

Pub Comment

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**California Conference  
of Directors of  
Environmental Health**

Mr. Dave Walls, Executive Director  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

September 27, 2011

**LETTER OF SUPPORT FOR PROPOSED POOL REGULATIONS: TITLE 24**

Dear Mr. Walls:

Please accept this letter of support for the proposed pool regulations in the California Building Code, California Code of Regulations, Title 24, Part 2, Chapter 31B. This update of the existing public pool regulations is needed to ensure the health and safety of all who use California's public pools.

One of the biggest changes in the recreational health industry in the past 25 years has been the emergence of water parks and spray grounds which have unique design and construction features that are not covered by the existing regulations. Spray grounds can have a high bather load and a low volume of water which present unique challenges for disinfection procedures. In 2005 a gastrointestinal illness outbreak at a spray ground in New York affected over 3000 people. This event prompted New York health officials to establish regulations for spray grounds.

Other needed changes presented in this pool regulation proposal include the following:

- Building construction sections have been moved from Title 22 which describes operations and maintenance activities to Title 24 which describes construction standards. [3103, 3105]
- The proposed regulations adopt the requirements of the United States Diving Rules and Codes effective January 1, 2010 for diving boards and platforms. [3113]
- The required signs section has been expanded to address health and safety concerns such as diarrhea signs that reflect fecal accident procedures addressed in Title 22 and do not drink spray ground water. [3120]
- The pool equipment enclosure is a new requirement for the protection of pool equipment to increase its longevity. [3122]
- Recirculation and water treatment systems must meet the standards of NSF/ANSI standard 50 effective August 2010. [3123]



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Page 2

The California Conference of Directors of Environmental Health strongly urges the California Building Standards Commission to adopt this sorely needed and overdue update of the current regulations.

Sincerely yours,

Justin Malan  
Executive Director  
California Conference of Directors of Environmental Health

cc: Robin Belle Hook, REHS, Chief  
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