



**Testimony on behalf of
The Connecticut Recreation and Parks Association, Inc.
Before the Public Health Committee
Wednesday, March 18, 2015
10:30 AM, Room 1D, Legislative Office Building**

**HB 6888 - AAC The Department Of Public Health's Recommendations
Regarding Public Swimming Pool Design Guidelines.**

The Connecticut Recreation and Parks Association, Inc. (CRPA) is a nonprofit charitable organization whose mission is to provide a network of support to our members through professional development and resources in order to enhance the quality of recreation and parks services in Connecticut. CRPA represents **over 600 individual professionals** from municipal, nonprofit and private, park, recreation & camp organizations, as well as **126 of the 169 municipal park and recreation departments in Connecticut.**

CRPA strongly opposes HB 6888 AAC The Department Of Public Health's Recommendations Regarding Public Swimming Pool Design Guidelines.

CRPA members operate and maintain public swimming pools in over 126 communities throughout Connecticut. CRPA has significant experience and expertise in the construction, maintenance, and operation of public swimming pools.

HB 6888 would allow the Department of Public Health ("DPH") to bypass the regulatory process, deny opportunity for public input, and eliminate an opportunity for the Legislature's Regulation Review Committee to review whatever standards DPH chooses to adopt.

HB 6888 states that:

"(a) notwithstanding the provisions of sections 4-166 and 4-168, the Commissioner of Public Health may establish public swimming pool design guidelines without adopting such guidelines as regulations for purposes of establishing minimum standards for the proper construction and maintenance of public swimming pools."

For whatever reason, DPH has not chosen to revise the regulations for pool maintenance since 2010. Their inactivity should not justify excluding the public from modernizing these important regulations.

Even if there is a crisis, not of DPH's own making, the appropriate course of action would be to adopt emergency regulations and then follow statutory requirements that allow for public participation and legislative review. The argument that it takes too long to adopt regulations is without merit.

CRPA commits to offering its extensive expertise to assist the DPH in adopting modern safe and effective regulatory standards regarding public swimming pools.

DPH action outside of the regulatory process would affect CRPA members and municipalities throughout the state and potentially deny a voice to others whose sole aim is the safe operation, maintenance and construction of public swimming pools.

DPH failure for nearly 5 years to update its “standards” through the regulatory process cannot justify excluding those it regulates from participating in a process that develops the best possible “guidelines.”

HB 6888 should not be favorably reported.

Paul J. Roche,
Chairman of the Legislative Committee for the
Connecticut Recreation & Parks Association