



## MANUFACTURED HOUSING CONSENSUS COMMITTEE

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# MHCC Proposed Changes

## 2024-2025 Cycle

January 4, 2024

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## Proposed Changes Status Summary

LogID	Section	Action	Current Status
227	3280.703 Minimum standards		Pending Recommendation from Technical Systems Subcommittee.
228	3282.408, 3282.411 and 3282.412		Pending Recommendation from Regulatory Enforcement Subcommittee.
229	2803.4 Incorporation by reference		Pending Recommendation from Structure and Design Subcommittee.
230	3286 - Subpart F		Pending Recommendation from Regulatory Enforcement Subcommittee.
231	3280.306 (d) Requirements for Ties.		Pending Recommendation from Structure and Design Subcommittee.
232	3280.105 Exit facilities; exterior doors		Pending Recommendation from Structure and Design Subcommittee.
233	3282.207(f)		Pending Recommendation from Regulatory Enforcement Subcommittee.
234	3282.362(e)		Pending Recommendation from Regulatory Enforcement Subcommittee.
235	3280.212(C)(1)		Pending Recommendation from Structure and Design Subcommittee.

## Proposed Changes 2024-2025 Cycle

<b>Log 227 - § 3280.703 Minimum standards</b>		<b>Date: 05/04/2022</b>
<b>Submitter:</b>	Travis Shivley	
<b>Requested Action:</b>	New Text	
<b>Proposed Change:</b>	<p><b>§3280.703 Minimum standards.</b></p> <p>Heating, cooling and fuel burning appliances and systems in manufactured homes shall be free of defects, and shall conform to applicable standards in the following table unless otherwise specified in this standard. (See <a href="#">§ 3280.4</a>)When more than one standard is referenced, compliance with any one such standard shall meet the requirements of this standard.</p> <p><b>Appliances</b></p> <p>Heating and Cooling Equipment, Second Edition, with 1999 revisions - UL 1995, 1995.</p> <p>Liquid Fuel-Burning Heating Appliances for Manufactured Homes and Recreational Vehicles, Seventh Edition, with 1997 revisions - UL 307A-1995.</p> <p>Fixed and Location-Dedicated Electric Room Heaters, Second Edition, with 1998 revisions - UL 2021-1997.</p> <p>Electric Baseboard Heating Equipment, Fourth Edition, with 1998 revisions - UL 1042-1994.</p> <p>Electric Central Air Heating Equipment - UL 1096-Fourth Edition-1986 with revisions July 16, 1986, and January 30, 1988.</p> <p>Gas Burning Heating Appliances for Manufactured Homes and Recreational Vehicles, Fourth Edition, with 1998revisions - UL 307B-1995.</p> <p>Gas Clothes Dryers Volume 1, Type 1Clothes Dryers - ANSI Z21.5.1-/CSA 7.1-M99 - 1999 with Addendum Z21.5.1a-1999.</p> <p>Gas Fired Absorption Summer Air Conditioning Appliances - ANSI Z21.40.1/CGA 2.91-M961996.</p> <p>Gas-Fired Central Furnaces (Except Direct Vent System Central Furnaces) - ANSI Z21.47-1990 with AddendumZ21.47a-1990 and Z21.47b-1992.</p> <p>Decorative Gas Appliances for Installation in Solid Fuel Burning Fireplaces - RADCO DS-010-91 (incorporated by reference, see <a href="#">§ 3280.4</a>).</p> <p>Household Cooking Gas Appliances -ANSI Z21.1-2000.</p> <p>Refrigerators Using Gas Fuel - ANSIZ21.19-1990, with Addendum ANSI Z21.19a-1992 and Z21.19b-1995.</p> <p>Gas Water Heaters - Volume 1,Storage Water Heaters with Input Ratings of 75,000 BTU per hour or Less - ANSIZ21.10.1-1998 with Addendum Z21.10.1a-2000.</p>	

	Household Electric Storage Tank Water Heaters, Tenth Edition - UL 174-1996, with 1997 revisions.  <u>Household And Similar Electrical Appliances – Safety – Part 2-40: Particular Requirements for Electrical Heat Pumps, Air- Conditioners and Dehumidifiers, Third Edition – UL 60335-2-40-2019</u>
<b>Reason:</b>	The purpose for this revision is for HUD to clarify in their Manufactured Home Construction and Safety Standards that heat pump water heaters are permitted to be installed in new manufactured homes. These products are hybrid water heater utilizing a residential electric water heater in combination with heat pump technology for added efficiency. Heat pump water heaters are ENERGY STAR rated for maximum efficiency over standard electric water heaters. The applicable UL safety standard for heat pump water heaters will eventually be UL 60335-2-40 (once this standard becomes effective). By adopting this proposed to change to HUD's Manufactured Home Construction and Safety Standards for Energy Efficiency, the Department would be clarifying that heat pump water heaters are permitted to be installed in newly constructed manufactured homes.
<b>Substantiating Documents:</b>	No
<b>Additional Cost:</b>	No
<b>Cost Benefit Explanation:</b>	This proposal should not represent any cost impacts to the Department.
<b>Subcommittee Recommendation:</b>	
<b>MHCC Action:</b>	
<b>MHCC Modification of Proposed Change:</b>	
<b>MHCC Reason:</b>	
<b>Current Status:</b>	Pending Recommendation from Technical Systems Subcommittee.
<b>Log History:</b>	

<b>Log 228 - § 3282.408, 3282.411 and 3282.412</b>		<b>Date: 01/12/2023</b>
<b>Submitter:</b>	Michael Moglia	
<b>Requested Action:</b>	New Text	
<b>Proposed Change:</b>	<p>Add the following language: 3282.408 Plan of notification required.</p> <p>Add:</p> <p>(1)(a) The SAA of the state where the home is located only when no SAA is present in the state of manufacture; or</p> <p>3282.411 add:</p> <p>(c)Receiving state SAA authority. If an SAA is not present in the state of manufacture, the SAA from the state of home location may take action pursuant to 3282.412. In the event of such action, the SAA who in the state of home location must provide all documentation to the Secretary. The Secretary has the authority to cease such action,</p>	

	<p>however, must provide the SAA that initiated such action as to the reason. In this case, the Secretary must take action.</p> <p>3282.412 revise:</p> <p>(a) Grounds for issuance of preliminary determination. The Secretary or, in accordance with 3282.411, an SAA in the State of manufacture <u>or when no SAA is present in the state of manufacture, the SAA in the state of the location of the home</u>, may issue a Notice of Preliminary Determination when:</p>
<b>Reason:</b>	<p>Current regulations only permit the SAA in the state of manufacture or the Secretary (HUD) when no SAA is present in the state of manufacture to issue a Notice of Preliminary Determination. This notice provides strength to the program which requires manufacturer's that fail to comply with Subpart I of the regulations when a non-compliance, defect, serious defect or immanent safety hazard has been systematically produced in more than one home. When no SAA is present in the state of manufacture, HUD must initiate this action, however with HUD handling multiple states it apparently makes it difficult for their staff to effectively manage these matters and as a result homes do not get corrected or take a lengthy period of time and as a result, unrepaired homes continue to experience the problems or they worsen which can jeopardize the health and safety of the occupants. This provides the SAA in the state where the homes are located additional authority.</p>
<b>Substantiating Documents:</b>	No
<b>Additional Cost:</b>	No
<b>Cost Benefit Explanation:</b>	No additional cost.
<b>Subcommittee Recommendation:</b>	
<b>MHCC Action:</b>	
<b>MHCC Modification of Proposed Change:</b>	
<b>MHCC Reason:</b>	
<b>Current Status:</b>	Pending Recommendation from Regulatory Enforcement Subcommittee.
<b>Log History:</b>	

<b>Log 229 - § 2803.4 Incorporation by reference</b>		<b>Date: 01/20/2023</b>
<b>Submitter:</b>	Robert Parks	
<b>Requested Action:</b>	Revised Text	
<b>Proposed Change:</b>	<p><b>3280.4 Incorporation by reference.</b></p> <p>(a)The specifications, standards, and codes of the following organizations are incorporated by reference in 24 CFR part 3280 (this Standard) pursuant to 5 U.S.C.552(a) and 1 CFR part 51 as though set forth in full <u>as a minimum standard to be met</u>. The incorporation by reference of these standards has been approved by the Director of the Federal Register. If a later <u>newer</u> edition is to be enforced, the Department will publish a notification of change in the FEDERAL REGISTER. <u>The utilization of newer versions of any reference standard will be considered above minimum code compliance and acceptable.</u> These incorporated standards are available for purchase from the organization that developed the standard at the corresponding addresses noted below. Incorporated standards are available for inspection at the Office of Manufactured Housing Program, Manufactured Housing and Construction Standards Division, U.S. Department of Housing and Urban Development, 451 Seventh Street SW, Room B-133,</p>	

	Washington, DC 20410, email <a href="mailto:mhs@hud.gov">mhs@hud.gov</a> . Copies of incorporated standards that are not available from their producer organizations may be obtained from the Office of Manufactured Housing Programs. These standards are also available for inspection at the National Archives and Records Administration(NARA). For information on the availability of this material at NARA, email <a href="mailto:fedreg.legal@nara.gov">fedreg.legal@nara.gov</a> or go to <a href="http://www.archives.gov/federal-register/cfr/ibr-locations.html">www.archives.gov/federal-register/cfr/ibr-locations.html</a> .
<b>Reason:</b>	I believe the changes are self explanatory in natural and clarifies the intent of the code language as setting forth a "minimum" standard. One should not have to have an Alternative Construction letter to build a home better than the minimum code standards.
<b>Substantiating Documents:</b>	No
<b>Additional Cost:</b>	No
<b>Cost Benefit Explanation:</b>	No additional cost related to this proposal
<b>Subcommittee Recommendation:</b>	
<b>MHCC Action:</b>	
<b>MHCC Modification of Proposed Change:</b>	
<b>MHCC Reason:</b>	
<b>Current Status:</b>	Pending Recommendation from Structure and Design Subcommittee.
<b>Log History:</b>	

<b>Log 230 - § 3286 - Subpart F</b>		<b>Date: 03/09/2023</b>
<b>Submitter:</b>	Michael Moglia	
<b>Requested Action:</b>	New Text	
<b>Proposed Change:</b>	<p><b>Addition:</b></p> <p><b>§3286.502 – Exemption of Third-Party Inspector Verification</b></p> <p><b><i>In a state that has adopted a uniform building code which requires the permitting and inspection of all residential construction, including manufactured homes, the third-party inspector verification requirements are exempt from this subpart when;</i></b></p> <p>a. <b><i>The state is an approved State Administrative Agency (SAA) and monitors the installation of manufactured homes installed in their state as provided in the State Plan, per to §3282.303(c).</i></b></p>	
<b>Reason:</b>	In the Commonwealth of Pennsylvania as well as other states, all residential construction is required to be issued a building permit and occupancy permit by the local authority. These ICC certified code officials are trained by the SAA and perform inspections on all manufactured homes. This will reduce the cost of installation while assuring manufactured home installations meet the manufacturers approved designs as well as provide consumer protection through the monitoring by the approved State Administrative Agency and additional regulatory requirements already established under 24 CFR Part 3282 - Subpart I.	
<b>Substantiating Documents:</b>	No	
<b>Additional Cost:</b>	No	
<b>Cost Benefit Explanation:</b>	Costs for the inspection verification ranges from \$350 to \$1,200. This expense will not longer be required.	

<b>Subcommittee Recommendation:</b>	
<b>MHCC Action:</b>	
<b>MHCC Modification of Proposed Change:</b>	
<b>MHCC Reason:</b>	
<b>Current Status:</b>	Pending Recommendation from Regulatory Enforcement Subcommittee.
<b>Log History:</b>	

<b>Log 231 - § 3280.306 (d) Requirements for Ties.</b>		<b>Date: 04/13/2023</b>
<b>Submitter:</b>	Steve Pinckard	
<b>Requested Action:</b>	Revised Text	
<b>Proposed Change:</b>	<p>3280.306 Windstorm Protection</p> <p>(d) Requirements for ties.</p> <p>Manufactured homes in Wind Zone I require <del>only</del> diagonal ties. These ties shall be placed along the main frame and below the outer side walls. All manufactured homes designed to be located in Wind Zones II and III shall have a vertical tie installed at each diagonal tie location.</p> <p>Manufactured homes in Wind Zone I require diagonal ties. These ties shall be placed along the mainframe and below the outer side walls. All manufactured homes designed to be located in Wind Zones II and III shall have a vertical tie installed at each diagonal tie location.</p>	
<b>Reason:</b>	The current installation requirements, in high wind event regions, does not provide sufficient uplift force resistance to preserve installation integrity and maintain the structure on the concrete block foundation.	
<b>Substantiating Documents:</b>	No	
<b>Additional Cost:</b>	No	
<b>Cost Benefit Explanation:</b>	By eliminating the word “only”, States located in high wind event regions may require additional anchoring to increase uplift protection, greatly reduce the risk of death or injury to consumers living in manufactured homes and protect the structural integrity of manufactured homes located in extreme wind event regions of the country.	

<b>Subcommittee Recommendation:</b>	
<b>MHCC Action:</b>	
<b>MHCC Modification of Proposed Change:</b>	
<b>MHCC Reason:</b>	
<b>Current Status:</b>	Pending Recommendation from Structure and Design Subcommittee.
<b>Log History:</b>	

<b>Log 232 - § 3280.105 Exit facilities; exterior doors</b>		<b>Date: 06/30/2023</b>
<b>Submitter:</b>	Michael Moglia	
<b>Requested Action:</b>	New Text	



<p><b>Proposed Change:</b></p>	<p><a href="#"><u>§ 3280.105 Exit facilities; exterior doors.</u></a></p> <p>(a) <b><i>Number and location of exterior doors.</i></b> <u>Manufactured homes with two or more rooms designed for sleeping shall have a minimum of two exterior doors located remote from each other.</u></p> <p>(1) Required egress doors shall not be located in rooms where a lockable interior door must be used in order to exit.</p> <p>(2) In order for exit doors to be considered <i>remote</i> from each other, they must comply with all of the following:</p> <p>(i) Both of the required doors must not be in the same room or in a group of rooms which are not defined by fixed walls.</p> <p>(ii) <b><i>Single-section units, with more than one room designed for sleeping.</i></b> Doors may not be less than 12 ft. c-c from each other as measured in any straight line direction regardless of the length of path of travel between doors.</p> <p>(iii) <b><i>Multi-Sectional-units.</i></b> Doors may not be less than 20 ft. c-c from each other as measured in any straight line direction regardless of the length of path of travel between doors.</p> <p>(iv) One of the required exit doors must be accessible from the doorway of each bedroom without traveling more than 35 feet. The travel distance to the exit door must be measured on the floor or other walking surface along the center-line of the natural and unobstructed path of travel starting at the center of the bedroom door, curving around any corners or permanent obstructions with a one-foot clearance from, and ending at, the center of the exit door.</p> <p><b><u>(3) Single-section units with a single room designed for sleeping.</u></b> <u>Manufactured homes with a single room designed for sleeping shall have a minimum of one exterior door. Multi-section homes are excluded.</u></p> <p>(i) <u>The single exterior door must be accessible from the doorway of the bedroom without traveling more than 20 feet. The travel distance to the exit door must be measured on the floor or other walking surface along the center-line of the natural and unobstructed path of travel starting at the center of the bedroom door, curving around any corners or permanent obstructions with a one-foot clearance from, and ending at, the center of the exit door and must meet the requirements of 3280.105(a)(1)</u></p> <p>(ii) <u>The requirements established under 3280.106, Exit facilities; egress windows and devices remain unchanged.</u></p>
<p><b>Reason:</b></p>	<p>The Manufactured Home Construction and Safety Standards define a “dwelling unit” as one or more habitable rooms which are designed to be occupied by one family with facilities for living, sleeping, cooking and eating. It also defines a “manufactured home” as a structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width or 40 body feet or more in length or which when erected on-site is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air-conditioning, and electrical systems contained in the structure. This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and</p>

	complies with the construction and safety standards set forth in this part 3280. The “Tiny Home” industry is attempting to provide transportable dwellings to many Americans, however due to zoning issues and standards used by the industry are not recognized by local authorities prohibit the use of an uncertified “Tiny Home” to be used as a dwelling. State elected officials are now attempting to promote the use of “Tiny Homes” to be used as a full-time single family dwelling to handle the housing shortage. This presents an opportunity for the manufactured housing industry, unfortunately, the only obstacle in providing a smaller manufactured home (yet still 320 sq ft or more) is 3280.105 which establishes the requirements for exit facilities and exterior doors as two exterior doors are required for a manufactured home.
<b>Substantiating Documents:</b>	No
<b>Additional Cost:</b>	No
<b>Cost Benefit Explanation:</b>	No additional costs.
<b>Subcommittee Recommendation:</b>	
<b>MHCC Action:</b>	
<b>MHCC Modification of Proposed Change:</b>	
<b>MHCC Reason:</b>	
<b>Current Status:</b>	Pending Recommendation from Structure and Design Subcommittee.
<b>Log History:</b>	

<b>Log 233 - § 3282.207(f)</b>		<b>Date: 08/08/2023</b>
<b>Submitter:</b>	Michael Moglia	
<b>Requested Action:</b>	Revised Text	
<b>Proposed Change:</b>	Add the additional language: (f) If a consumer manual or a change or revision to a manual does not substantially comply with the guidelines issued by HUD, the manufacturer shall cease distribution of the consumer manual and shall provide a corrected manual for each manufactured home for which the inadequate or incorrect manual or revision was provided. A manual substantially complies with the guidelines if it includes the language in paragraph (e) of this section and presents current material on each of the subjects covered in the guidelines in sufficient detail to inform consumers about the operation, maintenance, <u>obtaining customer service</u> and repair of manufactured homes. An updated copy of guidelines published in the Federal Register on March 15, 1996, can be obtained by contacting the Office of Manufactured Housing and Regulatory Functions, Department of Housing and Urban Development, 451 Seventh Street, SW., Washington, DC, 20410; the Information Center, Department of Housing and Urban Development, Room 1202, 451 Seventh Street, SW., Washington, DC, 20410; or any HUD Area or State Office.	
<b>Reason:</b>	Manufacturers provide conflicting information in the consumer manuals and need to clarify how to obtain service for failures in which the manufacturer may be responsible for. Current language in consumer manuals often refer to warranties and deter consumers from contacting the manufacturers. Retailers have also illustrated the same issue.	
<b>Substantiating Documents:</b>	No	
<b>Additional Cost:</b>	No	
<b>Cost Benefit Explanation:</b>	No additional costs.	

<b>Subcommittee Recommendation:</b>	
<b>MHCC Action:</b>	
<b>MHCC Modification of Proposed Change:</b>	
<b>MHCC Reason:</b>	
<b>Current Status:</b>	Pending Recommendation from Regulatory Enforcement Subcommittee.
<b>Log History:</b>	

<b>Log 234 - § 3282.362(e)</b>		<b>Date: 08/08/2023</b>
<b>Submitter:</b>	Michael Moglia	
<b>Requested Action:</b>	New Text	
<b>Proposed Change:</b>	<p>Change: 3282.362(e) to: Review of Consumer Manuals.  The IPIA in each manufacturing plant must perform a annual review of the consumer manual which is provided in each manufactured home. The IPIA must determine if the consumer manual complies with 3282.207 and determine if any information contained within the consumer manual conflicts with additional regulatory requirements.</p> <p>Current language identified in 3282.362(e) and (e)(2) will now be addressed in a new section, 2832.362(f) and (f)(2).</p>	
<b>Reason:</b>	Consumer manuals are often outdated and provide conflicting information to consumers. Outdated information can be SAA contact information and outdated regulatory information. Conflicting information regarding "warranties" is often provided which interferes with information being forwarded to the manufacturers.	
<b>Substantiating Documents:</b>	No	
<b>Additional Cost:</b>	Unknown	
<b>Cost Benefit Explanation:</b>	Only additional costs may be the time for the IPIA to perform the review of the consumer manual.	
<b>Subcommittee Recommendation:</b>		
<b>MHCC Action:</b>		
<b>MHCC Modification of Proposed Change:</b>		
<b>MHCC Reason:</b>		
<b>Current Status:</b>	Pending Recommendation from Regulatory Enforcement Subcommittee.	
<b>Log History:</b>		

<b>Log 235 - § 3280.212(C)(1)</b>		<b>Date: 09/12/2023</b>
<b>Submitter:</b>	Kelly Newcomer	
<b>Requested Action:</b>	New Text	
<b>Proposed Change:</b>	<p>1. Requested Action: Revise 3280.212(c)(1) to read as follows:  <b>§3280.212 Factory constructed or site- built attached garages.</b>  ....  (1)The garage must be separated from the manufactured home and its attic by not less than ½ -inch gypsum board or equivalent applied to the garage side of the manufactured home, separation shall be from the underside of the floor to the</p>	

	underside of the roof deck and may be provided on-site as part of an On-Site Completion of Construction approval. <u>Separation may stop at ½-inch gypsum garage ceiling when interior of garage is completely enclosed by ½- inch gypsum or equivalent.</u> Garages beneath habitable rooms must be separated from all habitable rooms by 5/8 - inch, Type X gypsum board or equivalent. Where the separation is a floor ceiling assembly, the structure supporting these paration must also be protected by not less than ½ -inch gypsum board or equivalent. The design approval and the manufacturer's installation instructions must also include provision for equivalent vertical or horizontal separation between the garage and the manufactured home as appropriate.
<b>Reason:</b>	Garages are often inset into floor plans in a manner that would require separation gypsum to extend in areas where there are not vertical framing members for attachment (see attached example). Allowing the separation gypsum to terminate at ½” gypsum garage ceiling will often save time and construction cost. Current regulation does not recognize this commonly used and accepted method in IRC. Since garages are typically constructed on-site many builders are accustom at stopping separation wall at the garage ceiling in conformance with IRC and locally approved practice and therefore the addition of the proposed sentence better align with national recognized code and reduce failed Site Completion inspections. The International Residential Code (IRC) allows garage to dwelling separation to stop either at roof decking or at ½” gypsum garage ceiling. Adding the proposed sentence would better align with IRC requirements which are nationally recognized (see attached R302.6 from 2021 IRC. Addendum Example of typical garage placement: see email 9-12-23
<b>Substantiating Documents:</b>	Yes
<b>Additional Cost:</b>	No
<b>Cost Benefit Explanation:</b>	The Proposal would save cost, resources, duplicated effort and remove redundant fire / smoke protective structures.
<b>Subcommittee Recommendation:</b>	
<b>MHCC Action:</b>	
<b>MHCC Modification of Proposed Change:</b>	
<b>MHCC Reason:</b>	
<b>Current Status:</b>	Pending Recommendation from Structure and Design Subcommittee.
<b>Log History:</b>	



## MANUFACTURED HOUSING CONSENSUS COMMITTEE

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1.888.602.4663 | [MHCC@HUD.GOV](mailto:MHCC@HUD.GOV) | [MHCC@HOMEINNOVATION.COM](mailto:MHCC@HOMEINNOVATION.COM)

# Log 235 Substantiating Documents

MHCC – Proposal

Date: 8-31-2023

Submitter Name: Kelly Newcomer Tel. No. 317-800-2508

Company: Clayton Home Building Group

Street Address: 5000 Clayton Road, Maryville, TN 37804 Email: [Kelly.Newcomer@ClaytonHomes.com](mailto:Kelly.Newcomer@ClaytonHomes.com)

1. MHCC Document Title / CFR Section Title: 3280.212(c)(1)
2. Requested Action: Revise 3280.212(c)(1) to read as follows:

**§3280.212 Factory constructed or site- built attached garages.**

....

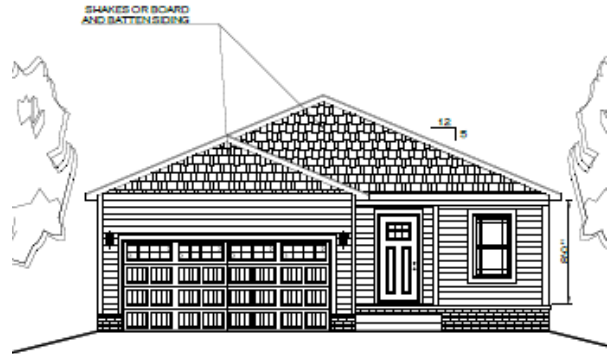
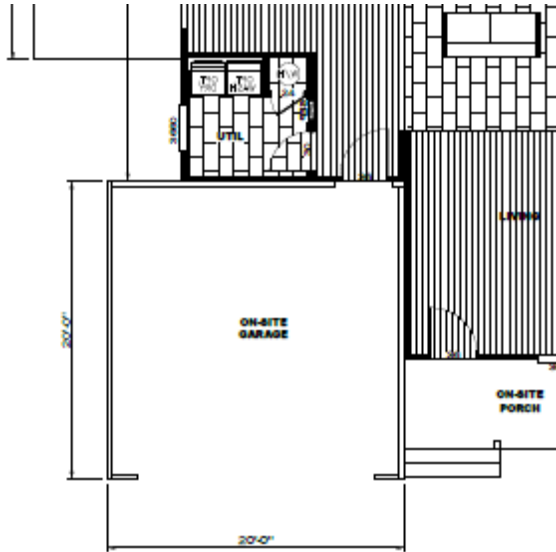
(1) The garage must be separated from the manufactured home and its attic by not less than ½ -inch gypsum board or equivalent applied to the garage side of the manufactured home, separation shall be from the underside of the floor to the underside of the roof deck and may be provided on-site as part of an On-Site Completion of Construction approval. Separation may stop at ½-inch gypsum garage ceiling when interior of garage is completely enclosed by ½- inch gypsum or equivalent. Garages beneath habitable rooms must be separated from all habitable rooms by 5/8 - inch, Type X gypsum board or equivalent. Where the separation is a floor ceiling assembly, the structure supporting the separation must also be protected by not less than ½ -inch gypsum board or equivalent. The design approval and the manufacturer's installation instructions must also include provision for equivalent vertical or horizontal separation between the garage and the manufactured home as appropriate.

3. **Reason:** Garages are often inset into floor plans in a manner that would require separation gypsum to extend in areas where there are not vertical framing members for attachment (see attached example). Allowing the separation gypsum to terminate at ½” gypsum garage ceiling will often save time and construction cost. Current regulation does not recognize this commonly used and accepted method in IRC. Since garages are typically constructed on-site many builders are accustom at stopping separation wall at the garage ceiling in conformance with IRC and locally approved practice and therefore the addition of the proposed sentence better align with national recognized code and reduce failed Site Completion inspections.
4. **Substantiation:** The International Residential Code (IRC) allows garage to dwelling separation to stop either at roof decking or at ½” gypsum garage ceiling. Adding the proposed sentence would better align with IRC requirements which are nationally recognized (see attached R302.6 from 2021 IRC).

5. Statement is original Proposal
6. The Proposal would save cost, resources, duplicated effort and remove redundant fire / smoke protective structures.

## Addendum

### Example of typical garage placement:



### Substantiation: The following is from the 2018 IRC

#### R302.6 Dwelling-garage fire separation.

The garage shall be separated as required by Table R302.6. Openings in garage walls shall comply with Section R302.5. Attachment of gypsum board shall comply with Table R702.3.5. The wall separation provisions of Table R302.6 shall not apply to garage walls that are perpendicular to the adjacent *dwelling unit* wall.

TABLE R302.6 DWELLING-GARAGE SEPARATION

SEPARATION	MATERIAL
From the residence and attics	Not less than 1/2-inch gypsum board or equivalent applied to the garage side
From habitable rooms above the garage	Not less than 5/8-inch Type X gypsum board or equivalent
Structure(s) supporting floor/ceiling assemblies used for separation required by this section	Not less than 1/2-inch gypsum board or equivalent
Garages located less than 3 feet from a dwelling unit on the same lot	Not less than 1/2-inch gypsum board or equivalent applied to the interior side of exterior walls that are within this area

For SI: 1 inch = 25.4 mm, 1 foot = 304.8 mm.