



MANUFACTURED HOUSING CONSENSUS COMMITTEE

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To: MHCC

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Date: August 10, 2021

Subject: MHCC Letter Ballot IX – Actions as taken at June 10, 2021 MHCC Meeting

Below are the initial results from the letter ballot of actions as taken at the June 10, 2021 MHCC meeting which took place via teleconference.

Ballot IX – Actions as taken at June 10, 2021 MHCC Meeting

21 Members Eligible to Vote

18 Ballots Returned

3 Ballot Not Returned – Luca Brammer, Garold Miller, and Cameron Tomasbi

The number of votes required to pass an item with a 2/3rds majority is based on number of ballots returned minus the number of abstentions. All items on this ballot received at least the required number of affirmative votes, thus all items passed. The committee members will be afforded an opportunity to change their votes based on circulation of the initial voting results and comments received.

The initial voting results are summarized in the table below.

Ballot Item No.	Log No.	Section	MHCC Meeting Action	Affirm	Negative	Abstain
IX-1	Log 195	Subpart M - On-Site Completion of Construction of Manufactured Homes	Approve as Modified	18	0	0
IX-2	Log 207	3280.305(c)(4) Map	Disapprove	18	0	0
IX-3	Log 208	3280.904(b)(3) Chassis	Disapprove	18	0	0
IX-4	Log 209	3282.16(b)(1) Incorporation by reference	Approve	18	0	0
IX-5	Log 210	3280 Subpart C Fire Safety	Disapprove	18	0	0
IX-6	Log 211	3280.715 (a)(4) Airtightness of supply duct systems	Approve as Modified	17	1	0
IX-7	Log 212	3280.709(h) Installation of appliances	Approve as Modified	18	0	0
IX-8	Log 213	3280.6 Serial Number	Approve	18	0	0

Ballot Item No.	Log No.	Section	MHCC Meeting Action	Affirm	Negative	Abstain
IX-9	Log 214	3286 Inspection Requirements	Disapprove	17	1	0
IX-10	Log 215	3280.305(g)(6) Floors	Disapprove	18	0	0
IX-11	Log 217	3280.6	Disapprove	18	0	0
IX-12	Log 218	3285 NFPA 501A Chp 6 2003 Edition	Disapprove	18	0	0
IX-13	Log 219	3280.703 Minimum standards	Approve as Modified	18	0	0
IX-14	Log 220	3280.107—Interior Privacy	Approve as Modified	18	0	0
IX-15	Log 221	3280.209—Smoke Alarm Requirements	Disapprove	18	0	0
IX-16	Log 222	3280.710—Venting, Ventilation, and Combustion Air	Approve	17	1	0
IX-17	Log 223	3280.715—Circulating Air Systems	Approve	18	0	0
IX-18	Log 224	3285.402(d) Ground anchor installations	Disapprove	18	0	0
IX-19	DRC 4	FR6030-N-01 – 24 CFR part 3282 Subpart M.	Review and Considered – No Further Action Required	18	0	0

All comments received are organized by Ballot Item No. and can be seen below.

[Ballot Item IX-6: Log 211 - Section 3280.715 \(a\)\(4\) Airtightness of supply duct systems](#)

MHCC Meeting Action - Approve as Modified (16 Affirm, 1 Negative, and 0 Abstain)

Comment(s) Received – 1

Negative – 1

Michael Moglia: Placing a prescriptive (IRC) requirement on a performance based housing product without additional examination or evaluation to determine the added costs.

[Ballot Item IX-9: Log 214 - Section 3286 Inspection Requirements](#)

MHCC Meeting Action - Disapprove (16 Affirm, 1 Negative, and 0 Abstain)

Comment(s) Received – 1

Negative – 1

Michael Moglia: Site built homes and modular homes only require a single inspection completed by the local code official. The manufactured housing program requires, a licensed installer, most likely a local code official and an inspector verification (3 total inspections) This adds unneeded costs on manufactured homes with no benefit as there is no training mechanism required and no oversight.

[Ballot Item IX-16: Log 222 - Section 3280.710-Venting, Ventilation, and Combustion Air](#)

MHCC Meeting Action - Approve (16 Affirm, 1 Negative, and 0 Abstain)

Comment(s) Received – 1

Negative – 1

Michael Moglia: Although the proposed change may be a good idea, other factors need to be assessed such as whole house ventilation and other exhaust systems. The IRC establishes prescriptive requirements, the MHCCS are performance based.