



**DATE:** May 9, 2023

**POLICY MEMO NO.:** CI2023-0002

**TITLE:** Public Pool Definition and Restroom Requirements

**RELATED DEPT. & DIVISION:** Development Services Department  
Austin Public Health - Environmental Health

**TOPIC:** Swimming Pools, Plumbing

**DECISION MAKER:** Todd Wilcox, Building Official  
Dr. Desmar Walkes, Health Authority

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**SUMMARY:** This code interpretation: (1) clarifies that all swimming pools are considered “public pools,” except residential pools; and (2) summarizes a variety of regulations applicable to outdoor public pools based on the International Swimming Pool and Spa Code (ISPSC), the International Building Code (IBC), the Uniform Plumbing Code (UPC), and the International Plumbing Code (IPC).

**CODE SECTIONS:** Texas Administrative Code

- [§265.182](#) (*Definitions*)

Land Development Code (LDC), Chapter 25-12 (*Technical Codes*)

- [§ 25-12-303](#) (*Local Amendments to the 2018 Swimming Pool and Spa Code*):
  - § 103.1 (*Authority*)

2018 International Swimming Pool and Spa Code (ISPSC)

- [Chapter 6](#) (*Aquatic Recreation Facilities*)

2021 International Building Code (IBC)

- [§ 303](#) (*Assembly Group A*)
- [§ 2902.1](#) (*Minimum number of fixtures*)
  - Table 2902.1 (*Minimum number of required plumbing fixtures*)
- [§ 2902.3.3](#) (*Location of toilet facilities in occupancies other than malls*)

### 2021 Uniform Plumbing Code (UPC)

- § 422.1 (*Fixture Count*)
  - Table 422.1 (*Minimum plumbing facilities*)
- § 422.4.1 (*Access to toilet facilities*)

### 2021 International Plumbing Code (IPC)

- [§ 403.1](#) (*Minimum number of fixtures*)
  - Table 403.1 (*Minimum number of required plumbing fixtures*)

### **Interpretation:**

#### Background

The code sections listed above provide guidance on the minimum required plumbing fixtures for pools. Determining the exact requirements, however, is confusing due to the use of extensive cross-referencing between the ISPSC, the IBC, the UPC, and the IPC. To provide clarity for staff and applicants, this interpretation defines the various types of public pools and summarizes requirements applicable to outdoor public pools.

#### Definition of “Public Pool”

Section 265.182 (*Definitions*) of the Texas Administrative Code (TAC)<sup>a</sup> provides the following definition for “public pool,” including the various classes of public pools:

<b>Public Pool General Definition<sup>1</sup></b>	
Public Pool	All pools, except “a residential pool, artificial swimming lagoon, floatation system or chamber, or a body of water that continuously recirculates water from a spring.”
<b>Public Pool Classification</b>	<b>Definition<sup>1</sup></b>
Class A	Any pool used with or without a fee for competitive events
Class B	Any pool used for public recreation and open to the public, with or without a fee
Class C	Any pool that is limited to occupants, members, students, and their guests, but not the general public, including pools for hotels, apartments, condominiums, schools, or private organizations.

<sup>1</sup> The definitions listed here are summaries of the code section. See “Relevant Code Sections” below for specific code language.

This interpretation is applicable to all pools that are defined as “public,” including Class C pools. Residential pools are not subject to this interpretation.

#### Authority Responsible for Administering Code Requirements

Per Section 103.1 (*Authority*) adopted in LDC Section 25-12-303 (*Local Amendments to the 2018 Swimming Pool and Spa Code*), the health authority administers requirements applicable to public swimming pools, and the building official administers requirements applicable to residential swimming pools.

<sup>a</sup> The International Swimming Pool and Spa Code (ISPSC) also provides a definition of Public Pool that is similar in nature to that of the TAC. See Relevant Code Sections for full definition.

### Public Pool Occupancy Classification

Section 303 (*Assembly Group A*) of the IBC classifies public pools under the following categories of Assembly Group A Occupancy:

Pool Type	Occupancy Classification	IBC Code Section
Indoor pool without spectator seating	A-3	303.4
Indoor pool with spectator seating	A-4	303.5
Outdoor pool	A-5	303.6

### Required Fixture Count

IBC Table 2902.1 (*Minimum Number of Required Plumbing Fixtures*)<sup>b</sup> establishes the number of plumbing fixtures required for each occupancy classification and related use. Under Assembly Occupancy Classification, “outdoor sporting events and activities” (i.e. outdoor pools) includes *note f* which states, “The required number and type of plumbing fixtures for outdoor swimming pools shall be in accordance with Section 609 of the International Swimming Pool and Spa Code.”

The following chart specifies the number of fixtures required for outdoor public pools, based on regulations found in Chapter 6 (*Aquatic Recreation Facilities*) (including Section 609 mentioned in *note f*) of the 2018 ISPS and Table 2902.1 (*Minimum Number of Required Plumbing Fixtures*) of the IBC:

#### Fixture Schedule for Outdoor Swimming Pool Facilities<sup>c</sup>

	Water Surface Area Less than 7,500 sq. ft. <sup>1</sup>		Water Surface Areas 7,500 sq. ft. or More <sup>2</sup>	
	Females	Males	Females	Males
Water Closets	1	1	2	0.7
Urinals	N/A	1	N/A	1
Lavatories <sup>3</sup>	1	1	1	0.85
Cleansing showers	1	1	1	1
Rinsing showers <sup>4</sup>	1	1	1	1
Baby changing table <sup>5</sup>	1	1	1	1

<sup>1</sup> Number of fixtures for entire facility.

<sup>2</sup> Number of fixtures per 7500 sq. ft. or portion thereof. Where the result of the fixture calculation is a portion of a whole number, the result shall be rounded up to the nearest whole number.

<sup>3</sup> Lavatories shall be provided with hot and cold running water.

<sup>4</sup> Rinsing showers can be tower showers or single showers without heated water. Not less than one and not more than half of the total number of showers required shall be located on the deck or at the entrance of each pool or spa. Tower rinsing showers are not required to provide heated water.

<sup>5</sup> One for each male or female sanitary facility.

<sup>b</sup> This is the same table as IPC Table 403.1 (Minimum number of required plumbing fixtures) and similar to the UPC Table 422.1 (Minimum plumbing facilities).

<sup>c</sup> This chart was previously published as [Figure: 25 Number of Fixtures at Class A, Class B, and Class C Pools and Spas constructed on or after the effective date of this subchapter](#) in the Texas Administrative Code (TAC) Section 265.204 (f). This chart is no longer included in the TAC.

### Access to Required Toilet Facilities

In multi-story buildings, accessibility to the required toilet facilities shall not exceed one vertical story per UPC Section 422.4.1 (*Access to toilet facilities*) and IBC Section 2902.3.3 (*Location of toilet facilities in occupancies other than malls*). Also, per IBC Section 2902.3.3, required toilet facilities must be accessible by a travel path of less than 500 feet and “accessible route” as defined by the IBC.

Additional toilet room fixtures are not required for existing swimming pool renovations or additions where the water surface and/or hazard are not increased.

### Relevant Code Sections

#### — **Texas Administrative Code**

##### § 265.182 (*Definitions*)

- (51) Public pool -- For purposes of the rules in this subchapter related to safety, operation and management, signage and enclosures, pools are classified and referred to as follows: any man-made permanently installed or non-portable structure, basin, chamber, or tank containing an artificial body of water that is maintained or used expressly for public recreation, swimming, diving, aquatic sports, or other aquatic activity. Public pools include but are not limited to activity pools, catch pools, lazy or leisure river pools, wave action pools, vortex pools, therapy pools, and wading pools. A public pool may be publicly or privately owned and may be operated by an owner, lessee, operator, licensee, or concessionaire. A fee for use may or not be charged. The term does not include a residential pool, artificial swimming lagoon, floatation system or chamber, or a body of water that continuously recirculates water from a spring.
- (A) Class A pool -- Any pool maintained or used, with or without a fee, for accredited competitive events such as FINA, United States Swimming, United States Diving, NCAA, or National Federation of State High School Association events. A Class A pool may also be used for recreational swimming.
- (B) Class B pool -- Any pool maintained or used for public recreation and open to the general public with or without a fee.
- (C) Class C pool -- Any pool that is not a Class A or B pool that is limited to occupants, members, or students and their guests, but not to the general public. It is a pool operated for and in conjunction with:
- (i) lodging, such as hotels, motels, apartments, condominiums, RV parks, or mobile home parks;
  - (ii) youth camps, property owner associations, private organizations, or clubs; or
  - (iii) schools, colleges, or universities while operated for academic or continuing education classes.

— **2018 International Swimming Pool and Spa Code (ISPSC)**  
 § 202 (*Definitions*)

**PUBLIC SWIMMING POOL (Public Pool).** A pool, other than a residential pool, that is intended to be used for swimming or bathing and is operated by an owner, lessee, operator, licensee or concessionaire, regardless of whether a fee is charged for use. Public pools shall be further classified and defined as follows:

**Class A competition pool.** A pool intended for use for accredited competitive aquatic events such as Federation International De Natation (FINA), USA Swimming, USA Diving, USA Synchronized Swimming, USA Water Polo, National Collegiate Athletic Association (NCAA), or the National Federation of State High School Associations (NFHS).


**Class B public pool.** A pool intended for public recreational use that is not identified in the other classifications of public pools.

**Class C semi-public pool.** A pool operated solely for and in conjunction with lodgings such as hotels, motels, apartments, or condominiums.




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Dr. Desmar Walkes, Health Authority




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Todd Wilcox, Building Official

*Historical Note: To provide additional clarity and context, this interpretation updates an earlier interpretation issued by Jose G. Roig, Building Official, under CI2018-0001.*