

Congress of the United States
House of Representatives
Washington, DC 20515-2504

March 17, 2025

The Honorable Brooke Rollins
Secretary
United States Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

Dear Secretary Rollins:

We write to express our deep concern regarding the April 26, 2024, final determination by the U.S. Department of Agriculture (USDA) requiring all newly constructed single-family and multifamily housing financed by your agency to comply with the 2021 International Energy Conservation Code (IECC) or ASHRAE 90.1-2019. Given the significant impact these requirements will have on housing affordability and availability, we urge your agency to extend the compliance deadlines beyond the current May 28, 2025, deadline for multifamily construction and the November 28, 2025, deadline for single-family construction.

The implementation of the 2021 IECC at the federal level raises serious concerns about affordability, consumer choice, and the overall availability of housing, particularly for first-time and low- to moderate-income home buyers. Studies have shown that compliance with the 2021 IECC can significantly drive-up construction costs, with some builders estimating increases of up to \$31,000 per single-family home. These costs will further restrict access to affordable homeownership and rental opportunities for Americans who are already struggling amid the nation's ongoing housing affordability crisis.

Recent case studies demonstrate that the energy savings achieved by adopting the 2021 IECC are minimal compared to the financial burden imposed on home buyers and renters. In one such study, a builder in Kansas City, MO, constructed two homes with identical floorplans—one built to the previous energy code (an amended version of the 2018 IECC) and one built to the 2021 IECC. The energy savings of the 2021 IECC home amounted to only \$125 per year, yet the additional construction cost increased the homeowner's mortgage by approximately \$1,224 **annually**. This discrepancy underscores the need to ensure that federal energy efficiency policies are cost-effective and do not disproportionately burden home buyers.

The new requirements are also inconsistent with the current building codes in 43 states, leading to further uncertainty about compliance, financing, and implementation. The lack of alignment between state and federal requirements could disrupt mortgage financing for newly constructed homes and create unnecessary barriers for buyers and developers alike.

Additionally, we are concerned that USDA's determination could pave the way for similar mandates from the Federal Housing Finance Agency (FHFA) for homes financed through Fannie

Mae and Freddie Mac. Such a move would, in effect, establish a de facto national energy code standard, further exacerbating affordability concerns and undermining local control over building codes. It is imperative that housing finance policy remains focused on its core mission of promoting access to safe, affordable housing rather than imposing costly, restrictive mandates that may not yield significant benefits.

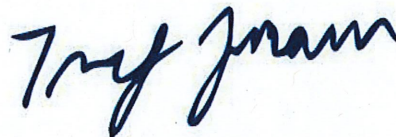
Given these concerns, we respectfully request that USDA extend the current compliance deadlines for the 2021 IECC requirements to allow for further review, stakeholder engagement, and consideration of the economic impact on home buyers and renters.

We appreciate your attention to this critical issue and look forward to your response.

Sincerely,



Mark Alford
Member of Congress



Tracey Mann
Member of Congress