

August 1, 2025

David C. Woll Jr.  
Principal Deputy Assistant Secretary for  
Community Planning and Development  
U.S. Department of Housing and Urban  
Development  
451 7<sup>th</sup> Street, SW  
Washington, DC 20410

Todd Lindsey  
Deputy Under Secretary, Rural  
Development  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250

Dear Principal Deputy Assistant Secretary Woll and Deputy Under Secretary Lindsey:

On behalf of the National Association of REALTORS® (NAR), we thank the U.S. Department of Housing and Urban Development (HUD) and U.S. Department of Agriculture (USDA) for the opportunity to provide comments on the potential reevaluation of the adoption of the 2021 IECC and ASHRAE 90.1-2019 energy efficiency standards for new construction of HUD- and USDA-Financed Housing.

The National Association of REALTORS® is America's largest trade association, including NAR's five commercial real estate institutes, its societies, and councils. REALTORS® are involved in all aspects of the residential and commercial real estate industries and belong to one or more of some 1,200 local associations or boards, as well as 54 state and territory associations of REALTORS®. NAR represents a wide variety of housing industry professionals, including approximately 25,000 licensed and certified appraisers, committed to developing and preserving the nation's housing stock, along with its availability to the broadest range of potential homebuyers. REALTORS®, guided by a code of ethics and fair housing laws, are vital to thriving communities because they provide professional expertise to help consumers navigate the intricacies of real estate transactions.

NAR shares the Administration's concerns on housing supply and affordability. Homebuyers and homeowners are faced with one of the most challenging markets in decades. According to NAR research, this country lacks 4.7 million homes. NAR's recently released [study](#) on affordability and supply shows that middle-income buyers face the largest inventory shortage, with lower-income households continuing to be disproportionately priced out of the market. Addressing housing affordability starts with adding to the nation's severely limited inventory. Eliminating or streamlining burdensome regulations in the housing ecosystem, particularly when it comes to building and development, is key to supporting access to housing and homeownership.

While NAR believes building high-performing energy efficient and quality homes nationwide is necessary to address the supply crisis, we are encouraged by the agencies' desire and efforts to provide builders with the most flexibility in meeting energy efficiency measures. NAR, along with other industry partners, previously urged against any proposals to attach specific energy efficient building code requirements to new construction. Now, we urge you to reconsider the impacts of new requirements on housing production and support voluntary efforts that promote energy efficiency without exacerbating America's housing challenges. Building codes and standards are an essential component of all housing construction and NAR supports the development of cost-effective and technically feasible codes and standards. However, expansive new energy code requirements burden home

construction. [Research](#) published by the National Multifamily Housing Council (NMHC) and the National Association of Home Builders found that government regulation accounts for over 40 percent of multifamily development costs.


NAR urges HUD and USDA to address the housing supply challenges across the nation without imposing additional regulatory obligations that hinder the capacity for creating new housing. REALTORS® greatly appreciate the efforts of this Administration, HUD, and USDA to address the housing supply crisis and make the dream of homeownership for Americans a reality. As an engaged partner, we stand ready to assist HUD and USDA with these efforts and look forward to continued discussions and action on this matter. Thank you for your leadership on these issues. If you have questions, please contact Shannon McGahn, Executive Vice President and Chief Advocacy Officer ([smcgahn@nar.realtor](mailto:smcgahn@nar.realtor)).

Sincerely,



Kevin Sears  
President, National Association of REALTORS®

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