



**BUILDING CONSTRUCTION CODE CHANGE PROPOSAL**

**Amendment to 2024 International Building Code (IBC)  
Section 105.2**

**Submitted by:** Smart Surfaces Coalition

**[A] 105.2 Work Exempt from Permit**

Exemptions from permit requirements of this code shall not be deemed to grant authorization for any work to be done in any manner in violation of the provisions of this code or any other laws or ordinances of this jurisdiction. Permits shall not be required for the following:

**Building:**

1. One-story detached accessory structures used as tool and storage sheds, playhouses and similar uses, provided that the floor area is not greater than 120 square feet (11 m<sup>2</sup>).
2. Fences, other than swimming pool barriers, not over 7 feet (2134 mm) high.
3. Oil derricks.
4. Retaining walls that are not over 4 feet (1219 mm) in height measured from the bottom of the footing to the top of the wall. unless supporting a surcharge or impounding Class I, II or IIIA liquids.
5. Water tanks supported directly on grade if the capacity is not greater than 5,000 gallons (18,925 L) and the ratio of height to diameter or width is not greater than 2:1.
6. Sidewalks and driveways not more than 30 inches (762 mm) above adjacent grade, and not over any basement or story below and are not part of an accessible route.
7. Painting, papering, tiling, carpeting, cabinets, counter tops and similar finish work.
8. Temporary motion picture, television and theater stage sets and scenery.
9. Prefabricated swimming pools accessory to a Group R-3 occupancy that are less than 24 inches (610 mm) deep, are not greater than 5,000 gallons (18,925 L) and are installed entirely above ground.
10. Shade cloth structures constructed for nursery or agricultural purposes, not including service systems.
11. Swings and other playground equipment accessory to detached one- and two-family dwellings.
12. Window awnings in Group R-3 and U occupancies, supported by an exterior wall that do not project more than 54 inches (1372 mm) from the exterior wall and do not require additional support.
13. Nonfixed and movable fixtures, cases, racks, counters and partitions not over 5 feet 9 inches (1753 mm) in height.
14. Roof replacement or roof recover with the same type of material as the original roofing provided such replacement does not affect more than 10 percent of an existing building's roof surface.

**Electrical:**

1. **Repairs and maintenance:** Minor repair work, including the replacement of lamps or the connection of approved portable electrical equipment to approved permanently installed receptacles.
2. **Radio and television transmitting stations:** The provisions of this code shall not apply to electrical equipment used for radio and television transmissions, but do apply to equipment and wiring for a power supply and the installations of towers and antennas.

3. **Temporary testing systems:** A permit shall not be required for the installation of any temporary system required for the testing or servicing of electrical equipment or apparatus.

**Gas:**

1. Portable heating appliance.
2. Replacement of any minor part that does not alter approval of equipment or make such equipment unsafe.

**Mechanical:**

1. Portable heating appliance.
2. Portable ventilation equipment.
3. Portable cooling unit.
4. Steam, hot or chilled water piping within any heating or cooling equipment regulated by this code.
5. Replacement of any part that does not alter its approval or make it unsafe.
6. Portable evaporative cooler.
7. Self-contained refrigeration system containing 10 pounds (4.54 kg) or less of refrigerant and actuated by motors of 1 horsepower (0.75 kW) or less.

**Plumbing:**

1. The stopping of leaks in drains, water, soil, waste or vent pipe, provided, however, that if any concealed trap, drain pipe, water, soil, waste or vent pipe becomes defective and it becomes necessary to remove and replace the same with new material, such work shall be considered as new work and a permit shall be obtained and inspection made as provided in this code.
2. The clearing of stoppages or the repairing of leaks in pipes, valves or fixtures and the removal and reinstallation of water closets, provided that such repairs do not involve or require the replacement or rearrangement of valves, pipes or fixtures.

**Justification:**

Phoenix is under incredible duress from extreme heat, necessitating the adoption of cool roofs for roof replacements in addition to new construction in order to improve energy efficiency, enhance power grid reliability, protect public health, and provide citywide cooling. Cool roofs are a proven strategy for mitigating the urban heat island effect, reducing cooling energy demand, and protecting vulnerable populations from heat-related illnesses. This amendment ensures that roof replacements meet updated roof reflectivity thresholds while allowing flexibility for small roof repairs.

**Staff Committee Rationale for Recommendation:** This amendment would have the effect of requiring permits where they are not currently required, per an existing amendment that is suggested by staff to be carried forward. The code is required to be complied with even if a permit is not obtained. *Roof replacements* and *roof recovers* are different from most construction in that they do not require the creation of construction documents for the work to be performed in conformance with the code. To show to staff that the code is complied with, as would be the condition of granting a permit, a design team would need to submit such documentation. It is not widely understood by the public that a permit would be required for this type of work and so requiring one would create more work for code enforcement staff and more citations.

**Cost Impact:** No cost impact.

**Approved in previous 2018 Code Adoption process:**

YES

NO

<b>ACTION TAKEN:</b>	
<b>2024 Code Committee</b> <input type="checkbox"/> Approved as submitted <input type="checkbox"/> Modified and approved <input checked="" type="checkbox"/> Denied	Date: 02/27/2025 <input type="checkbox"/> No action taken
<b>Development Advisory Board (DAB) Subcommittee</b> <input type="checkbox"/> Approved as submitted <input type="checkbox"/> Modified and approved <input checked="" type="checkbox"/> Denied	Date: 03/06/2025 <input type="checkbox"/> No action taken
<b>Development Advisory Board (DAB)</b> <input type="checkbox"/> Approved as submitted <input type="checkbox"/> Modified and approved <input type="checkbox"/> Denied	Date: <input type="checkbox"/> No action taken
<b>Transportation, Infrastructure and Planning Subcommittee</b> <input type="checkbox"/> Approved as submitted <input type="checkbox"/> Modified and approved <input type="checkbox"/> Denied	Date: <input type="checkbox"/> No action taken
<b>City Council Action</b> <input type="checkbox"/> Approved as submitted <input type="checkbox"/> Modified and approved <input type="checkbox"/> Denied	Date: <input type="checkbox"/> No action taken