

Resolution No: 9

Date: April 30, 2004

City: Washington, D.C.

NAHB Resolution

Title: Submetered Water Systems
Original Sponsor: Multifamily Council Board of Trustees

WHEREAS, the Safe Drinking Water Act (SDWA) requires the owners of all public water systems who maintain their own well or water supply and sell water to complete periodic water quality monitoring and testing; and

WHEREAS, the Environmental Protection Agency (EPA) has historically treated multifamily property owners who install water submeters or utilize a Ratio Utility Billing System (RUBS) or similar billing system as water suppliers and subjected them to these onerous monitoring and testing requirements; and

WHEREAS, in an effort to further promote water conservation, the EPA recently revised its interpretation of water supplier to exempt multifamily owners who install submeters from the regulatory compliance requirements of the SDWA, yet failed to exempt those who utilize RUBS and other billing systems; and

WHEREAS, neither the use of water submetering, nor RUBS and other billing systems affects the quality of the water received from the parent company and both can be effective ways to reduce water and sewer usage, promote water conservation, provide property owners with an equitable method of distributing costs and help control utility costs in multifamily housing; and

WHEREAS, the imposition of SDWA requirements to RUBS and other billing systems is unnecessary, duplicative and costly and may be detrimental to the economic stability of many federally assisted multifamily housing projects;

NOW, THEREFORE, BE IT RESOLVED that the National Association of Home Builders urge the Environmental Protection Agency (EPA) to reinterpret its definition of public water system/water supplier to maintain its exclusion of multifamily property owners who install water submeters and to exclude private multifamily property owners who utilize RUBS and other billing systems, including those systems that promote water conservation, from the SDWA requirements.

Board of Directors Action:
Joint Executive/Resolutions Committee Action:
Resolutions Committee Action:
Multifamily Council Board of Trustees Action:

Approved
Recommends Approval
Recommends Approval
Recommends Approval