



STATE OF WASHINGTON  
WASHINGTON STATE BOARD OF HEALTH

*PO Box 47990 • Olympia, Washington 98504-7990*

August 16, 2023

Elizabeth M. Stumpf  
310 Olympic Blvd  
Everett, WA, 98203

Sent Via Email

Dear Elizabeth,

Thank you for the rulemaking petition you submitted to the State Board of Health (Board) on June 12, 2023, requesting the amendment of WAC 246-260-031, General design, construction, and equipment for all WRF pool facilities.

In reviewing your petition, the Board reviewed the language from several different codes, including the Americans with Disabilities Act (ADA), State Building Code Council, and the Model Aquatic Health Code and found inconsistencies with WAC 246-260-031. Additionally, during that review, it was determined that the ADA guidelines provide an exception for latch height when entering swimming pool areas, increasing the maximum height to 54 inches.

The Board met on August 9, 2023, and after reviewing and discussing your petition, voted to accept your request to be considered as part of the ongoing rulemaking for water recreation facilities. The Board deemed that more research needs to be done by the technical advisory committee (TAC) to investigate latch height requirements. The Board further requested that the Department direct the TAC to prioritize this section of the rules and brief the Board of its findings by January 2024.

Staff would like to welcome and encourage you to view the TAC meetings. The TAC is scheduled to begin discussion on the construction and design of pool facilities in October. The meetings will be publicly available via the [Water Recreation Rule Updates](#) website.

If you require further assistance, please don't hesitate to contact Andrew Kamali, Health Policy Advisor in our office, at 360-584-6737 or at [Andrew.Kamali@sboh.wa.gov](mailto:Andrew.Kamali@sboh.wa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Grellner', with a long horizontal flourish extending to the right.

Keith Grellner, Chair