

July 7, 2010

Mr. Jay Peters, Executive Director Plumbing & Mechanical Activities  
International Code Council  
500 New Jersey Avenue, NW, 6th Floor  
Washington, D.C. 20001-2070

Re: Model Codes for Regulating Construction and  
Operation of Swimming Pools and Spas

Dear Mr. Peters,

The National Environmental Health Association (NEHA) is the national organization representing environmental health professionals. NEHA supports efforts that prevent disease and promote healthy environments by training and credentialing environmental health professionals, by advocating for national policies that protect the public from environmental health threats, and by supporting collaborative efforts with professionals from other disciplines in ways that enhance the effectiveness of environmental health professionals.

We understand that the International Code Council (ICC) is in the process of writing an all encompassing Comprehensive Swimming Pool Code. The ICC should be aware that over 150 stakeholders from all segments of environmental public health, including NEHA, the aquatics industry, and the public have been working with the Centers for Disease Control and Prevention (CDC) for about three years to create a science-based, up-to-date comprehensive Model Aquatic Health Code (MAHC). The MAHC will probably be adopted by most public health agencies nationwide to regulate their permitted aquatic facilities. More information about the MAHC is available on the web at

It is important to assure that any model code not undermine the oversight authority of environmental health officials for water quality, disease prevention, and injury prevention or the oversight authority of building officials for plumbing, electrical and mechanical systems or components, for the structural integrity of aquatic facilities, and for building safety. Further, it is important that confusion not be created among the owners and operators of aquatic facilities by the creation of two competing and possibly conflicting national model aquatic facility codes. In these tight budget times for most state and local programs, the efficiency of heading off this potential code conflict at the inception of your process rather than dealing with it jurisdiction by jurisdiction across the nation after the fact should make sense.

NEHA applauds your efforts to help assure health an

**(See following CC: list suggestion)**



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