

December 3, 2024

The Honorable Sandra Thompson
Director
Federal Housing Finance Agency (FHFA)
Tenth Floor, 400 Seventh Street SW
Washington, D.C. 20219

Dear Director Thompson,

In May 2024, 125 affordable housing, consumer, civil rights, health, energy efficiency, environmental, business, and other organizations at the national, state, and local levels [wrote to urge you](#) to direct the Government Sponsored Enterprises (Enterprises) — Fannie Mae and Freddie Mac, to join the Department of Housing and Urban Development (HUD) and the Department of Agriculture (USDA) in requiring that all new homes with mortgages backed by the Enterprises meet updated building energy efficiency codes.

We have appreciated your leadership, and the combined efforts over the past year from the Enterprises and internally at the Federal Housing Finance Agency (FHFA) to analyze the benefits and costs of adopting the 2021 International Energy Conservation Code (IECC) (for single-family and low-rise multifamily), or ANSI/ASHRAE/IES Standard 90.1-2019 (for medium- and high-rise multifamily housing), as well as other options besides codes for incorporating energy efficiency standards into Enterprise-backed mortgages. However, it is now time to act on adopting those codes.

Modern residential energy efficiency codes:

- Deliver energy utility cost savings to homeowners and renters (collectively “residents”) at a time when present and long-term housing affordability are in crisis;
- Reduce risk to the Enterprises and therefore FHFA by lowering overall monthly household costs, and increasing the ability of borrowers to make insurance and mortgage payments;
- Improve resident health through healthier indoor air quality and more comfortable homes; and,
- Increase household resilience to climate-driven risks and reduce emissions contributing to those growing risks.

We urge you to adopt the aforementioned energy efficiency building code standards for the Enterprises now, before the transition to a new administration. We also urge you to publish the FHFA/Enterprises analysis on the impacts of efficiency standards at this time. Making the analysis public provides full transparency into the process, will demonstrate the effort that FHFA and the Enterprises have put into considering the impacts of adopting modern codes, may support HUD and USDA in their ongoing energy efficiency work, and educates the public on the benefits of efficient and resilient new construction.

Thank you for your consideration.

Sincerely,

Alliance to Save Energy

American Council for an Energy-Efficient Economy

Americans for Financial Reform Education Fund

Consumer Federation of America

Earth Advantage

Earthjustice

Enterprise Community Partners

Evergreen Action

Fauquier Habitat for Humanity

Housing Assistance Council

Institute for Market Transformation (IMT)

Just Solutions

National Consumer Law Center (on behalf of its low-income clients)

National Fair Housing Alliance

North American Insulation Manufacturers Association

Northeast Energy Efficiency and Electrification Council

Southwest Energy Efficiency Project

U.S. Green Building Council