



**Southern Arizona
Home Builders
Association**

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SENT VIA ELECTRONIC MAIL

December 12, 2025

The Honorable Regina Romero
Mayor, City of Tucson
255 W. Alameda Rd.
Tucson, AZ 85701

RE: 2024 IECC

Dear Mayor Romero:

The Southern Arizona Home Builders, and our 320+ member businesses, are committed to building vibrant communities with an array of safe and reliable housing options. We know the importance of building codes and appreciate the efforts of Planning & Development Services and the Joint Consolidated Code Committee in vetting the 2024 suite of International Codes.

There is, however, one matter we ask for your consideration. The surrounding jurisdictions of Marana, Oro Valley and Sahuarita have all decided not to adopt the 2024 IECC. In fact, during a presentation to the Oro Valley Mayor and Council, staff estimated that the 2024 IECC could add an additional \$6,000 - \$9,000 in costs per home (see attached). This comes at a time when our communities are already struggling with housing affordability.

While we encourage you forgo adoption of the IECC to ensure regional code consistency and aide housing affordability, we offer the following local amendments:

1. Section R402.5.1.3 Maximum air leakage rate. REVISE Section by REPLACING all instances of the value "4.0" with the revised value of "5.0".
2. Section R403.3.3 Ductwork located outside conditioned space. REVISE Section by ADDING the following exception:

Exception: Ductwork associated with a simulated performance alternative design shall be insulated to an *R-value* of not less than R-6.

Since 2009, the I-Codes changes have set the bar for energy efficient construction. In southern Arizona, our builders have exceeded it (see attached). The proposed amendments would allow builders to keep building green while mitigating additional costs.

Respectfully,

David M. Godlewski
President & CEO

CC: Council Members, City Manager Thomure, Koren Manning, Clayton Trevillyan, Rick Bright and Ken Cawhtorne

Cost of 2018 vs. 2024 Updates



Town of Oro Valley

Based on a 2,000 sqft SFR new construction

IRC 2024:

- \$1,500–\$3,000 per home
- Wind/seismic updates, deck attachments, fire-resistance

IECC 2024 (if adopted):

- \$6,000–\$9,000 per home
- Higher R-values, air sealing, energy-efficient windows

Total Incremental Cost:

- **Minimum - \$1,500-\$3,000** (*example is based on 2024 IRC only*)
- **Maximum - \$7,500-\$12,000** (*example is based on 2024 IRC and 2024 IECC*)



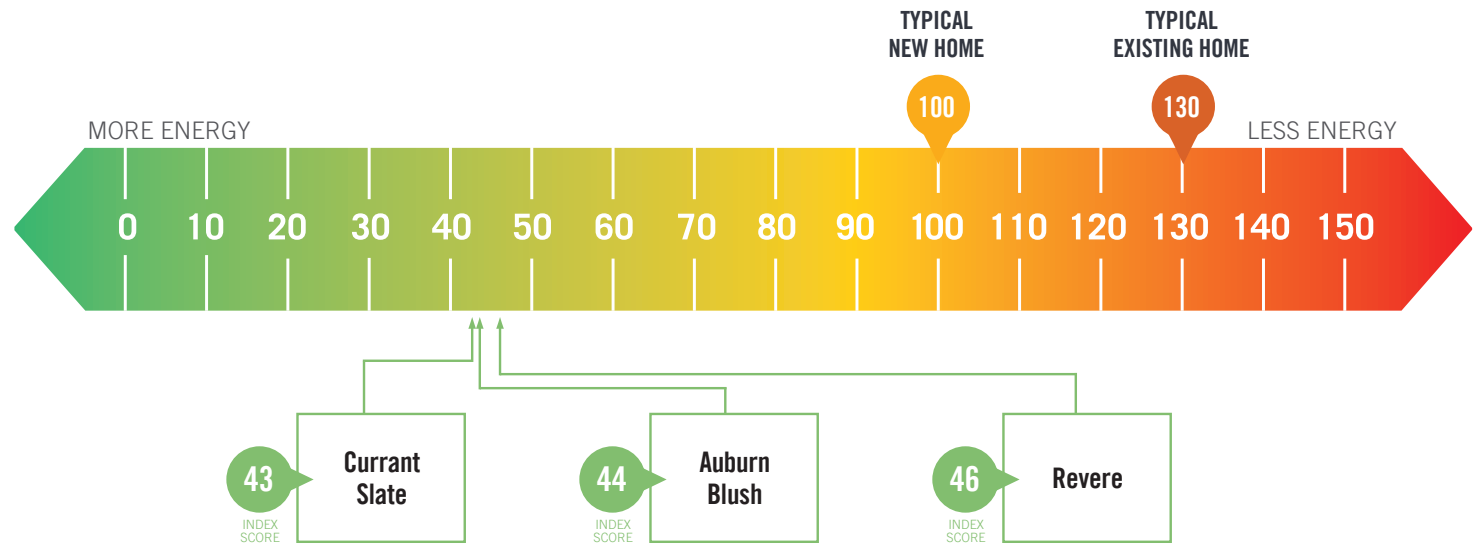
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HERS® INDEX:

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ESTIMATED ANNUAL SAVINGS

-> Currant: \$2,400
-> Slate: \$2,990

-> Auburn: \$2,095
-> Blush: \$2,196

-> Revere: \$2,758



*RESNET, or Residential Energy Services Network, a third party not affiliated with Mattamy Homes, has developed the HERS® Index to indicate the comparative efficiencies of homes. The Index is provided for informational purposes only and Mattamy makes no guarantee of energy-efficiency or cost savings. A typical existing home is based on the U.S. Department of Energy definition with a HERS® Index of 130. A typical new home is based on the RESNET Reference Home definition with a HERS® Index of 100 (based on the 2006 International Energy Conservation Code). Mattamy Homes uses certified independent HERS® energy raters to provide energy efficiency ratings for homes as designed pursuant to the applicable floor plan. Energy efficient features will vary depending upon the floor plans, elevations, design amenities/upgrades and the location of the home. Mattamy Homes does not represent, warrant, or guarantee all homes sold by Mattamy have been individually rated. Further an energy rating score may or may not factor in all options and/or upgrades available to be installed in the home. Actual energy costs and/or energy usage are dependent on several factors, including utility rates, energy consumption, home maintenance, thermostat settings, size of household, energy conservation practices, home orientation, and surrounding climate and weather conditions. Speak with a Mattamy Homes New Home Counselor for details. RESNET and HERS® are the trademarks and property of RESNET. MATTUC474