



HOME BUILDERS
ASSOCIATION
OF ST. LOUIS &
EASTERN MISSOURI

EST. 1934

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The Honorable Michael L. Parson, Governor
Missouri State Capitol, Room 216
201 W. Capitol Avenue
Jefferson City, Missouri 65101

March 24, 2020

Dear Governor Parson:

On behalf of the Home Builders Association of St. Louis and Eastern Missouri (HBA) and the National Association of Home Builders of the United States (NAHB), we write to present you with additional policy proposals for your consideration as it relates to support of the housing sector of the economy during the COVID-19 pandemic. The HBA's members stand with you during these uncertain times and look to your leadership to help steer the state through uncharted waters.

As a trade association made up of over 625 companies which represent all facets of the home building industry and employ over 40,000 men and women in the St. Louis region, we appreciate the opportunity to offer our recommendations for best practices as you consider what is the right course for our state as a whole.

Should you determine that a stay at home or shelter in place order is necessary in the State of Missouri, in order to help stabilize the housing sector in the near term, we respectfully request that you designate construction, including home construction, critical trades, and hardware and supply stores, as an "Essential Business".

As cities, counties, and states issue declarations and public health orders as a result of the crisis, many are considering what should be included as Essential Services and Businesses. We appreciate the commitment being made to housing in our local jurisdictions via continued issuance of building permits and code enforcement inspections, and the recognition that new home construction sites are more easily modified to be compliant with social distancing recommendations. Nashville, TN, Dallas County, TX, the Missouri counties of St. Louis, Jefferson, and the City of St. Louis, and states such as Connecticut, Delaware, Nevada, New York, and our neighboring state of Illinois have determined that construction is an Essential Business, as residents must have access to professionals who build and maintain essential services including: building, plumbing, electrical, HVAC systems, water, wastewater treatment plants, and power generation.

These governments have designated construction, including home construction, as Essential Businesses in various ways, and we have attached several examples of stay at home orders for your convenience. Below are some examples of sections related to construction:

- **In Illinois:** Section 1.9 Essential Infrastructure. Essential Infrastructure includes, but is not limited to: food production, distribution, and sale; *construction (including, but not limited to, construction required in response to this public health emergency, hospital construction, construction of long-term care facilities, public works construction, and housing construction)*; building management and maintenance;...
- **In Connecticut:** Guidance on Essential Businesses. *Construction, including: skilled trades (electricians, HVAC, and plumbers); general commercial and residential construction; essential infrastructure and emergency repair and safety; and planning, engineering, design, bridge inspection, and other construction support activities.*
- **In the City of St. Louis:** Section II. The following businesses are exempt from the above requirements: *(t) Construction*

The HBA empowers members to succeed by working toward common sense building regulations, providing networking and educational opportunities, and using its power in numbers to keep the housing market strong.



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We also encourage you to consider that government functions related to the building and development process, such as permitting, plan review, and inspection services can be modified to protect the public health in order to continue operating. Homebuilding (including remodeling and repair) is highly regulated and therefore requires support from the locality and state where it occurs. It is important that the roles of state government in land development and construction continue, including, but not limited to, permitting by the Department of Natural Resources.

With the health and safety of the public, our employees, and government officials in mind, our industry continues to adhere to public health guidelines set forth by the Occupational Safety and Health Administration (OSHA) and the Centers for Disease Control (CDC).

According to OSHA, "Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (i.e., within 6 feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers." (Guidance on Preparing Workplaces for COVID-19, p.20)

A large majority, if not all, of land development and residential construction job tasks fall within OSHA's Lower Exposure Risk jobs. Working on a new, unfinished home site occurs primarily outdoors and does not involve going onto a location occupied by residents or a public location, and there is minimal (if any) physical or transactional contact with customers compared to other customer/client relationships.

Housing is currently 14.6% of Gross Domestic Product and a major engine of the economy. Keeping the men and women of the building industry employed during this time must be a priority. If construction is disrupted, it creates a flow-down effect leading to dire negative economic repercussions for an already-burdened economy.

In summary, should the time come for a stay at home order in the State of Missouri, we ask that you designate construction as an Essential Business, so that individuals may continue to perform work necessary for the installation, operations, and maintenance of Essential Infrastructure. We appreciate your continued leadership and the work of your staff and those who are spending every waking hour keeping us safe.

Sincerely,

Bill Wannstedt
2020 President

Celeste Rueter
Executive Vice President

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