



City of Phoenix

PLANNING & DEVELOPMENT DEPARTMENT

BUILDING CONSTRUCTION CODE CHANGE PROPOSAL

Amendment to 2024 International Residential Code (IRC) Section R202

Submitted by: Home Builders Association of Central Arizona

SECTION: R202 DEFINITIONS

FIRE SEPARATION DISTANCE. The distance measured from the building face of the wall framing to one of the following:

1. To the closest interior *lot line*.
2. To the centerline of a street, an alley or a public way.
3. To an imaginary line between two buildings or townhouse units on the *lot*. ~~The distance shall be measured at the right angle from the face of the wall framing.~~

Justification:

This amendment provides a more exact point of measurement for fire separation distance.

From HBACA – A similar amendment was adopted by the City of Phoenix in 2018. The rationale from the city was that the amendment “established a more exact point for measurement” and that “[c]onstruction documents use this point for measuring distances.” We agree that this is a good clarification. This is a particularly important issue on narrow lots where the added width from stucco can determine compliance with the fire separation distance requirements.

Cost Impact: No cost impact.

Staff Committee Rationale for Recommendation: IRC Committee proposed amendment provides more concise verbiage that accomplishes what is being submitted here.

Approved in previous 2018 Code Adoption process: ☒ YES ☐ NO

ACTION TAKEN:

2024 Code Committee

☐ Approved as submitted ☐ Modified and approved ☒ Denied ☐ No action taken

Date: 1/17/2025

Development Advisory Board (DAB) Subcommittee

☐ Approved as submitted ☐ Modified and approved ☒ Denied ☐ No action taken

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Date: 04/22/2025

Transportation, Infrastructure and Planning Subcommittee

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Date:

City Council Action

☐ Approved as submitted ☐ Modified and approved ☐ Denied ☐ No action taken

Date:



BUILDING CONSTRUCTION CODE CHANGE PROPOSAL

Amendment to 2024 International Residential Code (IRC)

Section R319.1

Submitted by: Home Builders Association of Central Arizona

SECTION: R319.1 EMERGENCY ESCAPE AND RESCUE OPENING REQUIRED.

Basements, habitable attics, the room to which a sleeping loft is open, and every sleeping room shall have not less than one operable *emergency escape and rescue opening*. Where *basements* contain one or more sleeping rooms, an *emergency escape and rescue opening* shall be required in each sleeping room. *Emergency escape and rescue openings* shall open directly into a *public way*, or to a *yard or court* ~~having a minimum width of 36 inches (914 mm)~~ that opens to a *public way*.

Exceptions:

1. Basements used only to house mechanical equipment not exceeding a total floor area of 200 square feet (18.58 m²).
2. *Storm shelters* constructed in accordance with ICC 500.
3. Where the *dwelling unit* or *townhouse unit* is equipped with an automatic sprinkler system installed in accordance with Section P2904, sleeping rooms in *basements* shall not be required to have *emergency escape and rescue openings* provided that the *basement* has one of the following:
 - 3.1 One means of egress complying with Section R318 and one *emergency escape and rescue opening*.
 - 3.2 Two means of egress complying with Section R318.
4. A *yard* shall not be required to open directly into a public way where the *yard* opens to an unobstructed path from the *yard* to the *public way*. ~~Such path shall have a width of not less than 36 inches (914 mm).~~

Justification:

This amendment eliminates the width requirement for emergency escape paths. The basic requirements of emergency escape have been in the code since 2000. New to the 2021 code and continued with the 2024 code is the requirement that the path be not less than 36 inches wide. Our concern is emergency escapes on a 5' side yard with the air conditioner unit. The air conditioner unit is probably wide enough to render that side of the home less than 36 inches wide but still provides enough unobstructed pathway for residents or emergency response personnel to navigate. Given the importance of narrow lots to maintaining affordability, we suggest the new language be stricken so as to retain the requirement as it has existed for the past 27 years.

Cost Impact: No cost impact.

Staff Committee Rationale for Recommendation: To avoid potential legal conflicts, City of Phoenix adopted codes cannot be less restrictive than the base codes for critical life safety items and.

Approved in previous 2018 Code Adoption process: ☐ YES ☒ NO

ACTION TAKEN:

2024 Code Committee Date: 1/17/2025
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Transportation, Infrastructure and Planning Subcommittee Date:
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City Council Action Date:
☐ Approved as submitted ☐ Modified and approved ☐ Denied ☐ No action taken



City of Phoenix

PLANNING & DEVELOPMENT DEPARTMENT

BUILDING CONSTRUCTION CODE CHANGE PROPOSAL

Amendment to 2024 International Residential Code (IRC) Section R322

Submitted by: Strategic Workgroup on Accessibility

R322.1 Dwelling units or sleeping units. Where there are four or more dwelling units or sleeping units in a single structure, the provisions of Chapter 11 of the *International Building Code* for Group R-3 shall apply. Other dwelling unit and sleeping unit containing structures shall comply with Section R322.1.1.

Exception: ~~Owner-occupied lodging houses with five or fewer guestrooms are not required to be accessible.~~

R322.1.1 Dwelling units.

Dwelling units and sleeping units shall comply with the inclusive home design features of Section R322.1.1

Exceptions: The following are not required to comply with Section R322.1.1:

1. All portions of the dwelling units or sleeping units not on the floor level that contains the accessible entrance.
2. A raised or sunken floor area in a portion of a living, dining, or sleeping room.
3. Dwelling units or sleeping units covered by Section R322.1.2.

R322.1.1.1 Entrance.

At least one dwelling unit entrance shall be accessible and on an accessible route from the street or sidewalk, the dwelling unit's driveway, or the dwelling unit's garage or carport in compliance with the Chapter 4 of ICC A117.1 - 2017, except the clear width need not exceed 36 inches (815 mm) minimum. The required accessible entrance shall not be to a bedroom.

R322.1.1.2 Interior circulation paths.

Interior circulation paths shall have a clear width of 36 inches (815 mm) minimum as measured between fixed or built-in elements.

User passage doors shall have a clear opening width of 32 inches (805 mm) minimum; measured on a swinging door between the face of the door open to 90 degrees and the door stop.

Door hardware shall have a shape that is easy to grasp with one hand and does not require tight grasping, pinching, or twisting of the wrist to operate, except locks used only for security and not used for normal operation. Operable parts of hardware shall be 34 inches (865 mm) minimum and 48 inches (1220 mm) maximum above the floor.

R322.1.1.3 Operable parts.

Lighting controls, electrical switches and receptacle outlets, user controls for thermostats, and user controls for security or intercom systems shall be placed 15 inches (380 mm) minimum and 48 inches (1220 mm) maximum above the floor.

Exception: Floor receptacle outlets, controls mounted on ceiling fans, controls mounted on appliances, controls mounted on smoke detectors and carbon monoxide detectors.

R322.1.1.4 Toilet rooms and bathrooms.

Toilet rooms and bathrooms shall be provided with wall reinforcements for future grab bars where walls occur around toilets, showers, and bathtubs in compliance with Section 1104.11.1 of ICC A117.1-2017.

Toilet rooms and bathrooms shall be provided with floor clearance space that complies with either Section 304 or 1104.11.2 of ICC A117.1-2017.

Justification: Inclusive home design criteria has been in effect in Pima County and the City of Tucson since 2003. People over 65 years are the fastest growing sector of the American population and Phoenix is a retirement destination. Inclusive home design criteria allows people to stay in their homes and their neighborhood longer as they age.

Cost Impact: minimal cost impact to provide these features during construction but can be a significant cost when these features need to be retrofitted into an already constructed home.

Staff Committee Rationale for Recommendation: The amendment proposal aligns with the goals of the City of Phoenix Strategic Work Group on Accessibility. Members of the work group were appointed by the City Manager.

Approved in previous 2018 Code Adoption process: ☐ YES ☒ NO

ACTION TAKEN:

2024 Code Committee	Date: 03/18/2025
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Transportation, Infrastructure and Planning Subcommittee	Date:
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City Council Action	Date:
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City of Phoenix

PLANNING & DEVELOPMENT DEPARTMENT

BUILDING CONSTRUCTION CODE CHANGE PROPOSAL

Amendment to 2024 International Residential Code (IRC) Section P2905.3

Submitted by: Home Builders Association of Central Arizona

SECTION: P2905.3 HOT WATER SUPPLY TO FIXTURES

~~The developed length of hot water piping, from the source of the hot water to the fixtures that require hot water, shall not exceed 100 feet (30 480 mm). Water heaters and recirculating system piping shall be considered to be sources of hot water.~~

Justification:

This is a new requirement in the 2021 code and continued with the 2024 code. This change would significantly impact larger homes where the developed length often exceeds 100'. The additional cost of providing and installing water recirculation in larger homes will be cost-prohibitive. In addition, the additional work will significantly tax the available labor in the market. Therefore, this requirement should be removed.

Cost Impact: (Type one of the following: No cost impact. **Or** Minimal cost impact.)
(Add explanation here.)

Staff Committee Rationale for Recommendation: This will not impact the majority of new Single Family homes. Most new homes will not have a run of greater than 100 ft. Water recirculation aids in the reduction of water waste.

Approved in previous 2018 Code Adoption process: ☐ YES ☒ NO

ACTION TAKEN:

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Development Advisory Board (DAB) Subcommittee Date: 3/20/2025
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Transportation, Infrastructure and Planning Subcommittee Date:
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City Council Action Date:
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BUILDING CONSTRUCTION CODE CHANGE PROPOSAL

**Amendment to 2024 International Residential Code (IRC)
Section E3606.5**

Submitted by: Home Builders Association of Central Arizona

SECTION: E3606.5 SURGE PROTECTION

~~E3606.5 Surge Protection (2023 NEC 230.67)~~

Justification:

From NAHB and HBACA - Adequate substantiation was not provided to clearly identify a risk to equipment or safety concern to warrant this requirement being added to the 2020 NEC. Surge protection devices (SPDs) are currently permitted by the code and can provide a value to the end user, but it should remain up to the consumer as to whether the benefit is worth the investment. There are also potential issues with mandating currently available surge-protection products in all cases.

In addition to the overall problems of this provision, the 2023 NEC added the requirement that SPDs need to have a nominal discharge current rating of 10kA minimum. The National Electrical Manufacturers Association (NEMA) that represents the manufacturers of these devices submitted an amendment to remove the 10kA rating. In their testimony, they said the following: "The currently proposed revisions would confuse installers, specifiers, and inspectors who are familiar with interrupting ratings, and short circuit current ratings. It would inappropriately encourage them to require a nominal discharge current equal to or greater than the available short circuit current, under the mistaken belief that this would assure compliance with manufacturers' installation and use instructions, as required by NEC Section 110.3(B), or with short circuit current ratings - rating requirements of relevant 2023 NEC Sections."

Another company that manufacturers electrical devices claimed that the minimum rating of 10kA backed by certain members of the industry "represents an unwarranted exclusion of products offered by many other industry providers and stakeholders." These products that are now excluded have ratings permitted by their listing with UL Solutions (previously Underwriters Laboratories) and, until now, were compliant with the NEC. This requirement severely limits market choice by reducing the number of manufacturers offering compliant SPDs from about a dozen to just four. This is especially concerning in this time when supply chain difficulties already make it difficult to procure electronic devices and increase their cost substantially.

There is also no guarantee that SPDs remain in service, further negating any possible advantages of this new mandate. This becomes a costly requirement without a means to determine the benefit for the user. It is not necessary to mandate the protection just in case a

consumer has a transient incident. During the code development process for the 2020 NEC, several public comments were rejected to expand the surge-protection requirement to all occupancies and multiple levels of protection because they lacked substantiation. The same reason should be applied to remove this section as well.

Similar amendments have been adopted in Maine, North Dakota, Oregon, and South Carolina

Cost Impact: Cost savings.

Staff Committee Rationale for Recommendation: Denied by the NEC Committee in section 230.67

Approved in previous 2018 Code Adoption process: ☐ YES ☒ NO

ACTION TAKEN:

2024 Code Committee

Date: 1/22/2025

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Development Advisory Board (DAB) Subcommittee

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Development Advisory Board (DAB)

Date: 04/22/2025

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Transportation, Infrastructure and Planning Subcommittee

Date:

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City Council Action

Date:

☐ Approved as submitted ☐ Modified and approved ☐ Denied ☐ No action taken



City of Phoenix

PLANNING & DEVELOPMENT DEPARTMENT

BUILDING CONSTRUCTION CODE CHANGE PROPOSAL

Amendment to 2024 International Residential Code (IRC) Section E3901.4.2

Submitted by: International Residential Code Committee

CHAPTER 39 POWER AND LIGHTING DISTRIBUTION

E3901.4.2 Island and peninsular countertops and work surfaces

Receptacle outlets, ~~if shall be~~ installed to serve an island or peninsular countertop or work surface, ~~and shall be installed in accordance with Section E3901.4.3. If a receptacle outlet is not provided to serve an island or peninsular countertop or work surface, provisions shall be provided at the island or peninsula for future addition of a receptacle outlet to serve the island or peninsular countertop or work surface.~~

Justification: The intent of much of the electrical code is to discourage occupants from using extension cords at the interior of the home as much as possible. Furthermore, the cheapest method of adding a receptacle later (installing a receptacle on the side within 12" of the top of the work surface) has been removed from the code due to continued instances of children pulling appliance down on themselves with the overhanging cord. Not having power on the island will promote homeowners to use extension cords as this will be the cheapest/easiest solution. Adding the power after the fact, even when provisions are already stubbed to the island, poses an extremely high cost to the homeowner due to multiple trades being required to make the modification including an electrician, countertop craftsman to core the countertop, and possible a cabinet craftsman for cabinet modifications to allow for the electrical modification. This amendment will be more stringent than the base code

Cost Impact: No cost impact. This is already a requirement currently

Approved in previous 2018 Code Adoption process: ☐ YES ☒ NO

ACTION TAKEN:

2024 Code Committee	Date: 01/23/2025
<input checked="" type="checkbox"/> Approved as submitted <input type="checkbox"/> Modified and approved <input type="checkbox"/> Denied <input type="checkbox"/> No action taken	
Development Advisory Board (DAB) Subcommittee	Date: 03/20/2025
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Development Advisory Board (DAB)	Date: 04/22/2025
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Transportation, Infrastructure and Planning Subcommittee	Date:
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City Council Action	Date:
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City of Phoenix

PLANNING & DEVELOPMENT DEPARTMENT

BUILDING CONSTRUCTION CODE CHANGE PROPOSAL

Amendment to 2024 International Residential Code (IRC)

Section E3902.2

Submitted by: Home Builders Association of Central Arizona

SECTION: E3902.2 GARAGE AND ACCESSORY BUILDING RECEPTACLES

125-volt through 250-volt receptacles installed in garages and grade-level portions of unfinished accessory buildings used for storage or work areas and supplied by single-phase branch circuits rated 150 volts or less to ground shall have ground-fault circuit-interrupter protection for personnel. [210.8(A)(2)]

Exception: Receptacles that are not readily accessible.

Justification: This amendment creates an exception to the requirement that garage and accessory building receptacles be GFCI protected for receptacles that are not easily accessible to the homeowner. The City of Chandler adopted this amendment in the 2018 code update. The City recommended this amendment (which the HBACA supported) to ensure that the garage outlet serving the garage door does not have to be GFCI protected. During the amendment review process the City became aware of instances where people's garage doors would not open because the GFCI protection had tripped. Not knowing that the garage door outlet was GFCI protected, people were unable to figure out why their garage door would not open. Moreover, even if they did know that the GFCI was the problem, it is very difficult for homeowners to access the receptacle to reset the GFCI.

Cost Impact: No cost impact.

Staff Committee Rationale for Recommendation: Denied by the NEC Committee in section 210.8(A)(2).

Approved in previous 2018 Code Adoption process: ☐ YES ☐ NO

ACTION TAKEN:

2024 Code Committee

☐ Approved as submitted ☐ Modified and approved ☒ Denied Date: 1/22/2025

Development Advisory Board (DAB) Subcommittee

☐ Approved as submitted ☐ Modified and approved ☒ Denied Date: 3/20/2025

Development Advisory Board (DAB)

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Transportation, Infrastructure and Planning Subcommittee

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City Council Action

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City of Phoenix

PLANNING & DEVELOPMENT DEPARTMENT

BUILDING CONSTRUCTION CODE CHANGE PROPOSAL

Amendment to 2024 International Residential Code (IRC)

Section E3902.14

Submitted by: Home Builders Association of Central Arizona

SECTION: E3902.14 OUTDOOR OUTLETS

All outdoor outlets, including outlets installed in the following locations, and supplied by single-phase branch circuits rated 150 volts or less to ground, 50 amperes or less, shall be provided with GFCI protection:

1. Garages that have floors located at or below grade level
2. Accessory buildings
3. Boathouses

Exceptions:

1. GFCI protection shall not be required on lighting outlets other than those covered in Section 210.8(F) of NFPA 70.
2. GFCI protection shall not be required for receptacles that are not readily accessible and are supplied by a branch circuit dedicated to electric snow-melting, deicing, or pipeline and vessel heating equipment where such equipment is protected as required by NFPA 70.
3. GFCI protection shall not be required for listed HVAC equipment. ~~This exception shall expire September 1, 2026.~~ [210.8(F)]

Justification: From NAHB and HBACA - The requirements of this section have been very contentious since it was introduced in the 2020 NEC. When it was first implemented, multiple states experienced large numbers of GFCIs tripping which shut down air conditioning as well as heat pump units. Due to the problems experienced by the first states to adopt the 2020 NEC with the new section, almost every other state that adopted that edition modified or deleted Section 210.8(F). The 2023 edition would have required this section to be enforced in full except for the intervention of the NFPA Standards Council following an appeal. In their decision from August 2022, the Council, which acts like a court of last resort in the NFPA code development process, commented that the section has been at the heart of multiple processed Tentative Interim Amendments (TIAs), as well as extensive Task Group work since it was introduced. According to the Council, the appeal does present a clear and substantial basis upon which to overturn the results yielded by the NPFA standards development process. It cannot be overemphasized how significant this statement is, and it shows that not all model code changes should be accepted at face value. The Council's final decision #22-12 adds an exemption for "listed HVAC equipment" which expires September 1, 2026. Jurisdictions should be aware of this date because it is highly unlikely the compatibility issues explained below will be resolved by then. To fully address the issue, the standards that govern GFCI protection as well as HVAC equipment need to be updated in a coordinated manner, and that process is not close to completion. If GFCI protection is required while the incompatibility issue remains, there is a higher risk of people being

adversely impacted by exposure to extreme temperatures due to nuisance tripping than the risk of people being exposed to a leakage current that could cause injury or harm. The issue of GFCI protection not being compatible with listed HVAC equipment was known at the time it was

approved for the model code. In fact, three of the four negative ballots during the code development cycle specifically mentioned the concern with incompatibility associated with requiring GFCI protection for listed HVAC equipment.

Technical Substantiation

UL 943 (Standard for Ground-Fault Circuit-Interrupters) requires that Class A ground-fault circuit-interrupters are capable of tripping at a minimum of 6 mA and could be as low as 4 mA. UL 60335-2 (Standard for Household and Similar Electrical Appliances – Safety – Part 2-40: Particular Requirements for Electrical Heat Pumps, Air Conditioners and Dehumidifiers) allows a maximum leakage current value of 10 mA for appliances accessible to the general public. Data shows that HVAC equipment can have a leakage current higher than what would trip a Class A GFCI, but the touch current remains at safe levels. What is concerning are the number of fatalities (no cooling during a heat wave period) due to nuisance trips associated with GFCI protection of HVAC equipment.

Five conditions were identified that affect interoperability which have yet to be fully examined. This highlights the fact that a solution to the issue is unlikely to be found prior to the 2026 expiration date for the current exception as approved by the Standards Council.

Conclusion:

Almost every state that has adopted the 2020 Edition of the NEC has modified or deleted Section 210.8(F). The equipment incompatibility issues identified above will not be resolved by September 1, 2026. If GFCI protection is required while the incompatibility issue remains, there is a higher risk of people being adversely impacted by exposure to extreme temperatures due to nuisance tripping than the risk of people being exposed to a leakage current that could cause injury or harm.

- Similar amendments have been adopted in Georgia, Massachusetts, New Mexico, Oregon, South Dakota, Texas, and Utah. Many other states have dealt with Section 210.8(F) in ways other than code amendments. Additionally, five states added exemptions allowing certain pumps (sump pumps, sewage lift pumps or condensate pumps) to not be covered by a GFCI.

Cost Impact: Cost savings

Staff Committee Rationale for Recommendation: Denied by the NEC Committee in section 210.8(F) of NFPA 70

Approved in previous 2018 Code Adoption process: ☐ YES ☒ NO

ACTION TAKEN:

2024 Code Committee	Date: 1/17/2025
<input type="checkbox"/> Approved as submitted <input type="checkbox"/> Modified and approved <input checked="" type="checkbox"/> Denied	<input type="checkbox"/> No action taken

Development Advisory Board (DAB) Subcommittee	Date: 3/20/2025
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Development Advisory Board (DAB)	Date: 04/22/2025
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Transportation, Infrastructure and Planning Subcommittee	Date:
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BUILDING CONSTRUCTION CODE CHANGE PROPOSAL

Amendment to 2024 International Residential Code (IRC)

Section E4002.11

Submitted by Home Builders Association of Central Arizona

SECTION: E4002.11 BATHTUB AND SHOWER SPACES

~~Receptacles shall not be installed inside of the tub or shower or within a zone measured 900 mm (3 ft) horizontally from any outside edge of the within or directly over a bathtub or shower stall, including the space outside the bathtub or shower stall space below the zone.~~

~~The zone also includes the space measured vertically from the floor to 2.5 m (8 ft) above the top of the bathtub rim or shower stall threshold. The identified zone is all encompassing and shall include the space directly over the bathtub or shower stall and the space below this zone, but not the space separated by a floor, wall, ceiling, room door, window, or fixed barrier.~~

~~**Exception No. 1:** Receptacles installed in accordance with 680.73 shall be permitted.~~

~~**Exception No. 2:** In bathrooms with less than the required zone, the receptacle(s) required by 210.52(D) shall be permitted to be installed opposite the bathtub rim or shower stall threshold on the farthest wall within the room.~~

~~**Exception No. 3:** Weight supporting ceiling receptacles (WSCR) shall be permitted to be installed for listed luminaires that employ a weight supporting attachment fitting (WSAF) in damp locations complying with 410.10(D).~~

~~**Exception No. 4:** In a dwelling unit, a single receptacle shall be permitted for an electronic toilet or personal hygiene device such as an electronic bidet seat. The receptacle shall be readily accessible and not located in the space between the toilet and the bathtub or shower.~~

Informational Note No. 1: See 210.8(A)(1) for GFCI requirements in a bathroom.

Informational Note No. 2: See 210.11(C) for bathroom branch circuits.

Informational Note No. 3: See 210.21(B)(1) for single receptacle on an individual branch.

Justification:

This amendment reinstates the allowance for GFCI-protected receptacles to be located within 3-feet of a bathtub or shower stall. From NAHB and HBACA - The 2020 NEC prohibited receptacles to be installed near bathtub and shower spaces. This amendment reverts the language back to the 2017 edition of the NEC which prohibited receptacles from being located directly above a bathtub or in a shower stall. Receptacles in bathrooms are required to be GFCI protected, so further restrictions on their location are not needed. The submitter of the code change claimed the original language was unclear, but it was easily understood in most cases. The new language adds complexity, which is made clear based on the addition of multiple exceptions, and complexity leads to non-uniform enforcement.

Corded, handheld devices, such as hairdryers, hair trimmers and shavers have cords longer than three feet, so the new requirement does not prevent them from entering a tub or shower. Additionally, the code requires a receptacle within three feet of a sink with no minimum. No substantiation was 33 presented when this change was adopted to suggest that a receptacle within three feet of a bathtub or shower poses a greater risk than that at a sink. Since receptacles in bathrooms are required to be GFCI protected these locations do not pose different levels of risk. Both should be acceptable.

Finally, receptacles in proximity to bathtub and shower spaces is addressed for manufactured and mobile homes in the code as well, but distance restrictions are not included. The requirements for site-built homes should not be more restrictive than for manufactured and mobile homes.

Similar amendments have been adopted in Maine, Oregon, and Utah.

Cost Impact: No cost impact.

Staff Committee Rationale for Recommendation: Denied by the NEC Committee in section 406.9(C).

Approved in previous 2018 Code Adoption process: ☐ YES ☒ NO

ACTION TAKEN:

2024 Code Committee	Date: 1/22/2025
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