

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Withdrawn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.
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

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

March 10, 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: Rebuttal to February 16, 2025 AIA Georgia Correspondence on Items IPC-2024-01 and IPC-2024-02 Proposed Amendments

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

We respectfully request for Proposed Amendments Items IPC-2024-01 and IPC-2024-02 to be revived and included as part of the Task Force's proposed version of the 2024 IPC to be adopted in the state of Georgia. Specifically, we request that **2024 IPC Section 403.2 Exception 6 with its associated section 403.1.1 Fixture Calculations Exception 2 be deleted** from Georgia's proposed Code as **it is dangerous, discriminatory and unnecessary.**

We believe your decision to not carry the Amendments at the February 19th task force meeting were in direct relation to a letter you received from the Executive Director of the American Institute of Architects ("AIA"), Georgia Association, dated February 16, 2025 which opposed the proposed Amendments to delete 2024 IPC Section 403.2 Exception 6. It is also our understanding that the AIA had representation at the February 19th meeting to present their request. The AIA's letter ("*AIA Response*") specifically targets the concerns we raised about Exception 6 and **grossly misrepresents our reasons for deleting Exception 6.** Since we were not notified of this opposition with an opportunity to defend our position, **we offer the following rebuttal for your consideration.** Points 1-10 with quotes outline and address each statement made in the AIA Response.

We also previously provided a supporting document with ample research showing that mixed-gender bathroom spaces: (1) discriminate against women; (2) place men, women and children in dangerous circumstances; and (3) increase the instances of violence, sexual assault and voyeurism. At the February 19th meeting, Ms. Nicolette Dunn had a copy of this supporting document to share with you. **We are attaching another copy hereto for reference and request that it be made a part of the record.**

REBUTTAL TO AIA RESPONSE

1. **AIA incorrectly alleges that our concern over Exception 6 is somehow related to it being "mandatory".**

"...[AIA] are concerned that the statement by proponents appears to greatly misrepresent the requirements of the building codes. The first point to acknowledge is that the exceptions listed for IPC Section 403.2 are voluntary. There is no requirement for 'gender-neutral restrooms'."

We are aware that Exception 6 is optional; however, we do not believe it **should** be an option because it is unnecessary, vague and dangerous. While "there is no requirement for 'gender-neutral restrooms'," Exception 6 **does specifically open the door** for such designs. Exception 6 states in pertinent part: "**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." Essentially, so long as the space is designed with some kind of partition between the toilets and urinals, the bathroom space can have a common sink area for all persons **regardless of sex**. We believe the vagueness of this Exception opens the door for dangerous and unnecessary designs where women and children will be forced to use bathroom facilities with men. **Exception 6 is unnecessary and dangerous.**

2. AIA's misleading statement that Exception 6 is needed to design in existing buildings with space constraints.

"The exceptions allow us to work restrooms 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."

The AIA Response 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. Again, **Exception 6 is unnecessary.**

3. AIA misrepresents our comment about the placement of urinals and water closets under Exception 6.

"...men, women and children will be forced to use toilet and urinal stalls next to each other" is a misrepresentation of the requirements. The statement seems to ignore the plumbing code reference in the section the proponent wishes to strike. That section, 405.3.4 Water closet compartment,..."

In our supporting document, we clearly identified the requirements for water closet compartments (Section 405.3.4) and urinal partitions (section 405.3.5) as being included in the requirements for Exception 6; but that is part of the problem. While these sections provide the needed privacy in a typical gender-separated gang-style bathroom, **they do not provide the necessary privacy in a gender-neutral gang-style bathroom.** Section 405.3.4 only requires that water closets be enclosed with partitions, but it **does not require full vertical separation.** These partitions usually have a 1 to 2 ft offset from the floor surface and do not rise to the ceiling. Section 405.3.5 provides that urinal partitions **do not require full four-sided enclosures.** Essentially, Exception 6, in conjunction with the current requirements under 405.3.4 and 405.3.5, opens the door for gender-neutral gang-style bathroom spaces that have water closets without full vertical separations placed next to urinal spaces enclosed on only three (3) sides. However, even if a designer chose to include full height walls and full doors for each compartment (which defeats AIA's claim for cost savings), there is still no privacy provided at the sink area, which women especially need for various reasons, including menstruation, breast feeding care, and other biologically related medical needs. **Exception 6 is discriminatory and dangerous.**

4. AIA incorrectly assumes that Exception 6 is safer for families.

"Designs using exception 6 provide more privacy and safety than other designs because each water closet is completely enclosed. This allows a parent of any gender to take a child of any gender into a restroom designed using exception 6."

As noted in Section 3 above, water closet compartments under Section 405.3.4 **do not guarantee the full privacy** needed in a gender-neutral bathroom. Georgia's plumbing code already provides for family and assisted-use toilet facilities and single-user toilet rooms without gender specific designations. These types of family and single-user toilet rooms are common in family-orientated facilities, such as museums, restaurants and shopping malls. Also, it is socially acceptable for a parent to bring his or her young child into the parent's gender-specific public bathroom. Again, **Exception 6 is simply unnecessary.**

Furthermore, if Exception 6 is allowed to remain in the plumbing code, and businesses actually implement it, there will likely be an increase in sexual assault in the state of Georgia. Studies have shown a significant increase in sexual incidents from pre- to post- policy adoption of gender-neutral bathroom spaces. In those cases, about **99% of the victims were women and children**, with 34% being victimized children (see supporting document reference item 5). Study also showed **almost 90% of reported sexual assaults, harassment and voyeurism** in swimming pool and sports-center changing rooms **happened in gender-neutral facilities** (see supporting document reference item 10). **Exception 6 is discriminatory and dangerous.**

5. AIA incorrectly alleges that Exception 6 is cost effective.

"...more cost-effective alternative to other designs."

If a business uses Exception 6 to design a bathroom space, they are still required to have the **same plumbing fixture counts for men and women (section 403.1.1 Exception 2)**, and the **same plumbing fixture clearance (section 405.3.1)**. There is no change in cost. Furthermore, full height walls and full doors for each water closet and urinal compartment/room will incur additional cost for the extra construction materials, lighting and ventilation inside each compartment/room (IPC 310 which refers to IBC 1204 & 1210 and IMC403).

6. AIA incorrectly assumes no issue with exception 6 design.

"Some businesses have elected to construct restrooms with enclosed water closets (as previously described) and shared sinks. We're not aware of any issues with these facilities."

As stated in our supporting document, multiple cases of sexual assault and voyeurism have been documented in direct connection with gender-neutral gang-style bathroom design. We specifically highlight the incident where a man exposed himself in a female locker room where young girls were changing, claiming "The law has changed, and I have the right to be here." (see supporting document reference item 6). **Exception 6 is dangerous.**

7. AIA incorrectly assumes frequent traffic will deter predators.

"We believe that's largely because they are frequently trafficked – there are users who would immediately report any issues to security or the police. As to the proponents' claim that "predators who use this as opportunity for easy access" – in a restroom designed using exception 6, a predator could also be in the company of other men who could immediately intervene...making the restroom safer."

If AIA were correct in their assumption of increased traffic and presence of men in public bathroom will deter predators, then evidence would show sexual incidents to be evenly distributed across gender-separated and gender-neutral facilities. However, studies show sexual incidents are about **90% more likely to occur in gender-neutral facilities than in gender-separated facilities** (see supporting document reference item 10). This is most likely because a predator has easy access to the common sink area to wait for an opportune time. In a gender-neutral bathroom design, everyone will be less aware of who is in the bathroom since men and women are allowed at the same time. **Exception 6 is dangerous.**

8. AIA incorrectly alleges that Exception 6 would give women more access to plumbing fixtures.

"...help reduce the waiting line for women's restrooms. The proponents' statement that women and children will be discriminated against due to the number of available fixtures gets the situation exactly backwards – females gain access to more plumbing fixtures in restroom designs using exception 6."

Unfortunately for AIA, this argument is defeated by simple math. As noted above, the same number of plumbing fixtures for men and women is still required in a gender-neutral public bathroom; but the Code allows the water

closet count for men to be substituted by urinals up to 67% (section 424.2). Women and girls do not use urinals. Depending on the height of the urinal, some male children would not be able to use the urinal either. Therefore, **while men can use both water closet compartments and urinals, women and most children can only use the water closet compartments. The net effect reduces the number of water closets available for use by women and children.** If men opt to use the water closet, women will be stuck waiting in longer lines to use the facilities. Even if the number of water closets were not reduced, we cannot ignore that **women need privacy at the sink area given their biological, health and sanitary needs. Exception 6 discriminates against women and children.**

9. **AIA whimsically alleges that designers with “common sense” will use Exception 6 with balance.**

“Our members will continue to develop common sense design solutions that balance safety, privacy and function as we bear in mind exception 6 is voluntary.”

Have you ever heard the saying, “common sense is not common”? We are not willing to leave the above issues open to AIA’s “common sense” interpretation of Exception 6. **The State has a responsibility to weigh all potential public safety risks when implementing a statewide code like the building and plumbing codes.** Our supporting document clearly shows the potential public safety risks of Exception 6. **Exception 6 is not necessary; it is discriminatory; and it opens the door to dangerous precedents in our State.**

10. **AIA fails to substantiate its claim that deleting Exception 6 will potentially increase building costs.**

“Striking Exception 6... would potentially raise the cost of buildouts in existing buildings and make some projects infeasible while having little to no effect on schools.”

AIA fails to show how deleting Exception 6 would “potentially” increase costs. This statement is unsubstantiated with any evidence and completely ignores all the other exceptions and allowances that **already exist in the Code** which provides the design flexibility that AIA seeks.

AIA’s claims can be summarized into 2 main points: they want to keep Exception 6 for cost and design. However, we have shown that **Exception 6 is unnecessary, discriminatory and dangerous.** So 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 Exception 6. Is the State willing to accept that liability?**

We have clearly and repeatedly shown that 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. When our sister state of South Carolina was presented with supporting documents and statistics to show these imminent dangers, it invoked its Emergency Code Modification to delete Exception 6 without substitution (see supporting document under South Carolina).

Please keep our bathrooms safe. **We respectfully request that you delete without substitution 2024 IPC Section 403.2 Exception 6 with its associated section 403.1.1 Fixture Calculations Exception 2.**

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



AIA Georgia

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David Southerland
Executive Director
dsoutherland@aiaga.org

February 16, 2025

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

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

Dear Chairman Roberts:

The American Institute of Architects, Georgia Association has been hosting discussion about item one on the proposed amendment chart for the IPC/ISPSC task group. As we understand it, this same measure was proposed to the City Council of Savannah which voted not to adopt the proposal.

While we agree that safety and privacy are paramount, we are concerned that the statement by the proponents appears to greatly misrepresent the requirements of the building codes. The first point to acknowledge is that the exceptions listed for IPC Section 403.2 are voluntary. There is no requirement for “gender-neutral restrooms”.

The exceptions to Section 403.2 of the plumbing code allow 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 restrooms 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.

The proponent appears to suggest that exception 6 would crowd people of all ages and genders into a restroom with stalls in which women and children would not be safe. We feel the proponents’ statement, “...men, women and children will be forced to use toilet and urinal stalls next to each other” is a misrepresentation of the requirements. The statement seems to ignore the plumbing code reference in the section the proponent wishes to strike. That section, 405.3.4 Water closet compartment, requires, “Each water closet utilized by the public or employees shall occupy a separate compartment with walls or partitions and a door enclosing the fixtures to ensure privacy.”

The proponents state restrooms with shared sinks “place women and children in dangerous physical and emotional situations”. Designs using exception 6 provide more privacy and safety than other designs because each water closet is completely enclosed. This allows a parent of any gender to take a child of any gender into a restroom designed using exception 6. The parent can check the enclosed water closet space to be sure it is unoccupied before a child enters. The parent can see the door to the water closet to confirm no one is able to enter while the child is inside. The child is protected by the enclosed water closet.

Restrooms designed using exception 6 can be a safer and more cost-effective alternative to other designs. Some businesses have elected to construct restrooms with enclosed water closets (as previously described) and shared sinks. We're not aware of any issues with these facilities. We believe that's largely because they are frequently trafficked – there are users who would immediately report any issues to security or the police. As to the proponents' claim that "predators who use this as opportunity for easy access" – in a restroom designed using exception 6, a predator could also be in the company of other men who could immediately intervene... making the restroom safer.

In addition to creating much needed flexibility for designing in challenging spaces, the exceptions help equalize wait times for restrooms – restrooms designed using exception 6 help reduce the waiting line for women's restrooms. The proponents' statement that women and children will be discriminated against due to the number of available fixtures gets the situation exactly backwards – females gain access to more plumbing fixtures in restroom designs using exception 6.

The proponent references a house bill addressing student athletes. AIA Georgia architects work for school districts and will observe any requirements from the districts or state legislature regarding conditions in schools. Our members will continue to develop common sense design solutions that balance safety, privacy and function as we bear in mind exception 6 is voluntary.

Striking exception 6 to Section 403.2 would remove much needed flexibility for buildings across the state. It would potentially raise the cost of buildouts in existing buildings and make some projects infeasible while having little to no effect on schools. Thus, we oppose the proposed amendment and respectfully submit Section 403.2 of the plumbing code should be adopted as written.

As we strongly oppose proposed amendment IPC-2024-01, we also oppose proposed amendment item IPC-2024-02. The two amendments are related, so the disapproval of proposed amendment IPC-2024-01 would mean proposed amendment IPC-2024-02 should also be disapproved.

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" being more prominent and the last name "Southerland" following in a similar style.

David Southerland, Executive Director
American Institute of Architects, Georgia Association

Cc: Ted Miltiades, Director, Office of Construction Codes & Research at Georgia DCA
Craig Messina, Office of Construction Codes & Research at Georgia DCA

OVERVIEW

Under the 2024 Edition of the International Code pertaining to the Building and Plumbing code, there is a section which allows gender-neutral multiple occupancy use public restroom where men, women and children use toilet & urinal stalls next to each other while sharing common space at sink area.

The particular code section which allows this provision is the **2024 International Plumbing Code (IPC) Section 403.2 exception 6**, mimic in the **2024 International Building Code (IBC) 2902.2 exception 6**.

- [2024 IPC Section 403.2 exception 6 \(IBC 2902.2 exception 6\)](#)

“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.**”¹

¹ Section 405.3.4. of the 2024 International Plumbing Code elaborates that separation could be partition, as typical in a gang type bathroom design without full vertical separation, 1 to 2 feet offset from floor surface. Section 405.3.5 elaborates that urinal partition does not require full four sided enclosure as typical how a urinal is to be used.

Link to [2024 International Plumbing Code \(IPC\) Section 403.2](#).

Link to [2024 International Plumbing Code \(IPC\) Section 405.3.4](#) for water closet separation & [405.3.5](#) for urinal separation.

Link to [2024 International Building Code \(IBC\) 2902.2](#).

WHY DOES THIS POSE A SIGNIFICANT DANGER TO THE HEALTH AND SAFETY OF THE PUBLIC?

- 1) Gender-neutral multiple occupancy use restrooms pose a serious threat to the health and safety of all by increasing the incident of sexual violence against women and children, as well as increasing the incident of wrongful accusations of sexual assault, voyeurism and the like.
- 2) Gender-neutral multiple occupancy use restrooms undermine and reduce the “safe-spaces” for victims of human trafficking.
- 3) Gender-neutral multiple occupancy use restrooms discriminate against women and children by disproportionately decreasing available number of bathroom spaces for women and children, while men will have access to both water closet compartments and urinal spaces. In addition, common use sink spaces discriminate against women and children by disproportionately decreasing the area available for women to address personal needs, such as menstrual or other medical care, nursing and baby changing activities.
- 4) Exception 6 is not necessary. Exceptions 1-5 in the 2024 IPC Section 403.2 provide sufficient guidance and latitude for businesses, schools, churches, to provide gender-neutral spaces with adequate privacy protections.

See Page 2 for supporting data and additional information.

SOUTH CAROLINA

South Carolina adopted the 2021 Edition of the codes which also has the same provision for this type of public restroom design. However, when South Carolina was presented with supporting documents and statistics to show the imminent danger of this type of public restroom, it has invoked its Emergency Code Modification to delete without substitution of this code provision before the effective date of the code implementation statewide.

Link to the [South Carolina Emergency Code Modification](#).

OBJECTIVE

To delete without substitution this 2024 IPC Section 403.2 exception 6 & IBC 2902.2 exception 6, and all applicable sections associated with the provision of this public restroom design (i.e. 2024 IPC 403.1.1 Fixture Calculations exception 2) due to public safety risk as shown on this document.

SAFETY CONCERNS WITH GENDER-NEUTRAL PUBLIC BATHROOMS

- 1) **Gender-neutral gang type bathrooms pose a serious threat to the health and safety of all by increasing the incident of sexual violence against women and children, as well as increasing the incident of wrongful accusations of sexual assault, voyeurism and the like.**
 - a. Most victims of sexual assaults are women and children.¹ 20% of the sexual assaults are committed by strangers.^{2, 3} Statistics also show that 15% of sexual assaults happened in open public spaces, and 10% in public enclosed spaces such as parking lots or garages.⁴ Gender-inclusion policies, such as gender-neutral bathroom facilities, directly result in an increase in sexual violence against women and children in public spaces. A case study showed an increase in sexual incidents from pre to post policy adoption of gender-neutral facilities where about 99% of victims were women and children, with 34% being victimized children.⁵
 - b. It is documented that the policy for the use of sex-separated facilities that corresponds to one's subjective, psychological "gender identity" been used by sexual predators to gain access to women and children.⁶ Gender-neutral bathroom policies provide the same opportunities for predators and is inconsistent with State's effort against such policies.^{7, 8} It is also inconsistent with current Federal mandate to protect women from men to gain access to intimate single-sex spaces and activities designed for women.⁹
 - c. Gender-neutral public bathrooms create circumstances for all people regardless of age or sexual orientation to be exposed to sexual harassment, or to be falsely accused of lewd and lascivious behavior. A study showed almost 90% of reported sexual assaults, harassment and voyeurism in swimming pool and sports-center changing rooms happened in gender-neutral facilities.¹⁰
- 2) **Gender-neutral gang type bathrooms undermine and reduce the "safe-spaces" for victims of human trafficking.**
 - a. It is estimated that there are 24.9 million victims of human trafficking.¹¹ Victims of human trafficking are mostly women.¹² A public bathroom is a place where a victim can go in alone without their perpetrator. Awareness of this has set some states to require flyers of the National Human Trafficking Hotline Number to be posted in public bathrooms. The hope is that the victim can call for help and may possibly even find help from others inside the public bathroom while the perpetrator is not in sight.^{13,14} This slight hope for help will be taken away from the victim in a gender-neutral public bathroom where both men and women can enter.
- 3) **Gender-neutral gang type bathrooms discriminate against women and children by disproportionately decreasing available number of bathroom spaces for women and children, while men will have access to both water closet compartments and urinal spaces. In addition, the common use sink space discriminates against women and children by disproportionately decreasing the area available for women to address personal needs, such as menstrual or other medical care, nursing and baby changing activities.**
 - a. Gender-neutral public bathrooms place women and children at a significant disadvantage to biological men. While men can use both water closet compartments and urinals, women can only use the water closet compartments. The net effect reduces toilet provisions for women. Furthermore, women need safe spaces given their biological, health and sanitary needs such as menstruating, pregnancy or menopause. Given these needs, women tend to use the bathroom more often and do not feel comfortable using a public bathroom with men in it.¹⁵
 - b. Gender-neutral bathroom policies are not safe for school settings as demonstrated by lawsuits and sexual assault cases reported against schools with inclusion policies in Seattle and Atlanta.^{16, 17} Parents are speaking out against this type of bathroom policy.^{18, 19, 20}
 - c. Proponents and schools which had implemented gender-neutral bathrooms is citing problem of these bathrooms as being misused which defeats its purpose. There is lack of teacher resources to monitor the access to these bathrooms to prevent misuse. Teachers may be liable for "looking at student wrong", putting their livelihood and job at risk. Furthermore,

widespread multi-stall gender-neutral bathrooms might not be comfortable or safe space for everyone. Students are still uncomfortable using the bathroom. It proves these type of bathrooms are pointless, and wasteful.^{21, 22}

- d. After the United Kingdom implemented gender-neutral policies in their school system, it resulted in an inordinate number of female students skipping school, refusing to urinate all day, and stopping drinking liquids at school. It was determined that female students were especially susceptible to increased mental pressure and embarrassment when mandated to share bathrooms with male students at the time of menstruation. Doctors and politicians joined together and called on their schools to halt the move towards gender-neutral bathrooms to prevent any further harm to female students.²³ As of now, UK bans these type of gender-neutral bathrooms in new or major refurbishment of commercial buildings.²⁴

4) Exception 6 is not necessary. Exceptions 1-5 provide sufficient guidance and latitude for businesses, schools, churches and other similar large-capacity, to provide gender-neutral spaces with adequate privacy protections.

- a. The 2024 IPC already has provision for public gender-neutral user toilet rooms under Section 403.2 exceptions 3-5, and family or assisted-use toilet facilities under section 403.1.2, for any group who may have a concern, need, or claim to use non-sex designated public bathrooms.

REFERENCES & DOCUMENTS

¹ RAINN (Rape, Abuse & Incest National Network) Scope of the Problem: Statistics, Appendix A [https://www.rainn.org/statistics/scope-problem#:~:text=Every%2068%20seconds%20another%20American%20is%20sexually%20assaulted.&text=1%20out%20of%20every%206,completed%2C%202.8%25%20attempted\).&text=About%203%25%20of%20American%20men,completed%20rape%20in%20their%20lifetime](https://www.rainn.org/statistics/scope-problem#:~:text=Every%2068%20seconds%20another%20American%20is%20sexually%20assaulted.&text=1%20out%20of%20every%206,completed%2C%202.8%25%20attempted).&text=About%203%25%20of%20American%20men,completed%20rape%20in%20their%20lifetime).

² Registered Offenders List <https://www.registeredoffenderslist.org/>

³ Sex Offender Infographic, Appendix B <https://www.registeredoffenderslist.org/img/Sexual-Predator-Infographic.jpg>

⁴ See Endnote 1 above.

⁵ A Longitudinal Analysis of Media Reports at Target Stores, Paul Dirks January 29, 2018, Appendix C https://www.academia.edu/58504589/Gender_Inclusion_Policies_and_Sexual_Violence_A_Longitudinal_Analysis_of_Media_Reports_at_Target_Stores

⁶ Family Research Center Issue Brief on Bathroom Incidents, April 2017, Appendix D <https://downloads.frc.org/EF/EF16F27.pdf>

⁷ HB 1104 to Restricts Transgender Athletes from Participating in Sports Teams or Using School Bathrooms Based on Gender Identity. <https://www.legis.ga.gov/legislation/66567>

⁸ Attorney General Chris Carr Has Filed Suit Against The Biden Administration's Revised Title IX Rule That Upends The Foundation of Women's Sports and Mandates That Males and Females Share Bathrooms. [HTTPS://LAW.GEORGIA.GOV/PRESS-RELEASES/2024-04-29/CARR-TAKES-ACTION-PROTECT-WOMENS-SPORTS#:~:TEXT=ATLANTA%2C%20GA%20%E2%80%93%20ATTORNEY%20GENERAL%20CHRIS,MALES%20AND%20FEMALES%20SHARE%20BATHROOMS](https://LAW.GEORGIA.GOV/PRESS-RELEASES/2024-04-29/CARR-TAKES-ACTION-PROTECT-WOMENS-SPORTS#:~:TEXT=ATLANTA%2C%20GA%20%E2%80%93%20ATTORNEY%20GENERAL%20CHRIS,MALES%20AND%20FEMALES%20SHARE%20BATHROOMS).

⁹ Executive Order 14168 Defending Women From Gender Ideology Extremism. <https://www.federalregister.gov/documents/2025/01/30/2025-02090/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal>

¹⁰ Unisex Changing Rooms Put Women in Danger, Andrew Gilligan September 2, 2018, The Sunday Times, Appendix E <https://asteine8.github.io/data/Unisex%20changing%20rooms%20put%20women%20in%20danger%20%20News%20%20The%20Sunday%20Times.pdf>

¹¹ Human Trafficking Institute (TraffickingInstitute.org), Appendix F <https://traffickinginstitute.org/breaking-down-global-estimates-of-human-trafficking-human-trafficking-awareness-month-2022/>

¹² Federal Human Trafficking Report, 2022 Executive Summary, Appendix G <https://traffickinginstitute.org/wp-content/uploads/2023/06/2022-Federal-Human-Trafficking-Report-WEB-LR.pdf>

-
- ¹³ **New Law Hopes to Curb Human Trafficking, Eileen Street, July 15, 2022, Appendix H** <https://spectrumnews1.com/ky/louisville/news/2020/07/15/house-bill-2-kentucky-law-human-trafficking-hotline-posters-public-restrooms>
- ¹⁴ **Human Trafficking Hotline To Be Put In Public Restrooms Across Pennsylvania, Haley Potter, March 2, 2021, Appendix I** <https://www.weny.com/story/43428671/human-trafficking-hotline-to-be-put-in-public-restrooms-across-pennsylvania>
- ¹⁵ **UK Government Written Ministerial Statement, Kemi Badenoch July 4, 2022, Appendix J** <https://questions-statements.parliament.uk/written-statements/detail/2022-07-04/hcws172>
- ¹⁶ **Former Student Sues Seattle Schools Over Sexual Assault December 19, 2020, AP News, Appendix K** <https://apnews.com/article/lawsuits-seattle-sexual-assault-38d7b88d17e075ed6da7c20bcbf84c42>
- ¹⁷ **Complaint Says Transgender Bathroom Policy Led to Kindergarten Assault, Ty Tagami October 3, 2018, The Atlanta Journal-Constitution, Appendix L** <https://www.ajc.com/news/state--regional-education/child-sex-assault-case-decatur-schools-touches-national-debate-over-gender-identity/SKG4vOR4BCFpdrkynKSRvH/>
- ¹⁸ **Gender Neutral Toilets in Schools Aren't Working, Transgender Trend January 10, 2020** <https://www.transgendertrend.com/gender-neutral-toilets-schools/>
- ¹⁹ **Gender Neutral Bathroom Policy In Schools Is Not Gaining Support From Parents In Loudoun County, VA, Dick Uliano, September 28, 2021, Appendix M** <https://wtop.com/loudoun-county/2021/09/parents-teachers-against-loudoun-co-schools-transgender-policy-rally-outside-school-board-hq/>
- ²⁰ **Mothers Urge Change to Stillwater Bathroom Policy, Ray Carter, April 13, 2022, Oklahoma Council of Public Affairs (OCPA), Appendix N** <https://www.ocpathink.org/post/mothers-urge-change-to-stillwater-bathroom-policy>
- ²¹ **Students Confront Misuse Of Gender-Neutral Bathrooms, February 7, 2024, The Cypress Online, Appendix O** <https://thecypressonline.com/52740/longform/students-confront-misuse-of-gender-neutral-bathrooms/>
- ²² **Gender-Neutral Locker Room Plans Criticized, August 7, 2022, Press-Telegram (Long Beach), Appendix P** <https://www.pressreader.com/usa/press-telegram-long-beach/20220807/page/1/textview>
- ²³ **Girls Are Skipping School To Avoid Sharing Gender-Neutral Toilets With Boys, Sanchez Manning, October 7, 2019, Daily Mail, Appendix Q** <https://archive.ph/2GPVR#selection-939.0-939.119>
- ²⁴ **UK Government To Lay New Law To Halt The March Of Gender-Neutral Toilets In Buildings, May 6 2024, Appendix R** <https://www.gov.uk/government/news/government-to-lay-new-law-to-halt-the-march-of-gender-neutral-toilets-in-buildings#:~:text=Changes%20to%20building%20regulations%20will,toilets%20for%20women%20and%20men.>

ADDITIONAL READING

- ²⁵ **'I am not his victim' -- Hilliard mom recalls attack in store bathroom** <https://myfox28columbus.com/news/local/hilliard-gloria-cannon-mohamed-camara-sept-20-2024-at-home-mill-run-drive-attack-store-bathroom-plans-advocacy-safety-columbus-ohio>
- ²⁶ **Bystander who thwarted kidnapping in southern Utah tells her story** <https://www.fox13now.com/news/crime/alleged-kidnapping-thwarted-in-southern-utah-after-victim-slipped-note-to-bystander>
- ²⁸ **Why Gender-Neutral toilets is not working** <https://www.wired.com/story/gender-neutral-toilets-design/>
- ²⁹ **Majority of UK people do not want Gender-Neutral Facility** <https://www.youtube.com/watch?v=imPMvNaRtw0>
- ³⁰ **Toilets Matter A Short Guide to Law and Good Practice** <https://sex-matters.org/wp-content/uploads/2022/10/Toilets-matter.pdf>



NOTICE OF EMERGENCY MODIFICATION TO 2021 SC BUILDING CODES

At their meeting on November 15, 2022, the S.C. Building Codes Council approved an emergency modification request to delete the below exceptions from the 2021 SC Plumbing Code and 2021 SC Building Code, without substitution.

Approved Modifications:

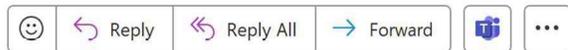
- Exception 6 was deleted without substitution from Section 403.2 of the 2021 IPC and from Section [P] 2902.2 of the 2021 IBC.
- Exception 2 was deleted without substitution from Section 403.1.1 of the 2021 IPC and from Section [P] 2902.1.1 of the 2021 IBC.

These modifications will take effect on January 1, 2023, and must be enforced by all municipalities and counties in South Carolina.

Exception 6 in Georgia's proposed Plumbing & Building Codes



leenorton1@aol.com
To Craig Messina



Wed 3/12/2025 10:56 AM

You replied to this message on 3/17/2025 8:36 AM.

Dear Sir, I recently became aware of a new ICC Code (plumbing & building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions & doors with common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program (GA DCA) is in the process of adopting this Exception 6 into its Code. Exception 6 put the public in danger, and I do not want this Exception to become a part of Georgia's law. Please protect Georgians' bathroom privacy and delete Exception 6 from Georgia's code.

[Sent from the all new AOL app for iOS](#)

Code Change



James Strickland <james.strickland1@gmail.com>

To Craig Messina, John.Kennedy@senate.ga, Buddy.Carter@mail.house.gov, Clint Dixon, Ben Watson, Jon Burns, Jan Jones, ccarr@law.ga.gov, wbanks@law.ga.gov

Thu 3/13/2025 6:50 PM



You replied to this message on 3/17/2025 8:36 AM.

Dear Member,

I recently became aware of a new ICC Code (plumbing and building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program (GA DCA) is in the process of adopting this Exception 6 into its Code. Exception 6 puts the public in danger, and I do not want this Exception to become a part of Georgia's law. Please protect Georgians' bathroom privacy and delete Exception 6 from Georgia's Code.

v/r

James Strickland
GA Resident

Exception 6 deletion



felicia williams <feliciawilliams50@gmail.com>

To Craig Messina



Thu 3/13/2025 7:00 PM

You replied to this message on 3/17/2025 8:37 AM.

Please protect Georgians' bathroom privacy and delete Exception 6 from Georgia's Code.

Say NO to Exception 6 and delete it from the code



terri terri <blessterri@yahoo.com>
To Craig Messina



Fri 3/14/2025 9:45 AM

You replied to this message on 3/17/2025 8:37 AM.

Dear Sir or Madam:

I recently became aware of a new ICC Code (plumbing and building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program (GA DCA) is in the process of adopting this Exception 6 into its Code. Exception 6 puts the public in danger, and I DO NOT want this Exception to become a part of Georgia's law.

Please protect Georgians' bathroom privacy and DELETE Exception 6 from Georgia's Code.

Sincerely,

Terri Hill

Exception 6 Georgia's Code



LISA WOMBLE <womble57@comcast.net>
To Craig Messina



Fri 3/14/2025 12:07 PM

You replied to this message on 3/17/2025 8:37 AM.

Dear Sir or Madam:

I recently became aware of a new ICC Code (plumbing and building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program (GA DCA) is in the process of adopting this Exception 6 into its Code.

Exception 6 puts the public in danger, and I do not want this Exception to become a part of Georgia's law. Please protect Georgians' bathroom privacy and delete Exception 6 from Georgia's Code.

Gender -neutral bathrooms undermine and reduce the "safe-spaces" for victims of human trafficking and discriminate against women and children.

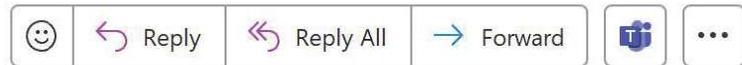
Again, please protect Georgians' bathroom privacy and delete Exception 6 from Georgia's Code.

Kempie and Lisa Womble

Exception 6 of GA ICC Code



Beth Holland <eaholland27@gmail.com>
To Craig Messina



Mon 3/17/2025 11:45 AM



Follow up.

You forwarded this message on 3/17/2025 11:46 AM.

Dear Attorney Messina,

I recently became aware of a new ICC Code (plumbing and building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Code Program (GA DCA) is in the process of adopting this Exception 6 into its Code. Exception 6 puts the public in danger, and I do not want this Exception to become a part of Georgia's law.

I am a grandmother of three young granddaughters. I live in Savannah, When they come to visit, I want them to be able to use public facilities without fear of inappropriate exposure to male bathroom habits or to any potential threat of indecent exposure, molestation, or abduction. Please protect Georgians' bathroom privacy and delete Exception 6 from Georgia's Code.

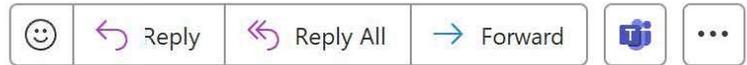
Kind regards,
Beth Holland

New ICC code



Julie Friday <juliewfriday71@gmail.com>

To Craig Messina



Tue 3/18/2025 3:36 PM

 You forwarded this message on 3/18/2025 3:38 PM.

Dear Sir:

I recently became aware of a new ICC Code (plumbing and building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program (GA DCA) is in the process of adopting this Exception 6 into its Code. Exception 6 puts the public in danger, and I do not want this Exception to become a part of Georgia's law. I don't see this being a safe decision especially for our children. Please protect Georgians' bathroom privacy and delete Exception 6 from Georgia's Code.

Thank you,
Julie Friday
912.272.2190

Sent from my iPhone

Fwd: Vote No on IPC Section 403.2 exception 6



Amber Cook <ambercook55@gmail.com>

To buddy.carter@mail.house.gov; wbanks@law.ga.gov; ccarr@law.ga.gov; Jan Jones; Jon Burns; Ben Watson; Clint Dixon; John Kennedy; Craig Messina

Tue 3/18/2025 4:01 PM



 You forwarded this message on 3/18/2025 4:11 PM.

Good Afternoon,

I'm writing to you not as a politician, but simply as a mom who's genuinely concerned about the vote of IPC Section 403.2 exception 6. I understand the intention behind these policies, and I fully believe everyone deserves respect and kindness. But from a parent's perspective, I can't help but worry about the unintended consequences, especially when it comes to the safety and privacy of children and women.

The biggest reason I would vote no on IPC Section 403.2 exception 6 comes from a safety standpoint - gender-neutral restrooms could create situations where those looking to harm or exploit others can take advantage. Sex trafficking and sexual assault are very real issues and something that I have to, unfortunately, warn my 10-year-old twins about daily. Providing predators easy access to spaces meant for privacy and vulnerability only makes those risks worse. As a mother, I think about that constantly.

I also think about how confusing and uncomfortable it would be for my twins, especially as they grow older, to have to share restrooms with the opposite sex in public places. It takes away an important layer of protection and comfort that families rely on when we're out and about.

I truly hope you'll consider the concerns of parents like me. I understand why it would be easier to just have one bathroom, but not at the cost of safety, privacy, and the innocence of our children. There has to be a better balance.

Thank you so much for taking the time to listen. I know you have hard decisions to make, and I appreciate your service.

Sincerely,

Amber Cook
Savannah, GA

2021 International Plumbing Code Gender Neutral Bathroom



Lorie Corona <locorona1212@gmail.com>
To Craig Messina



Tue 3/18/2025 4:04 PM

 You forwarded this message on 3/18/2025 4:11 PM.

Dear Mr. Messina,

I was just informed of a new ICC Code which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors and have common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program, is in the process of adopting Exception 6 into its Code. Exception 6 puts the public in danger, and I DO NOT want Exception 6 to become a part of Georgia's law. Not only do I personally not want to deal with possible peaking eyes, suggestive remarks and/or looks, or sexual assault, I also don't want my husband put in a position where another woman could accuse him of these things erroneously. Men, women and children NEED and deserve privacy. Period! Speaking of periods women require a lot more privacy during their menstrual cycles, and we often need the use of the sink to clean up. This should NOT be done in front of men.

Please help protect Georgians' bathroom privacy and delete Exception 6 from Georgia's Code.

Exception 6



Jennifer Butler-Grace <j.butlergrace22@gmail.com>

To Craig Messina



Tue 3/18/2025 4:59 PM

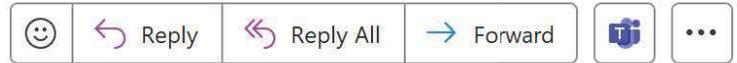
 You forwarded this message on 3/19/2025 8:20 AM.

I recently became aware of a new ICC Code (plumbing and building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program (GA DCA) is in the process of adopting this Exception 6 into its Code. Exception 6 puts the public in danger, and I do not want this Exception to become a part of Georgia's law. Please protect Georgians' bathroom privacy and delete Exception 6 from Georgia's Code.

NO to exception 6



Amazing opportunity Ministries <ao.ministries20@yahoo.com>
To Craig Messina



Tue 3/18/2025 9:56 PM

 You forwarded this message on 3/19/2025 8:20 AM.

Dear Sir or Madam:

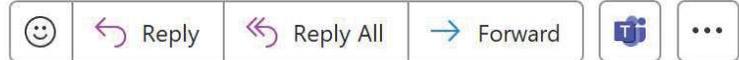
I recently became aware of a new ICC Code (plumbing and building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program (GA DCA) is in the process of adopting this Exception 6 into its Code. Exception 6 puts the public in danger, and I do not want this Exception to become a part of Georgia's law. Please protect Georgians' bathroom privacy and delete Exception 6 from Georgia's Code.

Exception 6



Cheryle Moss <cherylemoss24@gmail.com>

To Craig Messina



Tue 3/18/2025 10:03 PM

 You forwarded this message on 3/19/2025 8:21 AM.

Dear Sir

I recently became aware of a new ICC code (plumbing and building) which contains exception 6 allowing public bathrooms with stalls separated with partitions and doors with common sink areas to be used by both genders at the same time. It is my understanding that the state of Georgia under direction from the Georgia Department of Affairs Construction Codes Program (Ga DCA) is in the process of adopting this Exception 6 into its code. Exception 6 puts the public in danger, and I'd do not want this Exception to become a part of Georgia's law. Please protect Georgian's bathroom privacy and delete Exception 6 from Georgia's code.

Say "No" to Exception 6 - Gender Neutral Bathrooms



diane hardwick <dyhard9293@yahoo.com>
To Craig Messina



Tue 3/18/2025 11:03 PM

 You forwarded this message on 3/19/2025 8:22 AM.

Dear Sir :

I recently became aware of a new ICC Code (plumbing and building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program (GA DCA) is in the process of adopting this Exception 6 into its Code. Exception 6 puts the public in danger, and I do not want this Exception to become a part of Georgia's law. Please protect Georgians' bathroom privacy and delete Exception 6 from Georgia's Code.

Thank you,
Diane Hardwick

Exemption 6 plumbing and building code



Lisa Kirk <lisamk811@yahoo.com>

To Craig Messina; john.Kennedy@senate.ga; Clint Dixon; Ben Watson; Jon Burns; ccarr@law.ga.gov;
Buddy.Carter@mail.house.gov



Wed 3/19/2025 6:48 AM

 You forwarded this message on 3/19/2025 8:22 AM.

Dear Sirs,

I am in PROTEST of Georgia's plumbing and building code EXCEMPTION 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by both genders at the same time. This is absolutely ludicrous!!! How dare you or any human being to even consider putting people at risk! This is about the SAFTEY of ALL Georgians!
DO NOT ALLOW THIS CODE TO PASS!!!! DO NOT LET THIS BECOME GEORGIA LAW!!!

Thank you for your time.

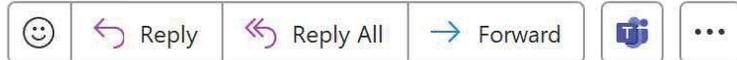
A very concerned citizen,
Lisa Kirk

2021 International Plumbing Code Gender Neutral Bathroom



Jeffrey Corona <rockydog9376@gmail.com>

To Craig Messina



Wed 3/19/2025 7:45 AM

 You forwarded this message on 3/19/2025 8:22 AM.

Dear Mr. Messina,

I was just informed of a new ICC Code which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors and have common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program, is in the process of adopting Exception 6 into its Code. Exception 6 puts the public in danger, and I DO NOT want Exception 6 to become a part of Georgia's law. Not only do I not want my wife to deal with possible peaking eyes, suggestive remarks and/or looks, or sexual assault, I also personally don't want to be put in a position where another woman could accuse me of these things erroneously. Men, women and children NEED and deserve privacy. Period!

Please help protect Georgians' bathroom privacy and delete Exception 6 from Georgia's Code.

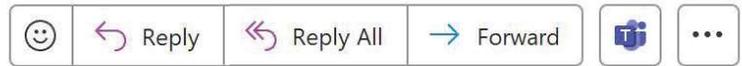
Best regards,
Jeff Corona

Exception 6 to ICC Code



Ellie Maddox <ewmaddness@comcast.net>

To Craig Messina



Wed 3/19/2025 10:41 AM

 You forwarded this message on 3/19/2025 10:47 AM.

Dear Sir:

I am aware that there is a new ICC Code (plumbing and building) which contains Exception 6 that would allow public bathrooms to be designed for use by both genders at the same time. I believe this is **dangerous** for women and children!! Please protect our bathroom privacy and delete Exception 6 from Georgia's code!

Thank you,

Georgia voter
Ellie Maddox
Savannah

EXCEPTION 6 VOTE MARCH 20, 2025



Melissa Mixon <mmixon@monroemarketing.net>

To Craig Messina



Wed 3/19/2025 12:01 PM

 Follow up.
You forwarded this message on 3/19/2025 12:03 PM.
This message was sent with High importance.

Dear Sir or Madam:

I recently became aware of a new ICC Code (plumbing and building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program (GADCA) is in the process of adopting this Exception 6 into its code.

Exception 6 puts the public in danger, and I do not want this Exception to become a part of Georgia's law. Do not let this Exception be the "hill you ride or die on", rather let your vote to remove Exception 6 from the Georgia code align with the majority of what we the people, your Georgia constituents stand for...

Please protect Georgia's bathroom privacy and delete Exception 6 from Georgia's code.

Thank you,

Melissa Mixon

Gender Neutral Bathroom



marcusholton25@gmail.com

To Craig Messina



Reply



Reply All



Forward



Wed 3/19/2025 12:41 PM

Sent from my iPhone

My name is Marcus Holton and I'm a registered Voter here in the state of Georgia and I am opposed to the Gender Neutral Bathroom Policy that is now up for a vote.

DELETE EXCEPTION 6!!!!!!!!!!!!!!!



Kailee Gonzalez <kaileehajovsky@gmail.com>

To Craig Messina



Wed 3/19/2025 1:04 PM

Good afternoon Mr Craig Messina,

I recently became aware of a new ICC Code (plumbing and building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by BOTH genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Code Program (GADCA) is in the process of adopting this Exception 6 into its code. Exception 6 puts the public in danger, and as another, it puts my children in danger. I couldn't imagine ANY human being allowing such inappropriate changes to be made in the State of Georgia. If you have any children or even grandchildren, you will also be putting them in danger. I DO NOT want this Exception to become a part of Georgia's law.

PLEASE PROTECT THE WOMEN AND CHILDREN IN GEORGIA AND THEIR PRIVACY AND DELETE EXCEPTION 6 FROM GEORGIA'S CODE.

Kailee Gonzalez

Exception 6 - Gender Neutral Bathrooms



karen sheehan <karensheehan@att.net>

To Craig Messina



Wed 3/19/2025 1:11 PM



Say No to Exception 6.pdf
783 KB

Dear Mr. Messina,

Please do not support Gender Neutral Bathrooms Exception 6 in the new ICC Code. (Please see attachment explaining Exception 6).

I do not want this Exception to become a part of Georgia's law.

I have two young granddaughters and I would be greatly concerned for their safety should this Exception 6 pass.

Thank you for your consideration.

Karen Sheehan
P.O. Box 328
Tybee Island, GA 31328
(912)220-0671

Say “No” to Exception 6 - Gender Neutral Bathrooms

WHAT IS EXCEPTION 6?

The International Code Council (ICC) publishes its model plumbing code every three (3) years and **most States in the U.S. adopt the ICC building code** on a similar cycle. Most of the time, a State will have a review committee to determine what parts of the ICC code should be adopted and then after an approval process, it becomes a part of the adopting State’s laws. **Exception 6 was added to the ICC’s Plumbing Code in 2021 and opens the door for the design and use of public gang-style gender neutral bathrooms.**¹ Specifically, this exception allows public restroom spaces to be designed with stalls separated by partitions and doors with common sink areas which would be used by both genders at the same time. **Exceptions 1-5**, which were already a part of the Code, provide for various accommodation scenarios that **address all the concerns** raised by supporters of Exception 6. **Exception 6 is unnecessary and dangerous. It completely disregards the safety of women and children, as well as the extra privacy women may need at the sink area to address personal issues** like menstruation and wardrobe malfunctions.

IF EXCEPTION 6 IS PART OF A MODEL CODE, WHY IS IT A PROBLEM?

In 2022, South Carolina adopted the 2021 model ICC Plumbing Code with no changes. It came to light that the committee involved in initially approving the Code was **unaware** of Exception 6 having been added by the ICC. **We reached out to legislature to express concern** with supporting documents showing the **public safety risk, especially to women and children. As a result, South Carolina promptly revised their code DELETING Exception 6.**

Now, the state of Georgia is in the process of adopting the 2024 ICC Code, INCLUDING Exception 6. We reached out to several state Senators and the Georgia Attorney General’s office to raise awareness of the dangers that Exception 6 poses to all Georgians. We were directed to the **Georgia Department of Community Affairs Construction Codes Program (GA DCA)** who handles the State’s building code adoption.

At the February 19, 2025 GA DCA Task Force Meeting, a proposed amendment to delete Exception 6 was in motion, based on the same criteria presented to the state of South Carolina; but **unfortunately, the GA DCA rejected the amendment.** For now, **the DCA Task Force is moving forward to adopt Exception 6.**

We found out that an architect had opposed the amendment and was given an opportunity to provide a “response” to our request for deletion. In the architect’s response, he **completely misrepresented our arguments for deletion and claimed an unsupported economic burden as the basis for the need to keep Exception 6 in the GA Code.** The February 19th decision by the DCA was shocking and disheartening as **they were provided with ample evidence showing the public safety risk Exception 6 poses and chose to ignore it.**

Attached in this package is a copy of the public safety risk documentation for your review and use.

SO, WHAT CAN I DO ABOUT IT?

LET YOUR VOICE BE HEARD!

We need all Georgians to **email or call** the State Senators, GA Attorney General’s office and the GA DCA to express your concern and request that the GA DCA’s task force **delete Exception 6 in Georgia’s proposed Plumbing and Building Codes before Thursday March 20, 2025**, which is the next DCA task force meeting.

WHAT SHOULD I WRITE?

We are glad you asked. The following is a sample e-mail for you to use as a guide. Please make it personal. Feel free to share any of your personal stories about public restroom safety and why keeping this dangerous language out of Georgia’s plumbing and building codes is so important.

Dear Sir or Madam:

I recently became aware of a new ICC Code (plumbing and building) which contains Exception 6 allowing public bathrooms to be designed with stalls separated by partitions and doors with common sink areas to be used by both genders at the same time. It is my understanding that the State of Georgia, under direction from the Georgia Department of Community Affairs Construction Codes Program (GA DCA) is in the process of adopting this Exception 6 into its Code. Exception 6 puts the public in danger, and I do not want this Exception to become a part of Georgia’s law. **Please protect Georgians’ bathroom privacy and delete Exception 6 from Georgia’s Code.**

WHO DO I SEND THIS EMAIL TO?

Please send your email BEFORE MARCH 20, 2025 to the following individuals. You will need to send the email to each person separately to avoid the state’s IT security rejecting it as spam.

Name	Email	Phone Number
Craig Messina, GA DCA	Craig.Messina@dca.ga.gov	(404)-416-8070
Lieutenant Governor Burt Jones	https://ltgov.georgia.gov/contact-lt-governor	(404)656-5030
Sen. John Kennedy, President Pro Tempore	John.Kennedy@senate.ga.gov	(404) 656-6578
Sen. Clint Dixon	clint.dixon@senate.ga.gov	(404) 656-6446
Sen. Ben Watson	ben.watson@senate.ga.gov	(404) 656-7880
Rep. John Burns, Speaker of the House	jon.burns@house.ga.gov	(404) 656-5020
Rep. Jan Jones, Speaker Pro Tempore	jan.jones@house.ga.gov	(404) 656-5072
Atty. Gen. Chris Carr	ccarr@law.ga.gov	(404) 458-3600
Chief Dep. Atty. Gen. Wright Banks	wbanks@law.ga.gov	(404) 458-3706
Congressman Buddy Carter (U.S. Representative)	Buddy.Carter@mail.house.gov	(202)225-5831

If the State Senators and Representatives listed do not represent your area, we encourage you to look up your Senator/Representative and send them an email also. **We want to send a clear message to the Georgia Government that they must protect our bathroom spaces and keep all Georgians safe.**

¹

2024 IPC Section 403.2 exception 6 (IBC 2902.2 exception 6) states: “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.”

OVERVIEW

Under the 2024 Edition of the International Code pertaining to the Building and Plumbing code, there is a section which allows gender-neutral multiple occupancy use public restrooms where men, women and children can use toilet & urinal stalls next to each other while sharing common space at the sink area.

The particular code section which allows this provision is the **2024 International Plumbing Code (IPC) Section 403.2 exception 6**, mimic in the **2024 International Building Code (IBC) 2902.2 exception 6**.

- [2024 IPC Section 403.2 exception 6 \(IBC 2902.2 exception 6\)](#)

“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.”¹

¹ Section 405.3.4. of the 2024 International Plumbing Code elaborates that separation could be partition, as typical in a gang type bathroom design without full vertical separation, 1 to 2 feet offset from floor surface. Section 405.3.5 elaborates that urinal partition does not require full four sided enclosure as typical how a urinal is to be used.

Link to [2024 International Plumbing Code \(IPC\) Section 403.2](#).

Link to [2024 International Plumbing Code \(IPC\) Section 405.3.4](#) for water closet separation & [405.3.5](#) for urinal separation.

Link to [2024 International Building Code \(IBC\) 2902.2](#).

WHY DOES THIS POSE A SIGNIFICANT DANGER TO THE HEALTH AND SAFETY OF THE PUBLIC?

- 1) Gender-neutral multiple occupancy use restrooms pose a serious threat to the health and safety of all by increasing the incident of sexual violence against women and children, as well as increasing the incident of wrongful accusations of sexual assault, voyeurism and the like.
- 2) Gender-neutral multiple occupancy use restrooms undermine and reduce the “safe-spaces” for victims of human trafficking.
- 3) Gender-neutral multiple occupancy use restrooms discriminate against women and children by disproportionately decreasing available number of bathroom spaces for women and children, while men will have access to both water closet compartments and urinal spaces. In addition, common use sink spaces discriminate against women and children by disproportionately decreasing the area available for women to address personal needs, such as menstrual or other medical care, nursing and baby changing activities.
- 4) Exception 6 is not necessary. Exceptions 1-5 in the 2024 IPC Section 403.2 provide sufficient guidance and latitude for businesses, schools, churches, to provide gender-neutral spaces with adequate privacy protections.

See Page 2 for supporting data and additional information.

SOUTH CAROLINA

South Carolina adopted the 2021 Edition of the codes which also has the same provision for this type of public restroom design. However, when South Carolina was presented with supporting documents and statistics to show the imminent danger of this type of public restroom, it has invoked its Emergency Code Modification to delete without substitution of this code provision before the effective date of the code implementation statewide.

Link to the [South Carolina Emergency Code Modification](#).

OBJECTIVE

To delete without substitution this 2024 IPC Section 403.2 exception 6 & IBC 2902.2 exception 6, and all applicable sections associated with the provision of this public restroom design (i.e. 2024 IPC 403.1.1 Fixture Calculations exception 2) due to public safety risk as shown on this document.

SAFETY CONCERNS WITH GENDER-NEUTRAL PUBLIC BATHROOMS

- 1) **Gender-neutral gang type bathrooms pose a serious threat to the health and safety of all by increasing the incident of sexual violence against women and children, as well as increasing the incident of wrongful accusations of sexual assault, voyeurism and the like.**
 - a. Most victims of sexual assaults are women and children.¹ 20% of the sexual assaults are committed by strangers.^{2,3} Statistics also show that 15% of sexual assaults happened in open public spaces, and 10% in public enclosed spaces such as parking lots or garages.⁴ Gender-inclusion policies, such as gender-neutral bathroom facilities, directly result in an increase in sexual violence against women and children in public spaces. A case study showed an increase in sexual incidents from pre to post policy adoption of gender-neutral facilities where about 99% of victims were women and children, with 34% being victimized children.⁵
 - b. It is documented that the policy for the use of sex-separated facilities that corresponds to one's subjective, psychological "gender identity" been used by sexual predators to gain access to women and children.⁶ Gender-neutral bathroom policies provide the same opportunities for predators and is inconsistent with State's effort against such policies.^{7, 8} It is also inconsistent with current Federal mandate to protect women from men to gain access to intimate single-sex spaces and activities designed for women.⁹
 - c. Gender-neutral public bathrooms create circumstances for all people regardless of age or sexual orientation to be exposed to sexual harassment, or to be falsely accused of lewd and lascivious behavior. A study showed almost 90% of reported sexual assaults, harassment and voyeurism in swimming pool and sports-center changing rooms happened in gender-neutral facilities.¹⁰
- 2) **Gender-neutral gang type bathrooms undermine and reduce the "safe-spaces" for victims of human trafficking.**
 - a. It is estimated that there are 24.9 million victims of human trafficking.¹¹ Victims of human trafficking are mostly women.¹² A public bathroom is a place where a victim can go in alone without their perpetrator. Awareness of this has set some states to require flyers of the National Human Trafficking Hotline Number to be posted in public bathrooms. The hope is that the victim can call for help and may possibly even find help from others inside the public bathroom while the perpetrator is not in sight.^{13,14} This slight hope for help will be taken away from the victim in a gender-neutral public bathroom where both men and women can enter.
- 3) **Gender-neutral gang type bathrooms discriminate against women and children by disproportionately decreasing available number of bathroom spaces for women and children, while men will have access to both water closet compartments and urinal spaces. In addition, the common use sink space discriminates against women and children by disproportionately decreasing the area available for women to address personal needs, such as menstrual or other medical care, nursing and baby changing activities.**
 - a. Gender-neutral public bathrooms place women and children at a significant disadvantage to biological men. While men can use both water closet compartments and urinals, women can only use the water closet compartments. The net effect reduces toilet provisions for women. Furthermore, women need safe spaces given their biological, health and sanitary needs such as menstruating, pregnancy or menopause. Given these needs, women tend to use the bathroom more often and do not feel comfortable using a public bathroom with men in it.¹⁵
 - b. Gender-neutral bathroom policies are not safe for school settings as demonstrated by lawsuits and sexual assault cases reported against schools with inclusion policies in Seattle and Atlanta.^{16, 17} Parents are speaking out against this type of bathroom policy.^{18, 19, 20}
 - c. Proponents and schools which had implemented gender-neutral bathrooms is citing problem of these bathrooms as being misused which defeats its purpose. There is lack of teacher resources to monitor the access to these bathrooms to prevent misuse. Teachers may be liable for "looking at student wrong", putting their livelihood and job at risk. Furthermore,

widespread multi-stall gender-neutral bathrooms might not be comfortable or safe space for everyone. Students are still uncomfortable using the bathroom. It proves these type of bathrooms are pointless, and wasteful.^{21, 22}

- d. After the United Kingdom implemented gender-neutral policies in their school system, it resulted in an inordinate number of female students skipping school, refusing to urinate all day, and stopping drinking liquids at school. It was determined that female students were especially susceptible to increased mental pressure and embarrassment when mandated to share bathrooms with male students at the time of menstruation. Doctors and politicians joined together and called on their schools to halt the move towards gender-neutral bathrooms to prevent any further harm to female students.²³ As of now, UK bans these type of gender-neutral bathrooms in new or major refurbishment of commercial buildings.²⁴

4) Exception 6 is not necessary. Exceptions 1-5 provide sufficient guidance and latitude for businesses, schools, churches and other similar large-capacity, to provide gender-neutral spaces with adequate privacy protections.

- a. The 2024 IPC already has provision for public gender-neutral user toilet rooms under Section 403.2 exceptions 3-5, and family or assisted-use toilet facilities under section 403.1.2, for any group who may have a concern, need, or claim to use non-sex designated public bathrooms.

REFERENCES & DOCUMENTS

¹ **RAINN (Rape, Abuse & Incest National Network) Scope of the Problem: Statistics** [https://www.rainn.org/statistics/scope-problem#:~:text=Every%2068%20seconds%20another%20American%20is%20sexually%20assaulted.&text=1%20out%20of%20every%206,completed%2C%202.8%25%20attempted\).&text=About%203%25%20of%20American%20men,completed%20rape%20in%20their%20lifetime](https://www.rainn.org/statistics/scope-problem#:~:text=Every%2068%20seconds%20another%20American%20is%20sexually%20assaulted.&text=1%20out%20of%20every%206,completed%2C%202.8%25%20attempted).&text=About%203%25%20of%20American%20men,completed%20rape%20in%20their%20lifetime).

² **Registered Offenders List** <https://www.registeredoffenderslist.org/>

³ **Sex Offender Infographic** <https://www.registeredoffenderslist.org/img/Sexual-Predator-Infographic.jpg>

⁴ See Endnote 1 above.

⁵ **A Longitudinal Analysis of Media Reports at Target Stores, Paul Dirks January 29, 2018** https://www.academia.edu/58504589/Gender_Inclusion_Policies_and_Sexual_Violence_A_Longitudinal_Analysis_of_Media_Reports_at_Target_Stores

⁶ **Family Research Center Issue Brief on Bathroom Incidents, April 2017** <https://downloads.frc.org/EF/EF16F27.pdf>

⁷ **HB 1104 to Restricts Transgender Athletes from Participating in Sports Teams or Using School Bathrooms Based on Gender Identity.** <https://www.legis.ga.gov/legislation/66567>

⁸ **Attorney General Chris Carr Has Filed Suit Against The Biden Administration's Revised Title IX Rule That Upends The Foundation of Women's Sports and Mandates That Males and Females Share Bathrooms.** <HTTPS://LAW.GEORGIA.GOV/PRESS-RELEASES/2024-04-29/CARR-TAKES-ACTION-PROTECT-WOMENS-SPORTS#:~:TEXT=ATLANTA%2C%20GA%20%E2%80%93%20ATTORNEY%20GENERAL%20CHRIS,MALES%20AND%20FEMALES%20SHARE%20BATHROOMS>.

⁹ **Executive Order 14168 Defending Women From Gender Ideology Extremism.** <https://www.federalregister.gov/documents/2025/01/30/2025-02090/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal>

¹⁰ **Unisex Changing Rooms Put Women in Danger, Andrew Gilligan September 2, 2018, The Sunday Times** <https://asteine8.github.io/data/Unisex%20changing%20rooms%20put%20women%20in%20danger%20%20News%20%20The%20Sunday%20Times.pdf>

¹¹ **Human Trafficking Institute (TraffickingInstitute.org)** <https://traffickinginstitute.org/breaking-down-global-estimates-of-human-trafficking-human-trafficking-awareness-month-2022/>

¹² **Federal Human Trafficking Report, 2022 Executive Summary** <https://traffickinginstitute.org/wp-content/uploads/2023/06/2022-Federal-Human-Trafficking-Report-WEB-LR.pdf>

¹³ **New Law Hopes to Curb Human Trafficking, Eileen Street, July 15, 2022** <https://spectrumnews1.com/ky/louisville/news/2020/07/15/house-bill-2-kentucky-law-human-trafficking-hotline-posters-public-restrooms>

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- ¹⁴ **Human Trafficking Hotline To Be Put In Public Restrooms Across Pennsylvania, Haley Potter, March 2, 2021**
<https://www.weny.com/story/43428671/human-trafficking-hotline-to-be-put-in-public-restrooms-across-pennsylvania>
- ¹⁵ **UK Government Written Ministerial Statement, Kemi Badenoch July 4, 2022** <https://questions-statements.parliament.uk/written-statements/detail/2022-07-04/hcws172>
- ¹⁶ **Former Student Sues Seattle Schools Over Sexual Assault December 19, 2020, AP News** <https://apnews.com/article/lawsuits-seattle-sexual-assault-38d7b88d17e075ed6da7c20bcbf84c42>
- ¹⁷ **Complaint Says Transgender Bathroom Policy Led to Kindergarten Assault, Ty Tagami October 3, 2018, The Atlanta Journal-Constitution**
<https://www.ajc.com/news/state--regional-education/child-sex-assault-case-decatur-schools-touches-national-debate-over-gender-identity/SKG4vOR4BCFpdrkynKSRyH/>
- ¹⁸ **Gender Neutral Toilets in Schools Aren't Working, Transgender Trend January 10, 2020** <https://www.transgendertrend.com/gender-neutral-toilets-schools/>
- ¹⁹ **Gender Neutral Bathroom Policy In Schools Is Not Gaining Support From Parents In Loudoun County, VA, Dick Uliano, September 28, 2021**
<https://wtop.com/loudoun-county/2021/09/parents-teachers-against-loudoun-co-schools-transgender-policy-rally-outside-school-board-hq/>
- ²⁰ **Mothers Urge Change to Stillwater Bathroom Policy, Ray Carter, April 13, 2022, Oklahoma Council of Public Affairs (OCPA)**
<https://www.ocpathink.org/post/mothers-urge-change-to-stillwater-bathroom-policy>
- ²¹ **Students Confront Misuse Of Gender-Neutral Bathrooms, February 7, 2024, The Cypress Online**
<https://thecypressonline.com/52740/longform/students-confront-misuse-of-gender-neutral-bathrooms/>
- ²² **Gender-Neutral Locker Room Plans Criticized, August 7, 2022, Press-Telegram (Long Beach)**
<https://www.pressreader.com/usa/press-telegram-long-beach/20220807/page/1/textview>
- ²³ **Girls Are Skipping School To Avoid Sharing Gender-Neutral Toilets With Boys, Sanchez Manning, October 7, 2019, Daily Mail**
<https://archive.ph/2GPVR#selection-939.0-939.119>
- ²⁴ **UK Government To Lay New Law To Halt The March Of Gender-Neutral Toilets In Buildings, May 6 2024**
<https://www.gov.uk/government/news/government-to-lay-new-law-to-halt-the-march-of-gender-neutral-toilets-in-buildings#:~:text=Changes%20to%20building%20regulations%20will,toilets%20for%20women%20and%20men.>

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:

ONE: Delete section and substitute the following:

Add new section to read as follows:

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 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

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 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 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 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._____”.
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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: 305.1.1

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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GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

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

CODE: 2021/2024 SECTION: 310 FIGURE

PROPOSER: NICOLETTE DUNN DATE: 2/3/2025

EMAIL: NDUNN@ATLANTAGA.GOV

ADDRESS: 55 TRINITY AVE. SUITE 3900 ATLANTA, GA. 30303

TELEPHONE NUMBER: 470-585-7445 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:

The figure shown in this section represents the configuration of a restroom that allows men and women to use the same facilities at the same time which goes against the intent of the plumbing code.

REASON/INTENT:

The intent of the plumbing code is clearly defined in section 101.3 which states that "The purpose of this code is to establish minimum standards to provide a reasonable level of safety, health, property protection and public welfare."

"The separate facilities requirement for males and females addresses two main concerns: privacy and safety."

"A toilet facility intended to be used by both sexes simultaneously does not offer the same level of immediate situational awareness for females and therefore, it is not perceived to be as safe as a facility intended for one gender only." Referenced from IPC Sec. 403.2 Commentary

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

NONE

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

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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: 2021/2024 SECTION: 403.1.1(exception 2)

PROPONENT: NICOLETTE DUNN DATE: 2/3/2025

EMAIL: NDUNN@ATLANTAGA.GOV

ADDRESS: 55 TRINITY AVE. SUITE 3900 ATLANT GA. 30303

TELEPHONE NUMBER: 470-585-7445 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 this exception without substitution.

“Calculations for multiple user facilities designed to serve all genders is to be calculated at 100%.”

REASON/INTENT: This exception removes the requirement for the total occupant load to be divided in half to determine fixture ratios making the minimum number of fixtures required per gender unbalanced. For example, if an occupant load for a restaurant is 400, calculated at 100%, this occupant load (@1 per 75) would require a minimum of 6 water closets. Urinals can be substituted for 67% of those making the total count 4 urinals and 2 water closets.

With the total occupant load required to be split in half (as the code requires now) the women’s restroom would require a minimum of 3 water closets, the men’s would require a minimum of 2 urinals and one water closet. This makes the ratio between the men’s and women’s facilities more suitable for the occupant load of the space.

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: 2021/2024 SECTION: 403.1.2

PROPONENT: NICOLETTE DUNN DATE: 2/3/2025

EMAIL: NDUNN@ATLANTAGA.GOV

ADDRESS: 55 TRINITY AVE. SUITE 3900 ATLANTA GA. 30303

TELEPHONE NUMBER: 470-585-7445 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:

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Approve Approve as amended (DCA STAFF ONLY) Disapprove Withdrawn

DESCRIPTION:

DELETE THIS PARAGRAPH WITHOUT SUBSTITUTION;

The total number of fixtures shall be based on the required number of separate facilities or based on the aggregate of any combination of single-user or multiple-user facilities.

REASON/INTENT: In this section the wording above this paragraph already states that the single-user toilet and bathing room facilities shall contribute to the total number of required plumbing fixtures. This was added to include the "multiple-user restrooms" but the wording is redundant as it is the same requirement.

FINANCIAL IMPACT OF PROPOSED AMENDMENT: NONE

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GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

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

CODE: 2021/2024 IPC SECTION: 410.3 FIGURE

PROPONENT: NICOLETTE DUNN DATE: 1/31/25

EMAIL: NDUNN@ATLANTAGA.GOV

ADDRESS: 55 TRINITY AVE. SUITE 3900 ATLANTA GA. 30303

TELEPHONE NUMBER: 470-585-7445 FAX NUMBER: () -

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DESCRIPTION: FIGURE FOR THE DRINKING FOUNTAIN REQUIREMENTS

REASON/INTENT: THIS FIGURE IS INCORRECT.

PER SEC. 410.3-WHEN A DRINKING FOUNTAIN IS REQUIRED, NO FEWER THAN TWO MUST BE PROVIDED, ONE HIGH, ONE LOW. THE FIGURE SHOWS THE SAME REQUIREMENT FOR ONE DRINKING FOUNTAIN AS IT DOES FOR TWO, AND AFTER THREE ARE REQUIRED, THERE ARE OTHER OPTIONS THAN WHAT IS SHOWN IN THE FIGURE.

FINANCIAL IMPACT OF PROPOSED AMENDMENT: NONE

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GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

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

CODE: 2021/2024 SECTION: DEFINITION

PROPOSER: NICOLETTE DUNN DATE: 1/31/25

EMAIL: NDUNN@ATLANTAGA.GOV

ADDRESS: 55 TRINITY AVE. SUITE 3900 ATLANTA GA. 30303

TELEPHONE NUMBER: 470-585-7445 FAX NUMBER: () -

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Approve Approve as amended (DCA STAFF ONLY) Disapprove Withdrawn

DESCRIPTION: DELETE WITHOUT SUBSTITUTION THE NEW DEFINITION AND FIGURE OF
"MULTIPLE USER TOILET FACILITY"

REASON/INTENT:

The new definition and intended use of "Multiple User Facilities" goes directly against the intent of the plumbing code.

The intent of the plumbing code is clearly defined in section 101.3 which states that "The purpose of this code is to establish minimum standards to provide a reasonable level of safety, health, property protection and public welfare."

"The separate facilities requirement for males and females addresses two main concerns: privacy and safety."

"A toilet facility intended to be used by both sexes simultaneously does not offer the same level of immediate situational awareness for females and therefore, it is not perceived to be as safe as a facility intended for one gender only." Referenced from IPC Sec. 403.2 Commentary

FINANCIAL IMPACT OF PROPOSED AMENDMENT: NONE

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GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

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

CODE: 2021/2024 SECTION: 403.2 EXCEPTION 6

PROPONENT: NICOLETTE DUNN DATE: 2/3/2025

EMAIL: NDUNN@ATLANTAGA.GOV

ADDRESS: 55 TRINITY AVE. SUITE 3900 ATLANTA GA. 30303

TELEPHONE NUMBER: 470-585-7445 FAX NUMBER: () -

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Approve Approve as amended (DCA STAFF ONLY) Disapprove Withdrawn

DESCRIPTION:

DELETE WITHOUT SUBSTITUTION SEC. 403.2 EXCEPTION 6

“Separate 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 Sec. 405.3.4 and for urinals in accordance with Sec. 405.3.

REASON/INTENT:

“The separate facilities requirement for males and females addresses two main concerns: privacy and safety.”
“A toilet facility intended to be used by both sexes simultaneously does not offer the same level of immediate situational awareness for females and therefore, it is not perceived to be as safe as a facility intended for one gender only.” Referenced from IPC Sec. 403.2 Commentary

There are no specific guidelines for the construction of the “water closet compartment” in this definition, adding to the concern that there will be no “reasonable level of safety” when it comes to men and women using the same facilities at the same time.

FINANCIAL IMPACT OF PROPOSED AMENDMENT: NONE

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

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CODE AMENDMENT FORM

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

CODE: 2024 ISPSC SECTION: 305.1.1

PROPONENT: Thomas Beckwith DATE: 02/12/2025

EMAIL: tommy@arcfp.com

ADDRESS: PO Box 81368, Atlanta, GA 30366

TELEPHONE NUMBER: (678)858-6270 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:

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Approve Approve as amended (DCA STAFF ONLY) Disapprove Withdrawn

DESCRIPTION:

305.1.1 Permanent barrier. ~~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~~ No pool or spa shall be filled with water and placed into operation until the permanent barrier is completed and complies with Section 305.2. ~~The fencing shall be not less than 4 feet (1219 mm) in height.~~

REASON/INTENT:

Too often, during the course of construction, the sequencing is such that a pool may be completed and filled with water without proper protection against hazards, drowning or otherwise, that an open body of water presents. A barrier must be provided to be in compliance at completion, therefore this ensures that there is no lapse in protection.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

NONE

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CODE AMENDMENT FORM

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

CODE: 2024 ISPSC SECTION: 302.3.1

PROPONENT: Thomas Beckwith DATE: 2/12/2025

EMAIL: tommy@arcfp.com

ADDRESS: PO Box 81368, Atlanta, GA 30366

TELEPHONE NUMBER: (678)858-6270 FAX NUMBER: () -

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Approve Approve as amended (DCA STAFF ONLY) Disapprove Withdrawn

DESCRIPTION:

~~302.3.1 Suction outlet fitting assembly sumps. Sumps shall be inspected for dimensional conformance to APSP 16 as specified by the suction outlet fitting assembly installation instructions.~~

REASON/INTENT:

Laboratories inspect and test sumps for conformity to APSP 16, as dictated by APSP 16. No need for outside inspection.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

NONE

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CODE AMENDMENT FORM

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

CODE: 2024 ISPSC SECTION: 305.3.3.1.1.1

PROPOSER: Thomas Beckwith DATE: 02/12/2025

EMAIL: tommy@arcfp.com

ADDRESS: PO Box 81368, Atlanta, GA 30366

TELEPHONE NUMBER: (678)858-6270 FAX NUMBER: () -

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DESCRIPTION:

305.3.3 Latch release. For doors and gates in barriers, the door and gate latch release mechanisms shall be in accordance with the following:

1. Where door and gate latch release mechanisms are accessed from the outside of the barrier and are not of the self-locking type, such mechanism shall be located above the finished floor or ground surface in accordance with the following:

1.1. At public pools and spas, not less than ~~52 inches (1219 mm) and not greater than~~ 54 inches (1372 mm).

1.2. At *residential* pools and spas, not less than 54 inches (1372 mm).

REASON/INTENT:

To stay consistent with the DPH and most other county regulations governing public pools.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

NONE

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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 IPC SECTION: 421.2

PROPONENT: Terry L Moon Jr DATE: 02/12/2025

EMAIL: terry.moon123@gmail.com

ADDRESS: 170 Avery Dr. Covington, Ga 30016

TELEPHONE NUMBER: (678)347-1117 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

421.2 Water supply riser.

Water supply risers from the shower valve to the shower head outlet, whether exposed or concealed, shall be attached to the structure. The attachment to the structure shall be made by the use of support devices designed for use with the specific piping material or by fittings anchored with non-corrosive screws.

REASON/INTENT:

To keep the screws from rusting.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

To prevent from having to open the wall later for repairs.

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM INSTRUCTION SHEET

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GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

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

CODE: 2024 IPC SECTION: 504.6

PROPONENT: Terry L Moon Jr DATE: 02/12/2025

EMAIL: terry.moon123@gmail.com

ADDRESS: 170 Avery Dr. Covington, Ga 30016

TELEPHONE NUMBER: (678)347-1117 FAX NUMBER: () -

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Approve Approve as amended (DCA STAFF ONLY) Disapprove Withdrawn

DESCRIPTION:

***Revise Section 504.6 'Requirements for discharge piping' to read as follows:**

504.6 Requirements for discharge piping.

~~7. When the relief valve discharge piping goes upward, a thermal expansion control device shall be installed on the cold-water distribution or service pipe in accordance with Section 607.3. If the discharge pipe is trapped, provisions shall be made to drain the low point of the trapped portion of the discharge pipe.~~

REASON/INTENT:

607.3 thermal expansion control devices are required to be installed on the cold water supply pipe

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 IPC SECTION: 504.7

PROPONENT: Terry L Moon Jr DATE: 02/12/2025

EMAIL: terry.moon123@gmail.com

ADDRESS: 170 Avery Dr. Covington, Ga 30016

TELEPHONE NUMBER: (678)347-1117 FAX NUMBER: () -

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Approve Approve as amended (DCA STAFF ONLY) Disapprove Withdrawn

DESCRIPTION:

504.7 Required Pan.

~~A plastic pan installed beneath a gas-fired water heater shall be constructed of material having a flame spread index of 25 or less and a smoke developed index of 450 or less when tested in accordance with ASTM E84 or UL 723.~~

Water heaters installed in pans shall comply with Section 314.2.3.2.

A plastic pan shall not be installed beneath a gas-fired water heater.

REASON/INTENT:

Not able to verify compliance due to information not directly visible for inspection.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

Plastic pan would probably be as much at an aluminum pan.

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 SECTION: 605.9

PROPONENT: Terry L Moon Jr DATE: 2/12/2025

EMAIL: terry.moon123@gmail.com

ADDRESS: 170 Avery Dr Covington, Ga. 30016

TELEPHONE NUMBER: (678)347-1117 FAX NUMBER: () -

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Approve Approve as amended (DCA STAFF ONLY) Disapprove Withdrawn

DESCRIPTION:

605.9 Prohibited joints and connections:

4. Saddle- type fittings.

Exception: Saddle-type fittings can be used to connect refrigerator ice makers and humidifiers to an existing residential unit water distribution system provided that the manufacturer's installation instructions for the distribution piping do not prohibit the use of saddle fittings and shall have access on the same floor at said appliance.

REASON/INTENT:

Homeowners have quick access to the valve in case of an emergency.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

Prevention of water damage to the property.

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 IPC SECTION: 607.3

PROPONENT: Terry L Moon Jr DATE: 02/12/2025

EMAIL: terry.moon123@gmail.com

ADDRESS: 170 Avery Dr. Covington, Ga 30016

TELEPHONE NUMBER: (678)347-1117 FAX NUMBER: () -

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Approve Approve as amended (DCA STAFF ONLY) Disapprove Withdrawn

DESCRIPTION:

607.3 Thermal expansion control.

Where a storage water heater is supplied with cold water that passes through a check valve, pressure reducing valve or backflow preventer, a thermal expansion control device shall be connected to the water heater cold water supply pipe at a point that is downstream of all check valves, pressure reducing valves ~~and~~ backflow preventers ~~and shut off valves~~. Thermal expansion ~~tanks shall be located a minimum of 18 inches from the cold water inlet fitting of the water heater~~, shall be sized in accordance with the tank manufacturer's instructions and shall be sized such that the pressure in the water distribution system shall not exceed that required by [Section 604.8](#).

REASON/INTENT:

If the thermal expansion device is installed upstream of the shut-off valve for the storage water heater and the valve is closed, the thermal expansion device will not serve its purpose.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

None

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GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

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

CODE: 2024 SECTION: 606.2

PROPONENT: Terry L Moon Jr DATE: 2/12/2025

EMAIL: Terry.moon123@gmail.com

ADDRESS: 170 Avery Dr Covington, Ga. 30016

TELEPHONE NUMBER: (678)347-1117 FAX NUMBER: () -

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Approve Approve as amended (DCA STAFF ONLY) Disapprove Withdrawn

DESCRIPTION:

606.2 Location of shutoff valves.

4. Shutoff valves, Saddle-type fittings to water supplies for refrigerators with automatic icemakers shall have access on the same floor as said refrigerator

REASON/INTENT:

Homeowners have quick access to the valves in case of an emergency.

Prevention of water damage to the property.

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GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

CODE AMENDMENT FORM

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

CODE: 2024 IPC SECTION: 706.3

PROPONENT: Terry L Moon Jr DATE: 02/12/2025

EMAIL: terry.moon123@gmail.com

ADDRESS: 170 Avery Dr. Covington, Ga 30016

TELEPHONE NUMBER: (678)347-1117 FAX NUMBER: () -

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DESCRIPTION:

706.3 Installation of fittings:

Fittings shall be installed to guide sewage and waste in the direction of flow. Change in direction shall be made by fittings installed in accordance with Table 706.3. Change in direction by combination fittings, ~~side inlets~~ or increasers shall be installed in accordance with Table 706.3 based on the pattern of flow created by the fitting. Double sanitary tee patterns shall ~~not receive the discharge of back-to-back fixtures or appliances with pressure or pumping action discharge. Water closets shall not be combined with fixtures other than water closets on a double drainage fitting.~~ only be used for dry venting purposes. Delete Exception with - out replacement.

REASON/INTENT:

To prevent sewer cable from crossing over into another plumbing fixture.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

Save on replacing broken plumbing fixtures from cleaning out sewer lines with a sewer machine

GEORGIA DEPARTMENT OF COMMUNITY AFFAIRS

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CODE AMENDMENT FORM

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

CODE: 2024 IPC SECTION: 708.1.3

PROPOSER: Terry L Moon Jr DATE: 02/12/2025

EMAIL: terry.moon123@gmail.com

ADDRESS: 170 Avery Dr. Covington, Ga 30016

TELEPHONE NUMBER: (678)347-1117 FAX NUMBER: () -

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DESCRIPTION:

708.1.3 Building drain and building sewer junction.

There shall be a cleanout installed at or near the junction of the building drain and the building sewer. The cleanout shall be outside the building wall unless otherwise approved and shall be brought up to finished ground level. Provided the sewer line is not deeper than 2 feet, an approved two-way cleanout is allowed to be used at this location to serve as a required cleanout for both the building drain and building sewer.

REASON/INTENT:

If the sewer line is any deeper the direction of the sewer cable/camera cannot be easily controlled.

FINANCIAL IMPACT OF PROPOSED AMENDMENT:

None

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AIA Georgia

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

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Will Stanford, AIA

Marissa Swanson, Assoc AIA

Ai-Lien Vuong, AIA

David Southerland
Executive Director
dsoutherland@aiaga.org

February 16, 2025

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

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

Dear Chairman Roberts:

The American Institute of Architects, Georgia Association has been hosting discussion about item one on the proposed amendment chart for the IPC/ISPSC task group. As we understand it, this same measure was proposed to the City Council of Savannah which voted not to adopt the proposal.

While we agree that safety and privacy are paramount, we are concerned that the statement by the proponents appears to greatly misrepresent the requirements of the building codes. The first point to acknowledge is that the exceptions listed for IPC Section 403.2 are voluntary. There is no requirement for “gender-neutral restrooms”.

The exceptions to Section 403.2 of the plumbing code allow 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 restrooms 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.

The proponent appears to suggest that exception 6 would crowd people of all ages and genders into a restroom with stalls in which women and children would not be safe. We feel the proponents’ statement, “...men, women and children will be forced to use toilet and urinal stalls next to each other” is a misrepresentation of the requirements. The statement seems to ignore the plumbing code reference in the section the proponent wishes to strike. That section, 405.3.4 Water closet compartment, requires, “Each water closet utilized by the public or employees shall occupy a separate compartment with walls or partitions and a door enclosing the fixtures to ensure privacy.”

The proponents state restrooms with shared sinks “place women and children in dangerous physical and emotional situations”. Designs using exception 6 provide more privacy and safety than other designs because each water closet is completely enclosed. This allows a parent of any gender to take a child of any gender into a restroom designed using exception 6. The parent can check the enclosed water closet space to be sure it is unoccupied before a child enters. The parent can see the door to the water closet to confirm no one is able to enter while the child is inside. The child is protected by the enclosed water closet.

Restrooms designed using exception 6 can be a safer and more cost-effective alternative to other designs. Some businesses have elected to construct restrooms with enclosed water closets (as previously described) and shared sinks. We're not aware of any issues with these facilities. We believe that's largely because they are frequently trafficked – there are users who would immediately report any issues to security or the police. As to the proponents' claim that "predators who use this as opportunity for easy access" – in a restroom designed using exception 6, a predator could also be in the company of other men who could immediately intervene... making the restroom safer.

In addition to creating much needed flexibility for designing in challenging spaces, the exceptions help equalize wait times for restrooms – restrooms designed using exception 6 help reduce the waiting line for women's restrooms. The proponents' statement that women and children will be discriminated against due to the number of available fixtures gets the situation exactly backwards – females gain access to more plumbing fixtures in restroom designs using exception 6.

The proponent references a house bill addressing student athletes. AIA Georgia architects work for school districts and will observe any requirements from the districts or state legislature regarding conditions in schools. Our members will continue to develop common sense design solutions that balance safety, privacy and function as we bear in mind exception 6 is voluntary.

Striking exception 6 to Section 403.2 would remove much needed flexibility for buildings across the state. It would potentially raise the cost of buildouts in existing buildings and make some projects infeasible while having little to no effect on schools. Thus, we oppose the proposed amendment and respectfully submit Section 403.2 of the plumbing code should be adopted as written.

As we strongly oppose proposed amendment IPC-2024-01, we also oppose proposed amendment item IPC-2024-02. The two amendments are related, so the disapproval of proposed amendment IPC-2024-01 would mean proposed amendment IPC-2024-02 should also be disapproved.

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
American Institute of Architects, Georgia Association

Cc: Ted Miltiades, Director, Office of Construction Codes & Research at Georgia DCA
Craig Messina, Office of Construction Codes & Research at Georgia DCA



Conditioned Air Association of Georgia

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Tucker Green, Executive Director*

February 19, 2025

Georgia Department of Community Affairs
Codes and Industrialized Buildings
Attn: SCAC Task Force for 2024 International Plumbing Code / Craig Messina, DCA Staff
60 Executive Park South, NE
Atlanta, GA 30329

RE: Letter of Opposition to Proposed Amendment IPC-2024-67

Dear Mr. Messina and Task Force Members:

The Conditioned Air Association of Georgia, Inc. (CAAG) is writing this letter in opposition of proposed amendment #IPC-2024-67 regarding IPC 605.9 the 2024 International Plumbing Code and 2024 International Swimming Pool and Spa Code TASK FORCE. We are submitting this letter after much consideration with our contractor members. The addition of the required location language causes concern amongst our association.

The first concern with this amendment is the conflict that can arise between the installing contractor and the code official interpreting this amendment for new construction versus system replacements with addition of a humidifier that was not previously installed. Another major concern is that while the proposed amendment would be workable with new construction applications, in our best estimate less than 8% of new construction residential or small to medium size commercial facilities elect to install humidifiers during their initial installation. Most humidifiers are installed after the fact when either there is a justifiable need to add humidity to the property either as an “add on feature” or when the system is replaced or retrofitted. In residential single family homes, we estimate this is between 10-20% of homeowners. Specifically, in residential applications where an entire system is replaced and they add a humidifier, this would be impractical due to the fact that many of these systems are in an attic, crawl space or unconditioned basement or garage space. This would require “tapping” into a water line on a different floor. It is a general and customary practice to use a saddle valve at the location of the “tap” (possibly on a different floor) and there is always a shut off valve at the manufacturer’s humidifier. In this case, there are two (2) sources for cutting the water supply off – one at each location.

The Conditioned Air Association of Georgia is very appreciative and thankful for the codification amendment that spells out the exception to allow the humidifier manufacturer’s installation instructions which provide and/or recommend the saddle fittings. However, the addition of “and shall have access on the same floor at said appliance” we believe is too burdensome and open to interpretation. We urge you not to approve this proposed amendment at this time.

We appreciate the work of SCAC and DCA and look forward to working together on future proposed code amendments.

Sincerely,
Tucker Green
Executive Director
Conditioned Air Association of Georgia (CAAG)