

**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

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- 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