

May 6, 2019

Mr. Jonathan Passe
U.S. Environmental Protection Agency Headquarters
1200 Pennsylvania Ave. N.W.
Washington, D.C. 20460

(Submitted electronically via email to energystarhomes@energystar.gov and passe.jonathan@epa.gov)

RE: NATIONAL PROGRAM REQUIREMENTS, ENERGY STAR CERTIFIED MANUFACTURED HOMES,
VERSION 2

Dear Mr. Passe,

On behalf of more than 140,000 members, the National Association of Home Builders (NAHB) submits these comments to the U.S. Environmental Protection Agency (EPA)'s on the "National Program Requirements ENERGY STAR Certified Manufactured Homes, Version 2," published on April 10, 2019.

NAHB is a Washington, D.C.-based trade association that works to ensure that housing is a national priority and that all Americans have access to safe, decent and affordable housing. The federation includes more than 700 affiliated state and local associations in all fifty states, the District of Columbia, and Puerto Rico. NAHB's membership includes, among others, those who design, construct, and supply single-family homes, build and manage multifamily projects, and remodel existing homes. We also have a Building Systems Council, whose members manufacture, supply and build modular, panelized, concrete, log, and timber frame homes. Each year, NAHB's members construct about 80 percent of the new homes built in the United States.

EPA is inviting ENERGY STAR stakeholder comments on the recently released draft Version 2 of the ENERGY STAR Manufactured Homes Program to ensure that it reduces barriers to participation, simplifies and reduces the number of previous prescriptive packages and improves alignment with manufacturer's existing efficiency packages. In addition, the draft intends to provide flexibility for Quality Assurance Providers to set verification protocols for features installed after a home leaves the plant. While NAHB applauds the EPA's initiative to reduce barriers and simplify complex processes to encourage more ENERGY STAR certifications, we remain critical of any program or policy that may give one type of housing an unwarranted competitive advantage in the marketplace.

NAHB supports the availability of voluntary, above-code programs as a means to encourage energy-efficient construction practices. In fact, in a recent survey conducted by NAHB, homebuyers ranked having an ENERGY STAR rating for the whole house as either highly desirable or an essential element for their next home. This information demonstrates that voluntary, above-code programs can penetrate the market place and create a demand, thus increasing their value. NAHB also supports enhancing consumer choices as well as market-based mechanisms to maintain or increase energy

efficiency savings.¹ To be effective, however, any program must send the right signals by creating efficient and effective solutions that not only reduce energy usage but are consistent among all housing types.

For example, manufactured housing is already subject to different building requirements. Manufactured homes must comply with the Federal Manufactured Home Construction and Safety Standards (commonly known as the HUD Code), while modular, panelized, and stick built homes are governed by building codes adopted at the state and local levels. While NAHB agrees that the HUD Code, like those enacted at the state and local levels, needs to be updated periodically so that it reflects current practice and technology, EPA must refrain from creating any new ENERGY STAR program requirements that would result in furthering the divide between manufactured homes and those that apply to homes that are stick-built or built using engineered building systems. Skewing the requirements so they favor one type of housing over another could mislead homebuyers and result in an unfair competitive disadvantage for other sectors of the home building industry.

NAHB has long been a supporter of policies that allow homebuyers and homeowners the opportunity to live in a home of their choice in a location of their choice, whether that home is a manufactured home, a modular home, a panelized home, a concrete home, a timber frame home, or a stick-built home. Manufactured homes remain a critical component of this mix, as they play an important role in meeting the nation's affordable housing needs and providing shelter following natural disasters and other catastrophic events. EPA is urged to maintain this balance and continue to facilitate consumer choice by ensuring any new ENERGY STAR program requirements do not favor manufactured homes over other types of residences, leading to consumer confusion and unfair competition in the marketplace.

As an ENERGY STAR stakeholder, NAHB appreciates the opportunity to provide comments on the EPA's request for feedback on the National Program Requirements ENERGY STAR Certified Manufactured Homes, Version 2. Please direct any questions regarding this letter to Anna Stern, Program Manager, Sustainability & Green Building, 202-266-8325 or astern@nahb.org.

Sincerely,



Jaclyn S. Toole, Assoc. AIA, CGP
Assistant Vice President, Sustainability & Green Building

¹ Emrath, Paul. "The Average Builder Uses 10 Different Green Products and Practices," *Eye on Housing* (blog). March 13, 2017 http://eyeonhousing.org/2017/03/the-average-builder-uses-10-different-green-products-and-practices/?_ga=2.172538915.1055520192.1494427816-135545152.1476289408

