

Dear Department of Essential Services,

I am writing to ask you to reconsider where private swim schools fit within the States phased release as they are essential and a necessary public health need. The Governor referenced that the County may soon make the call on who to open, but the restriction of no public pools until phase 3 does not allow the county to approve our use before phase 3 is approved by the state. Now that the state is re-opening manufacturing, restaurants and some public spaces, we feel it is time to allow private swim schools to open.

The classification of "public pool" is too broad and does not accurately depict a private swim school. The County of Los Angeles Public Health defines a public pool as any public swimming pool, bathhouse, public swimming and bathing place and all related appurtenances. A comparable analogy would be a "commercial building", which can be described as many different things (e.g. a church, warehouse, restaurant, retail, concert hall, etc.). A public pool is defined by the health department as any pool, except pools at a residence.

Private swim schools are not the same as public pools.

To reiterate, our swim school is private and not open to public to swim at any time. Swim lessons are by appointment only and take place in a controlled learning environment ("Waterworks Aquatics Additional Exhibits" - Exhibit A). We are currently teaching private lessons exclusively; therefore, we have a limited number of people in the facility at one time and have full tracing ability as we know when and where every person is in our building.

Public pools have many different uses akin to a commercial building; private swim schools do not have such uses. Unlike public pools, we do not run recreation swim or other aquatics programming for large groups of people.

We also feel the safety measures we have constructed thus far are much more comprehensive than any public pool and/or recreation center.

We have constructed a facility use plan summary ("Waterworks Aquatics Additional Exhibits" - Exhibit B), which summarizes the safety measures we have in place in the following areas: (1) social distancing, (2) general safety measures for our customers and employees, (3) sanitation efforts, (4) swimming pool cleanliness, and (5) signage. Our master facility use plan ("Waterworks Aquatics Additional Exhibits" - Exhibit C) provides much more detail into these steps and follows California guidelines for social distancing and reopening. In fact, some of the safety measures in our master facility use plan go beyond what is required.

We have taken pictures to illustrate some of these safety measures (see ""Safety Measure Pictures pdf" email attachment). For example, while an instructor needs to stay within a reachable distance from a non-swimmer in the water, they can still use protective face gear, which includes a face mask and face shield. I have also included an image below that shows our lessons that took place out of our Denver location.

Below are a couple testimonials that we received from our Denver customers.

"I attended a lesson yesterday and felt very comfortable with how the lesson was conducted. I felt that there were significant precautions taken to ensure that any risk of transmitting infection was extremely low." - Kassi Fanyo

"Our family was anxiously waiting your reopening, it felt good to have some sort of normal again. I absolutely felt safe and do feel you guys went above and beyond to make sure anyone and everyone felt safe coming back to lessons" - Katie Stager

We firmly believe swim lessons are essential. Learning to swim is a life-or-death skill, necessary for every child. Formal swim lessons between ages 1 and 4 can help reduce the risk of drowning by 88% according to a study conducted in 2015. Drowning is the number one cause of death for children ages 1 to 4 and a leading cause for young people up to 14 years of age.

We believe drowning to be at an even higher risk now as the schools, daycares and other children's activities are currently closed. This gives children more time to find a body of water such as a backyard pool, neighbor's pool, community pool, inflatable pool, sink, toilet, filled bathtub, bucket, ditches filled with rainwater, ocean, lakes, and rivers. A young child can drown in less than 2 inches of water.

Meanwhile, parents have even more distractions than ever, including remote work while children are home. They are unable to supervise their children at all times. Even before this pandemic, 9 out of 10 child related drowning deaths happened when a caregiver was supervising. Sixty-nine percent of children who drowned were not expected to be at or in the pool, yet they were found in the water and 77% of drowning victims had been out of sight for less than five minutes.

Private swim schools in California educate tens of thousands of children per week to learn to swim, providing critical water safety skills, proven to reduce the drowning rate. This is particularly important as we approach summer, where kids are spending more time around bodies of water.

There is no way to teach water survival or swim skills remotely, and the health risk from COVID-19 in instructional settings is very low when proper precautions are taken. According to the CDC, the chlorine in our swimming pools should inactivate the virus in the water. Chlorine is a disinfectant. There is no evidence that the virus that causes COVID-19 can be spread to people through the water in pools.

I hope you will agree that teaching swimming in a private swim school setting is essential to keeping our children safe. If you have any questions, I would be more than happy to answer them. I look forward to working together to reduce the risks to our children and our community.

Thank you for your time and consideration.

Sincerely,

Jon Alpert  
Owner/CEO  
Waterworks Aquatics

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