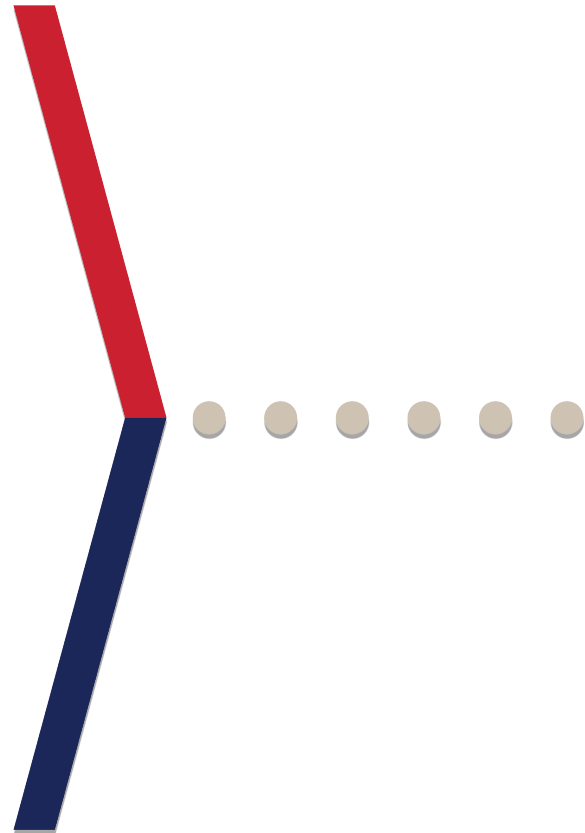


Residential Construction Perspective on Stormwater



National Stormwater Roundtable
Association of Clean Water Administrators
Wednesday, October 19, 2022



Today I'll talk about...

- Who is NAHB's membership and current economic trends for the residential construction sector.
- Highlight EPA's Changes to NPDES Construction General Permit.
- NAHB resources post-construction stormwater requirements under MS4 permits.





About the membership of the National Association of Homebuilders

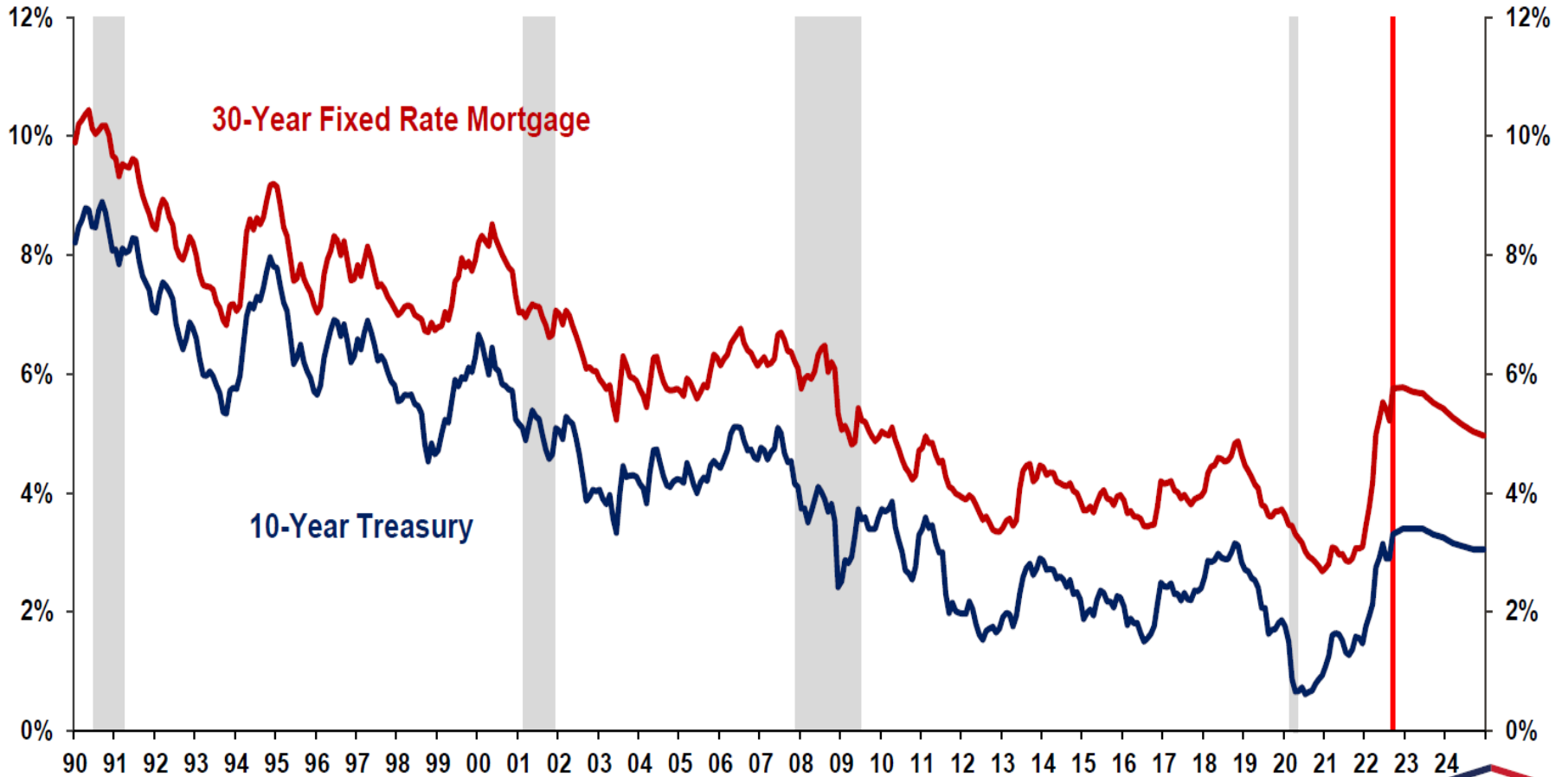
- ❑ NAHB is the largest national trade association representing over 140,000 member firms that perform residential and commercial land develop, construction, and remodeling activities.
- ❑ NAHB is a federation of over 750 state and local home building associations across all 50 states, Puerto Rico, and the U.S. Virgin Islands.
- ❑ NAHB members will construct this year over 80% of the projected 981,000 new residential housing units by the U.S. Census Bureau.
- ❑ Over 90% of NAHB's builder members are classified as a small business by the U.S. Administration.
- ❑ Median residential builder constructs five or fewer homes per year.



Economic Trends

Interest Rates Trending Higher

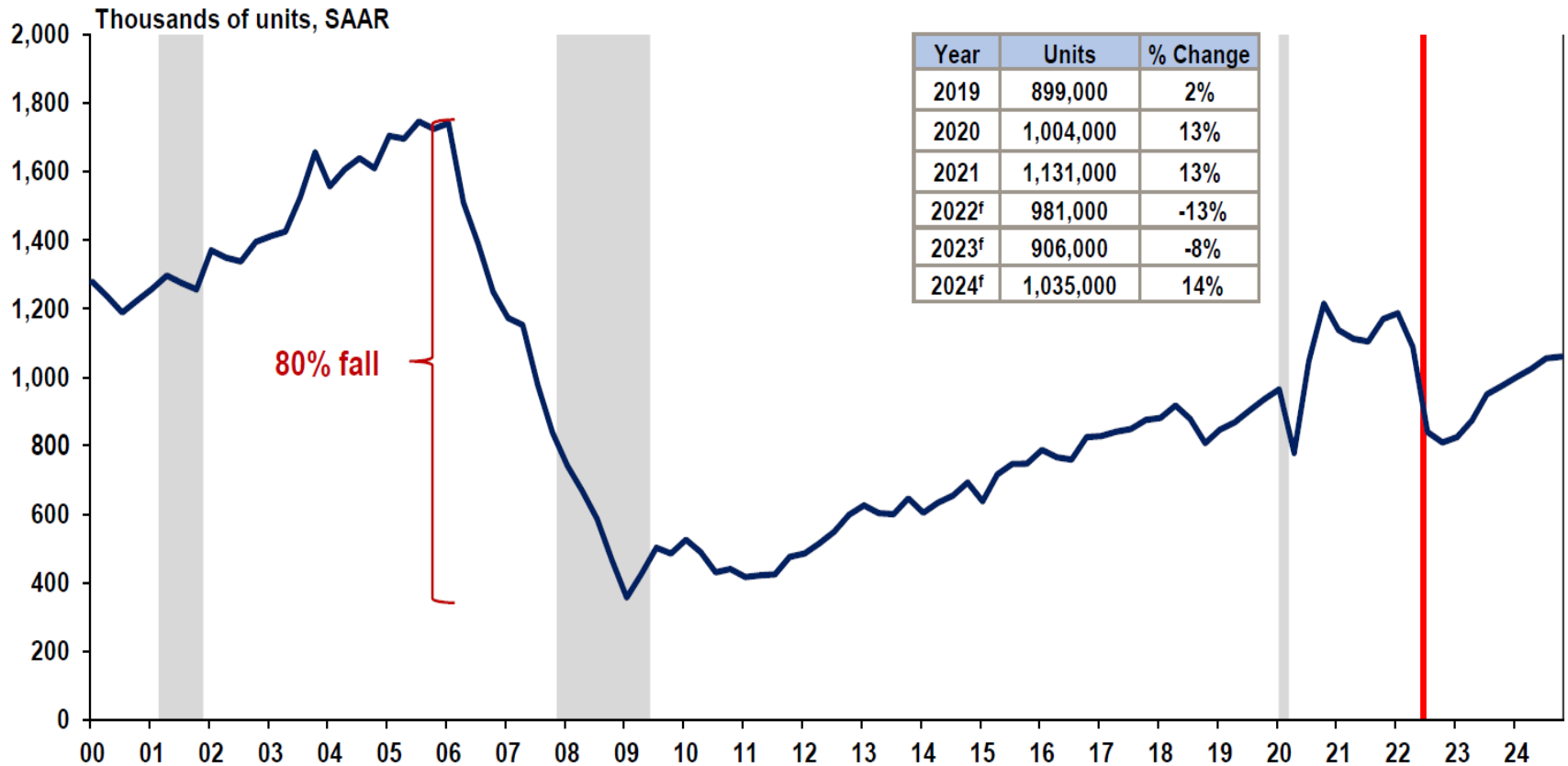
Federal Reserve is tightening monetary policy



Source: Federal Reserve and Freddie Mac data and NAHB forecast.

Single-Family Starts

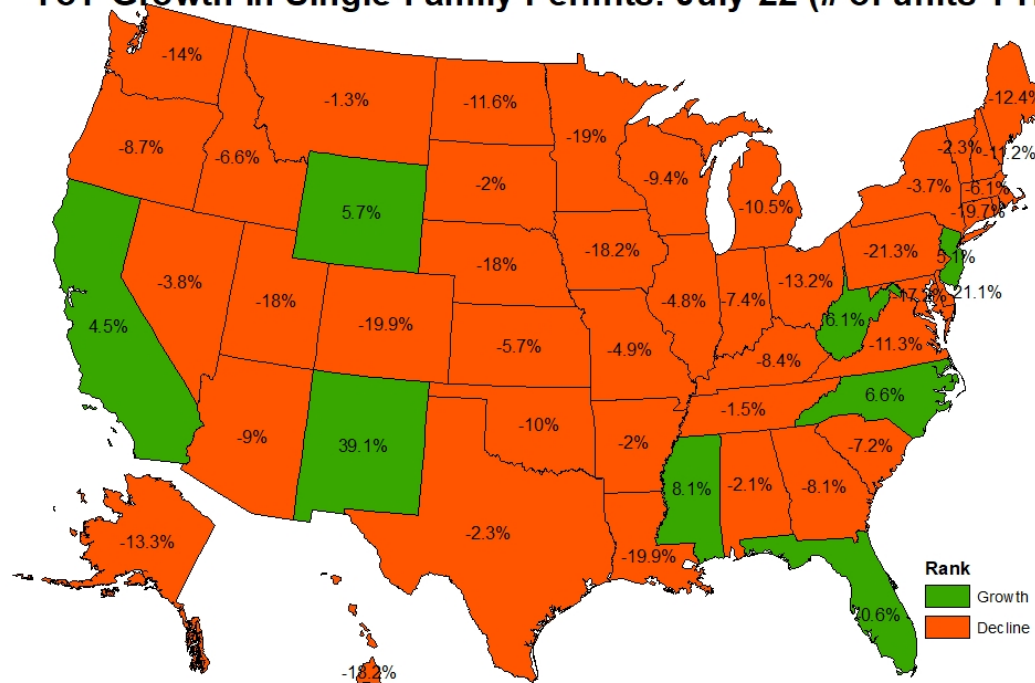
Home building declines as interest rates increase



Source: U.S. Census Bureau (BOC) and NAHB forecast

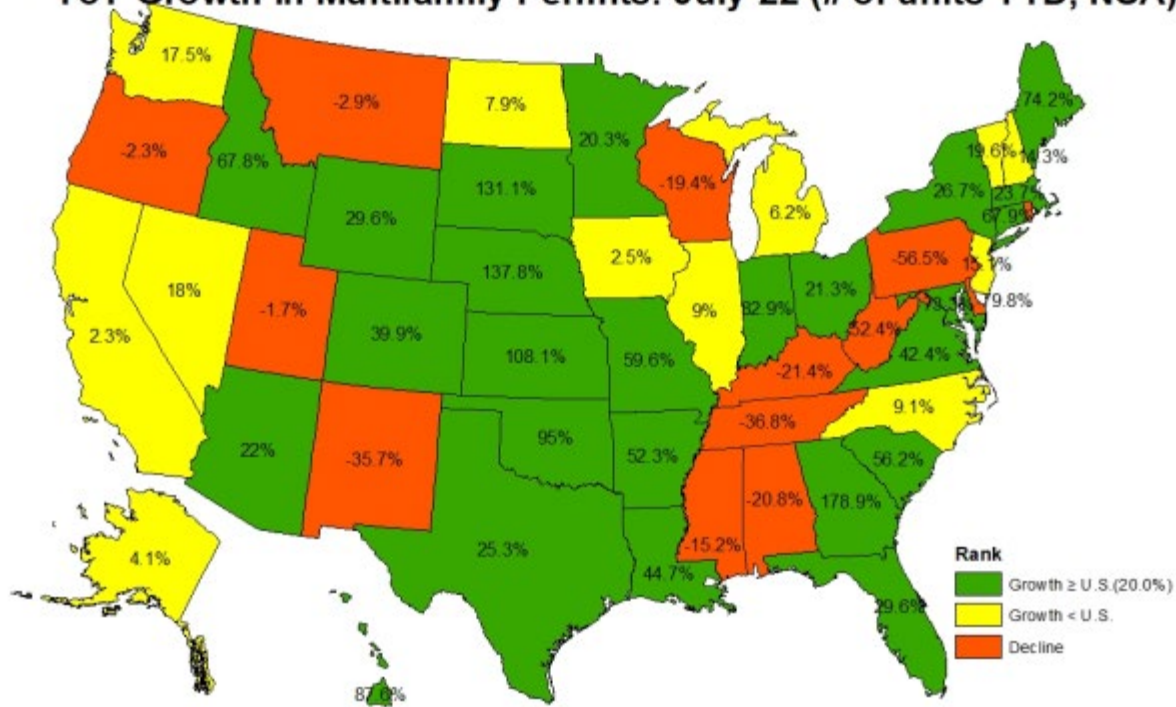
Deteriorating single-family home production.

YoY Growth in Single-Family Permits: July-22 (# of units YTD, NSA)

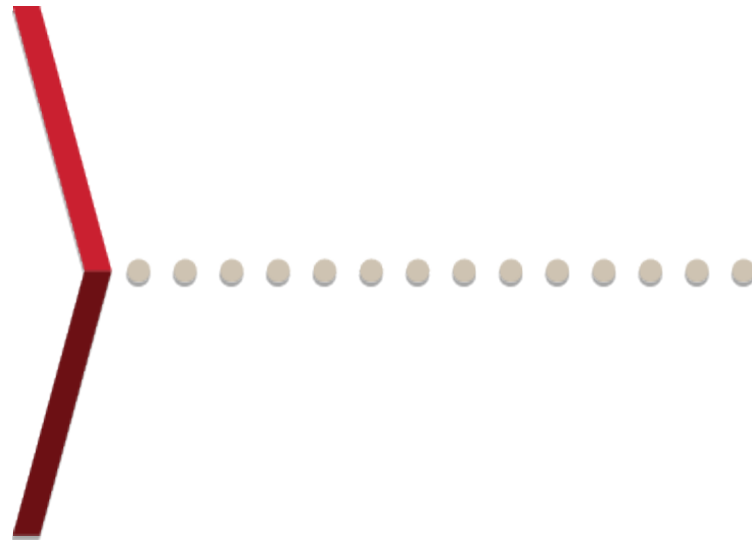


Multifamily production remains strong (for now)...

YoY Growth in Multifamily Permits: July-22 (# of units YTD, NSA)



EPA's changes to
NPDES
Construction
General Permit





NAHB's views on the NPDES CGP

- Supports EPA's current a non-numeric approach under NPDES CGP for implementing Effluent Limitation Guidelines (ELG) component of the permit.
- Prefer a BMP approach as opposed to benchmark monitoring for a numeric turbidity limit.
- Supports simplified CGP SWPPP compliance approaches particularly for small builders such as EPA's Small Lot Template SWPPP.

EPA's Small Residential Lot Stormwater SWPPP Template

- Designed for builders working on individual building lots within an already NPDES CGP permitting subdivision.
- Identifies BMPs capable of being installed on an individual building lot.
- Provides builders with checklist style SWPPP to use.
- Only directly applicable in EPA non-delegated states (i.e., MA, NH, & NM).





Key changes under EPA's (2022) NPDES CGP

- Establishes two prong approach for what constitutes a “qualified person” to perform required site inspections under the SWPPP.
 - Complete EPA's online (8 hour) training course and receive EPA certificate, or
 - Completed a stormwater training course whose curriculum meets CGP's criteria.
- Expanded dewatering requirements including turbidity benchmark monitoring, inspection, and recordkeeping requirements.
- Requires CGP operators/permitholders to submit photographs demonstrating site stabilization when submitting their NOIs.

NAHB's resources
on MS4 Post-
Construction
Standards



NAHB's Guide Phase II MS4's Post-Construction Standards

- Analyzed 50 state MS4 Phase II NPDES general permits.
- Categorized different types of post-construction stormwater approaches
- Interviewed NPDES permitting staff in 25 states.
- Identified where Post-Construction standards are found (e.g., permit, regulation, manual, etc.)



A Developer's Guide to Post-construction Stormwater Regulation



NAHB's resources
on MS4 Phase II
Post-Construction
Standards



NAHB's survey categorized Post-Construction standards

- Narrative standard “Develop and enforce a program to address..”
- Water quality or treatment standards “e.g., treat first 1.2 inches of runoff.”
- Retention or volume-based standards (e.g., retain first 1.2””)
- Retention and treatment standards (e.g., retain and treat first 1.2” on-site)



Narrative



Treatment Only

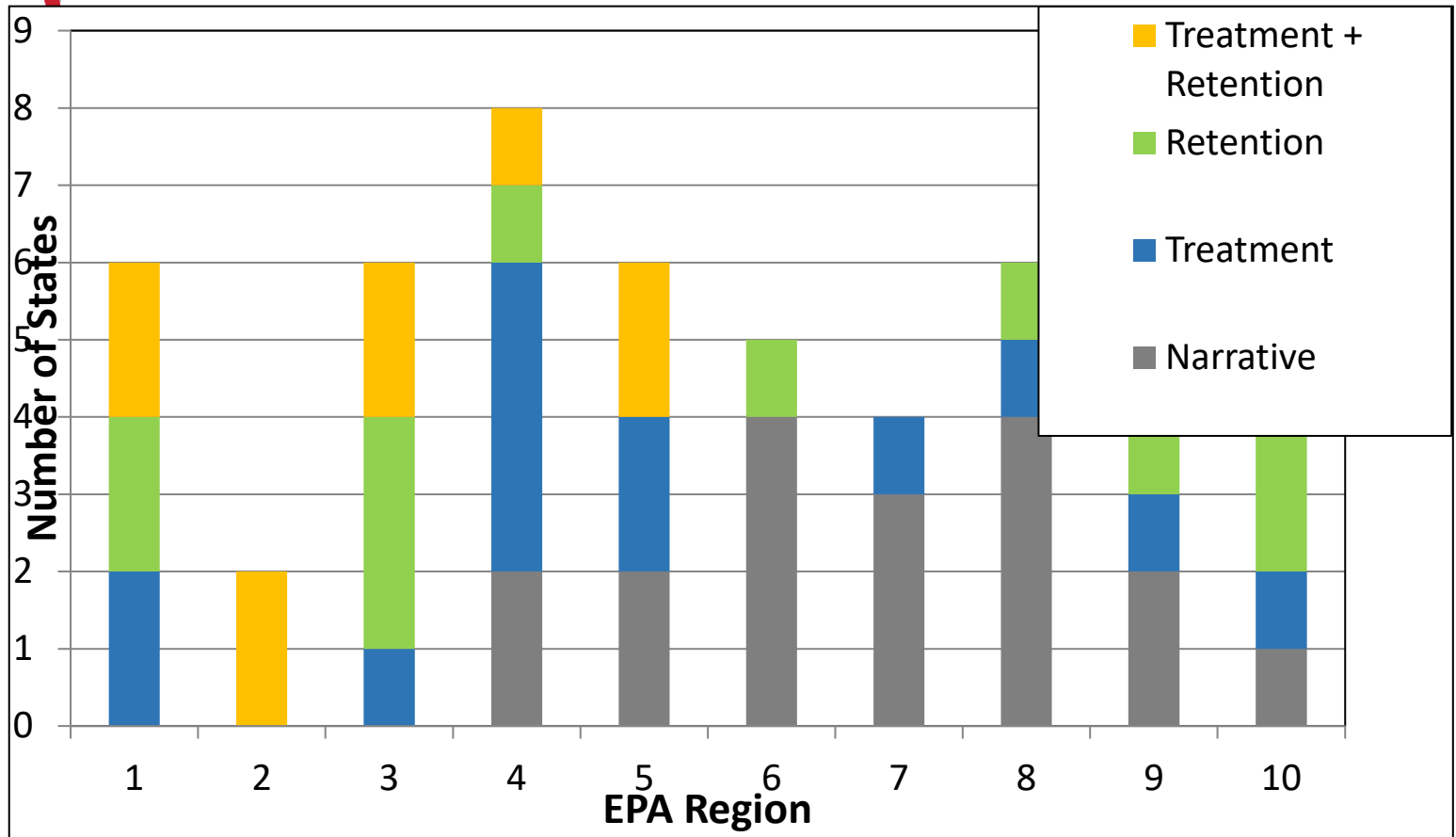


Retention Only

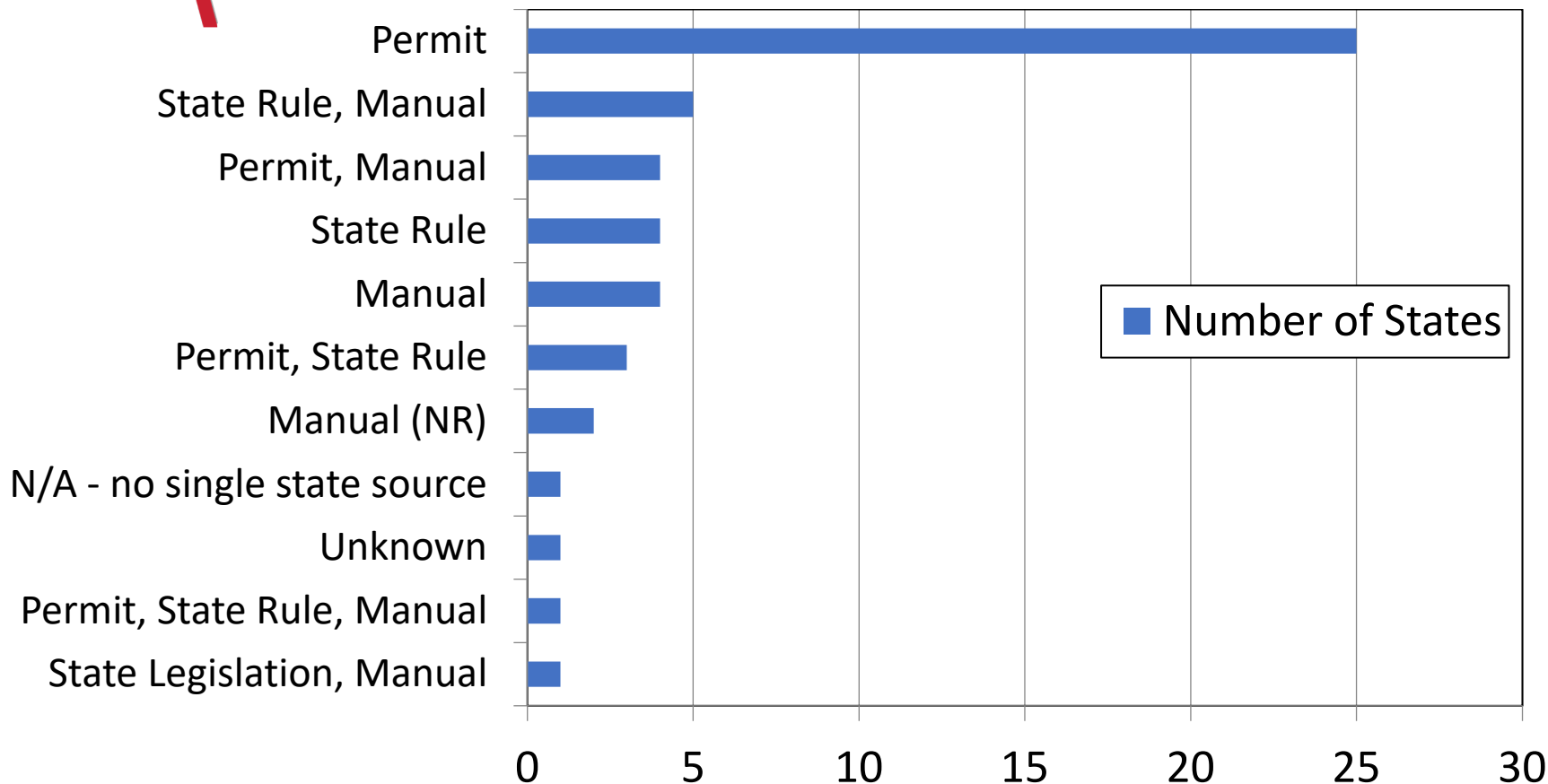


Treatment & Retention

- Post-construction standards vary by EPA Region



- Where Post-Construction design standards are located.





Thank you.

Michael Mittelholzer AVP, Environmental Policy
National Association of Home Builders
mmittelholzer@nahb.org

