



March 9, 2026

The Honorable Dave Baker
Committee Co-Chair
Centennial Office Building
St. Paul, MN 55155

The Honorable Dave Pinto
Committee Co-Chair
Centennial Office Building
St. Paul, MN 55155

RE: House File 3545 – **Support**

Dear Chair Baker, Chair Pinto, and Committee members,

The Spray Foam Coalition¹ (SFC) supports HF 3545 and the repeal of the Mitchell Provision. While the SFC is committed to advancing energy efficiency in Minnesota’s housing stock, we believe the specific mandates within this provision create unnecessary economic barriers for Minnesota builders and homebuyers without providing proportional environmental benefits or energy savings.

The Mitchell Provision seeks to mandate a 70% reduction in new home emissions by 2038 compared to the 2006 International Energy Efficiency Code (IECC) baseline. The IECC already provides a pathway for increasing efficiency that balances energy performance with cost-effectiveness. By contrast, the Mitchell Provision imposes aggressive targets without critical safeguards regarding construction costs or return on investment for the homeowner.

It is important to note that new homes built in Minnesota under current standards are already exceptionally energy efficient. While further reducing operational emissions is a noble goal, the Mitchell Provision reaches a point of diminishing returns. The incremental efficiency gains mandated by this provision will significantly drive up the initial purchase price of a home without a commensurate reduction in monthly utility bills to offset those costs.

Minnesota is currently facing a dual challenge: a critical shortage of housing inventory and rising home prices. To meet the state’s housing needs, we must prioritize policies that keep homeownership attainable. Repealing the Mitchell Provision will protect housing affordability while allowing Minnesota to continue its progress through the adoption of proven, cost-effective energy codes.

We urge you to support HF 3545 to ensure that Minnesota’s energy goals remain balanced with the practical economic realities of housing.

Sincerely,

Stephen Wieroniey
President

¹ The Spray Foam Coalition is a trade association representing the interests of spray foam insulation manufacturers and suppliers to the industry.