

MHCC
Tech Structure and Design
1-25-11

Attendees	
Subcommittee Members	
Tim King (Chair)	Y
Mark Mazz	Y
Bill Stamer	Y
Michael Wade	Y
Frank Walter	Y
Richard Weinert	N
HUD	
Liz Cocke	Y
Rick Mendlen	Y
Eric Bers	Y
Jim Everett, DFO for this call	Y
AO	
Joe Nebbia, NFPA/Newport Partners	Y
Guests	
Scott Oliver, Oliver Technologies	Y
Mark Weiss, MHARR	Y
George Wachter, Minuteman Anchors	Y
Scott Marino, Minuteman Anchors	Y
Newt Chauncey, Tie Down	Y
Alden Spencer, Tyco Fire Protection Products	Y
Lois Starky, MHI	Y
Jeff Lago, Skyline	Y
Mike Zieman Radco	Y
Jack Berger, Berger Reconstruction	Y
Bill Farish, Clayton Homes	Y

Action Items/Highlights

- **Mr. King made a motion** that the subcommittee recommends to the full MHCC that the industry and HUD try over the next two weeks to come up with a clean Crandell document that the industry has marked up so that the Subcommittee can review on the next subcommittee call. **Mr. Stamer seconded the motion.**
 - **Unanimous approval**
- HUD and MHI (with MHARR) requested to meet to try to come to consensus on a ground anchor proposal
- AO to send out Doodle poll for conference call the week of February 21

Discussion

The Technical Structure and Design Subcommittee met from 1:00 p.m. to 3:00 p.m.

HUD requested specific length for the meeting to be set before discussion. 2 hours was set as length of the call.

The chair opened the floor for public comment. No one from the public asked to make a comment.

The Chair opened a discussion of the ground anchor issue – the MHCC is under a 120 day comment period starting November 1 on this issue.

HUD stated that it has a specific proposal before the committee that has been referred to the subcommittee for discussion. The Subcommittee can take action and returned to the committee. The Subcommittee can also take action on the HUD proposal, and can come up with own proposal to bring to the committee. HUD provided a review of the proposal and the history of the issue.

HUD commented that the new proposal from MHI is an improvement, although there may be some differences over some of the details.

The Chair asked MHI to brief the group on the most up to date information. MHI pointed out some aspects of the proposal that they felt were unnecessary. MHI also commented that the classification of soil at installation site was listed as a major issue as something that shouldn't be done as a protocol.

HUD commented that there were 3 options in the HUD proposal, one of which was on-site testing. It was not mandated in the HUD proposal. Page 16 lists the 3 methods with 3 assigned safety factors. MHI is focusing in on the torque method in their proposal – method 2.

MHI did not see a need for alternatives. The torque method is the most commonly used.

Chair asked MHI if alternatives were a problem if no mandate exists. MHI would not have a problem if it was clear that it was an alternative method.

Subcommittee members requested that the group hear from the vendors as it affects them the most.

Several representatives from ground anchor manufacturers commented on certifying an anchor in the site soil classification. In testing anchors, the anchors were not tested in the proper soil. The report only included 5 anchors tested in the proper soil and the proper way. As far as classification of how to test the soil in the 2D report, the soil classifications appear to be wrong. Each anchor is manufactured for specific soil classes. In most cases anchors were tested in 4B soil, which would be a 5 foot anchor.

There was a question from a Subcommittee member on how that skews the protocol. Is it unreasonable to have a HUD contractor come up with a protocol based on that testing?

Industry commented that the torque method is one that everyone can live with.

The Chair asked, assuming that there is no objection with alternatives, has HUD looked at the proposed amendment? How far apart is HUD from the MHI proposal?

HUD commented on the soil conditions tested – the sites were donated and the soil conditions were unknown at the time. The test was not one of soil classification but of evaluation of test method.

Subcommittee member commented that on page 15 of The Crandell doc, paragraphs 7.2 and 7.3 these issues have been challenged. The first has to do with minimum of 6 ground anchors test specimens. For years we've used 3 and averaged them. The second issue is the displacement rate and duration. It says a constant displacement rate of 0.6, where as the other talks about a maximum of 0.6.

The Chair commented that MHI and HUD need to get together and review the proposed changes. A Subcommittee member agreed to getting the two sides as close as possible, and then get final proposals for date certain.

The DFO observed that the committee has arrived at an opinion. Subcommittee does not have to be apologetic asking HUD and MHI to give us a final document.

The Chair asked for agreement from the subcommittee.

MHARR requested that the process be open.

The Chair commented that he did not have a problem, but it would be up to HUD and MHI as they made the proposals

MHI commented that they would be happy to add MHARR to the list. The comments have worked by email so far.

HUD commented that they can't promise that they will have the resources necessary to provide you with what you've requested within the timeframe. It is up to the subcommittee to take action on the HUD proposal within the timeline.

The Chair suggested that the Subcommittee could reject the proposal if they can't get further work done on it before 120 days.

HUD commented that the Subcommittee would need to comment on the reason for rejecting, such as some of the comments from industry. Is the reason "lack of info from HUD" or "need of more discussion?" You'll have to come up with your explanation as to why.

A Subcommittee member commented that the Crandell document is not a clean document. The group needs a cleaner document and then have one or other side mark that up.

Chair comment that the sides are close, and it would be ridiculous to say "no." It is also ridiculous that the subcommittee is on a 120 day clock when the full committee has had years to deal with it. It seems like the parties can get together and come up with a solution.

The DFO suggested that the Subcommittee keep in mind that it's supposed to advise HUD. If there is a problem with how HUD delivered it, ask HUD to correct the problem and send it back.

Question – would sending the proposal back to HUD affect the 120 day time period? The DFO commented that the decision would be made by HUD.

HUD commented that the Subcommittee could recommend that HUD withdraw the proposal and come back to the Subcommittee with something specific that the subcommittee would like. HUD won't promise that it will follow that recommendation, but it is not closed to the idea. HUD is looking for advice, not just a cold vote. The Chair requested a motion from a subcommittee member.

Mr. King made a motion that the subcommittee recommends to the full MHCC that the industry and HUD try over the next two weeks to come up with a clean Crandell document that the industry has marked up so that the Subcommittee can review on the next subcommittee call. **Mr. Stamer seconded the motion.**

Unanimous approval

The Chair brought up further subjects for review.

HUD commented that there are two formal proposals with 120 day deadlines on crawl spaces and sprinklers. The Chair commented that there were two items sent back to the Subcommittee in October.

HUD commented that only two were formal proposals to the MHCC, delegated to the Subcommittee and on the 120 day clock. One action was on sprinklers. The other was on crawl space ventilation.

Sprinklers was on page 55 of 60 from the agenda from October meeting. Crawl spaces are on page 60 of 60. 120 day calendar began on November 1.

There was a suggestion to talk about fire sprinklers. Comment on page 11 of 13 that HUD would defer its proposal until next MHCC meeting on sprinklers, so the 120 day clock would not be on now.

HUD commented that if it hasn't formally been pulled, that is likely. HUD needs legal council before the MHCC can move forward. However it was thought that the Subcommittee had members that would look into items. It was tabled; however it was sent to Subcommittee for analysis. HUD to confirm that 120 day timeline does not apply to this issue. There was a question on what info HUD could use to help make decisions.

A Subcommittee member commented that, at the end of the Subcommittee discussion, in November, the discussion was tabled.

Mr. Walter made a motion to take the sprinkler off the table. **Mr. Mazz seconded the motion.**

Unanimous approval.

There was a comment on the October draft minutes. Page 11 of 13, the second full paragraph. In bold there is a sentence that reads, Mr. Walter moves that the proposal be tabled until MHCC receives info on pre-emption. – the incorrect part is that Mr. Walter did not move to table with the idea that the MHCC would wait until HUD had finished work on pre-emption.

A Subcommittee member asked what the differences in definitions are in the MHI proposal. –What does stand-alone system mean? 1st page of MHI proposal.

MHI answered that there are two different ways to address a system. The multipurpose uses the water already in the house. Stand-alone has own separate water and distribution system.

NFPA 13D shows two diagrams, before and after water meter. The preference is for before the water meter so that there is no reduction with use of fixtures inside.

There was a Subcommittee question on whether this proposal would still require a backflow preventer. – MHI responded that this came directly from the IRC.

Are the exceptions the same? Answer – no, a little different because they take into consideration 3280 regarding gypsum around flammable areas.

Exception 5 – the section referenced does not deal with fire rating. It only deals with flame spread. The rationale was that very few fires start where fuel equipment is. It does model the California requirement.

This goes above and beyond the IRC, which does not require gypsum lining in those spaces.

HUD comment that they are a source of fires, but that there is flame spread protection to contain it.

The Chair asked if there was any more general discussion on sprinklers?

There was a comment that many local jurisdictions are saying no to sprinklers.

There was a comment that HUD has to make a determination just like a local government would on whether they want sprinklers to be going with.

There was a comment that homes are safe enough period, without sprinklers. The group could discuss that first. No one has addressed the issue of low pressure in rural homes.

There was a comment that one thing we are required to do is to look at the cost figures. The group doesn't have enough info on cost. There was further suggestion that sprinklers are not needed in manufactured homes.

MHI commented that this issue has been going on for quite some time. The industry, by manufacturer, voted (everyone but one) for a standard that could be utilized where a jurisdiction required it. The concern is that local site built requirements will not be appropriate for manufactured homes.

There was a comment that a "when" standard exists in the HUD code already. HUD code does not require A/C, but when A/C is required, it has 3 options for the system requirements.

A Subcommittee member commented that it's ridiculous to consider putting them in. However, the industry will have to cross that path, and when it does, the language being worked on is appropriate.

If sprinklers are put together, should we just go in and adopt the national standard such as NFPA 13 D or the MHI proposal, which it sounds like HUD is moving toward?

MHARR commented that MHARR membership oppose sprinklers. Also, HUD does not have the authority to do this. A/C is not a safety standard. The safety standard requires an unreasonable risk. If there is that risk, HUD can adopt the standard. If not, then they cannot. If there is an unreasonable risk, it cannot be an "as needed" standard or "where required" standard only.

MHI commented that on the concern that the original intent was to allow the NFPA 13D standard – it has been modified to allow only references to NFPA 13D standard, but there are inconsistent measures in 13D in comparison with Manufactured Housing practices. It is 13D basically with a couple of exceptions and modifications to adjust for the way our homes are built and sold.

There was suggested wording that sprinklers shall not be required in MH homes, period, in the standard.

There was a comment that the Subcommittee should tell the full MHCC that we are still working on wording.

The Chair commented that he would like the entire MHCC to give guidance on whether they should be required at all. The other comment is that we cannot push this much farther without cost figures.

There was a Subcommittee comment that individuals can comment back to MHI and HUD informally.

The Chair indicated that subcommittee would tell full MHCC that they need to work on this issue more and would like more direction from full MHCC. The other two issues on the agenda the Subcommittee needs to address first at next conference call.

There was a comment that MHI will have a tweak to the fire combustion proposal.

There was a Request that in general, a week before a call is not enough time to review materials.

The Chair will ask the AO to send a Doodle poll out for week of 21st of February.

Chair request that HUD confirm what items are under 120 day limit within the next week.