female icons and a half male and half female icon. Focus group was not in favor of the third icon as it was not universally recognizable and may come across as offensive to people who identify as gender nonconforming as it depicts a half male half female (and they do not perceive themselves as such).



These two icons depict the traditional male and female icons. One uses a line to divide the male and female icons. Focus group members commented that these icons come across as restrooms for heterosexuals and not perceived as restrooms for any gender to use. The focus group also commented that it is frequently used as directional signage showing that gendered restrooms are available down the hall.

Title

1. Restroom

The word “Restroom” must be included in any signage for single-user restrooms.

2. All Gender Restroom and Gender-Inclusive Restroom

All Gender Restroom was favored by the focus group, but one focus group member commented that the term “gender” may not be widely understood by international travelers.

3. Gender Neutral Restroom

This title was not favored by the focus group as it implies that gender is a neutral concept and not as important. Gender nonconforming people see gender as very important and want to educate the general public on gender issues.

4. Inclusive Restroom and Universal Restroom

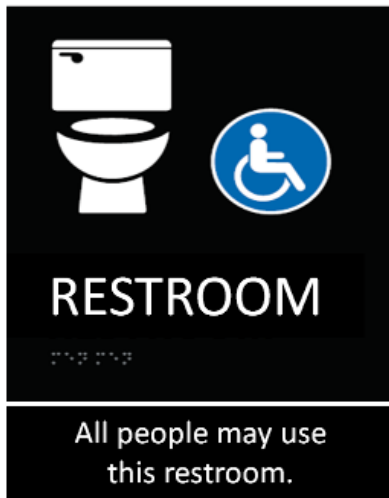
Removing the term “gender” was also considered by the working group. The term “inclusive” may not be widely understood and “universal” may connote that the restroom can be used for families and those seeking accessible bathrooms when it may not be the case.

5. All User Restroom
This title removes the term “gender” but is clear that all users may use the restroom. Canadian international airports, such as Vancouver, uses “All User Washroom” signage and the working group agreed that this described the purpose of the restroom to serve all users in a clear fashion.
6. Unisex Restroom
This term was confusing to the focus group and not used widely in public facilities.
7. Water Closet (WC)
Although WC is internationally recognizable, domestic travelers may not be familiar with this term.

Description

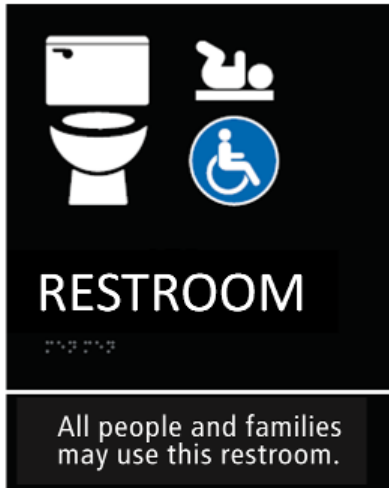
1. No description
If the iconography and title is clear, there may not be a need for a description to be included in the single-user restroom signage.
2. All people may use this restroom
This was favored. Our current family restroom signage at Sea-Tac says “All people and families may use this restroom.” This description would be consistent with the current family restroom signage. If an “All User Restroom” title is chosen, amending family restroom signage to state “All users and families may use this restroom” is appropriate.
3. Anyone can use this restroom
This is similar to the description above, however, is less consistent with the current family restroom signage.
4. Anyone can use this restroom, regardless of gender identity or expression
The focus group did not favor this description as it appears to call out the transgender people who may not necessarily want to be singled out.

c. Recommended Signage



For single-user All Gender Restrooms:

- a. **Plumbing fixture icon:** The iconography of the western-style plumbing fixture of a restroom is gender-inclusive and universally recognizable. The icon of a toilet is recognizable to both international and domestic travelers. Focus group members were in favor of depicting what was behind the door as it is clear and does not designate who can and cannot use the restroom. The symbol for accessibility will be included for at least 5 percent of the total number of single-user restrooms with a minimum of one restroom.
- b. **Restroom:** The title “Restroom” with the braille translation describes the purpose of the restroom to serve all users in a simple and straightforward manner.
- c. **All people may use this restroom:** This description is favored by the working group. The focus group did not favor including “regardless of gender identity or expression” as it appears to call out a minority group who may not necessarily want to be singled out in public for using the single-user restroom. (Note: For family restrooms, the working group is considering “All people and families may use this restroom” as a description).



For Family and Accessible/ADA Restroom:

- a. Plumbing fixture icon, ADA symbol, baby on baby changing table: The iconography of the western-style plumbing fixture of a restroom is gender-inclusive and universally recognizable. The icon of a toilet is recognizable to both international and domestic travelers. Focus group members were in favor of depicting what was behind the door as it is clear and does not designate who can and cannot use the restroom. The symbol for accessibility will be included for at least 5 percent of the total number of single-user restrooms with a minimum of one restroom. The icon of the baby on a horizontal line symbolizes a baby changing table. This icon is considered All Gender as it does not show a female or male changing a baby.
- b. Restroom: The title “Restroom” with the braille translation describes the purpose of the restroom to serve all users in a simple and straightforward manner.
- c. All people and families may use this restroom: This description is the current description used in our current family restrooms at Sea-Tac. The working group recommends this description to remain consistent with our current family restroom signage. The focus group did not favor including “regardless of gender identity or expression” as it appears to call out a minority group who may not necessarily want to be singled out in public for using the single-user restroom.

5. PROPOSED TIMELINE

a. Restroom Construction

This is the timeline for the Restroom Renovation Project which may include All Gender restrooms should it go forward.

- **Phase 1:** Enabling Work – Concourse B Leased Space Relocation
 - Status: Fully authorized. Construction complete

Restroom Construction

- **Phase 2:** Enabling Work – Airline office relocation and employee restroom renovation
 - Status: Awarded in January 2019
- **Phase 3:** Prototype Restroom. Requesting construction authorization
 - Status: Pending approval of design by the Federal Aviation Administration (FAA)

Restrooms In-Use

- **Phase 2:** Enabling Work – Airline office relocation and employee restroom renovation
 - Status: 1st Quarter 2020
- **Phase 3:** Prototype Restroom. Requesting construction authorization
 - Status: Pending approval of design by the FAA
- **Phase 4:** 3 Restrooms (one per concourse)
 - Status: Pending approval of design by the FAA
- **Phase 5:** Remaining restrooms
 - Status: Pending approval of design by the FAA

Both Phases 4 and 5 will require FAA funding, which means we need to wait for authorization from the FAA (currently do not know the timeline for when this will be advertised). The restroom renovation project is scheduled to be complete by Q4 2023 (pending FAA approval for phase 3 to phase 5).

b. Signage Installation

Based on previous signage installation, from time of order through production/fabrication of signage to installation of signage at restrooms the working group estimates four to six weeks.

6. COSTS

a. Estimated Costs for Restroom Construction

At our current conceptual design phase, it is difficult to estimate project costs for each of the potential All Gender Restroom locations. However, to build compartments restrooms on Concourses B, C, and D that are part of our restroom renovation project, it is estimated to cost about \$4 million dollars more than traditionally designed restrooms (gendered facilities). Using

a mix of traditional and compartment restrooms is estimated to cost about \$1.5 million more than installing traditional only restrooms.

Restrooms that are currently part of the restroom renovation project include restrooms at the following:

- Concourse B: Gates B3, B8 (existing restrooms), and B9 (new restrooms)
- Concourse C: Gates C2 (combined existing and new restrooms), and C16 (existing restroom)
- Concourse D: D-Head, D1 (new restrooms, hold room and Alaska customer service center), D3, D5 (which is the restroom being renovated in phase 3), and D11 (existing restrooms).

b. Estimated Costs for Signage

Based on the previous historical costs for signs, thirty (30) signs cost \$5,077.05 to fabricate, which is \$169.23 each. This does not include installation costs by the aviation carpenters to remove any previous signage and install new signage.

7. ADDITIONAL AREAS FOR COMMISSION CONSIDERATION

a. Opportunity costs

The working group acknowledges the space constraints at Sea-Tac. With airport dining and retail (ADR) requirements, hold room needs, mother's nursing rooms, and pet relief space, there is high demand for space at the airport after the security checkpoints. Sea-Tac needs to balance the various demands and requirements, consider revenue generating options and non-revenue generating options while meeting customer needs and providing high quality service.

b. Policy Considerations

i. Include All Gender Restrooms in Design Standards for all Port facilities

The working group recommends inclusion of All Gender Restroom (design and signage) as part of the design standards for all Port facilities. Consistent design and signage is ideal so that all employees and visitors to the Port are familiar with what to expect when using our facilities. It also sends the message to the public that this effort is Port-wide and not just at our airport.

ii. Include additional wayfinding for all restrooms

The working group recommends including additional wayfinding to alert travelers where All Gender restrooms, gendered restrooms, family restrooms, baby changing or ADA/Accessible restrooms may be located on the concourses.

iii. **Remove current family restroom signage and replace with All Gender Family and Accessible/ADA Restroom**

While the Port awaits updates to the WSBC to include All Gender Restrooms, the working group recommends removing current family restroom signage and replacing it with All Gender Family and Accessible/ADA restrooms to accommodate all people and families.

However, when the WSBC is updated to include All Gender Restrooms, the Port can ensure the family restrooms are designated for families only with appropriate signage to reflect that.

iv. **Support an update to WSBC to include All Gender Restrooms**

The working group recommends including All Gender Restrooms in the State Legislative Agenda for 2019 and 2020. The next cycle for updating the WSBC is in 2021. The working group recommends supporting a change to the WSBC that includes at a minimum that All Gender Restrooms to be counted as part of total number of fixtures at Sea-Tac. The working group recommends the Port of Seattle's Government Relations team look to the City of Seattle's All-Gender Restroom Ordinance (see below).

City of Seattle All-Gender Restroom Ordinance

In 2016, the City of Seattle passed the All-Gender Restroom Ordinance that helps achieve greater restroom access for transgender and gender diverse individuals. Seattle's Public Accommodations Ordinance (SMC 14.06) also clarifies the rights of individuals to use gender-specific facilities that are consistent with their gender identity.

The All-Gender Restroom Ordinance applies to existing and newly-built City facilities, as well as in public places in Seattle. It allows use of single occupant restrooms by any person, regardless of sex or gender identity, and prevents those restrooms from being restricted to a specific sex or gender identity. Single occupant restroom facilities without appropriate signage already in place will require new signs to be posted.

Beginning March 9, 2016, places of public accommodation within Seattle city limits will have to designate existing or future single-occupancy restrooms as All-Gender.

Seattle Municipal Code (SMC) 14.07.020 - Single-occupant restrooms in City facilities

All existing and newly-built single-occupant restrooms in City facilities shall not be restricted to a specific sex or gender identity and shall use appropriate signage to indicate such facilities are designated for use by any person, regardless of sex or gender identity. (*Ord. 124829, § 1, 2015.*)

14.07.030 - Requirements for single-occupant restrooms in places of public accommodation

A. Single-occupant restrooms shall not be restricted to a specific sex or gender identity and shall use appropriate signage to indicate such facilities are designated for use by any person, regardless of sex or gender identity.

B. Entities covered by this Chapter 14.07 shall have 180 days from the effective date of the ordinance introduced as Council Bill _____ to comply by replacing existing signs on the exterior of single-occupant restrooms restricting use to a single gender with signs indicating that they are for use by all genders.

(Ord. 124829, § 1, 2015.)

Examples of all-gender restroom signs:

1. All-Gender Restroom
2. Gender-Neutral Restroom
3. Unisex Restroom
4. Toilet
5. WC = Water Closet

WSBC and International Building Code (IBC)

The current Washington State Building and Plumbing Codes are based on the 2015 IBC and the 2015 Uniform Plumbing Code. The state amended and adopted the minimum number of required fixtures based on the International Plumbing Code and has been incorporated in Chapter 29 of the WSBC. Because Sea-Tac is a mixed use facility and occupants are in the facility for significant periods of time, the plumbing fixture calculations are based on the individual occupancy.

The methodology for the fixture calculations is summarized below:

- In public spaces at the baggage claim, check-in and terminal concourse areas, the minimum number of required plumbing fixtures have been calculated per WSBC Table 2902.1 A-3 Auditoriums, art galleries, exhibition halls with water closets calculated at a ratio of one per 125 (males) and one per 65 (females) and lavatories at one per 200.
- The Central Terminal food court area and lounges are calculated at one water closet per 75 and one lavatory per 200.
- The non-secure Mezzanine and AOB are calculated as a business at one water closet per 25 for the first 50 and one per 50 for the remainder exceeding 50, and one lavatory per 40 for the first 80 and one per 80 for the remainder exceeding 80.
- Baggage make-up is calculated as Factory/Storage at one water closet per 100 and one lavatory per 100.
- Water closets can be replaced with urinals but shall not be reduced to less than one quarter (25%) of the minimum specified.

The 2015 International Building Code 1109.2.2 Water Closet Compartment states: Where water closet compartments are provided in a toilet room or bathing room, at least 5 percent of the total number of compartments shall be wheelchair accessible. Where the combined total water closet compartments and urinals provided in a toilet room or bathing room is six or more, at least 5 percent of the total number of compartments shall be ambulatory accessible, provided in addition to the wheelchair-accessible compartment.

Where lavatories are provided, at least 5 percent, but not less than one, shall be accessible. Where an accessible lavatory is located within the accessible water closet compartment, at least one additional accessible lavatory shall be provided in the multi-compartment toilet room outside the water closet compartment. Where the total lavatories provided in a toilet room or bathing facilities is six or more, at least one lavatory with enhanced reach ranges shall be provided.

2018 Updates to the IBC

In 2018, the International Code Council revised the IBC section 2902.1.2 adding that single-user toilet facilities and bathing room fixtures shall contribute to the total number of required plumbing fixtures for a building or tenant space. Single-user toilet facilities and bathing rooms, and family or assisted-use toilet rooms and bathing rooms shall be identified for use by either genders.

In addition, IBC Section 2902.2 added that where plumbing fixtures are required, separate facilities shall be provided for each sex except:

1. Separate facilities shall not be required for dwelling units and sleeping units.
2. Separate facilities shall not be required in structures or tenant spaces with total occupant load, including both employees and customers, of 15 or less.
3. Separate facilities shall not be required in mercantile occupancies in which the maximum occupant load is 100 or less.
4. Separate facilities shall not be required in business occupancies in which the maximum occupant load is 25 or fewer.

2018 Updates to the WSBC

On July 27, 2018, the WSBC Council considered the proposed Separate Facilities code change for IBC Section 2902.2. WSBC voted to adopt the IBC code change with the following amendment:

2902.2 Separate facilities. Where plumbing fixtures are required, separate facilities may be provided for each sex. Exceptions:

1. Separate facilities shall not be required for dwelling units and sleeping units.
2. Separate facilities shall not be required in structures or tenant spaces with a total occupant load, including both employees and customers, of 15 or less.
3. Separate facilities shall not be required in mercantile occupancies in which the maximum occupant load is 100 or less.

4. Separate facilities shall not be required in spaces primarily used for drinking or dining with a total occupant load, including both employees and customers, of 30 or fewer.³

WSBC explained that the WAC 162-32-060 requires segregated facilities to be available to all genders. Therefore, some institutions are migrating to non-gendered full height restrooms to comply with this requirement as well as to be sensitive to non-gender issues. Making segregation optional is consistent with WAC. According to the WSBC schedule, the 2018 codes will be effective on July 1, 2020.

³ <http://apps.leg.wa.gov/WAC/default.aspx?cite=51-50-2900>