

**Subject:** RE: 2101 Regulations for State Energy Conservation Code – Proposed Amendments  
**Date:** Thursday, July 17, 2025 at 9:13:32 AM Eastern Daylight Time  
**From:** Sonya Starr  
**To:** HearingComments, DNREC (MailBox Resources)  
**CC:** Meyer, Matthew (Governor), Phillips, Vanessa (Governor), Park, Evan (Governor), ohall@westendnh.org, Paul Calistro, Sarah Lester, tharvey@doover.de.us, Carrie Casey, abostjancic@hdcweb.org, lrawhauser@hdcweb.com, Christine Schiltz, Kevin Habitat, Kevin Smith, M Charest, T Morrison, Rachel Stucker, Tim Bailey, Sonya Starr, Dana Hanchin, Susan Kent, swilson@westsidegrows.org, Chicks@hdcweb.org, David Moore, kspeakman@neighborgoodpartners.org, dfreeman@neighborgoodpartners.org, jmyer@neighborgoodpartners.org, Patricia Kelleher, cneary@cinnare.com, msoto@neighborgoodpartners.org, amypratt diamondstateclt.org, Donna Gooden, Rich Przywara, Dave Ford, ckyriss@centraldelawarehabitat.org, Dionna Sargent, Sean Kelly, amatas@woodlawntrustees.com, Paula Sims, cstanley@milfordhousing.com, Joann Carroll, Jim Purcell, jjfrancis@reachriverside.org  
**Attachments:** Outlook-wgfcvjt.png

Dear Theresa Smith,

The Delaware Affordable Housing Coalition (DAHC) appreciates the Department's commitment to energy efficiency and sustainability. However, we strongly urge DNREC to **stay the implementation of the proposed regulations or eliminate all penalties** until the Delaware General Assembly has an opportunity to revisit the timeline when it returns in January.

The DAHC represents nonprofit organizations serving low-income households, including affordable housing developers who are deeply concerned about the implications of these regulations. As the National Low Income Housing Coalition's 2024 *Gap Report* indicates, Delaware has only **41 affordable and available units for every 100 extremely low-income households**. We are in the midst of a severe affordable housing crisis.

Affordable housing development is already financially prohibitive. The new code requirements – such as mandating that each new residential unit have an electric vehicle ready parking space with a branch circuit and outlet capable of supporting EVSE installation – further increase costs without providing meaningful benefit to most residents. The reality is that **many residents in affordable housing do not own a car, let alone an electric vehicle**. These regulations will burden affordable housing providers with substantial additional costs that are not supported by any federal funding, which has now been eliminated.

Therefore, **we respectfully request:**

1. **A stay in implementation** of these regulations until the General Assembly can review the financial and operational impacts on affordable housing development and preservation.
2. **Elimination of penalties** for noncompliance during this period to ensure ongoing development and rehabilitation projects are not delayed or derailed.

We stand ready to work collaboratively with DNREC and other stakeholders to achieve energy

efficiency and decarbonization goals in ways that do not exacerbate Delaware's housing crisis or place additional burdens on the state's most vulnerable residents.

Respectfully,

Better Homes of Seaford

Central DE Habitat for Humanity

Cinnaire

Cornerstone West

DE Federation of Housing Counselors

DE-NAHRO

Diamond State Community Land Trust

Habitat for Humanity of New Castle County

HDC MidAtlantic

Housing Alliance Delaware

Milford Housing Development Corporation

NeighborGood Partners

Peoples' Place

REACH Riverside

Sussex County Habitat for Humanity

Todmorden Foundation

Westend Neighborhood House

Respectfully,

Sonya

Rabbi Sonya Starr

She/Her/Hers

Policy Director

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DELAWARE