

John Norwood [JNorwood@nalobby.net]

President of the California Spa and Pool Industry Education Counsel(SPEC)

CDPH Pool regulations 2010 Cycle 45-Day Comment

Dear Mr McGowan:

You are listed as the contact person relative to the proposed new building standards, Title 24, Part 2, just posted by CBSC for a 45 day notice in an email I received yesterday. I am the President of the California Spa and Pool Industry Education Counsel(SPEC). By way of background, our trade association became aware of these proposed building standards less than a week prior to the hearing before the Hoc Advisory Committee to the CBSC on March 24th. At the committee hearing the CDPH indicated that these new building standards had been under development for the last 8 to 10 years. The department admitted that during that period the department solicited little, if any, input from the commercial swimming pool and water park industry. The department explained that there had been turnover in the swimming pool industry and that the department did not know who to contact for such input. SPEC has been the recognized representative for the swimming pool industry in Sacramento for over 36 years. My predecessor, Don Carlton Burns, was a legend in representing this industry in at the state Capitol. As such it is hard to fathom that the CDPH did not know who to contact as they developed these new building standards.

SPEC is committed to work with the department to develop proposed regulations that can be presented to the CBSC with the support of the industry. To that end, we put together a working group of 14 of the leading commercial swimming pool and water park builders and design firms to review the department's 133 page proposal. I sent the first draft of our comment document to Glenn Takeoka at the department this week. At present we are awaiting proposed dates from the department to meet with a subcommittee of our working group to begin the process of reviewing these proposed new standards. I can tell you our draft document has very extensive comments. The department's proposal is replete with problems including outdated references and requirements that do not meet industry standards for the design and construction of commercial swimming pools and water parks. Additionally, a new ICC code for swimming pool construction are also pending approval. These proposed new building standards have yet to be compared to that document. Given the short timeframe to try to develop a compromise proposal, I am of the opinion that it is highly likely that SPEC will request a public hearing on these new building standards. In the meantime SPEC will be developing official comments to submit by the June 27th deadline. As the contact person at CBSC relative to these building standards, I wanted you to have some pertinent background information as soon as possible.

If you have any questions or concerns, please feel free to contact me. **Thank you**

Sent from my iPad