

An Affiliate of  
the Maryland Association  
of Counties, Inc.



Reply to:

DATE: January 22, 2021  
TO: Members, Environment and Transportation  
FROM: Maryland Conference of Local Environmental Health Directors  
RE: HB 109 Public Safety – Maryland Swimming Pool and Spa Standards – Adoption

The Maryland Conference of Local Environmental Health Directors (the Conference) *opposes* **HB 109** with respect to the regulation and adoption of swimming pool and spa standards.

While the Conference appreciates the intent to increase consistency across the state for these activities, we believe the scope of the bill is too broad sweeping in nature and undermines longstanding existing standards used for pool construction statewide resulting in less consistency between jurisdictions. Local jurisdictions would then be left to pass local ordinances and regulations if they wanted more stringent regulations with notice to the Department. This would create different standards in each jurisdiction, which would make it very difficult for industry to comply. Safety measures currently in place would be removed, placing citizens and children at risk of injury.

Further, there are no operational standards described as are currently enforced under COMAR 10.17.01; namely, chlorine levels, pool operators, lifeguards, etc. The bifurcation of construction and operational issue are problematic for owner/operators, as well as local health departments.

Given the potential inconsistencies due to different standards to be set in each jurisdiction and the reduction in safety standards, we are opposed to HB 109.

Accordingly, we request the Committee give HB 109 an **UNFAVORABLE** report.

Thank you for the opportunity to share our views on this matter. If you have further questions concerning this written testimony, please contact me at 240-777-3840.

Respectfully,

Kenneth Welch, President  
Conference of Environmental Health Directors