3. A sun shelf may be installed in pool areas with no more than 4 feet (1219 mm) of water depth, or less. A sun shelf must have a dark contrasting slip resistant tile marking at the edge of the shelf and the pool wall extending 4 inches (102 mm) from the horizontal shelf edge surface. Additionally, a 2 inch (51 mm) contrasting tile line is required on the vertical pool wall at the edge of the shelf. Vinyl liner, stainless steel and fiberglass pools may use other material for the sun shelf edge marking as detailed in Section 454.1.2.3.1, Item 7, provided the material is permanently secured, dark in color, nonfading and slip resistant. A sun shelf shall not protrude into the 15-foot (4572 mm) clearance requirement of Section 454.1.2.6. A sun shelf shall not protrude into the diving bowl. A sun shelf must additionally comply with 454.1.2.8.

We are not sure what the purpose of the 2” tile line on the vertical wall at the edge of the shelf is. On a rollout gutter pool and at 8” water depth, if the gutter lip tile is 6” x 6” bullnose, the 2” tile line will not be aesthetically pleasing and may need to be shaved at the bottom where the wall & floor are radiused. If the function of this line is to demarcate where the shelf ends, then can it be installed on the floor at this point? I have already discussed this with two builders who have reservations about the tile being installed on the vertical. 

**454.1.2.8 Sun shelves**

Sun shelf areas must be a minimum of 20 inches (508 mm) wide and provide a minimum of 10 square feet (0.93 square meters) of horizontal surface adjoining on the edge of the pool over a distance of not less than 3 feet (914 mm). The sun shelf floor shall be horizontal or shall a have uniform slope from a zero depth entry, and its maximum depth shall be between 8 inches (203 mm) to 12 inches (254 mm) below the water surface.

**OK**

**454.1.2.8.2 Depth Markers at sun shelves**

Where a sun shelf is installed, wet deck-located depth and no-diving markers shall be placed every 20 feet (6096 mm) or less. If the vertical distance between the coping or wet deck and the shelf floor adjacent to the wall is 12 inches (305 mm) or less, these markers shall indicate the water depth of the sun shelf. **For Open Gutter Pools, this distance shall be measured from the gutter lip to the shelf floor.** Where vertical distance between the coping or wet deck and the shelf floor adjacent to the wall is more than 12 inches (305 mm), “No-Entry” markers as described in 454.1.9.6.4 shall be provided in the deck. Depth markers of the adjacent pool depth at the sun shelf edge, and no-dive markers shall be placed on the sun shelf floor, every 10 feet (3048 mm) or less, along a line no more than 1 foot (305 mm) back from the edge of the sun shelf above the deeper pool. **Depth markers are not required at the shelf edge where the shelf transitions to a set of steps.**

All markers shall comply with Items 2, 6, and 7 of 454.1.2.3.1., except the distance between then described in this section shall be followed.

*Suggested additional text is shown above in red italics. John Wahler brought up a good point in his correspondence in that the maximum riser height for pools is 10”, this proposed code language allows for a*
12” step down into the shelf for skimmer pools, recessed gutter pools, and deck-level overflow pools. **We may want to revisit that and make it 10”**.  

**JC comment; I agree with John and Jim, it should be max 10”**.

454.1.2.8.3 Access to sun shelf

For the purposes of 454.1.2.5, a sun shelf area shall be considered an entrance to or exit from the pool. If the vertical distance between the coping and the shelf floor adjacent to the wall is more than 10 in (254 mm), stairs up to the deck or coping shall be provided which shall comply with 454.1.2.5.3 and 454.1.2.5.5, or a zero depth entry area, complying with 454.1.9.6, may be provided instead of stairs. **For Open Gutter pools, where the gutter is used as a step, additional steps shall not be required where the distance from the gutter lip to the shelf floor is 10” or less. At least one handrail that is compliant with 454.1.2.5.5 must be provided at the sun shelf.**

*Suggested additional text is shown above in red italics. We have already coordinated this exception with FDOH for three of our designs.*  

**JC comment: I agree with Jim’s additional language shown in red italics for open-gutter pools.**

454.1.2.8.4 Sun Shelf Turnover Rate

Additional inlets shall be provided in the sun shelf area. The numbers and location shall be such as to ensure the volume of water in the shelf is filtered and chemically treated once every 60 minutes (1 hour) or less.

**OK**

### #7074

As we discussed, we will leave this to Bob Vincent for potential revisions to help clarify this section. We would be happy to assist as needed.

### #7070

454.1.10.1 Modifications, Repairs or Alterations of Pool Structure and Equipment. Modifications include nonequivalent changes or additions to the recirculation system, treatment equipment, physical structure or appurtenances. Replacement of the pool or spa shell is considered to be construction of a new facility and shall be processed as such. The installation of new decking is not considered a modification if it is installed in conformance with Section 454.1.3.1, and deck markings are upgraded in accordance with Section 454.1.2.3. Resurfacing the pool interior to original nontoxic, slip-resistant and smooth specifications or equivalent replacement of equipment is not considered a repairs or alterations. **Equivalent replacement of equipment is not considered a repair or alteration.** However, the following items shall be addressed during resurfacing projects:

*Suggested additional text is shown above in red italics. Double strikethroughs are by us. This clarifies that the building departments should not be requiring permitting for swapping equivalent pumps, motors, ladders, flowmeters, etc.*  

**JC comment: This section’s wording has always been a problem. Jim’s wording is an improvement and I agree with it for now. This section’s wording may be addressed again in a subsequent code change cycle.**