



Coalition of Sustainable Communities New Mexico  
[www.coalitionscnm.org](http://www.coalitionscnm.org)  
Santa Fe, New Mexico

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Hearing Officer  
Construction Industries Division  
PO Box 25101  
Santa Fe, New Mexico 87505

**Regarding: Proposed 2020-5-14 2018 Residential and Commercial International Energy Conservation Code Adoption**

Dear Hearing Examiner and Construction Industries Commissioners,

I am writing you on behalf of the Members of the Coalition of Sustainable Communities New Mexico (CSCNM) recommending adoption of the Proposed 2020-5-14 2018 Residential and Commercial International Energy Conservation Code, **without roll-backs or exemptions.**

CSCNM is a member driven organization that currently represents the cities of Albuquerque, Santa Fe, Las Cruces, and Santa Fe County, accounting for approximately 40% of the total population of New Mexico. CSCNM's Members are dedicated to supporting and implementing policies that will increase economic opportunity and wellbeing for their communities, while also reducing greenhouse gas emissions and resource degradation that will adversely affect the most vulnerable populations and all future generations.

Energy efficiency continues to be one of the least cost options for reducing utility bills and greenhouse gas emissions. Implementing stricter energy efficiency standards for new and renovated buildings provides well known economic benefits to building occupants, particularly lower income households. Buildings consume almost 40% of the U.S.'s primary energy and emit over 30% of U.S. greenhouse gas emissions, mostly due to natural gas heating and electricity to power air conditioning and appliances. Upfront investment in buildings has long term positive impacts; most buildings have lifetimes of at least 40 years, and the average person spends over 90% of their time inside buildings. Buildings with advanced building envelopes and reduced cooling loads will be essential as the largest cities in New Mexico are predicted to face an increased number of days that exceed 100°F in coming years.

Following the end of the Great Recession in 2009, construction permits for residential buildings in New Mexico averaged 4,000 per year, between 2009 to 2019, corresponding to an average of 4,700 permits for new residential units per year. With over 900,000 housing units in New



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Mexico, this corresponds to an increase of about 0.5% of the housing stock each year. Over a ten-year time period this would result in about 5% of the housing stock coming from new builds. Updated building energy codes are essential to ensure that new construction is built to improved standards.

New Mexico has missed over a decade of energy savings opportunities, as its current code is based on outdated 2009 IECC codes. Builders often push back against new code updates since they will require learning new rules and incurring new building costs. However, there are clear safety and economic benefits for occupants from each code update. Analysis from Pacific Northwest National Laboratories shows significant net benefits for updating to the 2018 IECC codes (**without roll-backs or exemptions**) from the 2009 IECC. The analysis indicates that, statewide, all residential dwelling units would have an average incremental cost of \$1,908 to implement 2018 IECC codes, relative to 2009 IECC codes. This is about 1% of the statewide median sales price for a new single-family home in 2018 (\$225,000). The energy efficiency measures would result in an annual energy savings of \$377, having a simple payback of 5 years, and result in a life-cycle cost savings of \$6,397.

Updated energy codes for new construction have important equity impacts by reducing utility bills for the poorest occupants. Lower income families are more likely to rent and live in multifamily housing units, where there is less incentive for developers and owners to invest in energy efficiency since they often don't pay the utility bills. When a jurisdiction has older codes, it is more likely that the cheaper housing stocks will be the ones built to the lower standards. Unlike wealthier families, who can commission the construction of a green building, lower income families are left to choose from housing stock that may be built to the minimal code requirements. Without updated, stricter codes, a low-cost builder might avoid technologies that will provide the future occupants significant long-term benefits.

On behalf of our Members, I strongly urge you to adopt the Proposed 2020-5-14 2018 Residential and Commercial International Energy Conservation Code, **without roll-backs or exemptions**. It's good for our citizens. It's good for New Mexico.

Sincerely,

Beth Beloff  
Executive Director  
Coalition of Sustainable Communities New Mexico