Dallas Builders ASSOCIATION

November 4, 2022

To: Meenal Chauk
C: Andres Espinoza and James Metzgar

Re: Rebuttal to Public Comments to the 2021 Edition of the International Energy Conservation Code

The Dallas Builders Association represents more than 1,300 members of the residential construction industry, the vast majority of which do business in the City of Dallas. We appreciate the opportunity to provide feedback on the comments received by the city regarding the forthcoming 2021 code amendments.

The Dallas BA is actively involved as a voting member of the North Central Texas Council of Governments Regional Code Coordinating Committee (RCCC). We are strong believers in the RCCC's process as it provides much-needed standardization and uniformity for the code amendments adopted by the dozens of municipalities within our 10-county jurisdiction.

The City of Dallas must balance the laudable environmental objectives of the 2021 IECC with its significant housing challenges. Specifically, some groups have suggested that the city should require a ceiling R value of 49 as opposed to the RCCC's R-42 amendment.

According to the model listed below, compiled by Fox Energy Specialists, the expected energy savings of their recommendation is expected to be anywhere from $5-13 annually. Factoring in an estimated up-front cost of $1,300 reveals that the average homeowner should recoup this cost in 100 to 260 years.

The Real Estate Center at Texas A&M University estimates that every $1,000 increase in the price of an entry level home prevents more than 20,000 Texas families from enjoying the wealth-creating opportunities of homeownership. A disproportionate number of these families are minority groups who are already underrepresented as new homeowners and who are particularly affected by rapidly rising interest rates. In summary, preventing more than 20,000 Texas families from affording a home in the City of Dallas is not worth $5-13 per year in energy savings!

For similar reasons, we do not support the suggested imposition of the 5 percent penalty for performance based compliance pathways. Less than 25 percent of dwelling units constructed in the United States obtain an ERI/HERS rating, and these units are typically more energy efficient than the ones that do not seek the rating. Additionally, the industry continues to grapple with unprecedented challenges with supply chains and building material availability/affordability. This has created the need for builders to become more innovative and reliant upon comprehensive performance-based solutions. Innovation should not be stifled by product mandates that favor a select few large

companies who spend millions lobbying for favorable treatment in the prescriptive portions of the code.

The city has also been encouraged to introduce solar-ready provisions into the 2021 IECC. Our members already offer solar-ready homes as an option for residents where such an installation makes sense. However, it should be noted that very few residents choose to install solar. This is because of the prohibitive cost and limited payback of solar power not due to the absence of the wiring, brackets and conduit to begin with. In other words, there is no environmental benefit from these proposals unless residents invest tens of thousands of dollars for the panels themselves. We would be happy to work with the city on an optional provision that would reduce or eliminate the tree mitigation fees paid under Article X for homes that deploy solar-ready components.

Finally, we urge the City of Dallas to eliminate the Electric Vehicle (EV) charging provisions that are currently proposed. Similar to the solar-ready measures, this is an after-market addition that can already be easily incorporated by residents who choose to make the substantial up-front purchase for an EV. It is not appropriate for the housing industry to supplement the automotive industry, nor does it make sense to force homeowners to pay hundreds of dollars for a product most of them will never use and that contributes nothing to the home's life safety or operational efficiency. We encourage the city to examine incentives related to the installation of EV charging stations in residential and commercial settings and funding from automotive manufacturers and governmental agencies as opposed to current and prospective residents.

Thank you again for the opportunity to weigh in on the city's public comments. As housing advocates and the voice of the region's residential construction industry, we look forward to continuing our partnership with the city and furthering our mutual quest to ensure every resident has a roof over their head and an affordable place to call home.

Sincerely,

Phil Crone
Executive Officer

R49 versus R42 Comparison on Dallas-Fort Worth Homes

House #1 *(High-Denton Plan)*		
2283 sf	1-Story	4BR
Annual Energy Cost		
with R49 Attic Insulation	with R42 Attic Insualtion	Difference
$2,017	$2,026	($9)

House #2 *(Shad-31145)*		
3215 sf	2-Story	4BR
Annual Energy Cost		
with R49 Attic Insulation	with R42 Attic Insualtion	Difference
$2,473	$2,478	($5)

House #3 *(GFO-5240)*		
4227 sf	2-Story	5BR
Annual Energy Cost		
with R49 Attic Insulation	with R42 Attic Insualtion	Difference
$3,281	$3,294	($13)

House #4 *(Cam-Nash)*		
2073 sf	1-Story	3BR
Annual Energy Cost		
with R49 Attic Insulation	with R42 Attic Insualtion	Difference
$2,082	2095	($13)

House #5 *(Ches-1736)*		
1736 sf	1-Story	3BR
Annual Energy Cost		
with R49 Attic Insulation	with R42 Attic Insualtion	Difference
$2,141	$2,152	($11)

House #6 *(Khov-M20A)*		
1704 sf	2-Story	3BR
Annual Energy Cost		
with R49 Attic Insulation	with R42 Attic Insualtion	Difference
$1,785	$1,790	($5)