

VIA E-MAIL

April 28, 2021

The Honorable Gina McCarthy
National Climate Advisor
The White House
1600 Pennsylvania Ave. NW
Washington, D.C. 20500

Dear Ms. McCarthy:

We are diverse stakeholders – consumer, environmental, and efficiency advocates and construction industry manufacturers and contractors – united in the goal of a zero-energy ready construction policy for all new buildings in the United States. President Biden has set ambitious and necessary goals for the U.S. to meaningfully address climate change. With residential and commercial buildings responsible for up to 40 percent of U.S. greenhouse gas (“GHG”) emissions, executive action to promote adherence to updated building energy codes is one of the Administration’s best opportunities under existing authorities to capture long-term emission reductions from our nation’s building stock.

The opportunity for GHG emission reductions from buildings is significant. The American Council for an Energy-Efficient Economy (“ACEEE”) forecasts that rapidly shifting to zero energy building construction in the U.S. would reduce GHG emissions by 265 million tons in 2050, or approximately 6 percent of total carbon emissions in that year. The 2021 International Energy Conservation Code (“IECC”) and ASHRAE Standard 90.1-2019 are the current industry standards for new buildings, but they also include appendices with initial requirements for zero energy residential and commercial buildings.

The Federal Government can catalyze the transition of the U.S. construction market to zero-energy ready with the key first step of establishing an Administration policy that all federal programs that support new building construction or reference energy codes are required to meet the ASHRAE 90.1-2019 and 2021 IECC industry standards. Federal programs that this will favorably impact include:

- Federal Housing Administration loans for new homes
- Department of Housing and Urban Development programs for new and rehabilitated public and subsidized housing
- Department of Agriculture loans for new homes
- Veterans Affairs Administration loans for new homes
- Federal Energy Management Administration Building Resilient Infrastructure and Communities Program
- Department of Energy manufactured housing energy efficiency standard
- Department of Energy federal building energy efficiency standards
- Department of Defense building code

- General Services Administration new and altered building policy
- Environmental Protection Agency Energy Star New Homes program

By asserting leadership on compliance with current model residential and commercial energy codes across the federal government and federal programs, you will also expedite broad market adoption nationwide. While taking such actions marks an important step in furtherance of the Administration's climate goals, there are other important policy benefits that will result. These include improving the resiliency of our buildings to withstand extreme weather events and enhancing housing affordability by lowering utility bills. Finally, zero energy building construction is a made-in-America enterprise, involving American-made products and employing our construction and energy efficiency trades.

Thank you for considering our request.

Sincerely,

Alliance to Save Energy
American Council for an Energy-Efficient Economy
American Chemistry Council
American Institute of Architects
Cellulose Insulation Manufacturers Association
Energy and Environmental Building Alliance
EPS Industry Alliance
Institute for Market Transformation
Insulation Contractors Association of America
National Association of State Energy Offices
National Insulation Association
Natural Resource Defense Council
New Buildings Institute
North American Insulation Manufacturers Association
Polyisocyanurate Insulation Manufacturers Association
Responsible Energy Codes Alliance
Spray Polyurethane Foam Alliance
Structural Insulated Panel Association
U.S. Green Building Council

cc: Secretary Tom Vilsack, U.S. Department of Agriculture
Secretary Lloyd Austin, U.S. Department of Defense
Secretary Jennifer Granholm, U.S. Department of Energy
Administrator Michael Regan, Environmental Protection Agency
Acting Administrator Katy Kale, General Services Administration
Secretary Marcia Fudge, U.S. Department of Housing and Urban Development
Secretary Denis McDonough, U.S. Department of Veterans Affairs