



Office of the Governor  
James R. Thompson Center  
100 W. Randolph, 16-100  
Chicago, IL 60601  
Phone: 312-814-2121  
May 4, 2020

Dear Governor Pritzker,

My name is Jeff Arce, and I am the General Chair of Illinois Swimming. I am writing to you on behalf of my organization. We represent members of USA Swimming, which is a sub-committee of the U.S. Olympic Committee, throughout Illinois. Our 20,000 members range in age from five years old to their seventies. Our mission is to promote and achieve excellence in performance through education, innovation, service and committed leadership.

Our membership is a subset of an exceptionally large group who derive the benefits of swimming for fitness. While our members swim competitively in the Olympic movement, others swim through park districts, masters swimming, YMCAs, triathlon programs and individually throughout this state, and though we do not directly represent them, their interests are ours. Simply put, the restrictions on pool access due to the novel Coronavirus impacts hundreds of thousands of Illinois residents.

We are concerned about the plans for pool openings, which is admittedly based on the limited public information available. Our position is that the use of pools is not homogeneous, and we urge you to consider that moving forward. We respect the Illinois Department of Public Health's concerns about social distancing and common contact issues, but stress that lap swimming is distinctly different than recreational swim.

We have reviewed as much information, data and research as is available to the public and believe there is a path for the transitional opening of swimming facilities while still maintaining public safety. We have also consulted with our member clubs, park districts, high schools and other agencies that operate aquatics facilities throughout Illinois, both to gain insight into their concerns as well as an understanding of what is reasonable and possible in terms of a reopening plan.



Swimming pools have unique advantages in opening in a limited capacity. The process of pool disinfection both chemically<sup>1</sup> (chlorine, and to a lesser extent bromine) and physically<sup>2</sup> (ultra-violet systems) have been noted in research<sup>3</sup> and by the Center for Disease Control as deactivating agents of the novel Coronavirus. The CDC reported on March 10, 2020 that “there is no evidence that COVID-19 can be spread to humans through the use of pools and hot tubs. Proper operation, maintenance, and disinfection (e.g. with chlorine and bromine) of pools and hot tubs should remove or inactivate the virus that causes COVID-19.”<sup>4</sup>

While pool amenities (slides, pool toys, etc.) are points of common contact, the specific elimination of those does not affect an individual’s ability to lap swim. Further, as novel Coronavirus is a respiratory illness<sup>5</sup>, contact between those individuals engaged in lap swimming, which is an inherently an individualistic pursuit, makes transmission less likely.

Current literature indicates COVID-19 spreads mainly among people who are within six feet of each other, or by touching a surface or object that has the virus and then touching their own mouth, eyes, nose or ears.<sup>6</sup> To that end, Illinois adopted reasonable restrictions for golf facilities which we believe serve as a model for ensuring social distancing and protections from points of common contacts.

The golf restrictions mitigate the potential of contracting novel Coronavirus by focusing on reducing capacity, limiting points of common contact, reducing staff, and increasing signage.<sup>7</sup> These same principles could easily be applied to swimming pools.

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<sup>1</sup> U.S. Center for Disease Control, *Infection Control, Chemical Disinfectants*, <https://www.cdc.gov/infectioncontrol/guidelines/disinfection/disinfection-methods/chemical.html>

<sup>2</sup> U.S. Center for Disease Control, *Infection Control, Miscellaneous Inactivating Agents*, <https://www.cdc.gov/infectioncontrol/guidelines/disinfection/disinfection-methods/miscellaneous.html>

<sup>3</sup> International Water Association, “*Covid-19 and Safe Water Treatment*,” April 15, 2020

<sup>4</sup> U.S. Center for Disease Control, *Water and Covid-19 FAQs*, <https://www.cdc.gov/coronavirus/2019-ncov/php/water.html>

<sup>5</sup> U.S. Center for Disease Control, *Coronavirus Disease 2019 Basics*, <https://www.cdc.gov/coronavirus/2019-ncov/faq.html#Coronavirus-Disease-2019-Basics>

<sup>6</sup> U.S. Center for Disease Control, *Prevent Getting Sick*, <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>

<sup>7</sup> Illinois Department of Commerce and Economic Opportunity, *Golf Operational Restrictions*, <https://www2.illinois.gov/dceo/Documents/Golf%20With%20Restrictions.pdf>



Based on all the information currently available, Illinois Swimming proposes that the Illinois Department of Public Health consider limitations on facilities such as:

- Limiting the number of people in a swimming pool based on a percentage of bather load. We believe that one-third of the licensed load for recreational and fifty percent for lap swim and competitive training is sufficient, given the use restrictions we recommend below.
- Eliminate use of points of common contacts, such as slides, diving boards and other amenities.
- Eliminate the use of common items provided by the facility, such as flotation devices, and allow only swimming-related items that are personally owned such as goggles, caps, kickboards, etc.
- Eliminate the use of locker rooms for showering and changing. Individuals could wear appropriate swimwear to and from a facility.
- Limit the use of washrooms to single users and require those washrooms to be on a heightened cleaning schedule.
- Increase the required chlorine level in pools to 2ppm. This would have the dual effect of increasing the disinfection relative to the virus and offsetting the limitations on showering facilities.<sup>8</sup>
- Require signage and deck markings allowing for individuals to adequately social distance, including cones or tape delineating six-foot intervals.
- Mandate specific training for all staff on the tenets of social distancing and increased cleaning schedules with specific increases in disinfection efforts.
- Decrease staff to the minimum to guarantee safety of swimmers by keeping ancillary services such as concessions closed until a later date.
- The wearing of personal protective equipment by staff and where otherwise appropriate.<sup>9</sup>

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<sup>8</sup> USA Swimming, *Facility Reopening Plan*, <https://cdn.swimswam.com/wp-content/uploads/2020/05/facility-reopening-plan-guidelines.pdf>

<sup>9</sup> Illinois Department of Public Health, *Workplace Health and Safety Guidance for Employees and Staff of Businesses*, April 30, 2020, <http://dph.illinois.gov/sites/default/files/Stay%20at%20Home%20Order%20-%20IDPH-OAG%20Workplace%20Health%20and%20Safety%20Guidance.pdf>



We believe that these guidelines will allow for a safe transitional opening of facilities to allow people to get out of their homes and increase their general health. They are consistent with federal guidelines on park and recreation space usage.<sup>10</sup>

There is a further economic concern. As the summer passes, outdoor pools will need to make a choice about opening at all if there is delay. The ability to fill pools and train lifeguards and staff early will keep open the possibility of an economically viable summer season, especially for outdoor facilities. Without a transitional plan in place at a reasonably early date, there will be no possibility of opening at all.

We recognize that any individual facility may not be able to open their doors under the proposed set of restrictions for economic reasons, but we urge you to allow the agencies, individuals and organizations in this state who own and operate pools to make the economic decisions on their own, and not try to create a one-size-fits-all plan for aquatics facilities across the state.

We respectfully ask that IDPH consider this proposal and recognize that thousands of Illinois residents are anxious to resume their healthy lifestyle choices, and that Illinois Swimming's 20,000 members, from beginners to Olympians, are anxious to resume training in pursuit of their goals.

Yours truly,

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<sup>10</sup> U.S. Center for Disease Control, *Visiting Parks and Recreational Facilities*, [www.cdc.gov/2019-ncov/daily-life-coping/visitors.html](http://www.cdc.gov/2019-ncov/daily-life-coping/visitors.html)