

To: Dravis, Samantha[dravis.samantha@epa.gov]
Cc: Ward, Thomas[TWard@nahb.org]
From: Birk, Eva
Sent: Mon 4/17/2017 2:18:42 PM
Subject: FOLLOW-UP to NAHB ADMINISTRATOR MEETING - Stormwater

Ms. Dravis,

Jim Rizzo and NAHB's senior officers met with yourself and Administrator Pruitt earlier this month to discuss a number of issues. Thank you again for this opportunity. I'm writing in regards to follow-up on stormwater specifically.

If possible, we'd like to set a short meeting with you sometime this or next week to provide a more in-depth briefing on two time-sensitive topics:

1. Streamlined Small Lot Permit for Residential Sites

o NAHB would like to continue to work with the agency to develop a streamlined "small lot" construction stormwater permit. We are concerned that these efforts may be stalled. NAHB worked with Office of Wastewater Management (OWM) staff over the past three years to develop a streamlined [voluntary compliance plan template](#) for residential sites. However, we do not yet have a green light on developing an EPA permit based on this model. NAHB believes the cost savings to single family builders from shrinking the current ~300 page permit down to 20 pages would be enormous. Work needs to start soon to allow time for NAHB and other stakeholders to provide feedback, develop new software, and organize outreach to our membership. As of now we are not confident that OWM is committed to pursuing this project.

2. Federal Overreach in the NPDES Stormwater Program

o In the four states where EPA is in charge of stormwater permitting, we've seen actions that far outreach the scope of the Clean Water Act. Most recently, Region 3 included a provision in D.C.'s draft MS4 permit which actually mandates that the city spend \$12.75 million local dollars to establish a Stormwater Retention Credit (SRC) purchase agreement program. We are gravely concerned with this type of federal meddling in municipal affairs and the precedent this permit will set. The timeline for action is tight here as well. Region 3 will likely finalize the permit in the next few weeks/months.


We look forward to discussing these issues in person. Thank you again for your time earlier this

month, and feel free to contact me at the number below with any questions.

Kind regards,

Eva



EVA BIRK Program Manager, Environmental Policy
National Association of Home Builders
1201 15th Street, NW | Washington, DC 20005
d: 202.266.8124 e: EBirk@nahb.org w: nahb.org
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