

**Summary of Comments, EPA Responses, and Resulting Policy Changes Regarding  
Proposals for the ENERGY STAR Single-Family New Homes (SFNH) California Version 3.5  
and ENERGY STAR Multifamily New Construction (MFNC) California Version 1.5 Program Requirements**

The EPA has posted a compilation of all comments received from stakeholders on the proposals for ENERGY STAR SFNH California Version 3.5 and ENERGY STAR MFNC California Version 1.5 program requirements on its website.

The comment period was open from October 10, 2024, to November 07, 2024. This document contains a summary of the comments received, along with the EPA's responses and resulting policy changes, if any.

**Proposals for ENERGY STAR SFNH CA Version 3.5 and ENERGY STAR MFNC CA Version 1.5 Program Requirements**

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**Proposals for ENERGY STAR SFNH CA Version 3.5 and ENERGY STAR MFNC CA Version 1.5 Program Requirements**

ID	Comment Summary	The EPA's Response
<b><i>More Stringent Infiltration Backstop for the SFNH Program</i></b>		
	<p>One commenter stated that the proposed infiltration backstop of 3.5 ACH50 would be difficult to achieve and recommended that the limit be relaxed to 4.0 ACH50. The commenter also noted that the California Energy Code currently does not require air leakage testing for all homes, though such a requirement may be added in the next edition.</p>	<p>The EPA understands that California does not have a history of testing most homes for air leakage, but believes that the proposed backstop limit is achievable, particularly with enough time to prepare. In 2023, among the ~93,000 homes outside of California that were certified and individually inspected (i.e., not sampled), 55% achieved an air leakage rate of <math>\leq 3.5</math> ACH50.</p> <p>While the expectation has been that the program's mandatory air sealing details result in tight homes, the infiltration backstop is an important added assurance that objectively demonstrates this goal has been met.</p> <p>However, the EPA understands that partners in California may need additional time to consistently hit this target. Therefore, the final program requirements have been adjusted such that any home permitted prior to 1/1/2027 will be allowed to be certified with a leakage rate of <math>\leq 4.5</math> ACH50. For homes permitted on or after 1/1/2027, the infiltration backstop of <math>\leq 3.5</math> ACH50 will apply. This change provides an extra year for partners in California to prepare to meet this requirement.</p> <p>It is also important to note that the less stringent alternative metric of 0.30 CFM50 per square foot of dwelling unit enclosure area will apply to dwellings <math>\leq 1,500</math> sq ft, townhouses, and attached dwelling units (e.g. duplexes).</p>