



**POOL &  
HOT TUB  
ALLIANCE**



**CPSA**

California Pool & Spa Association

June 15, 2022

Mayor Patrick Burt  
City of Palo Alto  
250 Hamilton Avenue  
Palo Alto, CA 94301

**RE: Request for Reconsideration on Restrictions Against Filling Pools**

Dear Mayor Burt:

I am writing on behalf of CPSA and our member spa retailers, pool builders, and suppliers that serve your city. We are requesting that the City of Palo Alto reconsider the prohibition the initial filling of new swimming pools, as part of Shortage Stage III of the City's Water Shortage Contingency Plan.

We do not have an issue with prohibiting the dumping and refilling of existing swimming pools. In fact, there are alternatives to dumping pool or spa water which use reverse osmosis where the water is simply sucked out of the pool or spa, cleaned, and returned. CPSA would recommend that dumping of pool or spa water in a drought be prohibited but new swimming pools and spas be allowed for the reasons cited below.

We are very aware that California is experiencing a severe drought and water is a precious commodity. However, prohibiting the filling of swimming pools and spas is, at most, a symbolic gesture. Pools use very little water and, as such, there is no basis in fact or science that would indicate that banning the filling of swimming pools would have anything but a de minimis impact on water conservation. However, what this prohibition does achieve is to threaten the very existence of pool builders in the community who have weathered the COVID-19 storm over the last 18 months.

The facts about water use by swimming pools:

1. A new swimming pool requires an average of 14,000-18,000 gallons of water to fill it. When you sum the total amount of water to fill all new swimming pools that were permitted by a city annually and compare the sum against the average one-day use of water by the city's residents, you find that filling new pools accounts for less than 1% of a city's one-day water use.
2. Filling new swimming pools takes less water than car washes that recycle their water. According to the Western Car Wash Association, car wash facilities that recycle their water use approximately 1.5% of a city's annual water use.
3. Once filled, a new pool saves 10,000 gallons of water in the first year it is installed, and 30,000 gallons annually thereafter. Santa Margarita Water District Study
4. In the state's guidebook for Urban Water Management Plans the State of California's only water conservation restriction relative to swimming pools and spas is to recommend that

cities require pools to be covered when not in use. A pool that is covered when not in use can save up to 97% of the water lost through evaporation.

5. The swimming pool and spa industry creates approximately \$50,000 in local economic impact for each new pool built. At about \$903.00 per acre-feet, the pool and spa industry has the highest economic impact per acre-feet of water used than any other industry in California except high tech.
6. The swimming pool and spa industry employs more people per acre-feet of water used than any industry in the state at 11,797 people employed.

Our pool builders, distributors, and retailers live and work in the community. The industry provides good-paying jobs and purchases almost all construction materials from local suppliers. Our members utilize local subcontractors, accountants, tax preparation firms, and many other businesses in the community and pay local taxes and permit fees. A prohibition on filling new pools and spas amounts to the government taking their business away and nullifying the benefits this industry brings to the community, especially where there is no compelling evidence that such action will have a significant effect on water conservation.

For all the reasons cited above, we would implore the City of Palo Alto to reconsider prohibition on the filling of new swimming pools in the City's Water Shortage Contingency Plan. I would be more than happy to respond to any questions you might have relative to this letter and/or the source of the facts contained herein.

Sincerely,

JOHN A. NORWOOD  
Norwood Associates, LLC  
916-447-5053

Cc: Lydia Kou, Vice Mayor  
Alison Cormack, Councilmember  
Tom DuBois, Councilmember  
Eric Filseth, Councilmember  
Greer Stone, Councilmember  
Greg Tanaka, Councilmember