



MANUFACTURED HOUSING CONSENSUS COMMITTEE

1.888.602.4663 | MHCC@HUD.GOV | MHCC@HOMEINNOVATION.COM

DRAFT MINUTES MHCC STRUCTURE AND DESIGN SUBCOMMITTEE MEETING

November 12, 2020

DRAFT MINUTES

MANUFACTURED HOUSING CONSENSUS COMMITTEE (MHCC) STRUCTURE & DESIGN SUBCOMMITTEE MEETING

November 12, 2020

Call to Order

The Manufactured Housing Consensus Committee (MHCC) Structure and Design Subcommittee meeting was held on Thursday, November 12, 2020 via Zoom teleconference. Subcommittee Chair, Cameron Tomasbi, called the meeting to order at 10:05 a.m. Kevin Kauffman, Administering Organization (AO) Home Innovation Research Labs, called the roll and announced that a quorum was present. See [Appendix A](#) for a list of meeting participants.

Introduction and Opening Remarks

Teresa Payne, Administrator of the Office of Manufactured Housing Programs, and Designated Federal Officer (DFO), welcomed the MHCC members to the teleconference. DFO Payne informed the MHCC members and public that HUD Secretary Dr. Carson contracted COVID-19. DFO Payne offered a speedy recovery to Secretary Dr. Carson. DFO Payne and MHCC members offered condolences and remembered former MHCC Chair Tommy Colley and his contribution to the industry. Mr. Colley passed away earlier this year.

DFO Payne thanked the Manufactured Housing Institute (MHI) and Manufactured Housing Association for Regulatory Reform (MHARR) for their written public comments. See [Appendix B](#).

DFO Payne introduced new HUD staff member - Charles Ekiert. DFO Payne informed the members about Dana Wade's Op-Ed in the National Mortgage Magazine about manufactured housing.

Approval of the Minutes

Motion to approve the October 30, 2019 MHCC Structure and Design Subcommittee meeting minutes.

Maker: Jim Husom

Second: Russell Watson

The motion carried unanimously.

Public Comments Period

The public comments during this period focused on the Log Items assigned to the Subcommittee.

Leslie Gooch, MHI, thanked HUD and the Subcommittee for the opportunity to provide feedback for this teleconference. Ms. Gooch requested the HUD Code to be regularly updated and asked to elevate the Office of Manufactured Housing to be on par with other HUD housing programs. MHI had submitted two Log Items – Log 220 and Log 221 and requested the Subcommittee to approve these items. Ms. Gooch was pleased to hear about Dana Wade's article in the National Mortgage Magazine.

Mark Weiss, (MHARR), objected to the limited amount of time for Public Comment Period in this teleconference. Mr. Weiss requested action on Log 210 which is an important issue. He urged HUD to push through the Log Items that have already been approved by the MHCC.

Log Items Assigned to Structure & Design Subcommittee

The Subcommittee worked on the assigned Log Items. The Subcommittee Chair introduced each Log Item and opened the floor for discussion.

LOG 207: § 3280.305(c)(4) Map

Subcommittee Motion: Disapprove

Maker: Russell Watson Second: Aaron Howard

The motion carried unanimously via voice vote.

Subcommittee Chair Tomasbi provided some background on the item. Mr. Tomasbi stated it would be a significant cost jump as this change would ripple out to other areas of the house potentially affecting their costs as well. There is a difference between the standard snow loads and the HUD code snow loads. Manuel Santana pointed out that there is already a mechanism in the HUD code to increase load if there is a demonstrated need based on evidence.

LOG 208: § 3280.904(b)(3) Chassis

Subcommittee Motion: Disapprove

Maker: Manuel Santana Second: Rita Diienno

The motion carried unanimously via voice vote.

The submitter of the Log Item, Michael Moglia, presented that there is a rusting issue with open porches. This Log Item intends to bring this problem forward. The Subcommittee disapproved the item however a couple of the MHCC members planned to work with Mr. Moglia to draft language to resolve this issue within the HUD code.

LOG 210: 24 CFR 3280 Subpart C Fire Safety

Subcommittee Motion: Disapprove

Maker: Cameron Tomasbi Second: Manuel Santana

The motion carried unanimously via voice vote.

CO detectors are part of the third set of standards being processed by HUD.

LOG 213: § 3280.6 Serial Number

Subcommittee Motion: Approve

Maker: Joseph Sadler Second: Dave Anderson

The motion carried via voice vote with 1 opposed.

The Subcommittee discussed the location of the serial number stamped on the frame. And there was consensus on the importance of the stamp and its location.

LOG 215: § 3280.305(g)(6) Floors

Subcommittee Motion: Disapprove

Maker: Cameron Tomasbi Second: Aaron Howard

The motion carried via voice vote with 1 opposed.

The Subcommittee debated on whether the proposed code language would prohibit use of certain patch products that perform adequately.

LOG 217: § 3280.6 Serial Number
Subcommittee Motion: Disapprove
Maker: Joseph Sadler Second: Rita Diienzo
The motion carried unanimously via voice vote.

LOG 220: § 3280.107—Interior Privacy
Subcommittee Motion: Approve as Modified
Maker: Manuel Santana Second: Rita Diienzo
The motion carried unanimously via voice vote.

The Subcommittee worked on wordsmithing the Log Item to ensure privacy locks are part of the HUD code.

LOG 221: § 3280.209—Smoke Alarm Requirements
Subcommittee Motion: Disapprove
Maker: Cameron Tomasbi Second: Rita Diienzo
The motion carried unanimously via voice vote.

LUNCH BREAK

LOG 224: § 3285.402(d) Ground anchor installations
Subcommittee Motion: Disapprove
Maker: Aaron Howard Second: Manuel Santana
The motion carried unanimously via voice vote.

Dawson Spano, the submitter, provided background on the Log Item. There is a HUD guidance document (published by HUD’s Office of Policy Development and Research) that recommends 1000 pounds of force in the preload, but that guidance is not reflected in the HUD code. Log 224 requests the guidance to be part of the HUD code. Mr. Santana understood the importance that the anchors and straps are installed properly but opposed to having any sort of tension or preload prescriptive requirement. Subcommittee Chair Tomasbi agreed with the importance of this issue however a one size fits all approach is not appropriate. The Subcommittee members agree with the sentiment of the submitter, but prescriptive preload is not the correct way to solve this problem.

Public Comments Period

Ms. Gooch thanked the Subcommittee member for their time and effort. Mr. Weiss also commented on a similar note. Mr. Weiss requested the written Public Comments to be part of the minutes. See [Appendix B](#).

DFO Payne thanked MHCC members for their work so far and HUD is looking forward to the next meetings.

The MHCC Structure and Design Subcommittee adjourned at 2:52 p.m.

Appendix A: Subcommittee Attendees

| Structure & Design | | |
|---------------------------------------|-----------------|-------------------|
| 3280 Subpart A, B, C, D, E, J | | |
| | Name | Attendance |
| Users | Dave Anderson | Y |
| | Rita Diienzo | Y |
| | Loretta Dibble | |
| | Russell Watson | Y |
| Producers | Robert Garcia | Y |
| | Manuel Santana | Y |
| | Peter James | |
| | Cameron Tomasbi | Y |
| General Interest / Public Official | Joseph Sadler | Y |
| | James Husom | Y |
| | Aaron Howard | Y |
| | Robert Parks | |

HUD Staff

Teresa Payne, DFO
 Jason McJury
 Barton Shapiro
 Demetress Stringfield
 Angelo Wallace
 Charles Ekiert
 Alan Field
 Leo Huott

AO Staff, Home Innovation Research Labs

Kevin Kauffman
 Nay Shah

MHCC Members

Alan Spencer
 Robert Garcia
 David Tompos
 Michael Moglia
 Mitchel Baker

Public

Dawson Spano
 Drew Petrushka
 William Sherman
 Kara Beigay
 Leslie Gooch
 Mark Weiss
 Benjamin Brantley
 Devin Leary-Hanebrink



MANUFACTURED HOUSING CONSENSUS COMMITTEE

1.888.602.4663 | MHCC@HUD.GOV | MHCC@HOMEINNOVATION.COM

Appendix B: Written Public Comments

DRAFT



Manufactured Housing Association for Regulatory Reform

1331 Pennsylvania Avenue, NW • Suite 512 • Washington, DC 20004 • 202-783-4087 • Fax 202-783-4075 • mharrdg@aol.com

November 4, 2020

VIA FEDERAL EXPRESS AND ELECTRONIC SUBMISSION

Manufactured Housing Consensus Committee
C/O Home Innovation Research Labs
Administering Organization
400 Prince George's Boulevard
Upper Marlboro, Maryland 20774

Re: Log Items Scheduled for Review -- November 12, 2020
MHCC Structure and Design Subcommittee Meeting

Dear Members of the MHCC Structure and Design Subcommittee:

The Manufactured Housing Association for Regulatory Reform (MHARR) submits the following comments to the Structure and Design Subcommittee of the Manufactured Housing Consensus Committee (MHCC), regarding the Log Items scheduled for discussion at the Subcommittee's November 12, 2020 meeting, as announced in the Federal Register on October 26, 2020. MHARR is a national trade association representing smaller and medium-sized producers of manufactured housing subject to federal regulation pursuant to the National Manufactured Housing Construction and Safety Standards Act of 1974, as amended by the Manufactured Housing Improvement Act of 2000.

I. INTRODUCTION

The Manufactured Housing Consensus Committee (MHCC) was established by Congress as the centerpiece reform of the Manufactured Housing Improvement Act of 2000. Its function, as is made clear both by its composition and by its express statutory duties and responsibilities, is not merely "technical" in nature. While an analysis of the technical merit of any proposal is certainly *part* of the MHCC's statutory function, its duties and functions extend much further, to a consideration of: (1) whether a proposal serves to advance the statutory objectives of the 2000 reform law (42 U.S.C. 5401)¹; (2) an analysis of the probable effect of the proposed standard, regulation or interpretation on the "cost of the manufactured home to the public" (42 U.S.C.

¹ The law states, in relevant part: "The purposes of this title are – (1) to protect the quality, durability, safety and affordability of manufactured homes [and] (2) to facilitate the availability of affordable manufactured homes and to increase homeownership for all Americans."

5304(e)(4))²; and (3) whether the benefits of any such proposal outweigh its costs and its likely impact on the “availability of affordable manufactured homes.” (42 U.S.C. 5401(b)(2)). MHCC consideration of *any* proposal, therefore, involves not just an analysis of technical merit, but also a balancing of whether a proposal, even if technically sound, would produce negative cost impacts that would override its value in connection with a type of housing that, as a matter of federal policy, is – and must remain – inherently affordable for every American and, particularly, lower and moderate-income homebuyers.

Based on this statutory formulation, which is *mandatory* for both the MHCC (including subcommittees) and HUD, MHARR offers the following comments on the Log Items scheduled for review at the November 12, 2020 Structure and Design Subcommittee meeting.

II. COMMENTS

A. Log Item 207 – 24 C.F.R. 3280.305(c)(4) – Snow Load Map

It is unclear whether this Log Item calls for replacement of the current 40 PSF (North), 30 PSF (Middle) and 20 PSF (South) snow load requirements with 42 PSF and 35 PSF snow loads to “match the Minnesota State Code requirement,” or whether it is possibly seeking to change only the 20 and 30 PSF criteria respectively. In either event, this Log Item should be rejected for at least four reasons: (1) it provides no cost information and, therefore, no cost benefit analysis in accordance with 42 U.S.C. 5403(e)(4); (2) it provides no specific evidence of manufactured home roof failures due to snow loads above the required parameters; (3) it provides no evidence supporting the higher parameters in all three areas (North, Middle and South); and (4) the HUD standards are a “floor” standard – manufacturers can provide and homebuyers can obtain higher snow load capacities as optional features. Mandating Minnesota snow load requirements for all snow map areas would be clearly excessive and unnecessarily costly.³

B. Log Item 208 – 24 C.F.R. 3280.904(b)(3) -- Chassis

This Log Item call for the inclusion of unspecified “additional methods to protect against deformation of” the home’s “finish, when a recessed porch area is constructed with the home.” The proposal, however, does not state what those “additional methods” would be, or provide information as to their cost, or provide an analysis of their cost-benefit. Consequently, MHARR opposes this Log Item as stated, and it should be rejected as stated by the Subcommittee.

² The law provides, in relevant part: “The consensus committee, in recommending standards, regulations and interpretations ... shall: *** (4) consider the probable effect of such standard on the cost of the manufactured home to the public

³ The law addresses this as well, stating, in relevant part: “The consensus committee, in recommending standards, regulations and interpretations ... shall (3) consider whether any ... proposed standard is reasonable for the particular type of manufactured home or for the geographic region for which it is prescribed.” (Emphasis added).

C. Log Item 210 – 24 C.F.R. 3280 Subpart C – Fire Safety

This Log Item would add a requirement for Carbon Monoxide alarms to the Part 3280 manufactured housing standards. Assuming that the stated cost information is validated and no other or additional costs are entailed, MHARR has no objection to this proposal. The proposal should be clarified, however, to specify that the “manufacturer’s instructions” referenced in proposed section 3280.211 (a) are the “alarm manufacturer’s instructions.”

D. Log Item 213 – 24 C.F.R. 3280.6 – Serial Number

This Log Item would require that the home serial number be stamped on the “inside of” the foremost cross member in order to ensure that the number is visible in homes installed on full foundations. Assuming that this requirement would have no cost impact, as stated, MHARR has no objection to this proposal.

E. Log Item 215 – 24 C.F.R. 3280.305(g)(6) -- Floors

This Log Item would add a provision requiring that bottom board patches “include an adhesive seal and be mechanically fastened every 4”-6” around the entire perimeter.” Currently, the standard provides only that “Patch installation instruction[s] shall be included in the manufactured home manufacturer’s instructions.” Because of the way that the proposal is stated, it is unclear whether the additional language would require: (1) that the manufacturer include the additional proposed language regarding an “adhesive seal” and “mechanical fastening” in the manufacturer’s installation instructions; or (2) whether the additional proposed language would require some other additional action by the manufacturer as part of the construction process; or (3) would require some action by the homeowner or a person other than the manufacturer. Regardless, however, MHARR opposes this proposal. First, in the event that this proposal involves only a prescriptive instruction in the manufacturer’s home instructions, it is not shown whether the methodology required would be appropriate for all homes or the most cost-effective approach for every home. An across-the-board prescriptive mandate of this sort would be inconsistent with the performance-based nature of the standards. Second, in the event that the proposal requirement would mandate additional action by the manufacturer in the factory, there is no evidence, again, that an across-the-board prescriptive mandate is appropriate or warranted for every home and/or every patch situation. Third, to the extent that this proposal would require some post-production action by a homeowner or repair provider (other than a manufactured home retailer), there is no statutory basis for the assertion of HUD regulatory jurisdiction over such persons.

F. Log Item 217 – 24 C.F.R. 3280.6 – Wind Zone Certification

This Log Item would require that the wind zone, thermal zone and roof load zone parameters for each home be stamped into the foremost cross member of each home in 3/8” minimum height. Assuming that this requirement would have no cost impact, as stated, MHARR has no objection to this proposal.

G. Log Item 220 – 24 C.F.R. 3280.107 – Interior Privacy

This Log Item would eliminate the existing privacy lock requirement for “bathroom and toilet compartment doors.” Insofar as this change would provide both manufacturers and consumers with additional design options and, assuming that this change would have no cost impact, as stated, MHARR has no objection to this proposal.

H. Log Item 221 – 24 C.F.R. 3280.209 – Smoke Alarm Requirements

This Log Item would allow combination smoke and carbon monoxide alarms to be used “in lieu of smoke alarms.” Such a provision, as well as a provision for UL listing are already contained in Log Item 210. Consequently, if Log Item 210 is approved for recommendation, this Log Item would become superfluous.

I. Log Item 224 – 24 C.F.R. 3285.402(d) – Ground Anchor Installations

This Log Item would require a “known anchor preload (1000 lbs.) for each anchor installation.” The proponent states that specifying such an anchor strap tension level would not entail any additional cost. MHARR opposes this proposal as stated. First, there is no evidence presented that the current applicable standard is insufficient or that home installations completed in accordance with the present standard have failed to any significant degree. Second, there is no evidence to show that an across-the-board tensioning standard of 1000 lbs. would be appropriate for all soil types and/or conditions. Third, the absence of any cost impact resulting from such a standard appears unlikely. Fourth, anchor tensioning criteria should be addressed by the anchor manufacturer in *its* manual, based on relevant factors and criteria, which may vary.

III. CONCLUSION

In accordance with the foregoing, MHARR urges the Structure and Design Subcommittee to reject Log Items 207, 208, 215, 221 and 224. Beyond these proposals, however, MHARR urges the Subcommittee *and the full MHCC* to demand information and an answer from HUD regarding the status of the regulatory reform proposals reviewed and recommended by the MHCC in 2019 (and early 2020). To date, there has been no public action by HUD to follow-up on the extensive and detailed consideration and recommendations provided by the MHCC with respect to those proposals. In accordance with both the 2000 reform law and Executive Orders 13771 and 13777, HUD is *required* to take action with respect to those MHCC recommendations.

Sincerely,



Mark Weiss
President and CEO

cc: Hon. Dana Wade



November 4, 2020

The Honorable Ben Carson
Secretary
U.S. Department of Housing and Urban Development
451 7th Street SW
Washington, D.C. 20410

RE: Notice of a Federal Advisory Committee Meeting; Manufactured Housing Consensus Committee: Structure and Design Subcommittee (Docket No. FR-6237-N-01)

Dear Secretary Carson,

The Manufactured Housing Institute (MHI) is pleased to provide feedback to the U.S. Department of Housing and Urban Development (HUD) and the Manufactured Housing Consensus Committee (MHCC) in response to the request for public comments in preparation for the MHCC's upcoming Structure and Design Subcommittee (the Subcommittee) teleconference.

MHI is the only national trade association that represents every segment of the factory-built housing industry. Our members include home builders, suppliers, retail sellers, lenders, installers, community owners, community operators, and others who serve the industry, as well as 49 affiliated state organizations. In 2019, our industry produced nearly 95,000 homes, accounting for approximately 10 percent of new single-family home starts. These homes are produced by 32 U.S. corporations in 129 plants located across the country. MHI's members are responsible for close to 85 percent of the manufactured homes produced each year.

Ensuring that the HUD Code is regularly updated is critically important to our industry. The HUD Code provides a single regulatory framework for home design and construction of manufactured homes, including standards for health, safety, energy efficiency, and durability. This single Code has enabled manufacturers to ship homes easily across interstate lines and achieve economies of scale that have brought high quality, affordable homes to millions across the country. If the HUD Code is not updated on a consistent basis, our members cannot continue to provide millions of Americans with access to safe, affordable manufactured homes that include the latest innovations, technologies and features that consumers demand. Our industry has also launched a new class of homes known as CrossMod™ that are indistinguishable from site-built homes, and any delay in updating the HUD Code to support this potential solution for providing more attainable homeownership opportunities only hurts prospective homebuyers.

MHI appreciates the efforts of HUD and the MHCC to ensure updates to the HUD Code are appropriate and allow for even greater evolution by our industry. As the Subcommittee reviews the proposed changes for the 2020-2021 HUD Code development cycle, below are MHI's recommendations for the Log Items on the Subcommittee's agenda.

1) Log 207 – 24 C.F.R. § 3280.305(c)(4) – Map (Rick Abbot, Abbott Consulting Forensics & Design)

This Log Item suggests changing the snow load map to align with the Minnesota state code

requirements citing that the current pounds per square foot in the HUD Code are too low and the proposer has witnessed failures as a result.

There is no documented evidence that the cause of the failures witnessed by the proposer requires a change to the standards for roof snow loads outlined in the HUD Code. There are a number of factors that could have led to the situation and MHI recommends that a task group be formed to study the potential problem and whether roof snow load requirements within Minnesota need an update. Pursuant to the current standard, manufactured home builders routinely build homes with greater roof snow loads that reflect the requirements of localities that have higher local snow requirements upon request. It is unclear from the proposal how the current process set forth in the HUD Code should be changed. In addition, because weather patterns are regional it is not wise to make the entire state load requirement a one-size-fits all. While it is important to ensure appropriate roof snow loads, it is also important that such standards fit the weather patterns for the varying snow fall across the state. It is important to note that Minnesota uses the 2018 IRC and ground snow maps which do not directly equate to uniform snow load as used within the HUD Code. It is not clear whether the conversion method indicated within 3280.305(c)(3)(C)(ii) has been utilized by the proposer in making this recommendation. While MHI agrees that the standards should accommodate areas which may experience higher snow loads, we believe the uniform snow load approach as indicated with the standard is the ideal way to reflect differences in snow fall across the country. We also believe that applicable counties must be properly identified for such changes within 3280.305 as part of the proposal. MHI recommends that a task group be formed to review the roof snow requirements within the HUD Code and report back to the Subcommittee with a recommendation about any needed changes to the HUD Code.

2) Log 208 – 24 C.F.R. § 3280.904(b)(3) – Chassis (Michael Moglia, PA Dept. of Community and Economic Development)

This Log Item suggests including additional methods in the HUD Code to protect a chassis' finish when a recessed porch area is constructed with the home. The proposer does not provide any specific direction to the Subcommittee about how to address this issue since no specific technical mark-up of the HUD Code was included. Log Items require a specific language proposal, including mark-up of the existing HUD Code, Reason Statement, and Cost-Benefit Explanation. Each component is critical to ensure that the performance-based building Code is preserved. The referenced section, which is for designing transportation systems, isn't appropriate for protecting finish as proposed and section 3280.305(h)(4)(i)(2) already requires metal frames to be made corrosion resistant or protected against corrosion. MHI recommends the Subcommittee reject this Log Item and ask the proposer to resubmit with the missing information.

**3) Log 210 – 24 C.F.R. § 3280 Subpart C – Fire Safety (Michael Moglia, PA Dept. of Community and Economic Development)
Log 221 - 24 C.F.R. § 3280.209 – Smoke Alarm Requirements (Lesli Gooch, Manufactured Housing Institute)**

These Log Items, one of which MHI submitted, both propose adding language to the HUD Code about carbon monoxide alarms. MHI supports incorporating carbon monoxide requirements into the HUD Code because consumer health and safety should always be a top priority – a position included in our March 31, 2020, comment letter to HUD in response to the Department's proposed amendments to the HUD Code. As part of the proposed amendments to the HUD Code that were

published on January 31, 2020, HUD introduced a new section to Subpart C (Section 3280.211 - Carbon monoxide detector requirements), which would require the installation of carbon monoxide alarms and addresses some of the concerns in these two Log Items. While supporting the inclusion of this new section, MHI recommended several technical changes that we believe will enhance the new regulations.

Because HUD is already in the process of addressing carbon monoxide requirements in the HUD Code, MHI recommends the Subcommittee dispense with these Log Items as “reviewed and considered, no further action needed” with a reason statement that the Subcommittee supports the premise about the need for carbon monoxide requirements to be a part of the Code and urging the finalization of such requirements, as proposed in January with the technical changes proposed by MHI, which are as follows:

Section 3280.211 Carbon Monoxide Requirements. HUD’s proposed carbon monoxide requirements should align more closely with similar requirements in other building codes, such as the International Residential Code. Specifically, MHI’s suggestions include:

- A. Striking the word “detector” wherever it occurs. Alarms and detectors are distinct concepts. Alarms are self-contained, single or multi-station sensing devices that detect a given event and sound an audible (or visual) alarm. Detectors are not self-contained systems. They are sensing devices that must be connected to a separate alarm system. The HUD Code’s new carbon monoxide requirements should be limited to alarms, which are more common and much more practical in residential applications.
- B. Specifying the required locations where carbon monoxide alarms must be installed. For example, alarms should be required outside each separate sleeping area or in the immediate vicinity of any bedrooms.
- C. Requiring interconnectivity between alarms. When more than one alarm is installed in a home, the activation of one alarm should activate all alarms.
- D. Specifying how each alarm must be powered. The home’s electrical system should be the primary power source, with batteries as a secondary, reserve power source.
- E. Clarifying that the HUD Code will allow combination carbon monoxide and smoke alarms. While smoke and carbon monoxide alarms are essential health-safety devices, almost every homeowner considers them to be an unsightly nuisance. To ensure our industry continues to keep pace with consumer demand, HUD should clarify that combination alarms are acceptable. MHI also suggests amending 24 C.F.R. § 3280.209 to ensure the sections cross-reference each other.

- 4) **Log 213 – 24 C.F.R. § 3280.6 – Serial Number (Michael Moglia, PA Dept. of Community and Economic Development)**
Log 217 – 24 C.F.R. § 3280.6 – Serial Number (Joseph Sadler)

These Log Items propose adding and revising language of Part 3280.6 which addresses a manufactured home’s serial number. Log Item 213 suggests revising the current language to require the serial number be stamped into the inside of the foremost cross member, while Log Item 217 suggests adding new language to the serial number including stamping the wind zone, thermal zone and roof load zone after the serial number into the foremost cross member as well.

Similar to site-built homes, homeowners will renovate and upgrade their manufactured homes over the years. Also, homeowners may move their manufactured home to a different neighborhood or community. During this process, the certification label and/or the data plate could be removed or misplaced, which can cause an issue if the homeowner needs to re-issue or replace the title and no longer has access to either of these items. And, if the manufactured home is being moved to a different location, local officials may require proof that the home is built to the correct wind, thermal and roof load zone for that area. If these items are not readily available, it can pose issues for the homeowner.

MHI agrees that homeowners need access to this information. If the current placement poses a challenge as more homes are being placed on full or permanent foundations, the Subcommittee should discuss solutions. As the industry launches its new CrossMod™ homes, which require a permanent foundation to qualify for conventional financing, placing the serial number in a more readily accessible location will be important for homeowners and also helpful for appraisers.

MHI is not opposed to including this information in an additional area of the home. The details could be affixed to a sticker that is placed inside the home's electrical panel box, for instance. When homes are renovated or moved, the electrical panel box is not usually impacted. In addition, this location is much easier for a homeowner to access than crawling underneath the home to locate the information. The placement of this sticker inside the electrical panel box will not only benefit the homeowner in the event the certification label and data plate have been lost and they need to reissue or replace the home title, but will also assure the local jurisdiction that the home is built to meet the wind, thermal, and roof load zones of that area without delay. Ultimately, MHI recommends that a task group be formed to review the issue and report back to the Subcommittee with a recommendation about any needed changes to the HUD Code.

5) Log 215 – 24 C.F.R. § 3280.305(g)(6) – Floors (Robert Parks, Healthy Homes of Louisiana, LLC)

This Log Item seeks to revise language to ensure that repairs to the bottom board material, which is the primary vapor protection for the floor system of a manufactured home, are fixed correctly by suggesting that patches “shall include an adhesive seal and be mechanically fastened every 4” – 6” around the entire perimeter.” MHI understands the issues that can arise for homeowners if a patch is not installed or repaired properly and encourages the MHCC to support this change.

6) Log 220 – 24 C.F.R. § 3280.107 – Interior Privacy (Lesli Gooch, Manufactured Housing Institute)

This Log Item, which MHI submitted, proposes removing the bathroom door privacy lock requirement. Currently, the HUD Code requires all bathroom doors be equipped with a privacy lock that includes a safety release which, in the event of an emergency, disengages the locking mechanism from outside the room. While this requirement has generally not been a problem, interior barn doors present a unique design challenge, and these doors are popular with homebuyers. MHI is recommending that this requirement be repealed. Other contemporary building codes, such as the International Residential Code (IRC), do not require privacy locks on bathroom doors. Instead, whether to install a privacy lock is left to the discretion of the consumer. MHI encourages the MHCC to support this change.

7) Log 224 – 24 C.F.R. § 3285.402(d) – Ground Anchor Installations (Spano Dawson, Profile Home Inspection)

This Log Item suggests adding new text to the HUD Code to provide a “known anchor preload (1,000 lbs.) for each manufactured home anchor installation.” MHI recommends the Subcommittee reject this proposal. The HUD Code contains performance standards and certification requirements for ground anchors and straps, which must be installed and pre-tensioned in accordance with their installation instructions. It is not appropriate for the standard to force prescriptive pre-tensioning on these devices.

When the HUD Code is not regularly updated, it places an inordinate burden on manufacturers, forcing them to navigate an outdated regulatory landscape to simply provide consumers with the latest innovations, technologies, and features they demand. MHI urges HUD and the MHCC to finalize proposed updates to the HUD Code with our suggested enhancements and for the Department to move forward with finalizing the subsequent sets of updates that have been approved by the MHCC but are still pending HUD action. MHI thanks the MHCC for their continuing efforts to update the HUD Code and we look forward to working with HUD and the Committee to implement these changes.

Sincerely,

A handwritten signature in black ink that reads "Lesli Gooch". The signature is written in a cursive, flowing style.

Lesli Gooch, Ph.D.
Chief Executive Officer