



August 7, 2023

Mr. Michael Freedberg
Senior Advisor for High Performance
Building
Office of Environment and Energy
United States Department of Housing and
Urban Development
451 7th Street, SW
Room 7282
Washington, DC 20410

Ms. Meghan Walsh
Senior Architect
Rural Housing Service
United States Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

RE: AIA Comment on Preliminary Determination Notice and Solicitation for Comment, Adoption of Energy Efficiency Standards for New Construction of HUD and USDA Financed Housing [Docket No. FR-6271-N-01]

Dear Mr. Freedberg and Ms. Walsh:

The American Institute of Architects (AIA) represents over 96,000 architects and design professionals. Since 1857, AIA has been committed to safeguarding the public's health, safety, and welfare and improving the nation's quality of life through design. Central to that mission is AIA's commitment to advancing climate action and equity in the built environment.

Designing for greater energy efficiency, resilience, and equity is a top priority for practicing architects. Building codes and standards are foundational to the practice of architecture, setting minimum prerequisites for our industry and sending clear signals to clients about what they should come to expect from their buildings. The adoption and enforcement of the latest building energy codes will improve building performance in communities across the country while simultaneously hastening market trends toward building decarbonization.

AIA appreciates the opportunity to comment on the U.S. Department of Housing and Urban Development (HUD) and the U.S. Department of Agriculture (USDA) *Preliminary Determination Notice on Adoption of Energy Efficiency Standards for New Construction of HUD and USDA Financed Housing*. AIA strongly supports HUD and USA's adoption of the 2021 International Energy Conservation Code (IECC) and the ASHRAE 90.1-2019 standard for new single family and multifamily buildings. Homes built to the 2021 IECC use 28% less energy than homes built to the 2009 IECC. Homes built to ASHRAE Standard 90.1-2019 are 38% more effective than 90.1-2004 and 5% more effective than the previous version, 90.1-2016.

(3) HUD and USDA request comments on the cost benefit analysis utilized by PNNL as described in Sections II.B and III.B of this Preliminary Determination.

II.B 2021 IECC Affordability Analysis

Instead of using the energy costs savings over a typical 30-year mortgage period, AIA would recommend using the energy costs savings over the economic lifespan of a building which is 75 years.¹ This would result in increased energy cost savings.

(6) HUD and USDA seek comment on the time required for builders and building designers to familiarize themselves with the new codes, the training or technical support that may be required by building professionals and local code officials on the new requirements of the 2021 IECC and ASHRAE 90.1–2019 standards, workforce training needs, and any other issues related to implementation of these standards. Comments on particular challenges or issues facing rural areas in adoption and/or implementation of these codes are also requested.

To repeat the successful approach of the American Recovery and Reinvestment Act (ARRA), HUD and USDA should provide free code books and workbooks as part of the training and technical assistance for builders and building designers on the new requirements of 2021 IECC and the ASHRAE 90.1-2019 standard. Training materials and resources addressing cost concerns about adopting the updated energy codes head on is a practical necessity.

Many communities and stakeholders are concerned about the rising cost of homes and building materials. AIA stands with them and is committed to promoting policies that increase the supply of housing affordability across this country. However, it is a false choice to assume that updating residential building codes will make housing unaffordable.

AIA stands ready to assist in the implementation of this important policy. Please contact me if you need any additional information. Again, we remain strongly supportive of your efforts.

Sincerely,



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¹ https://www.nibs.org/files/pdfs/NIBS_MMC_MitigationSaves_2019.pdf, p. 3