

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

ITEM NO: _____ (DCA USE ONLY)

PAGE 1 OF 1

CODE: 2021/2024 IPC

SECTION: 403.2 exception 6

PROPONENT: Kenneth Jacobsen

DATE: 8/28/24

EMAIL: [REDACTED]

ADDRESS: [REDACTED]

TELEPHONE NUMBER: [REDACTED]

FAX NUMBER: () -

CHECK ☐ Revise section to read as follows:

☐ Add new section to read as follows:

ONE: ☐ Delete section and substitute the following:

☒ Delete without substitution:

~~LINE THROUGH MATERIAL TO BE DELETED:~~

UNDERLINE MATERIAL TO BE ADDED

☐ Approve

☐ Approve as amended

(DCA STAFF ONLY)

☐ Disapprove

☐ Withdrawn

DESCRIPTION:

Delete without substitution - IPC section 403.2, Exception #6

REASON/INTENT:

The safety of females is the paramount concern and intent behind section 403.2. Allowing all sexes in the same restroom at the same time removes the barrier for the women's safety.. Exception #6 violates the safety concerns for women & young girls.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

no impact

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM INSTRUCTION SHEET

1. Do not complete the line entitled "Item No. _____".
2. Use a separate form for each proposed code amendment.
3. "Sheet ____ of ____" indicates the number of sheets for each individual proposed code amendment, not the number of sheets for all the amendments submitted.
4. Identify the code and code section that is the subject of the proposed amendment.
5. The proponent's name, address, telephone number and fax number must be filled out completely.
6. Be sure to indicate the type of recommended action in the space referred to as "Check One".
7. If the proposed amendment revises the language of the code section, deletes the entire code section, or deletes the entire code section and offers substitute language, include the language of the present code section and line through the language to be deleted and underline the language of the proposed amendment.
8. Under the "Reason" section, provide the reasoning behind the proposed code amendment. The reason should be clear and concise. Test reports, standards or other supporting information and documentation may be submitted with the proposed amendment and must be attached to the amendment form.
9. **A Statement of Financial Impact must accompany all proposed code amendments.** The statement should be clear and concise. Test reports, standards or other supporting information and documentation may be submitted with the proposed amendment and must be attached to the amendment form.
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11. The proponent will be notified when the proposed amendment will be considered by the State Codes Advisory Committee.
12. Information concerning submittal of code amendments, including deadline dates for submittal, can be obtained by contacting the Codes and Industrialized Buildings Section at (404) 679-3118. All proposed code amendments should be submitted to:

The Department of Community Affairs
Codes and Industrialized Buildings Section
60 Executive Park South, NE
Atlanta, Georgia 30329-2231



AIA Georgia

50 Hurt Plaza
Suite 109
Atlanta GA 30303
P: 678-553-0500

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Heather Potts Lang, AIA

Will Stanford, AIA

Marissa Swanson, Assoc AIA

Ai-Lien Vuong, AIA

David Southerland
Executive Director
dsoutherland@aiaga.org

April 25, 2025

Mr. Scott Roberts
SCAC Member and 2024 IPC/ISPSC Task Force Chair
Georgia Department of Community Affairs
60 Executive Park South NE
Atlanta, GA 30329

RE: Items IPC-2024-01 and IPC-2024-02 on Proposed Amendment Chart

Dear Chairman Roberts:

The American Institute of Architects, Georgia Association was present during the latest meeting where the changes to IPC Section 403.2 were discussed by the proponents and the task force where we were also allowed to speak in opposition of the deletion of Exception #6.

The exception to Section 403.2 of the plumbing code allows architects to meet requirements for the number of plumbing fixtures based on the occupant load and federal requirements for accessibility in a broad range of spaces. The exceptions allow us to work restroom into existing (sometimes historic) spaces that otherwise wouldn't meet the building/plumbing code requirements and thus could not operate as a business. The exceptions also make it possible in some conditions to meet the federal requirements for accessible restrooms that could not otherwise be met.

We ask to still be on record as strongly opposing both IPC-2024-01 and IPC-2024-02. We ask that the Task Force consider a new proposal that would help to give relief to the use cases described above. We would like to propose that a new Exception #6 be reviewed that would help direct building officials and architects to the Existing Building Code for restroom modifications. Please see our proposal below:

403.2 Separate facilities

Where plumbing fixtures are required, separate toilet facilities shall be provided for each sex.

Exceptions:

1. Separate toilet facilities shall not be required for dwelling units and sleeping units.
2. Separate toilet facilities shall not be required in structures or tenant spaces with a total occupant load, including both employees and customers, of 15 or fewer.
3. Separate toilet facilities shall not be required in mercantile occupancies in which the maximum occupant load is 100 or fewer.
4. Separate toilet facilities shall not be required in business occupancies in which the maximum occupant load is 25 or fewer.
5. Separate toilet facilities shall not be required to be designated by sex where single-user toilet rooms are provided in accordance with Section 403.1.2.

6. ~~Separate toilet facilities shall not be required where rooms having both water closets and lavatory fixtures are designed for use by all persons regardless of sex and privacy is provided for water closets in accordance with Section 405.3.4 and for urinals in accordance with Section 405.3.5.~~

Delete and replace exception #6 to read:

6. Toilet facilities in existing buildings constructed in accordance with the International Existing Building Code is permitted.

We appreciate your time and attention. Please forward any questions or guidance to my attention at the American Institute of Architects, Georgia Association.

Sincerely,

A handwritten signature in black ink, appearing to read "David Southerland". The signature is fluid and cursive, with the first name "David" written in a larger, more prominent script than the last name "Southerland".

David Southerland
Executive Director
AIA Georgia and AIA Atlanta
404.933.4541 (M)

April 28, 2025

Mr. Scott Roberts, SCAC Member and 2024 IPC/ISPSC Task Force Chair
Members of the 2024 IPC/ISPSC Task Force
Georgia Department of Community Affairs
60 Executive Park South NE Atlanta, Georgia 30329

RE: Opposition to April 25, 2025 AIA Georgia Correspondence on Items IPC-2024-01 and IPC-2024-02 Proposed Amendments to Delete and Replace 2024 IPC Section 403.2 exception 6

Dear Chairman Roberts and Members of the IPC/ISPSC Task Force:

We are writing with grave concern in strong opposition to the American Institute of Architects ("AIA"), Georgia Association's latest proposal dated April 25, 2025 to delete and replace **2024 IPC Section 403.2 exception 6** to read from the *original text* to the *new text*, as shown below referenced from the AIA's letter.

[Original text] "6. Separate toilet facilities shall not be required where rooms having both water closets and lavatory fixtures are designed for use by all persons regardless of sex and privacy is provided for water closets in accordance with Section 405.3.4 and for urinals in accordance with Section 405.3.5."

[New text] "6. Toilet facilities in existing buildings constructed in accordance with the International Existing Building Code is permitted."

2024 IPC Section 403.2 titled Separate Facilities, is a section in the Plumbing Code which designates that toilet facilities shall be provided separately for Male and Female use. However, it provides exceptions to when separate facilities for Male and Female are not required. On March 20, 2025, the Task Force members voted to delete the *original text* of Exception 6 with its associated section without substitution after being presented with rebuttal letter and supporting document showing the significant public safety risks of Exception 6. **The supporting document elaborates and clarifies what is Exception 6. It is a gender-neutral or all-gender multiple occupancy use public restroom where men, women and children use toilet and urinal stalls next to each other without guarantee of full privacy from compartment or wall, while sharing common space at sink area. Even if full vertical room height separation is provided, there is still no privacy at the sink area.**

AIA's new text proposal of Exception 6 is saying that toilet facilities are not required to be provided separately for Male and Female use when the toilet facilities are provided in existing building complying with the Existing Building Code. Since Exception 1 to 5 pertains to Single User Toilet Facility, **this new text Exception 6 is referring to the same effect as the original text of Exception 6 that is Multiple User Toilet Facilities can be gender-neutral or all-gender use without any restriction, but applicable to an existing building only.**

We outline below to show how AIA's proposal is unnecessary and presents the same public safety risk and concerns as in the *original text* of the Exception 6.

1. **AIA claims the new text proposal is needed to design in existing buildings with space constraints is unnecessary.**

In our rebuttal letter to AIA dated March 10, 2025, we have shown that AIA failed to point out that **Exceptions 1 to 5 already provide wide latitude to address the design needs they raised**, specifically to accommodate existing spaces and comply with accessibility requirements. In fact, Exceptions 2 to 5 were added to the Code in consideration of the financial burden that small businesses may face when trying to comply with Section 403.2. In addition, **the Americans with Disabilities Act of 2010, as enforced in Georgia ("ADA"), allows for exceptions in existing facilities when it is impossible to fully comply with the accessibility requirements.** The **GSFIC/State ADA Coordinator's Office memo dated June 2014** clarified further that some spaces, including **bathrooms, are not considered as a primary function area so that these spaces do not need to comply with accessibility if they are not altered.** When altered or

renovated, the ADA also does not require full compliance with accessibility when the total cost of the full compliance exceeds twenty (20%) percent of the overall cost of alteration. The current GA State Amendment to the IBC 2018 edition, Chapter 34 Existing Structures, also provides exemptions for facilities where meeting accessibility requirements is technically not feasible. These provide relief in the form of a Single User Toilet Facility (Room) for existing or new toilet facility, accessible or non-accessible toilet facility, in a historic or a non-historic building, without exposing the public to safety risks in a gender-neutral or all-gender Multiple User Toilet Facility. Building officials and architects are familiar with these various codes which are already in place. Therefore, AIA's proposal of new text is unnecessary.

Also, there is no significant space saving in gender-neutral or all-gender Multiple User Toilet Facilities when the minimum number of plumbing fixtures is still required. Furthermore, installation of walls from floor to ceiling with a door for full privacy at each water closet will add on to the cost of construction and may add up to unnecessary use of space because of the full wall construction instead of typical plastic partition. Again, AIA's proposal of new text is unnecessary.

2. AIA's new text language is misleading

The way AIA structured the language of this *new text* is misleading. A regular person reading the new text will innocently take away that all toilet facilities in existing buildings are permitted to be constructed in accordance with the Existing Building Code, and not specifically about it being a gender-neutral or all-gender Multiple User Toilet Facility provision. However, since we have been aware of the *original text* of Exception 6, and AIA's opposition to its deletion, we are able to understand the intent of AIA's *new text* language, that is toilet facilities is not required to be provided separately for Male and Female use when the toilet facilities are provided in an existing building complying with the Existing Building Code. AIA's new text proposal is misleading.

3. International Existing Building Code (IEBC) is not a mandatory code and has no direct cause to justify gender-neutral or all-gender Multiple User Toilet Facility.

IEBC is not a mandatory code but a permissive code to be adopted by local jurisdiction. AIA's *new text* proposal presents ambiguity and vagueness in implementation especially to local jurisdictions who do not adopt IEBC. Furthermore, IEBC's main relief for different classes of work in an existing building is similar to the various codes mentioned in item 1 (reference 2024 IEBC 306.7) which is why some local jurisdictions do not adopt IEBC. Though 2024 IEBC 1009.1 exception has an additional relief provision in an existing building change of use to not require additional plumbing fixtures when the occupant load increase is less than 20% in each story, none of the available sections in IEBC point to the design of Multiple User Toilet Facility as gender-neutral or all-gender use. Even if it does, we have shown how this gender-neutral or all-gender bathroom design presents public safety risks. AIA's new text proposal is a broad brushstroke that is not vetted.

4. AIA's new text proposal presents significant public safety risks.

As we mentioned earlier, AIA's *new text* proposal has the same effect as the *original text* of Exception 6 in public safety risks. The only difference is that AIA is now requesting the application of Exception 6 original text to existing buildings. In our rebuttal letter to AIA dated March 10, 2025 with supporting document, we have shown Exception 6 comes with significant public safety risks by: (1) discriminating against women; (2) placing men, women and children in dangerous circumstances; and (3) increasing the instances of violence, sexual assault and voyeurism. South Carolina invoked its Emergency Code Modification to delete Exception 6 without substitution when they were presented with supporting documents and statistics to show these imminent dangers. It is also inconsistent with the current Federal mandate to protect women from men gaining access to intimate single-sex spaces and activities designed for women. The UK which already has a decade of head start in these type of gender-neutral

bathrooms has now banned it in new or major refurbishment of commercial buildings because **they found out it does not work. We should be careful to learn from their mistake.**

Because of these public safety risks, the Task Force members overwhelmingly voted to delete Exception 6 and its associated section in the March 20, 2025 meeting. We encourage Task Force members to review our rebuttal letter to AIA dated March 10, 2025 with supporting document again.

It would be gross negligence if the Task Force members now vote to approve AIA's *new text* proposal of Exception 6 after being presented with the supporting document showing the public safety risks that come with it. **Approval of AIA's new text proposal sends an absurd message that public safety risk is less of a concern when it involves an existing building compared to new building.** Furthermore, we believe the deadline to submit an amendment was February 14, 2025. If an amendment could still be submitted now, this will be a never-ending task.

It goes back to the question what is the real cost and design at stake here? **The cost is just one person being harmed in the state of Georgia by a faulty design implemented under the original text or the new text of Exception 6. Is the State willing to accept that liability?**

We trust that the Task Force members are well versed with the Code and see the fallacy of AIA's *new text* proposal to replace the *original text* of Exception 6. **It is unnecessary, and presents the same significant public safety risks as the original text.**

Please keep our bathrooms safe. **We respectfully request that you do not consider nor approve AIA's new text proposal of Exception 6 in the code adoption.**

Thank you for your time and attention. If you have further questions, please do not hesitate to contact us.

Sincerely,

Yen Yen Skelton
Edith Darden
Kim Thornton
Madeline & Grace Mercado
Chuck Gerren
Karen Sheehan



AIA Georgia

50 Hurt Plaza
Suite 109
Atlanta GA 30303
P: 678-553-0500

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David Southerland
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dsoutherland@aiaga.org

April 25, 2025

Mr. Scott Roberts
SCAC Member and 2024 IPC/ISPSC Task Force Chair
Georgia Department of Community Affairs
60 Executive Park South NE
Atlanta, GA 30329

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David Southerland
Executive Director
AIA Georgia and AIA Atlanta
404.933.4541 (M)

APPENDIX

GENDER-NEUTRAL MULTIPLE USER TOILET FACILITIES DO NOT REDUCE PLUMBING FIXTURES NOR SPACE

When an example is furnished to show plumbing fixtures can be reduced in a gender-neutral compared to a gender separated multiple user toilet facilities, it is not a true statement for all cases. The following examples will prove so. These examples are based on the 2024 IPC.

1. Case 1: Given an office space of Business use classification with occupant load of 49.

Per Table 403.1: Water closet ratio is 1 per 25 for the first 50 and 1 per 50 for the remainder > 50.

Calculations for **Gender-Separated Facilities:**

49 occupant load divided by half is 24.5 for Male and 24.5 for Female

Water closet for Male:	$24.5/25 = 0.98$, round up to 1 water closets minimum
Water closet for Female:	$24.5/25 = 0.98$, round up to 1 water closets minimum
Total to be provided	= 1.96, round up to 2 water closets minimum

Calculations for **Gender-Neutral Facilities:**

At 100% of 49 occupant load

Water closet for Male & Female: $49/25 = 1.96$, round up to 2 water closets minimum

There is not reduction of water closets in this case 1.

2. Case 2: Given a retail space building of Mercantile use classification with occupant load of 2950.

Per Table 403.1: Water closet ratio is 1 per 500.

Calculations for **Gender-Separated Facilities:**

2950 occupant load divided by half is 1475 for Male and 1475 for Female

Water closet for Male:	$1475/500 = 2.95$, round up to 3 water closets minimum
Water closet for Female:	$1475/500 = 2.95$, round up to 3 water closets minimum
Total to be provided	= 5.9, round up to 6 water closets minimum

Calculations for **Gender-Neutral Facilities:**

At 100% of 2950 occupant load

Water closet for Male & Female: $2950/500 = 5.9$, round up to 6 water closets minimum

There is not reduction of water closets in this case 2.

3. Case 3: Given an auditorium of Assembly use classification with 4500 occupant load

Per Table 403.1: Water closet ratio is 1 per 125 for Male, and 1 per 65 for Female. In this case the ratio for Male and Female is different.

Calculations for **Gender-Separated Facilities:**

4500 occupant load divided by half is 2250 for Male and 2250 for Female

Water closet for Male:	$2250/125 = 18$
Water closet for Female:	$2250/65 = 34.6$, round up to 35 water closets minimum
Total to be provided	= 52.6, round up to 53 water closets minimum

Calculations for **Gender-Neutral Facilities:**

Adjustment is needed on this case with different ratios for gender-neutral facility. Number of water closet is still required to be calculated at 100% on total occupant load. The ratio of male (1/125) is less than female (1/65). Female's ratio is allocated at 52% more than male (65/125), which makes male's ratio allocated at 48%. If using the same allocated ratio to proportionate the number of male and female out of the total occupant load of 4500, male occupant load would be 2160 (4500x48%), and female would be 2340 (4500x52%).

Water closet for Male:	$2160/125 = 17.28$, round up to 18 water closets minimum
Water closet for Female:	$2340/65 = 36$
Total to be provided	= 53.28, round up to 54 water closets minimum

Gender-Neutral Facilities will require one additional plumbing fixtures. Therefore, no gain in designing a gender-neutral multiple user toilet facilities.

If designer choose to default back to the regular way to calculate the plumbing fixtures in this Case 3 for gender-neutral facility (divide total occupant load in half for male and female), there is still no reduction in required plumbing fixtures.

Gender-neutral multiple user toilet facilities do not save space

There is **no significant space saving in gender-neutral or all-gender Multiple User Toilet Facilities when the minimum number of plumbing fixtures is still required.**

Furthermore, the call for water closet compartments (Section 405.3.4) and urinal partitions (section 405.3.5) provides the needed privacy in a typical gender-separated multiple user bathroom, but do not provide the necessary privacy in a gender-neutral multiple user bathroom. **To achieve reasonable full privacy, typical installation of walls from floor to ceiling with a door at each water closet will add on to the cost of construction¹ and may add up to unnecessary use of space** because of the full wall construction instead of typical plastic partition.

As elaborated in previous documents² and at DCA Plumbing Task Force Third Meeting on March 20, 2025, gender-neutral multiple user toilet facilities present significant public safety risk: **(1) discriminating against women; (2) placing men, women and children in dangerous circumstances; and (3) increasing the instances of violence, sexual assault and voyeurism.**

¹IPC 310 which refers to IBC 1204 & 1210 and IMC403 requires non-absorbent material on wall up to 4" from floor, and up to 4 feet on walls located within 2 feet from fixture, lighting and ventilation inside each compartment/room.

²Reference to "Rebuttal to Architect's letter dated March 10, 2025" and "Supporting Document To Delete Exception 6 – Updated" which were submitted to DCA on March 16, 2025.

We are regular citizens of the State of Georgia with no affiliation to any particular associations or groups. We live in and around the Savannah area. My background is in civil engineering with a focus on building design. My two counterparts in this email are Edith and Kim. Edith is the wife of an air force veteran, mother of an Army Sargent First Class, and grandmother. Kim is a business entrepreneur, wife and mother.

We are reaching out to you because we believe your heart's mission is to support and promote the welfare of families, women and children. We are deeply concerned about some of the provisions in the new 2024 Edition of International Building Code and International Plumbing Code ("Building Code") and how, if implemented in its original format, could gravely endanger the lives of women and children all over this state. We want to make sure that you and the Governor are aware of this risk and that the appropriate committees and state congressional leaders will address this threat without delay.

The Building Code has a provision for gender-neutral multiple occupancy use public restrooms where men, women and children will be forced to use toilet and urinal stalls next to each other and share common space at the sink area. The State's Department of Community Affairs Construction Codes Program is in the process of adopting this Code as statewide minimum building code.

<https://www.dca.ga.gov/node/8849>

<https://www.dca.ga.gov/node/9066>

Gender-neutral public restrooms discriminate against women and children. Men will have access to both water closet compartments and urinal spaces while decreasing the available number of bathroom spaces for women and children. It also decreases the area available for women to address personal needs such as menstrual or medical care, nursing and baby changing activities which may be carried out in the sink area as opposed to the water closet compartment.

Furthermore, Gender-neutral public restrooms place women and children in dangerous physical and emotional situations. Women and children tend to be physically less able to fight off predators who use this as opportunity for easy access. We have multiple sources demonstrating that this type of restroom directly exposes women and children to sexual violence, voyeurism, and human trafficking.

Gender-neutral public restrooms as provided in the Building Code do not work. In the United Kingdom, they tried to implement these kinds of facilities to disastrous effects and have since reverted to traditional gender-separated public restroom spaces. Our neighboring state of South Carolina adopted the Building Code last year, and when they realized these provisions were in it, they held an emergency session to revise their Code and remove this dangerous language.

It is our understanding that Bill HB1104 sponsored by Senator Clint Dixon will restrict student athletes from using school bathrooms based on gender identity which is further supported by efforts from Attorney General Chris Carr to prevent title IX from mandating males and females share restrooms. The new Building Code provision for gender-neutral multiple occupancy use restrooms is in direct conflict with the State's efforts to preserve gender-separate bathroom spaces for our students.

We have more information to share and hope that we might be able to meet with you to discuss this critical matter further. We would also appreciate your recommendations on who we may contact to make sure these dangers have been thoroughly discussed before this terrible Building Code language is implemented in Georgia. We wait in eager anticipation of your reply.

You can easily reach us through our emails or my contact number.

Thank you for your time and attention to this matter.

Respectfully,

Yen Yen Skelton [REDACTED]

Edith Darden

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

ITEM NO: _____ (DCA USE ONLY)

PAGE 1 OF 1

CODE: 2024 IPC

SECTION: 403.1.1 Exception #2

PROPONENT: Yen Yen Skelton

DATE: 1/12/2025

EMAIL: _____

ADDRESS: _____

TELEPHONE NUMBER: _____

FAX NUMBER: () - _____

CHECK ☐ Revise section to read as follows:

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(DCA STAFF ONLY)

☐ Disapprove

☐ Withdrawn

DESCRIPTION:

Delete without substitution 2024 IPC section 403.1.1, Exception #2. [This section is also mimic in the 2024 IBC [P] section 2902.1.1, Exception #2.]

REASON/INTENT:

Since 2024 IPC section 403.2, Exception #6 is to be deleted, this associated section should be deleted too.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

None.

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

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GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

ITEM NO: _____ (DCA USE ONLY) PAGE 1 OF 1

CODE: 2024 ISPSC SECTION: 305.1

PROPONENT: Kevin Gore DATE: 12/17/2024

EMAIL: Kevin.gore@perry-ga.gov

ADDRESS: 741 Main St. Perry, GA 31069

TELEPHONE NUMBER: 478-988-2719 FAX NUMBER: _____

CHECK X Revise section to read as follows: ☐ Add new section to read as follows:
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DESCRIPTION:

305.1 General

The provisions of this section shall apply to the design of barriers for restricting entry into areas having pools and spas. Where the spas or hot tubs are equipped with a lockable safety cover complying with ASTM F1346 ~~and swimming pools are equipped with a powered safety cover that complies with ASTM F1346~~, the areas where those spas, or hot tubs ~~or~~ pools are located shall not be required to comply with Sections 305.2 through 305.7

REASON/INTENT:

The exception to the barrier requirements when a powered safety cover is installed, relies on the homeowner/occupant to ensure that the cover is closed when the pool is not in use. This exception creates an unenforceable regulation in that the code official is unable to police the closure of swimming pool covers. This exception essentially negates any safety measure if the pool cover is left open when the pool is not in use or unattended and increases the risk significantly for accidental drownings.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

This proposed amendment would not have any financial impact on the cost of construction.

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

INSTRUCTION SHEET

1. Do not complete the line entitled "Item No._____".
2. Use a separate form for each proposed code amendment.
3. "Sheet ____ of ____" indicates the number of sheets for each individual proposed code amendment, not the number of sheets for all the amendments submitted.
4. Identify the code and code section that is the subject of the proposed amendment.
5. The proponent's name, address, telephone number and fax number must be filled out completely.
6. Be sure to indicate the type of recommended action in the space referred to as "Check One".
7. If the proposed amendment revises the language of the code section, deletes the entire code section, or deletes the entire code section and offers substitute language, include the language of the present code section and line through the language to be deleted and underline the language of the proposed amendment.
8. Under the "Reason" section, provide the reasoning behind the proposed code amendment. The reason should be clear and concise. Test reports, standards or other supporting information and documentation may be submitted with the proposed amendment and must be attached to the amendment form.
9. **A Statement of Financial Impact must accompany all proposed code amendments.** The statement should be clear and concise. Test reports, standards or other supporting information and documentation may be submitted with the proposed amendment and must be attached to the amendment form.
10. **All proposed amendments must be typed and completed in full and the original submitted to the Codes and Industrialized Buildings Section of the Department of Community Affairs NO LATER THAN DECEMBER 15TH.** The proposed code change shall be submitted for review to the State Codes Advisory Committee at their quarterly meeting in January. An incomplete form will be sent back to the proponent for completion. An amendment submitted after the submittal deadline date will be returned to the proponent.
11. The proponent will be notified when the proposed amendment will be considered by the State Codes Advisory Committee.
12. Information concerning submittal of code amendments, including deadline dates for submittal, can be obtained by contacting the Codes and Industrialized Buildings Section at (404) 679-3118. All proposed code amendments should be submitted to:

The Department of Community Affairs
Codes and Industrialized Buildings Section
60 Executive Park South, NE
Atlanta, Georgia 30329-2231

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

ITEM NO: _____ (DCA USE ONLY) PAGE 1 OF 1

CODE: 2024 ISPC SECTION: 305.1.1

PROPONENT: Chuck Wooley DATE: 01/30/2025

EMAIL: cwooley@greencountyga.gov

ADDRESS: 1034 Silver Drive Greensboro GA, 30642

TELEPHONE NUMBER: (706)453-3333 FAX NUMBER: (706)453-2579

CHECK ☐ Revise section to read as follows: ☐ Add new section to read as follows:
ONE: ☐ Delete section and substitute the following: ☒ Delete without substitution:

LINE THROUGH MATERIAL TO BE DELETED: UNDERLINE MATERIAL TO BE ADDED

☐ Approve ☐ Approve as amended (DCA STAFF ONLY) ☐ Disapprove ☐ Withdrawn

DESCRIPTION: ~~305.1.1 Construction fencing required: The construction sites for in-ground swimming pools and spas shall be provided with construction fencing to surround the site from the time that any excavation occurs up to the time that the permanent barrier is completed. The fencing shall be not less than 4 feet (1219 mm) in height.~~

REASON/INTENT:
—This section has nothing to do with making the components of an aquatic vessel safe. If this section is adopted the IRC and IBC will need to be amended to install construction fencing around basement and footing excavations. The ruling is more fitting for OSHA requirements to keep a jobsite safe.

FINANCIAL IMPACT OF PROPOSED AMENDMENT: None.

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM INSTRUCTION SHEET

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