Congress of the United States
Washington, DC 20515

August 6, 2025

The Honorable Scott Turner
Secretary
U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410

The Honorable Brooke Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Secretaries Turner and Rollins,

As Co-Chairs of the House Sustainable Energy and Environment Coalition (SEEC) Building Resilient Housing Task Force, we write to strongly urge the Department of Housing and Urban Development (HUD) and Department of Agriculture (USDA) to uphold the 2021 IECC and ASHRAE 90.1-2019 building codes as the minimum requirements for programs covered under the Energy Independence and Security Act of 2007 (EISA). As HUD and USDA seek to advance the construction of affordable residences, these energy efficiency building requirements are vital to reducing housing costs, promoting long-term home ownership, and enhancing the resilience of our housing stock with respect to natural disasters. With electricity bills rising rapidly and expected to jump even more in 2026, this is a particularly important issue for HUD- and USDA-supported households, who spend a disproportionate share of their income on energy bills.[1]

We are aware that HUD and USDA are reexamining the economic analysis that underpins the agencies' 2024 Final Determination to adopt these building codes, specifically asking for how economic factors have shifted since publication on April 26, 2024. In this endeavor, we recommend you start by examining the impacts of H.R. 1, the recently enacted mega-legislative package, as well as the Administration's cost-ballooning tariffs. H.R. 1 is projected to raise household energy bills by $400 annually over the next decade.[2] If you are in fact working towards the goal of "Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis" as stated by the Executive Action you cited in the public comment notice, we urge you to uphold these building codes, which will reduce household energy costs over the lifetime of a home and will increase the resilience of new homes to ever-worsening disasters, thereby keeping rising insurance premiums in check.

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[1] https://www.eia.gov/todayinenergy/detail.php?id=65284
[2] https://www.nytimes.com/2025/06/04/climate/electricity-prices-republican-big-beautiful-bill.html

The adoption of modern building codes has been essential for lowering housing costs and supporting our nation's transition to a more affordable and resilient energy future. According to the Department of Energy (DOE), the average multifamily residential building built to the ASHRAE 90.1-2019 standard uses 33% less energy than the same building built to the outdated ASHRAE 90.1-2007 standard that HUD and USDA currently require.[3] Likewise, the average single-family home built to the 2021 IECC uses 27.5% less energy than the same house built the outdated 2009 IECC that HUD and USDA currently require.[4] By requiring commonsense steps like improved insulation and tighter windows, these codes lower utility costs, reduce energy waste, and make our homes more comfortable and safer.

DOE has conducted extensive cost-benefit analysis of the 2021 IECC codes on a state-by-state basis to show how much money the updated standards would save homeowners. For example, in Arkansas, DOE analysis finds that that a single-family home built to the 2021 IECC generates lifecycle energy cost savings of $17,602 on average (or $760 per year) for owners or renters compared with the state's current code of the 2009 IECC. After subtracting out the increased mortgage payment to cover the upfront costs of meeting the 2021 code as opposed to the 2009 code, that translates to net savings to the homeowner or renter of $552 each year over the current 2009 IECC.[5]

These savings have proven critical for families' financial stability. Mortgage default risks are on average 32 percent lower in energy-efficient homes.[6] Lowering default rates directly reduces risk to HUD- and USDA-supported loans. And such measures will not only reduce the long-term housing costs for homeowners and renters—especially benefiting low-income and minority households who disproportionately bear the burden of high energy costs—but also create critical energy savings for our grid, which is already struggling under unprecedented demand in our country, thereby decreasing energy costs for everyone in the country as a side benefit.

When homes are built to the 2021 IECC and ASHRAE 90.1-2019 standards, our families and communities are also safer during natural disasters and blackouts. A study by three national laboratories and the DOE estimated that during a 7-day heat wave and power outage in Houston, Texas, a house built to the 2021 IECC would stay at safe temperature and humidity levels for the entire week, while a typical house would only remain safe for four days. Bringing Houston's housing stock up to the 2021 standards would prevent about 80 percent of heat wave-related deaths, which represents a 75% improvement over the existing stock.[7] And when the weather turns, Minneapolis residents would be safe for about twice as long during a cold-snap outage in homes built to the updated standards as compared to the average Minneapolis house. Robust, proven building standards not only save money, they save lives.

Finally, the analysis you seek to revise has already been reanalyzed many times over. Both statutorily sanctioned analysis by DOE[8], as well as independent, nonpartisan analysis by

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[3] https://www.energycodes.gov/infographics
[4] https://www.energycodes.gov/infographics
[5] https://www.energycodes.gov/sites/default/files/2021-07/ArkansasResidentialCostEffectiveness_2021_0.pdf
[6] IMT_UNC_HomeEEMortgageRisksfinal.pdf
[7] https://www.energycodes.gov/sites/default/files/2023-07/Efficiency_for_Building_Resilience_PNNL-32727_Rev1.pdf
[8] https://www.energy.gov/sites/default/files/2021-07/2021-iecc-final-determination.pdf

organizations like the Institute for Market Transformation[9], have found that the 2021 IECC codes are cost effective. Resurrecting a closed debate wastes time and taxpayer money.

The 2021 IECC and ASHRAE 90.1-2019 building codes have already made American households safer and more prosperous. Rolling them back will only force the burden of rising energy prices and health costs further onto the shoulders of hopeful homebuyers pursuing the American Dream. We urge HUD and USDA to uphold these building codes and protect cost savings for Americans during a time of acute need. Thank you for your attention to this matter and for your interest in affordable, resilient housing.

Sincerely,

Rep. Dave Min
Co-Chair
SEEC Building Resilient Housing Task Force

Rep. Johnny Olszewski, Jr.
Co-Chair
SEEC Building Resilient Housing Task Force

[9] https://imt.org/wp-content/uploads/2023/11/Cost-Effectiveness-of-the-Residential-Provisions-of-the-2021-IECC-Rev-June-2022.pdf