



MANUFACTURED HOUSING CONSENSUS COMMITTEE

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

Meeting Minutes Manufactured Housing Consensus Committee

September 11-12, 2024

Meeting Minutes

Manufactured Housing Consensus Committee (MHCC)

September 11-12, 2024

Day 1: Wednesday, September 11, 2024

Call to Order

The Manufactured Housing Consensus Committee (MHCC) meeting was held on Wednesday (September 11, 2024) and Thursday (September 12, 2024) at the Hotel Elkhart in Elkhart, Indiana. 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

MHCC members and members of HUD staff present introduced themselves. Teresa Payne, Administrator of the Office of Manufactured Housing Programs, and Designated Federal Officer (DFO) welcomed the committee members and meeting guests, then made administrative announcements. Ms. Payne discussed how great it was to be in Elkhart, Indiana, and indicated the last time she was in Elkhart was in 2009 for the congressional hearing on Title 1. She specifically recognized and thanked all the staff members and contractors that were involved in the planning and preparation of the meeting. Ms. Payne noted on this day 23 years ago, the tragic events of September 11, 2001, took place in New York City and Washington, D.C. There was a moment of silence to recognize all the souls lost that day.

Ms. Payne recognized this year as the 50th anniversary of the National Manufactured Housing Construction and Safety Standards Act of 1974. This act allowed HUD to set standards for all manufactured homes and has stood the test of time. The regulations have evolved over time ensuring that manufactured homes are safe, efficient, and cost-effective housing solution for many Americans. She reminded everyone of a tour of the RV/MH Hall of Fame, the 50th anniversary celebration and networking event directly following today's meeting. She thanked everyone who submitted public comments prior to the meeting and those who have or are planning on participating in the proposed change review and standard update process. She provided a brief background on the five new MHCC members and thanked them for their service. In closing, she excitedly introduced a guest speaker, the Assistant Secretary for Housing and Federal Housing Commissioner of the U.S. Department of Housing and Urban Development (HUD), Julia Gordon.

Commissioner Gordon started by thanking Ms. Payne and the other members of the MHCC for allowing her the opportunity to speak during the meeting and the celebration of the 50th anniversary of the 1974 Act. She also thanked Ms. Payne for recognizing the anniversary of the terribly sad events of September 11th. She reinforced that we need to remember both those who lost their lives to such evil and the heroes of that day.

Commissioner Gordon indicated her excitement to be in Elkhart, Indiana, especially as this is the location of the RV/MH Hall of Fame and noted how the Hall of Fame chronicles how far manufactured

housing has come in the last 50 years and reminded the committee they are the primary driving force for that evolution. Commissioner Gordon reiterated that manufactured housing is an incredibly important sector to the housing industry, highlighting how much attention the Biden-Harris administration has paid to manufactured housing. She announced that the 4th and 5th set of standards updates to the Manufactured Housing Construction and Safety Standards were just published as a final rule and closed by expressing her gratitude to the MHCC for having her as a guest and for all their hard work in updating the code.

Morgan Garguilo, Rainmaker Studios, made some administrative announcements reminding all MHCC members and guests to sign in at the registration desk. She also reminded members about the post meeting survey, reimbursement forms, and that it is not necessary to keep meal receipts. She provided some additional information pertaining to transportation to the RV/MH Hall of Fame tour.

Leo Poggione informed the committee that everyone was welcome to tour the RV/MH Hall of Fame, and that the entry fee would be waived for the MHCC members. He provided a brief background the Hall of Fame itself, its origins, and thanked the various manufacturers who donated homes which are on display.

Public Comment Period

See [Appendix B](#) for written public comments received prior to the meeting.

Mark Weiss, MHARR, thanked everyone for their work on the MHCC and for having these meetings to update the standard. Mr. Weiss reiterated the MHCC's requirement to consider the cost impacts on any update or modification to the standards. Mr. Weiss briefly discussed which Log Items MHARR was in favor of and indicated he hopes the committee shares the same sentiment on those items. He also indicated a few log items which he did not agree with and requested the committee disapprove those items.

Lesli Gooch, MHI, thanked Ms. Payne, Commissioner Gordon, and the MHCC. She shared her excitement regarding the publication of the final rule for the 4th and 5th set of standards updates which she is anxiously awaiting. She reinforced the idea that the committee epitomizes the "consensus" aspect and that it is vital to the maintenance of the Manufactured Housing Construction and Safety Standards (MHCSS). She said manufactured housing can and will be a major component in addressing the affordable housing crisis in this country. She referred the committee members to the written comments submitted on behalf of MHI and explained that in those comments was MHI's breakdown and recommendation on each Log Item. She closed her comments by again thanking the committee for their work and the opportunity to speak.

Nick Hoisington, representing MHI, thanked HUD and the MHCC for their time. His comments focused on the importance of preemption for the MHCSS and stressed that the MHCC should not make any modifications that could weaken or bring into doubt that preemption. Mr. Hoisington shared his concerns about some potential conflicts if all the Log Items were approved without modification.

John Weldy, Clayton Homes, thanked the committee for their hard work and dedication. Mr. Weldy shared his thoughts, concerns, recommendations, and potential modifications to some of the Log Items indicating why he felt certain actions should be taken on specific items.

Oliver Technologies and Minute Man Anchors Presentation

Shawn Clanton, Oliver Technologies and Cecil Ayllon, Minute Man Anchors provided an instructional presentation on properly anchoring a manufactured home, see [Appendix C](#).

Break for Technical Systems Subcommittee Meeting

The full MHCC took a break for a Press Conference and to allow the Technical Systems Subcommittee to meet and provide recommendations on assigned Log Items.

Public Comment Period

Jesus Carrasco, Construction Industries Division and Manufactured Housing Division New Mexico Regulation and Licensing Department, indicated he has worked and interacted with Ms. Payne for years and noted that she has always been very responsive and supports her leadership in the Manufactured Housing Program. He noted that he is thankful for everything HUD has done and is doing in New Mexico.

Wrap Up – DFO & AO

Teresa Payne thanked the committee for a great day and is looking forward to addressing additional Log Items tomorrow. She mentioned the tireless work her team has been doing to elevate manufactured housing. She provided some additional details pertaining to the RV/MH Hall of Fame tour, the networking event, and thanked everyone for a productive first day.

Adjourn

The motion to adjourn the meeting was carried.

Day 2: Thursday, September 12, 2024

Call to Order

The Manufactured Housing Consensus Committee (MHCC) meeting reconvened Thursday, September 12, 2024, at the Hotel Elkhart in Elkhart, Indiana. 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 participants, expressed her appreciation and enjoyment for the tour of the RV/MH Hall of Fame, the 50th anniversary celebration, and networking event, and thanked the committee for their time.

Morgan Garguilo, Rainmaker Studios, again reminded the MHCC members to please fill out the evaluation forms and the post meeting survey.

Review of Current Log and Action Items from the 2024-2025 Cycle

The MHCC discussed Log 228 prior to the Regulatory Subcommittee meeting.

Log 228 - § 3282.408, 3282.411 and 3282.412

Log 228 - MHCC Motion: Disapprove

Maker: Michael Moglia

Second: Leo Poggione

The motion was carried unanimously.

Break for Regulatory Subcommittee Meeting

The full MHCC took a break to allow the Regulatory Subcommittee to meet and provide recommendations on assigned Log Items.

Public Comment Period

Mark Weiss, MHARR, indicated that if public comments are accepted during the discussion of the individual items, he did not have any specific comments during this period.

Jesus Carrasco, Construction Industries Division and Manufactured Housing Division New Mexico Regulation and Licensing Department, made a comment following the discussion on Log 233 indicating that part of their records review is to ensure that the consumer card gets back to the retailer/consumer after inspections.

Break for Structure and Design Subcommittee Meeting

The full MHCC took a break to allow the Structure and Design Subcommittee to meet and provide recommendations on assigned Log Items.

Review of Current Log and Action Items from the 2024-2025 Cycle

Log 227 - § 3280.703 Minimum standards

Log 227 - MHCC Motion: Approve as Modified

Maker: Michael Moglia **Second:** Robert Parks

The motion was carried unanimously.

Log 230 - § 3286 - Subpart F

Log 230 - MHCC Motion: Disapprove

Maker: Manuel Santana **Second:** Joseph Sullivan

The motion was carried with a single negative vote.

Log 231 - § 3280.306 (d) Requirements for Ties

Log 231 - MHCC Motion: Approve

Maker: Michael Moglia **Second:** Leo Poggione

The motion was carried with a single negative vote.

Log 232 - § 3280.105 Exit facilities; exterior doors

Log 232 - MHCC Motion: Approve as Modified

Maker: Joeseeph Sullivan **Second:** Phillip Copeland

The motion was carried unanimously.

Log 233 - § 3282.207(f)

Log 233 - MHCC Motion: Disapprove

Maker: Manuel Santana **Second:** Joeseeph Sullivan

The motion was carried with a single negative vote.

Log 234 - § 3282.362(e)

The MHCC discussed their concerns with the Log Item and weighed the benefits against the potential negatives. Many MHCC members expressed their agreement with the intent of the item, but had concerns with the proposed solution and did not think that the Production Primary Inspection Agencies (IPIA) were the appropriate entity to do the review.

Log 234 - MHCC Motion: Disapprove

Maker: Manuel Santana **Second:** Phillip Copeland

The motion was carried with two negative votes.

Log 235 - § 3280.212(C)(1)

Log 235 - MHCC Motion: Approve

Maker: Joeseeph Sullivan

Second: Manuel Santana

The motion was carried unanimously.

Wrap Up – DFO & AO

Ms. Payne recognized the members who are rolling off at the end of the year, Stacey Epperson, Peter James, Michael Moglia, and Robert Parks, by providing a brief background on each member and invited them to come to the podium to address the committee. Each member briefly spoke and thanked the committee and HUD for allowing them to serve on the MHCC.

Leo Poggione expressed his gratitude for the efforts that HUD has put into the MHCC, the meetings, and the MHSCC update process. He thanked the committee members for their time and commitment.

Tara Brunetti, Vice Chairperson, thanked the MHCC for their participation, welcomed the new members, and recognized the departing members.

Kevin Kauffman, AO, provided a brief synopsis of the steps immediately following the MHCC meeting such as the process for the ballot, and review and approval of the minutes. He thanked them for their dedication, hard work, and recognized the outstanding and productive meeting.

Adjourn

The motion to adjourn the meeting was carried.

Certification of Minutes

I hereby certify that, to the best of my knowledge, the foregoing minutes are accurate and complete.

Tara Brunetti

Manufactured Housing Consensus Committee Vice-Chair

Certified via email on November 12, 2024



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Appendix A: MHCC Attendance and Guests



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MHCC Attendance September 11-12, 2024

	Name	Attendance, Day 1	Attendance, Day 2
General Interest / Public Official	Tara Brunetti	Y	Y
	Keisha Hoggard	Y	Y
	Aaron Howard		
	Kaye Lawlis	Y	Y
	Michael Moglia	Y	Y
	Robert Parks	Y	Y
	Randy Saunders	Y	Y
Producer	Phillip Copeland	Y	Y
	Jayar Daily		
	Derek Dodson	Y	Y
	Peter James		
	Leo Poggione	Y	Y
	Sean Roberts		
	Manuel Santana	Y	Y
User	Amy Batiste		
	Rita Dilenno	Y	Y
	Stacey Epperson	Y	Y
	Nicole Hebbe		
	David Kruczek	Y	Y
	Tim Sheahan	Y	Y
	Joseph Sullivan	Y	Y



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HUD Staff:

Alan Field
Christina Foutz
Dan Hardcastle
Demetress Ross
Dennaire Anderson
Geraldine Aguolu
Glorianna Peng
Igor Ristic
Jason C. McLJury
Leo Huott
Rodney Moody
Teresa Payne

AO Staff, Home Innovation Research Labs:

Kevin Kauffman
**Meeting Planner Contract
Staff:**
Jane Holifena
Morgan Garguilo, CGMP
Grace Salvant

Guests:

Annie Kate
Cameron LeCount
Cameron Tomasbi
Clay Bailey
David Tompos
Demarco Brown
Dustin Klose
Jeff Parrott
Jesus Carrasco
Josh Weldy
Lesli Gooch
Mark Peterson
Mark Weiss
Mary Gaiski
Murad Hummator
Nick Hoisington
Nick Oudroff
Patrick Revere
Robert Gorleski
Shawn Clanton
Tyler Wood



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Appendix B: Written Public Comments

Public Comments Received for September 11-12, 2024 MHCC Meeting	
1	John Weldy
2	Krystina Nickila
3	Lesli Gooch
4	Mary Gaiski



September 3, 2024

Dear MHCC members,

Clayton is pleased to provide comments to the Manufactured Housing Consensus Committee in response to the August 1, 2024 Federal Notice Docket NO. FR-6447-N-02 on the log items which you will be considering this week.

Clayton is a vertically integrated, single-family modern manufactured and site-built homebuilder with 40 home building facilities, 362 company-owned home retail centers, financial services operations that provide mortgage services for more than 400,000 homeowners, and an insurance company that protects over 100,000 families. Additionally, our modern manufactured homes are sold through a network of over 1,500 independent retailers and manufactured home communities.

Log 227: We agree with and appreciate Mr. Shivley's effort to update the Federal Standard by incorporating standards for heat pump water heaters. We believe that heat pump water heaters can significantly reduce homeowners energy consumption and thereby lower homeownership cost. We encourage the committee to accept in concept log 227 with modifications. We ask the committee to add the 5th Edition of UL1995/CSA C22.2 No. 236 as referenced standard. This modification would eliminate the required Alternate Construction (AC) letter when using our Rheem hybrid heat pump water heaters.

Log 229: We agree with and appreciate Mr. Parks effort to keep the incorporated references current. Off-site home manufacturing is less than 10% of housing starts in the US today, and product manufacturers are unlikely to list products to an obsolete standard simply because it is referenced within the Federal Standards. However, we encourage the committee to reject Log 229 and instead, encourage HUD and the MHCC to regularly review and update the listed referenced standards to allow the use of standard building components. Federal preemption provided within the Federal Standard is critical for the success of manufactured housing as a viable source of attainable housing. To preserve preemption and safeguard affordability, we believe it is important for the committee to review and approve new referenced standards. It is possible that States or Local jurisdictions may perceive the proposed changes within log 229 to allow them to impose their adopted referenced standards on manufactured homes that go into their jurisdiction and thereby significantly weaken preemption.

Log 231: We encourage the committee to accept Log 231. Clayton supports this log item and reasonable efforts to improve the safety and sustainability of manufactured homes. Removing the word "only" within 3280.306 as proposed would allow the State of Alabama to require additional vertical tiedowns at each diagonal strut of the steel pan type system often used to anchor our homes today and would add extra resistance to overturning loads caused by extreme storms.



Log 232: We encourage the committee to accept Log 232. Clayton supports this log item and its efforts to remove barriers to small home attainability.

Log 235: We encourage the committee to accept Log 235. Clayton submitted this log in an attempt to align garage separation with the predominate method used on-site and meets National Building Codes to avoid confusion with on-site construction contractors. We found that many site builders terminate the ½" gypsum garage wall separation at ½" gypsum ceiling in accordance with the IRC (R302.6).

Sincerely,

A handwritten signature in black ink that reads "John Weldy". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

John Weldy, P.E.
Vice President of Engineering
Clayton Home Building Group

Comments on proposed changes
For
2024 – 2025 Cycle

Proposal #1 Log ID 227 for § 3280.703 Minimum Standards – No Comments

Proposal #2 Log ID 228 § 3282.408, 3282.411 and 3282.412

Add the following language to 3282.408:

3282.408 Plan of notification required.

- (a) *Manufacturer's plan required.*** Except as provided in [§ 3282.407](#), if a [manufacturer](#) determines that it is responsible for providing notification under [§ 3282.405](#), the [manufacturer](#) must prepare a plan in accordance with this section and [§ 3282.409](#). The [manufacturer](#) must, as soon as practical, but not later than 20 days after making the determination of [defect](#), [serious defect](#), or [imminent safety hazard](#), submit the plan for approval to one of the following, as appropriate:
- (1)** The SAA of the [State](#) of manufacture, when all of the manufactured homes covered by the plan were manufactured in that [State](#); or
 - ~~(a) The SAA of the receiving state where the home is located only when no SAA is present in the state of manufacture; or~~
 - (2)** The Secretary, when the manufactured homes were manufactured in more than one [State](#) or there is no SAA in the [State](#) of manufacture.

Comments: Rather than adding new language, i.e. "where the home is located" which is not consistent with current language used within these provisions, adding the term "receiving state" makes it clear which SAA is initiating the action and retains the uniformity of current language used. In addition, adding the language "The SAA of the receiving state" provides a greater level of protection to the consumer, when there is no SAA in the state of manufacturer.

3282.411 SAA initiation of remedial action:

- (a) *SAA review of information.*** Whenever an SAA has information indicating the possible existence of a noncompliance, defect, serious defect, or imminent safety hazard in a manufactured home, the SAA may initiate administrative review of the need for notification and correction. An SAA initiates administrative review by either:
- (1)** Referring the matter to another SAA in accordance with [paragraph \(b\)](#) of this section or to the Secretary; or
 - (2)** Taking action itself, in accordance with [§ 3282.412](#), when it appears that all of the homes affected by the noncompliance, defect, serious defect, or imminent safety hazard were manufactured in the SAA's State.
- (b) *SAA referral of matter.*** If at any time it appears that the affected manufactured homes were manufactured in more than one State, an SAA that decides to initiate such administrative review must refer the matter to the Secretary for possible action pursuant to [§ 3282.412](#). If it appears that all of the affected manufactured homes were manufactured in another State, an SAA that decides to initiate

administrative review must refer the matter to the SAA in the State of manufacture or to the Secretary, for possible action pursuant to [§ 3282.412](#).

add the following language:

- (c) Receiving state SAA authority. If an SAA is not present in the state of manufacture, the SAA from the receiving state of home location may take action pursuant to 3282.412. In the event of such action, the SAA who in the receiving state of home location must provide all documentation to the Secretary, who must take action. The Secretary has the authority to cease such action, however, must provide the SAA that initiated such action as to the reason. In this case, the Secretary must take action.

Comments: Again, by adding the language “receiving state SAA authority” it incorporates additional protection to the consumer, if the state of manufacturer does not have an SAA. However, as submitted, it seems to be ambiguous. Removing the additional language which states “the Secretary has the authority to cease action....”, and adding the language “who must take action”, eliminates any question on the course of action that will be taken, and by whom.

CFR3282.412

Revise language as follows: (in Red and underlined)

§ 3282.412 Preliminary and final administrative determinations.

- (a) *Grounds for issuance of preliminary determination.* The Secretary or, in accordance with [§ 3282.411](#), an SAA in the [State](#) of manufacture, or when no SAA exists is present in the state of manufacture, the SAA in the receiving state of the location of the home may issue a [Notice of Preliminary Determination](#) when:

Comments: by including “the SAA in the receiving state”, this ensures that defect, serious defect, or imminent safety hazards are identified and brought to the attention of the manufacturer, so the proper course of action can be completed, including Subpart I investigation to determine if a class of home does exist, and corrections can be completed. Including the language “the receiving state SAA” also provides a greater level of protection to the consumer. However, this proposal seems to lack clarification on who will ensure the manufacturer concludes the proper procedures and verify corrections for the determination, if a class of homes does exist and who will verify the subpart I is completed. If the receiving state SAA will be responsible to see the process through, that responsibility must be clearly identified in the language that follows in the remainder of that section. IMHO, simply adding the language “the SAA of the receiving state” has the authority to issue a notice of preliminary determination without adding clarification of who will be responsible to see the process through, makes this language ambiguous, without incorporating language for who will be responsible to see the process through.

Proposal #3 Log ID 229 for 2803.4 – Incorporation by reference. – No comment.

Proposal #4 Log ID 230 for § 3286 – Subpart F

Proposed Change:

Addition:

**§3286.502 – Exemption of Third-Party
Inspector Verification**

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;

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).

Comments: In general, it would not appear that all code officials are trained by the SAA in most states. Municipality code officials are typically not familiar with the specific and detailed requirements of manufactured home installations requirements of CFR 3285 and CFR 3286. Third party inspector requirement is an extremely important factor to ensuring compliance and understanding of the above rules. This proposed change should not be adopted as submitted.

Proposal #5 Log ID 231 – 3280.306 (d) Requirement for Ties. – No comment.

Proposal #6 Log ID 232 – 3280.105 – Exit facilities; exterior doors.

Comments: 1.) In review of the scoping provisions of Subpart B of CFR 3280 it clearly states “the planning requirements of manufactured homes”. It states nothing about “tiny homes” or the requirements for the construction and for architectural planning considerations. If HUD wants to get involved with “tiny homes”, Minnesota would suggest a separate subpart dealing only with code adequacy and architectural considerations for “tiny homes” to ensure safe and healthy environment. While the author’s reasoning for adding for the provisions for “tiny homes” is based on the definition of the manufacture home safety standards for a “dwelling unit”, there are huge differences between “dwelling units” and “tiny homes”. Adding the proposed language is going to cause confusion and misinterpretation of the federal standards which will be a detriment to the consumer. This proposal should not be adopted as submitted.

Proposal #7 Log ID 233 – 3282.207(f) – No comment.

Proposal #8 Log ID 234 – 3282.362(e) –

Comments: When reviewing the charging paragraph of 3282.362 it is specific to the IPIA’s responsibilities. Looking at the charging language of 3282.207(a) this language is dealing with the responsibility to providing a consumer manual to purchasers of manufactured homes. Adding the responsibility to the IPIA for the annual review of these manuals, appears to be more cumbersome and no benefit to the consumer. Rather it would be suggested that a consumer manual that has been approved by the DAPIA be maintained in a central library, maintained by HUD or it’s contractor (IBTS), once it has been approved by the DAPIA. Any changes to an approved manual would require resubmission to HUD and it’s contractor (IBTS) to be filed for reference and use by any SAA.

Proposal #9 Log ID 235 – 3280.212(C) (1) – No comment.



September 5, 2024

Kevin Kauffman
Coordinator of Standards and Testing
Home Innovation Research Labs
Administering Organization, MHCC
400 Prince George's Blvd.
Upper Marlboro, MD 20774

RE: Notice of Federal Advisory Committee Meeting; Manufactured Housing Consensus Committee (MHCC) [Docket No. FR-6447-N-02]

Dear Mr. Kauffman,

The Manufactured Housing Institute (MHI) is pleased to provide comments to the Manufactured Housing Consensus Committee (MHCC) as part of the upcoming September 2024 meeting [Docket No. FR-6447-N-02]. MHI is the only national trade association that represents every segment of the factory-built housing industry. Our members include builders, suppliers, retail sellers, lenders, installers, community owners, community managers, and others who serve our industry, as well as 48 affiliated state organizations. Our industry is on track to build more than 100,000 homes this year, accounting for approximately 9 percent of new single-family home starts. These homes are produced by 36 U.S. corporations in 148 homebuilding facilities located across the country. Today, MHI members represent over 90 percent of all manufactured homes constructed.

Log Item Analysis

With this letter, MHI addresses each of the nine log items to be discussed at the upcoming MHCC meeting. For each log item, MHI offers a comprehensive review of the issues surrounding the proposed changes along with recommendations for how each log item might be used to elevate manufactured housing and improve the federal standards that govern our industry.

- 1. MHI supports Log Item 227 if amended to incorporate the fifth edition of UL 1995/CSA C22.2 No. 236 rather than the third edition of UL 60335-2-40 because this log item aligns the regulations with current heating and cooling standards.**

For Log Item 227, Travis Shivley proposes adding the third edition of UL 60335-2-40 to the list of acceptable appliance standards in § 3280.703. The stated purpose of the proposal is to clarify that heat pump water heaters may be installed in new manufactured homes. Heat pumps are ENERGY STAR rated for maximum efficiency over standard electric water heaters, and their use will improve energy efficiency. Currently, the use of heat pump water heaters requires approval through an Alternative Construction Letter. This proposal clarifies the permissive use of hybrid water heaters that use an electric water heater along with heat pump technology.

MHI recognizes the importance of updating § 3280.703 to allow for more energy efficient water heaters. As such, MHI supports Log Item 227, albeit with one amendment—that the fifth edition of UL 1995/CSA C22.2 No. 236 be added rather than the third edition of UL 60335-2-40. This amendment to Log Item 227 will ensure that the most recent version of the standard is added. Given the lack of regular updates to the regulations—updates that would otherwise ensure that the regulations consistently align with current design and manufacturing practices—use of the most recent standard is paramount.

MHI does, however, recommend that the MHCC not stop with this addition but also take one step further to ensure that the standards added to the regulations do not become outdated before added. To achieve this, MHI recommends that the limiting language of § 3280.703 be replaced with broader language like that found in § 3280.604(a). Section 3280.703 currently only allows for the use of “[h]eating, cooling and fuel burning appliances and systems in manufactured housing” that “conform to the applicable standards” listed in § 3280.703 or otherwise specified in § 3280 (i.e. § 3280.4). Section 3280.604(a) allows for use of appropriate or preferred standards not otherwise indicated in the regulations so long as that standard is listed by a nationally recognized testing laboratory, inspection agency, or other qualified organization as suitable for the intended use. If § 3280.703 began with language like § 3280.603, then manufacturers would have more flexibility to improve manufactured housing and make it more energy efficient without being restricted by outdated standards. This flexibility is key.

MHI thus supports an amended version of Log Item 227 but asks the MHCC and HUD to consider changes to the regulations that would allow for the use of updated, energy efficient practices without seeking Alternative Construction Letters and without waiting for the regulations to be updated to include a specific standard.

2. MHI does not support Log Item 228 because it will create conflicts that may result in contradictory outcomes.

For Log Item 228, Mike Moglia proposes several changes to Subpart I that would permit the SAA in a state where a home is located to be a stakeholder in managing corrective action plans. Moglia proposes changing § 3282.408 by adding the language in red below so the section reads:

(a) *Manufacturer’s plan required.* Except as provided in § 3282.407, if a manufacturer determines that it is responsible for providing notification under § 3282.405, the manufacturer must prepare a plan in accordance with this section and § 3282.409. The manufacturer must, as soon as practical, but not later than 20 days after making the determination of defect, serious defect, or imminent safety hazard, submit the plan for approval to one of the following, as appropriate:

- (1) The SAA of the State of manufacture, when all of the manufactured homes covered by the plan were manufactured in that State; or

(1)(a) The SAA of the state where the home is located only when no SAA is present in the state of manufacture; or

- (2) The Secretary, when the manufactured homes were manufactured in more than one State or there is no SAA in the State of manufacture.

Along with the addition to §3282.408, Moglia also proposes the following additions to § 3282.411–12 (in red):

§ 3282.411 SAA initiation of remedial action.

- (a) ***SAA review of information.*** Whenever an SAA has information indicating the possible existence of a noncompliance, defect, serious defect, or imminent safety hazard in a manufactured home, the SAA may initiate administrative review of the need for notification and correction. An SAA initiates administrative review by either:
 - (1) Referring the matter to another SAA in accordance with paragraph (b) of this section or to the Secretary; or
 - (2) Taking action itself, in accordance with § 3282.412, when it appears that all of the homes affected by the noncompliance, defect, serious defect, or imminent safety hazard were manufactured in the SAA's State.
- (b) ***SAA referral of matter.*** If at any time it appears that the affected manufactured homes were manufactured in more than one State, an SAA that decides to initiate such administrative review must refer the matter to the Secretary for possible action pursuant to § 3282.412. If it appears that all of the affected manufactured homes were manufactured in another State, an SAA that decides to initiate administrative review must refer the matter to the SAA in the State of manufacture or to the Secretary, for possible action pursuant to § 3282.412.
- (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, however, must provide the SAA that initiated such action as to the reason. In this case, the Secretary must take action.***

§ 3282.412 Preliminary and final administrative determinations.

- (a) ***Grounds for issuance of preliminary determination.*** The Secretary or, in accordance with § 3282.411, an SAA in the State of manufacture ***or when no SAA is present in the state of manufacture, the SAA in the state of the location of the home,*** may issue a Notice of Preliminary Determination when:

The stated purpose of the changes is to provide “strength to the program.” Moglia notes as part of this log item that”

“when no SAA is present in the state of manufacture, HUD must initiate its [own] 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.”

MHI believes that Log Item 228 is likely to have the opposite effect from what it intends, and

therefore it is opposed to the changes proposed.

Subpart I is designed to provide a timely resolution to manufacturing defects through a preemptive, federal program of corrective action. As it stands, states either have their own SAA, approved by HUD, or rely on HUD as their “SAA.” When corrective action is needed, a manufacturing state’s SAA or HUD work with the applicable IPIA to approve plans of action that will ensure the health and safety of homeowners. Adding another stakeholder—receiving states’ SAAs—into the mix, creates inherent conflicts that could generate contradictory outcomes and remove a state’s decision to have HUD as its chosen authority for corrective action.

Consider a manufacturer in a state where HUD is the “SAA” that manufactures a class of homes that are shipped to multiple states. This proposed change would create confusion about which receiving state’s SAA would have the final say on the corrective plan of action. Further, it would become a chaotic process for manufacturers where there is uncertainty about which receiving state’s SAA has the right to override any other receiving state’s SAA. Resolving these conflicts would then delay corrective action, complicating Subpart I investigations such that it harms homeowners.

Contradictory outcomes may also result even when all homes are shipped to a single state. Consider a manufacturer that ships one set of homes with one issue to State A and later ships another set of homes with a different issue to State B. The manufacturing facility would have IPIAs from multiple states in their facility, potentially offering different opinions about the manufacturer’s practices. Although the issues leading to corrective action may have been different, the plans for corrective action could overlap and contradict. Imagine, then, that we have more than two state’s IPIAs involved. Upwards of 33 SAAs and their IPIAs could be involved with how a manufacturer operates one facility. This undesirable outcome—lack of uniformity leading to confusion—was one of the key principles underlying the 1974 Act. The promise of that uniformity should not be undone. This proposal creates uncertainty and chaos that would be harmful to the industry, and it ultimately negatively impacts consumers as increased costs of managing all the out-of-state IPIAs would be passed along, harming them further.

MHI remains confident in HUD’s ability to uphold its duties under Subpart I so that a safe, beneficial, and uniform system of corrective action is maintained. A state’s decision to use HUD as its “SAA” should be respected and upheld. The chaos that would result from Log Item 228’s approval would harm preemption and, as a result, consumers too. Thus, MHI strongly opposes Log Item 228.

3. MHI supports the principle behind Log Item 229 but does not support Log Item 229 as written because it creates unintended risks for manufacturers, increasing costs for consumers.

For Log Item 229, Robert Parks proposes a revision to § 3280.4 so that the standards listed in that section are only a minimum standard of compliance, not the limit of compliance. Any revisions or updates to the standards listed in § 3280.4 would then be automatically accepted as above the minimum compliance requirements. In other words, the listed standards would now be the floor of compliance rather than the floor and the ceiling of compliance. The stated purpose of this proposal is to eliminate the need for Alternative Construction Letters when manufacturers wish to design and manufacture homes that comply with more recent versions of the listed standards.

MHI supports the principle behind Log Item 229—that the HUD Code should permit manufacturers to produce the most energy efficient and commercially available homes. This log item would

also assist manufacturers with one problem they often face: the availability of products and appliances that align with the old standards. As appliance and product manufacturers update their products, those products often no longer comply with the old standards, limiting the products and appliances that manufacturers can use in their new homes without first seeking approval through an Alternative Construction Letter.

But, as written, Log Item 229 will create uncertainty for manufacturers and harm preemption. Each of the codes and standards incorporated by reference into the HUD Code are complex. If the newest version of any of those codes applies without the administrative oversight that the current process provides to ensure that each of those codes adheres with one another and with the HUD Code, then inconsistent standards may result.

Under federal law and regulations, HUD is prohibited from incorporating new standards into the HUD Code without undergoing rulemaking. We believe that such restriction on HUD is important to maintain. Before any new standard is incorporated by reference into the HUD Code, the MHCC should vet the new standards for compliance with the HUD Code and all its incorporated standards. Without this vetting, pre-1974 chaos could ensue. For 50 years, preemption has allowed manufacturers to efficiently produce affordable housing for consumers with the certainty that their homes are federally consistent. If each manufacturer is left to resolve conflicts among the standards themselves, then the intent behind the uniform system of manufactured housing construction would be lost.

Further, the compliance costs for manufacturers to resolve any conflicts and update their designs to match any revision to any one standard would be significant. All manufacturers would have to monitor every release of each new edition of every incorporated standard and ensure compliance with those standards. These costs would then be passed on to consumers.

To achieve the purpose of Log Item 229 without its consequences and while preserving the important rulemaking process required by law, MHI reiterates its call for HUD to ensure the HUD Code is updated regularly, at least every three-to-five years. Regular updates to the HUD Code would secure § 3280's preemptive nature while also allowing for manufacturers to innovate and incorporate commercially available products into their designs without the need for Alternative Construction Letters.

Another way to achieve the purpose of Log Item 229 without its consequences, would be to adjust the language proposed in Log Item 229 and move it to other sections within § 3280 to alleviate some of the concerns about product and appliance availability while maintaining the preemptive nature of § 3280 regarding design. For example, language could be incorporated into §§ 3280.503, 603, and 703—sections that govern the use of various products and appliances within manufactured homes.

In conclusion, Log Item 229 raises a classic conflict created by the HUD Code: on the one hand, the need to preserve preemption, and on the other, the need and desire to incorporate the latest appliances and products into those designs. Regular updates to the HUD Code by HUD would solve this dilemma. Alternatively, incorporating the language proposed into the product sections of § 3280 may help strike a balance between these competing issues. Thus, MHI opposes Log Item 229 as written but recommends that the MHCC and HUD take steps to achieve the Log Item's underlying principles.

4. MHI supports requiring only one installation inspection but does not support Log Item 230 as written because it weakens the integrity of the inspection process.

For Log Item 230, Mike Moglia proposes an addition to Subpart F of § 3286 that eliminates the third-party inspector verification requirements in states where the SAA monitors the installation of manufactured homes. The proposed addition reads:

§ 3286.502—Exemption of Third-Party Inspector Verification

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;

- a. 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).

The stated purpose behind Log Item 230 is to eliminate multiple inspections in states that require an inspection separate from HUD. In these states, an ICC inspector must approve a home in addition to a HUD trained or licensed inspector. By eliminating the additional HUD inspection, this proposal attempts to lower costs for homeowners, who otherwise must pay for two permits, rather than one.

MHI supports a program that would allow homeowners to only pay for and receive a single inspection, but MHI also wants to ensure that the inspectors who inspect manufactured housing are trained to understand the issues unique to manufactured housing. The HUD 309 Form,¹ used in states without their own installation programs, ensures that the inspectors who inspect manufactured homes review and approve the issues critical to a successful setup. Log Item 230 would remove the requirement that the 309 Form be completed and signed, requiring homeowners to trust that their state's SAA had adequately trained the ICC inspectors to review and approve their home in accordance with the regulations. If these ICC-trained inspectors are adequately trained to inspect manufactured housing, then they should also be willing to affirm as much by completing and signing the 309 Form. If an inspector refuses to complete and sign the form, then that shows a lack confidence in understanding the regulations—meaning that they should not be relied upon to approve the home under the regulations.

MHI supports a program in which ICC inspectors are trained to inspect manufactured homes, which is already permitted under § 3286.511(a)(5). But MHI cannot support a program that risks the integrity of the process. Log Item 230 harms that integrity by *exempting* the use and signature on the HUD 309 Form. Because of this, MHI does not support Log Item 230 as written.

5. MHI supports Log Item 231 and calls on the MHCC and HUD to continue their efforts to make homes even more resilient during high-risk weather events.

For Log Item 231, Steve Pinkard proposes an amendment to § 3280.306 (d) so that the regulation permits an SAA to impose additional tie-down requirements for manufactured homes in Wind Zone 1:

¹ Exhibit 1, HUD 309 Form.

(d) Requirement for ties

Manufactured homes in Wind Zone 1 require ~~only~~ 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.

The stated purpose for this proposal is to improve a home's resistance to uplift force during high wind events, increasing the likelihood that the home remains attached to its foundation during these events. By eliminating the word *only* from the regulations, states located in regions with frequent high wind events may require additional anchoring to increase uplift protection, reducing the risk of death or injury to homeowners and protecting the structural integrity of manufactured homes.

The manufactured housing industry supports improvements that could help ensure the safety of its consumers. Over 50 years, our industry has recognized the importance of home installation, and MHI's has consistently supported process and technical improvements when needed. MHI is proud of our industry's track record of continual improvement in structure and installation, and Log Item 231 is another step in the right direction of ensuring that our homes are among the most resilient being built today. While this change is one approach, MHI would also support another way of achieving the underlying objective by including more flexible language in § 3280.306 that permits manufacturers to design anchor systems that meet certain load calculations, even if those designs are not specifically listed in the HUD Code.

6. MHI supports Log Item 232 if amended to include door specifications because it is one more step in the right direction to align egress requirements with current safety requirements and design trends.

For Log Item 232, Mike Moglia proposes removing the requirement in § 3280.105(a) that manufactured homes have at least two exterior doors when the manufactured home is a single room designed for sleeping:

§ 3280.105 Exit facilities; exterior doors.

(a) *Number and location of exterior doors.* Manufactured homes ~~with two or more rooms designed for sleeping~~ shall have a minimum of two exterior doors located remote from each other.

(1) Required egress doors shall not be located in rooms where a lockable interior door must be used in order to exit.

(2) In order for exit doors to be considered *remote* from each other, they must comply with all of the following:

(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.

(ii) ~~Single-section units, with more than one room designed for sleeping.~~ 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.

- (iii) **Multi-Sectional-units.** 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.
 - (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.
- (3) **Single-section units with a single room designed for sleeping.** Manufactured homes with a single room designed for sleeping shall have a minimum of one exterior door. Multi-section homes are excluded.
- (i) 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)
 - (ii) The requirements established under 3280.106, Exit facilities; egress windows and devices remain unchanged.

The stated purpose of Log Item 232 is to allow “tiny homes” to fit under the definition of manufactured housing, alleviating the zoning challenges faced by many Americans searching for affordable housing. The requirement of multiple exterior doors currently prevents “tiny homes” from fitting within the category of manufactured housing. By eliminating this requirement, more Americans will have access to affordable housing.

MHI supports Log Item 232. Not only will Log Item 232 create another opportunity for manufactured housing to alleviate the affordable housing crisis, but it also helps align manufactured housing with current design practices already adopted by site-built codes, like the IRC. Manufactured homes are now required to have egress windows in rooms designed for sleeping, eliminating the original rationale for multiple egress doors in separate rooms. Manufactured homes are also designed with open floor plans consistent with consumer expectations and design sensibilities, obviating the need for egress doors to be remote from one another and separated by a “fixed wall.” In fact, based on this reasoning, MHI supports even further action by the MHCC and HUD by eliminating the multiple door requirement altogether, since sufficient safety measures (like egress windows) are in now place.

MHI’s support, however, is conditioned on one caveat: that the specifications for the door be made clear as part of the proposed language in Log Item 232. These specifications should include information like the door’s dimensions so that MHI can be sure that the door provides safe egress from the manufactured home.

MHI thus supports Log Item 232, if amended as stated above, but encourages additional action, which aligns with current safety requirements and design trends.

7. MHI does not support Log Item 233 because it is either redundant or it violates HUD's enabling act authority.

For Log Item 233, Mike Moglia proposes revising § 3282.207(f) to note that a consumer manual substantially complies with the U.S. Department of Housing and Urban Development Manufactured Home Consumer Manual Guide (Guide) when it also provides enough detail about “obtaining customer service”:

- (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, **obtaining customer service** 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.

The stated reason for this proposal is that consumer manuals are sometimes outdated and provide conflicting information to consumers, including conflicting warranty information.

MHI does not support Log Item 233 because it is either redundant or it violates HUD's enabling act authority. If the purpose behind Log item 233 is to create an additional requirement for those manufacturers that already offer written warranties with their homes, then it is redundant. HUD requires manufacturers to provide a consumer manual with their homes under § 3282.207. In addition to including information for dispute resolution, HUD promulgated the Guide to govern the content of those manuals. 61 Fed. Reg. 10,858 (C)(3)(c)(Mar. 15, 1996). If a manufacturer offers a written warranty, then the manufacturer must state that fact in the manual and provide information that describes the warranty, which includes the following: (1) the repairs covered, (2) the length of the warranty, (3) conditions *for obtaining warranty service*, (4) actions or conditions that void the warranty, and (5) the steps the homeowners must take *to obtain warranty service*. These requirements align with the FTC's regulations, which stem from the Magnuson-Moss Warranty Act. Thus, Log Item 233 is redundant if a manufacturer already offers a written warranty to its consumer.

If Log Item 233 is intended to require manufacturers to offer written warranties, then it violates HUD's enabling act. If a factory chooses to give a written warranty, the warranty is governed by the Magnuson-Moss Warranty Act and FTC regulations, which are preemptive. The Magnuson-Moss Warranty Act and FTC regulations specifically regulate communications between consumers and factories about notification. To a lesser extent, state uniform commercial codes also speak to warranty notice requirements. The 1974 Act did not give the HUD Secretary the right to prescribe warranty terms; that is

a matter of state and federal law. Therefore, HUD cannot prescribe regulations that would require including a written, express warranty in a consumer manual.

A HUD requirement that manufacturers offer consumers with written warranties would also be harmful to consumers. When a manufacturer includes a written warranty with a home, the cost of performing that warranty is wrapped into the cost of the home. The more robust the warranty, the more expensive the home. If manufacturers were required to offer written warranties (and include certain provisions), then the cost of homes would increase for consumers. Maintaining flexibility with written warranties allows manufacturers to serve more consumers by offering homes at different price points. Removing that flexibility would negatively impact consumers.

8. MHI does not support Log Item 234 because it gives IPIAs a new authority that goes beyond their expertise, leading to unintended and costly conflicts.

For Log Item 234, Mike Moglia proposes granting IPIAs authority to perform an annual compliance review of consumer manuals for every consumer manual provided in each manufactured home. Moglia proposes changing § 3282.362(e) to read:

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.

This proposal would move the current language at subsection (e) to a new subsection (f).

The stated purpose of Log Item 234 is to address a concern with consumer manuals providing conflicting information to consumers. The type of information that may be incorrect is contact information for a state SAA or “[c]onflicting information regarding ‘warranties.’”

MHI does not support Log Item 234 because it expands IPIA authority beyond that granted by the regulations, which, in turn, will likely result in every manufacturer having a separate consumer manual for each state in which it ships a home. IPIAs are also not trained to perform such a review—a review best left to each manufacturer’s compliance or legal departments.

First, IPIA’s lack the authority under the regulations to review consumer manuals and their warranties. Section 3282.351 states Primary Inspection Agencies (PIAs) serve four basic functions: (1) approval of design, (2) approval of quality control programs, (3) approval of manufacturing processes, and (4) performance of ongoing inspections of the manufacturing processes. Under the four functions of PIAs, IPIA’s serve as the primary agency for approval of the manufacturing process, assessment of quality control, and management of corrective action. § 3282.362.

Second, many consumer manuals include a limited warranty, which, as described above, is controlled by state and federal law. It would be unwise to give all IPIAs control over the manuals because the factories would be subject to up to 50 conflicting opinions. This could result in a factory having a different manual for every state. And this requirement would also conflict with the regulations that require consumer manuals to be placed inside a home before it leaves the factory because a factory would then

need to know where a home would ultimately be installed to offer the right manual for that state. 24 C.F.R. § 3282.207(b).

Third, an IPIA is not ordinarily trained to understand federal and state contract law. For an IPIA to perform a compliance review of a consumer manual, including any warranties within the manuals, the IPIA would need a deep understanding of the applicable state's contract law and the federal law and regulations that govern warranties. Factories should determine on their own whether they comply with these laws and how they believe it is best to communicate with their consumers. An IPIA decision on whether a factory complies with federal law would have no force and effect. Further, if an IPIA requires a manufacturer to remove or change something in a manual that is required to be included, the IPIA opens itself to legal liabilities. The regulations should protect IPIAs from that outcome and allow manufacturers to govern their warranties without IPIA oversight.

Ultimately, IPIA review of consumer manuals would result in significant compliance costs for manufacturers (manufacturers would need to spend time and resources managing the differences for each manual among the states and then confirming whether an untrained IPIA has assessed a manual correctly under the applicable state and federal laws and regulations). These costs would then be passed on to consumers. Manufacturers stand in the best position to cost-effectively govern the compliance of their consumer manuals. Adding another stakeholder into the equation increases costs, harming consumers as a result. MHI thus does not support Log Item 234.

9. MHI supports Log Item 235 because it will reduce costs without added safety concerns.

For Log Item 235, Kelly Newcomer proposes allowing not less than 1/2-inch separation of gypsum on garage ceilings when the interior of the garage is completely enclosed by 1/2-inch gypsum or its equivalent:

§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 1/2-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 1/2-inch gypsum garage ceiling when interior of garage is completely enclosed by 1/2- 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 1/2-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.

The stated purpose of Log Item 235 is to save time and construction costs by aligning the regulations regarding separation gypsum with current IRC requirements. Garages are often inset into floor plans such that separation gypsum must extend in areas without vertical framing members for attachment. Allowing the separation gypsum to terminate at 1/2-inch gypsum will save

time and construction cost. The current regulations do not recognize this common and accepted method in the IRC. Since garages are typically constructed on-site, many builders are used to stopping separation at the garage ceiling as set forth by the IRC and locally approved practice. The addition of the proposed sentence would better align with a nationally recognized code and reduce failed site inspections.

MHI agrees with the reasoning and purpose behind Log Item 235 and supports its acceptance by the MHCC.

Conclusion

MHI appreciates the opportunity to share our views with the Manufactured Housing Consensus Committee about the Log Items to be considered at its upcoming meeting. We commend the continued dedication of HUD and the members of the MHCC to support innovations in the construction of manufactured housing to help more American families have access to quality homes at attainable prices.

Preserving preemption is vital to the success and reliability of our industry on a national scale. In addition, allowing manufacturers flexibility to innovate remains as important as ever to meet growing housing needs. Achieving these mutually important objectives will uphold the goal of fulfilling our nation's housing supply needs with safe, quality homes at price points that are attainable.

Several of the proposals set to be discussed at the upcoming meeting will help HUD achieve its statutory duty of facilitating the availability of manufactured housing for more people, while other proposals to be considered would lead to unintended consequences that harm consumers and manufacturers alike. As the only national trade association that represents every segment of the factory-built housing industry, we appreciate careful consideration of our views on Log Items 227–235 and look forward to a productive dialogue at the upcoming September 2024 meeting.

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

**HUD Manufactured Home
Installation Certification
And Verification Report**

**U.S. Department of Housing and Urban Development
Office of Manufactured Housing Programs**

OMB Approval No. 2502-0578
Expires 04/30/2018

The Manufactured Housing Installation Program Regulations 24 CFR Chapter XX Part 3286 Sections 111 and 411 require the licensed installer certify that the manufactured home has been installed and inspected in accordance with the regulations. The Manufactured Housing Installation Program Regulations 24 CFR Chapter XX Part 3286 Subpart F requires a qualified inspector verify that the manufactured home has been installed in accordance with the requirements of Part 3286 and Part 3285. The information collected here will ensure that the licensed installers and qualified inspectors inspect the minimum elements for compliance. The public record burden for the collection of information is estimated to average 3.5 hours per response including the time to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the collected information. Response to this information is mandatory. This agency may not collect this information, and you are not required to complete this form, unless the form displays a currently valid OMB control number.

Certification Label Number(s) (include all zeros and agency prefix)	Manufacturer's Serial Number(s) (include all letters and numbers)	_____ (Installer Name)		_____ (HUD License No.)					
_____ (Homeowner Name)		_____ (State)		_____ (Inspector Name)		_____ (State)			
_____ (Street Address)		_____ (City)		_____ (Zip)		_____ (Street Address)		_____ (Phone)	

1. Initial Inspection

Inspection Item	Inspector Verification			Installer Certification		
Site location with respect to home design and construction	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A
Consideration of site specific conditions	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A
24 CFR 3285 Subpart C - Site preparation and grading for drainage	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A
24 CFR 3285 Subpart D - Foundation construction	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A
24 CFR 3285 Subpart E - Anchorage	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A
24 CFR 3285 Subpart F - Optional features (Skirting, etc.)	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A
24 CFR 3285 Subpart G - Completion of ductwork, plumbing, and fuel supply systems	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A
24 CFR 3285 Subpart H - Completion of electrical systems	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A
24 CFR 3285 Subpart I - Exterior and interior close-up	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A
Completion of operational checks and adjustments	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> N/A

2. Reinspection of Home (To be completed and initialed by the inspector)

If the inspector discovers that any item during the Initial Inspection fails to comply with the manufacturer's installation instructions or with an installation design and instructions that have been certified by a professional engineer or registered architect, the installation must be reinspected after the installation is corrected.

Briefly describe the work that did not pass the initial inspection. Upon reinspection, inspector must initial item(s) that are in compliance. Attach additional sheet(s) if necessary.

3. Inspector Verification

I have performed a visual inspection in accordance with 24 CFR § 3286.507, of the manufactured home installation identified above. I have inspected the minimum elements noted above, as required by 24 CFR § 3286.505 and the items above have been installed in accordance with an installation design and instructions that have been provided by the manufacturer and approved by the DAPIA or an installation design and instructions that have been prepared and certified by a professional engineer or registered architect that have been approved by the manufacturer and the DAPIA as providing a level of protection for residents of the home that equals or exceeds the protection provided by the federal installation standards in part 3285 of this chapter. It is a crime to knowingly make false statements in any matter within the jurisdiction of the United States such as the verification statement on this or any similar form. Penalties upon conviction can include a fine and imprisonment. See 18 U.S. Code Section 1001.

Inspector Signature

(Date)

4. Installer Certification

I hereby certify, in accordance with 24 CFR §§ 3286.111 and 3286.411, that the manufactured home identified above has been installed in accordance with an installation design and instructions that have been provided by the manufacturer and approved by the DAPIA or an installation design and instructions that have been prepared and certified by a professional engineer or registered architect that have been approved by the manufacturer and the DAPIA as providing a level of protection for residents of the home that equals or exceeds the protection provided by the federal installation standards in part 3285 of this chapter. It is a crime to knowingly make false statements and/or certifications in any matter within the jurisdiction of the United States such as the certification on this or any similar form. Penalties upon conviction can include a fine and imprisonment. See 18 U.S. Code Section 1001.

Installer Signature

(Date)

Distribution:

Installer
Retailer
Purchaser

Form HUD - 309



Pennsylvania Manufactured Housing Association
PO Box 248 | 315 Limekiln Road | New Cumberland PA 17070
(717) 774-3440 Fax (717) 774-5596
Website: www.pmha.org E-mail: general@pmha.org

TO: MEMBERS OF THE MANUFACTURED HOUSING CONSENSUS COMMITTEE

FROM: MARY GAISKI, PMHA

DATE: AUGUST 29, 2024

SUBJECT: MHCC PROPOSED CHANGES – 2024-2025 CYCLE

On behalf of the Pennsylvania Manufactured Housing Association (PMHA), I am writing to request your support for two critical agenda items scheduled for review at the upcoming Manufactured Housing Consensus Committee (MHCC) meeting on September 11-12, 2024.

PMHA, established in 1949, is a non-profit trade association representing the manufactured housing industry. Our membership includes over 550 entities, encompassing manufacturers, retailers, installers, community owners, suppliers, lenders, and various service-related businesses dedicated to supporting the manufactured housing sector.

The first item is **Log 230 - §3286-Subpart F**. The proposed change is to add the following:

§3286.502 – Exemption of Third-Party Inspector Verification

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; 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).

This was submitted by Mike Moglia, Pennsylvania's SAA, who knows firsthand the additional costs consumers choosing manufactured housing is subjected to due to the program requirements related to the signing of HUD form 309. 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. When Pennsylvania implemented their state-wide building code back in 2004, the industry made sure this included manufactured homes regardless of the land ownership as a way to streamline inspections and costs for manufactured homebuyers. Building permits costs for someone looking to purchase a manufactured home range from \$500 to thousands of dollars depending on the local jurisdiction and the size of the home. The permit process for manufactured homes requires the submission of the installation instructions, specific to the home, which are shared with the code officials. The permit fee covers all inspections from foundation to the final finish, which results in the issuance of a certificate of occupancy.

Additionally, we required the ICC certified code officials to be trained by the SAA, giving them the knowledge and confidence to perform inspections on manufactured homes. Our goal was to 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.

This process worked very well until the Commonwealth suspended parts of Pennsylvania's state-based installation program due to state budget constraints in 2020. The program elements suspended were the training and registration

of the installers which resulted in Pennsylvania becoming a HUD default state. Also suspended was the paperwork the state required since the HUD program included their own paperwork such as HUD Form 305, 306 and 309.

The industry expressed concerns to the SAA and our SAA assured us that they would continue to monitor the installation of new manufactured homes to assure the homes are properly installed. And though they would no longer provide training and registration to installers they would continue to communicate with and provide training to local code officials who issue building permits and inspect manufactured home installations to issue a certificate of occupancy before the home is occupied as required under PA Chapter 149. Additionally, there would be no changes in their monitoring provided in accordance with 24 CFR Part 3282 – Subpart I. It is our understanding that this remains a responsibility under their plan with HUD.

The introduction of a new form to our building code community presented a lot of confusion, that continues today. They do not understand why the issuance of the certificate of occupancy would not be sufficient to satisfy HUD that the home has undergone necessary inspections. Some refuse to sign as they are discriminatory to manufactured housing and this allows local jurisdictions one more way to make it difficult for manufactured home buyers. Though the HUD code allows state code officials to sign the “inspection verification” on the HUD 309 form, many do not as the form appears to be threatening to them. When this happens, the retailer then has to contract with an inspector approved by HUD. This results in additional costs which range from \$350 to \$1500 as well as additional wait time for the homebuyer to occupy the home. These additional costs and delay in home occupancy erodes homeowner confidence and leads to greater buyer’s remorse. Homebuyers voice concerns daily as to why their home needs more inspections than required for a modular or site-built home which provides no benefit as there is no training requirement or monitoring of the inspector. Homeowners are simply purchasing a signature.

In 2020, there were a handful of code officials who refused to sign the “inspection verification,” today it is more of the norm than the exception, and unfortunately it is not till further down the process that a code official will make a decision to not sign the form. For the last three years, retailers have reported that code officials are now making a “side business” out of this situation, agreeing to only sign the HUD 309 Form inspection verification section if they are provided an additional fee equal or greater than what HUD approved inspectors are charging. This is in addition to the building permit fee they are required to pay and does not require any additional visits to the home site.

Please note that by making this change, HUD’s 309 form will not go away. The HUD 309 Form will still need to be properly completed and signed by the certified installer, and copies will be provided to HUD. Therefore, for states that require permitting and inspections of all homes (including manufactured homes), such as Pennsylvania, the HUD Form 309 will be required, just without the completion of the “inspector verification” section.

Amending Subpart F in §3286 with the proposed change, will add no additional costs to the program. In fact, it will be a cost savings to the homeowner. Additionally, this change will not impact the quality and safety designed into these homes. Homeowners will continue to have confidence that manufactured homes from factory to site will provide them with a safe, affordable and durable place to call home.

The other proposed change we support is **Log 232 – §3280.105 Exit facilities: exterior doors**. This change as proposed would allow manufacturers more flexibility in designing and building small footprint homes, specifically single-section homes with a single room designed for sleeping without the challenge of meeting the two-exterior door requirements for egress.

Our modular and site-built counterparts who build under the International Residential Code are not required to provide two egress doors. Because of this, the manufactured housing industry is at a disadvantage when it comes to requests for small footprint homes. Retailers are having to compete with the “tiny home” industry and are approached daily by existing homeowners needing to find cost effective options to provide independent living for their aging parents or disabled family members. More and more local governments are open to allowing ADUs to help with this housing challenge and the manufactured housing industry needs the ability to provide this housing type when asked.

Amending §3280.105 Exit facilities: exterior doors with the proposed change, will add no additional costs to the program and will not sacrifice any of the quality or safety designed into these homes as our homes provide a higher or equal level of fire safety when compared to housing built under other programs. Fire safety has been established throughout the code by requiring maximum flame spread ratings of interior finishes; stringent fire protection with limited combustible materials at and above the cooking range; required fire blocking at penetrations in the floor, walls and ceilings; required smoke alarms, which are required to be hard-wired with battery back-up and are interconnected, in each room designed for sleeping, the living/kitchen area, basements, and upper floors; required egress windows in all rooms designed for sleeping, to include operational instructions on each window for the occupant; required testing of the electrical, plumbing, gas, heat and water systems on each home produced; and consumer manuals are required to provide each owner of the proper care of the home as well as instructions in the event of an emergency.

Again, allowing one exterior door for these homes will not reduce the safety built into every manufactured home produced today.

We appreciate the opportunity to share information on both of these proposed changes, and again ask that you vote yes to **Log 230 - §3286-Subpart F** and **Log 232 – 3280.105 Exit facilities: exterior doors**.

Your consideration and support of these items are vital to our industry's continued growth and success.

Thank you for your attention to this matter.



MANUFACTURED HOUSING CONSENSUS COMMITTEE

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

Appendix C: Presentation - Properly Anchoring a Manufactured Home

Properly Anchoring a Manufactured Home





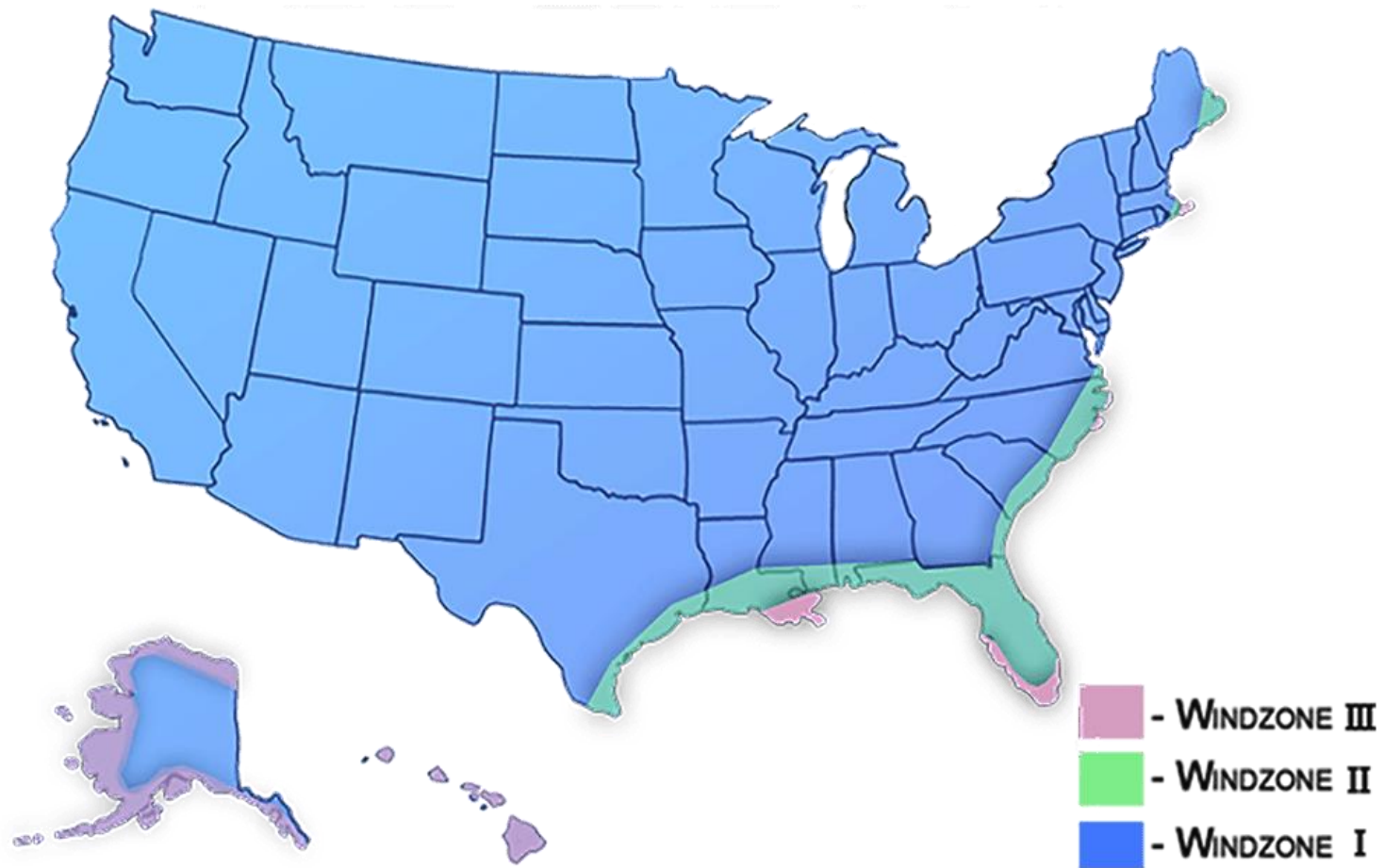
Contents

- ▶ **Wind Zones**
 - ▶ Wind Zone Map
 - ▶ Determining the Wind Zone of Installation
- ▶ **Soil Conditions**
 - ▶ Classification of Soil
 - ▶ Verifying Soil Class
 - ▶ Video: Using a Soil Test Probe
- ▶ **Anchor Selection**
 - ▶ Concrete anchors, Rock Anchor, Soil Anchors and Stabilizer Plates
- ▶ **Anchor Installation**
 - ▶ Dry Set Concrete Anchors
 - ▶ Wet Set Concrete Anchors
 - ▶ Rock Anchors
 - ▶ Soil Anchors
 - ▶ Stabilizer Plates
- ▶ **Video: Vertical and Lateral Anchor Installation**
- ▶ **Video: Proper Soil Anchor Installation**
- ▶ **Safety is Our Concern**



Wind Zones



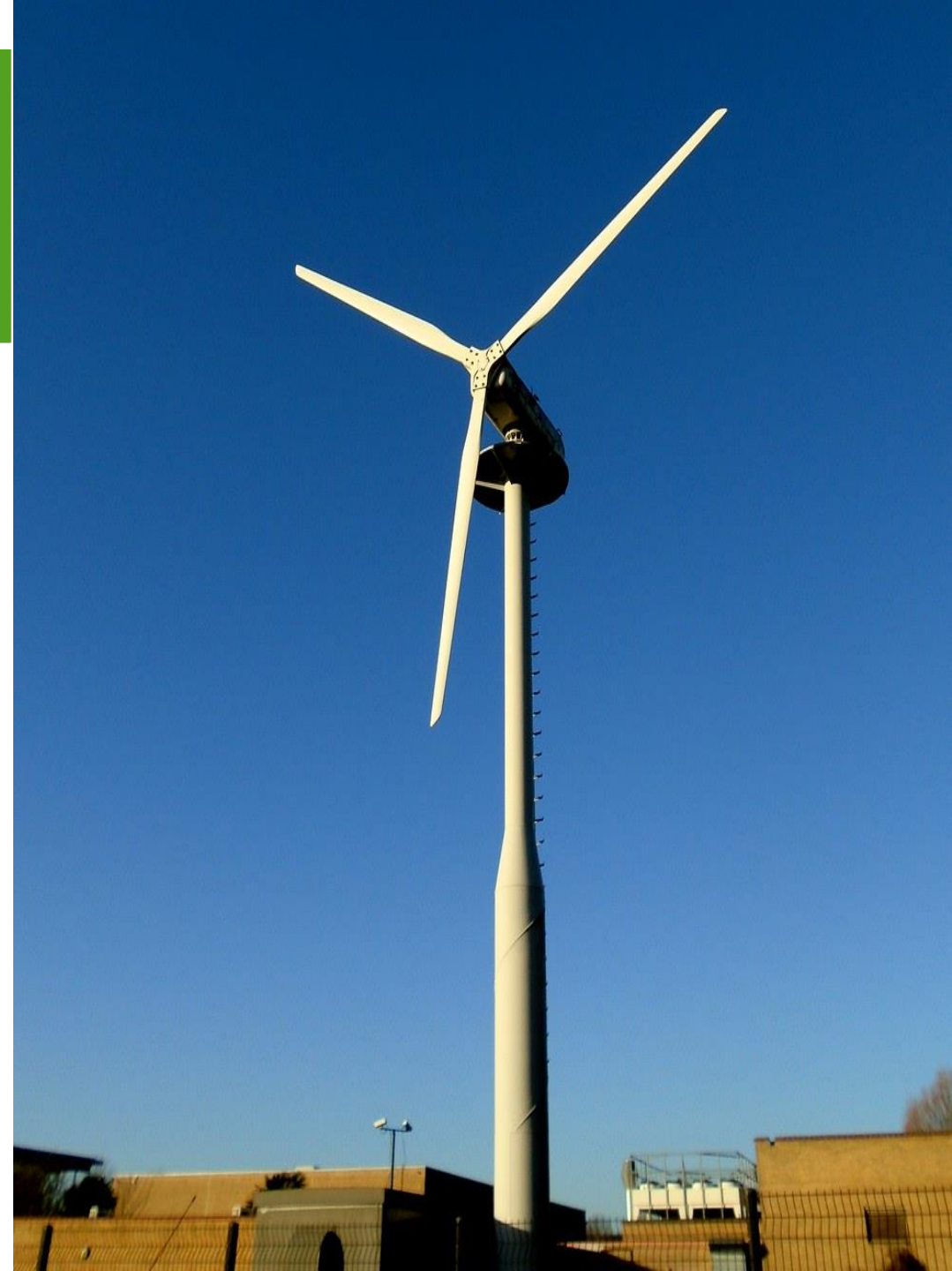


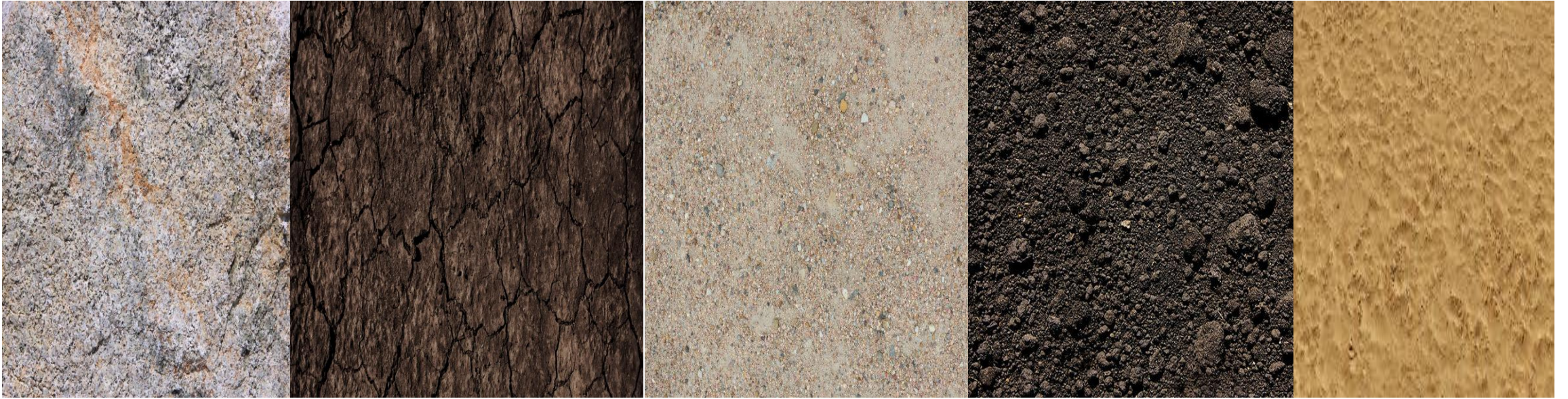
HUD WIND ZONE MAP

<https://www.ecfr.gov/current/title-24/section-3285.103>

Determine Wind zones I, II , III

- ▶ **Wind Zone I** - Covering the majority of the U.S. interior where hurricanes are not common, homes in wind zone I need to withstand horizontal wind loads of no less than 15 psf (pounds per square foot) and net uplift loads of no less than 9 psf, which is equivalent to **70-90 mph** wind speeds.
- ▶ **Wind Zone II** - The home must withstand up to **100 mph** wind speeds in wind zone. II This is designated for areas that are hurricane-prone. The closer your home is located to either the Gulf or Atlantic coast, the more likely your location will be in this zone.
- ▶ **Wind Zone III** - The home must be able to resist wind speeds up to **110 mph** in wind zone III. For residences located along certain coastal regions, it becomes imperative for homes to be constructed to withstand these wind speeds due to the heightened occurrence of hurricane-force winds in these specific areas.





SOIL CONDITIONS

Classification of Soil

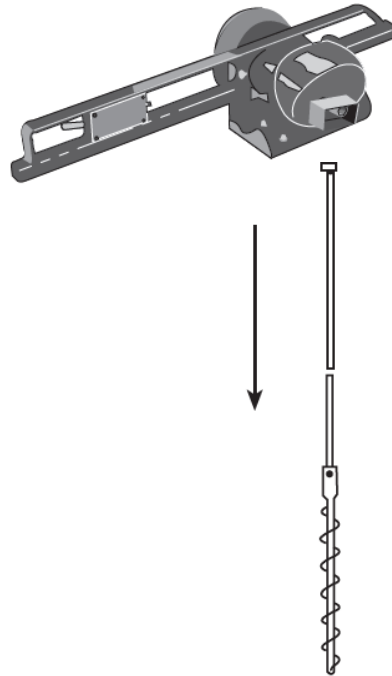
Soil Class	Soil Description
1	Sound Hard Rock
2	Very dense and/or cemented sands, coarse gravel, cobbles, preloaded slits, clays, and corals
3	Medium-dense coarse sands, sandy gravels, very stiff slits, and clays
4a	Loose to medium-dense sands, firm to stiff clays, slits, and alluvial fill
4b	Loose sands, firm clays, slits, and alluvial fill



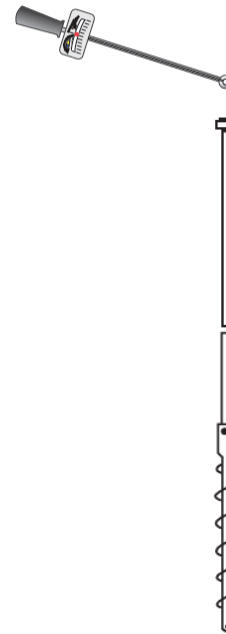
Verifying Soil Class

Soil Class	Test Value (in. lbs.) Torque Probe Reading
1	N/A
2	551+
3	351 to 550
4a	276 to 350
4b	175 to 275

Anchor Drive
Machine



Torque Probe
Wrench



Soil Test Probe Kit



Soil Class & Test Values (p. 10)		Anchor Chart		TYP Part Number (Black/Galvanized)	
1	N/A	30" Green Drive Neck Anchor 40" Green Drive Neck Anchor		50110	50115
				50111	50116
2	500 lbs +	30" 3/4" and 1 1/4" hole 30" 3/4" and 1 1/2" hole 30" 3/4" and 1 3/4" hole All anchors above should use one of the following when subjected to lateral loads: 12" Stabilizer Plate Quick Set Stabilization Plate 3-Plate Anchor with 2-1/2" hole		50119	50120
				50121	50122
3	300 to 500 lbs.	40" 3/4" and 1 1/4" hole 40" 3/4" and 1 1/2" hole 40" 3/4" and 1 3/4" hole & 1 1/2" hole All anchors above should use one of the following when subjected to lateral loads: 12" Stabilizer Plate Quick Set Stabilization Plate		50123	50124
				50125	50126
4a	275 to 300 lbs.	40" 3/4" and 1 1/4" hole 40" 3/4" and 1 1/2" hole 40" 3/4" and 1 3/4" hole & 1 1/2" hole 3/4" and 40" long 2 1/4" hole, Class M 3/4" and 40" long 2 1/2" hole, Class M All anchors above should use one of the following when subjected to lateral loads: 12" Stabilizer Plate 12-1/2" Stabilizer Plate (Florida Dept.) Quick Set Stabilization Plate 3-Plate Anchor with 2-1/2" hole (Florida Dept.) 3-Plate Anchor with 2 1/4" and 1 1/2" hole		50127	50128
				50129	50130
4b	175 to 275 lbs.	40" 3/4" and 1 1/4" hole All anchors above should use one of the following when subjected to lateral loads: 12-1/2" Stabilizer Plate 3-Plate Anchor with 2 1/4" and 1 1/2" hole		50131	50132
				50133	50134

NOTE: Check local, County or Municipality codes require a specific anchor from the group shown for each soil classification. Check local and state regulatory code.

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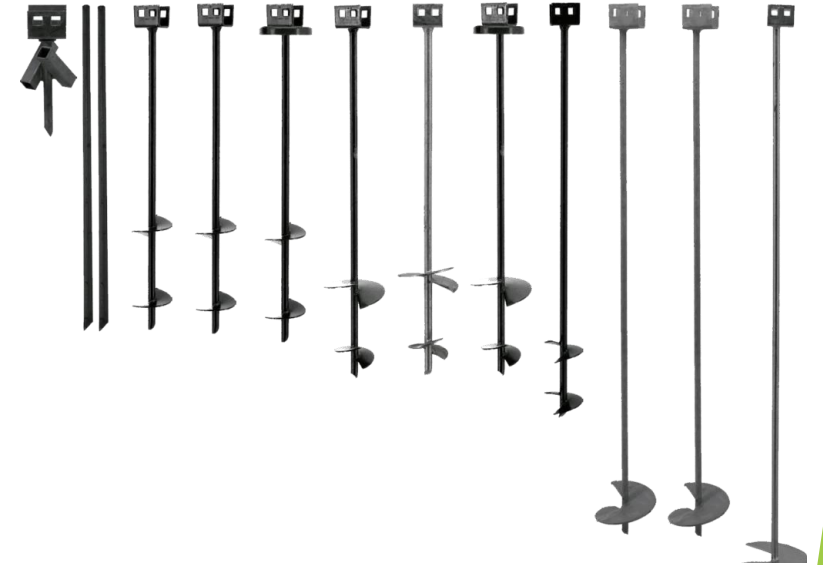
Anchor Selection



Anchor Selection

Based on 24 CFR 3285.402

- Each anchor is designed and tested to hold 3150 lbs. working load and has a 1.5 times safety factor of 4725 lbs.



Anchor Selection

Based on 24 CFR 3285.402

- Each anchor is designed and tested to hold 3150 lbs. working load and has a 1.5 times safety factor of 4725 lbs.
- Concrete Anchors - Concrete Footing and Slab Installation

Double -Had
Dry set
Concrete Anchor



Double-Head
Wet set
Concrete Anchor



Anchor Selection

Based on 24 CFR 3285.402

- Each anchor is designed and tested to hold 3150 lbs. working load and has a 1.5 times safety factor of 4725 lbs.
- Concrete Anchors - Concrete Footing and Slab Installation
- Rock anchor is designed and rated to be installed in solid rock. Soil Class 1

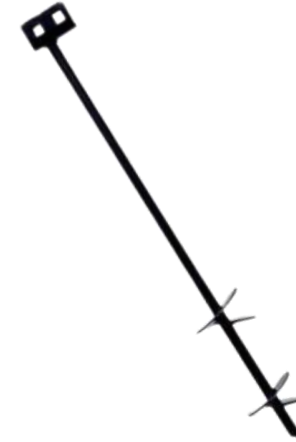
Rock Anchor
Soil Class 1 Anchor



Anchor Selection

Based on 24 CFR 3285.402

- Each anchor is designed and tested to hold 3150 lbs. working load and has a 1.5 times safety factor of 4725 lbs.
- Concrete Anchors - Concrete Footing and Slab Installation
- Rock anchor is designed and rated to be installed in solid rock. Soil Class 1
- Soil/ Earth Anchors - Soil Class 2



30" x $\frac{3}{4}$ " Anchor
(2) 4" Helixes



30" x $\frac{3}{4}$ " Anchor
(2) 4" Helixes
with stabilizer Cap

Anchor Selection

Based on 24 CFR 3285.402

- Each anchor is designed and tested to hold 3150 lbs. working load and has a 1.5 times safety factor of 4725 lbs.
- Concrete Anchors - Concrete Footing and Slab Installation
- Rock anchor is designed and rated to be installed in solid rock. Soil Class 1
- Soil/ Earth Anchors - Soil Class 2
- Soil/ Earth Anchors - Soil Class 3



36" x $\frac{3}{4}$ " Anchor
(1) 4" Helix
(1) 6" Helix
with Stabilizer cap



36" x $\frac{3}{4}$ " Anchor
(1) 4" Helix
(1) 6" Helix
with Stabilizer cap

Anchor Selection

Based on 24 CFR 3285.402

- Each anchor is designed and tested to hold 3150 lbs. working load and has a 1.5 times safety factor of 4725 lbs.
- Concrete Anchors - Concrete Footing and Slab Installation
- Rock anchor is designed and rated to be installed in solid rock. Soil Class 1
- Soil/ Earth Anchors - Soil Class 2
- Soil/ Earth Anchors - Soil Class 3
- Soil/ Earth Anchors - Soil Class 4a

36" x 3/4"
Anchor
(1) 4" Helixes
(1) 6" Helix



36" x 3/4"
Anchor
(1) 4" Helixes
(1) 6" Helix
With Stabilizer
Cap



42" x 3/4"
Anchor
(2) 4" Helixes



48" x 3/4"
Anchor
(1) 6" Helix



Anchor Selection

Based on 24 CFR 3285.402

- Each anchor is designed and tested to hold 3150 lbs. working load and has a 1.5 times safety factor of 4725 lbs.
- Concrete Anchors - Concrete Footing and Slab Installation
- Rock anchor is designed and rated to be installed in solid rock. Soil Class 1
- Soil/ Earth Anchors - Soil Class 2
- Soil/ Earth Anchors - Soil Class 3
- Soil/ Earth Anchors - Soil Class 4a
- Soil/ Earth Anchors - Soil Class 4b

60" x $\frac{3}{4}$ "

Anchor

(1) 7" Helix



Stabilizer plates

- Each anchor is designed and tested to hold 3150 lbs. working load and has a 1.5 times safety factor of 4725 lbs.
- Concrete Anchors - Concrete Footing and Slab Installation
- Rock anchor is designed and rated to be installed in solid rock. Soil Class 1
- Soil/ Earth Anchors - Soil Class 2
- Soil/ Earth Anchors - Soil Class 3
- Soil/ Earth Anchors - Soil Class 4a
- Soil/ Earth Anchors - Soil Class 4b
- Stabilizer Plates

ABS Stabilizer
Plate



12" Stabilizer
Plate



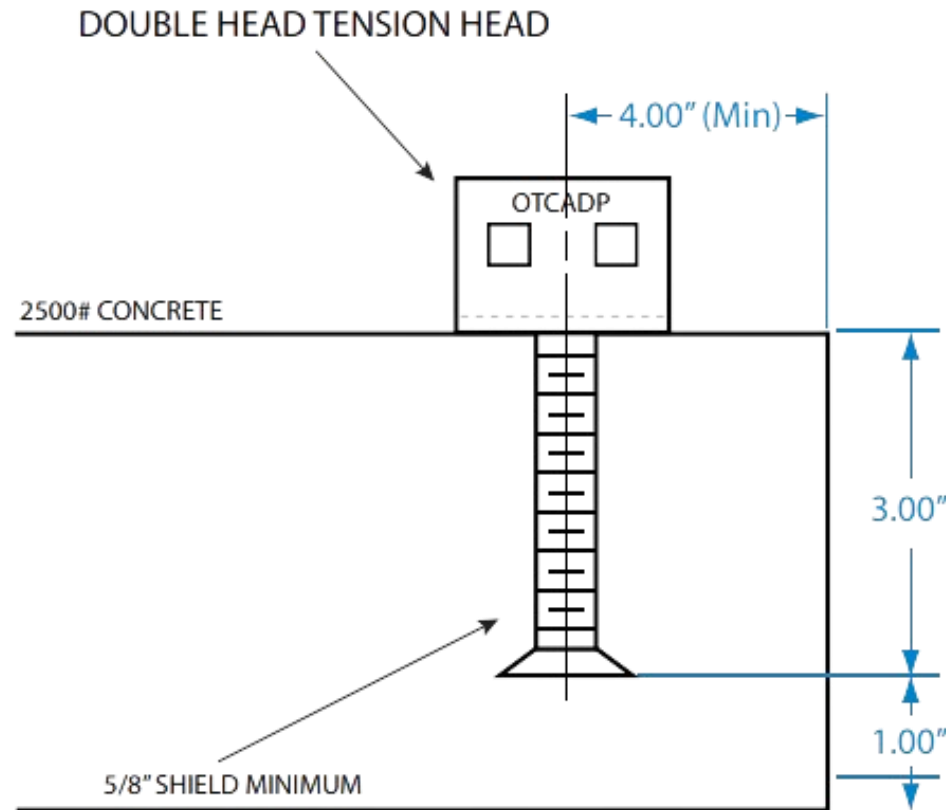
17" Stabilizer
Plate





Anchor Installation

Dry Concrete Anchors



The maximum load per anchor is 4725 lbs.

Must be installed at a minimum of 4" from the edge of the slab or footing.

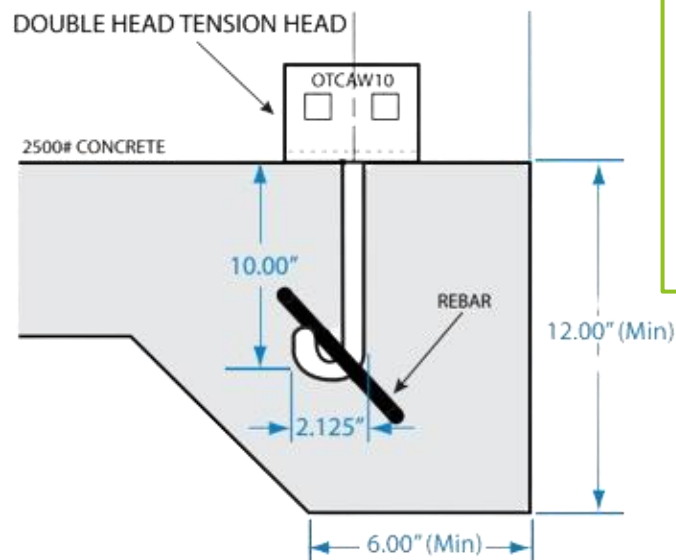
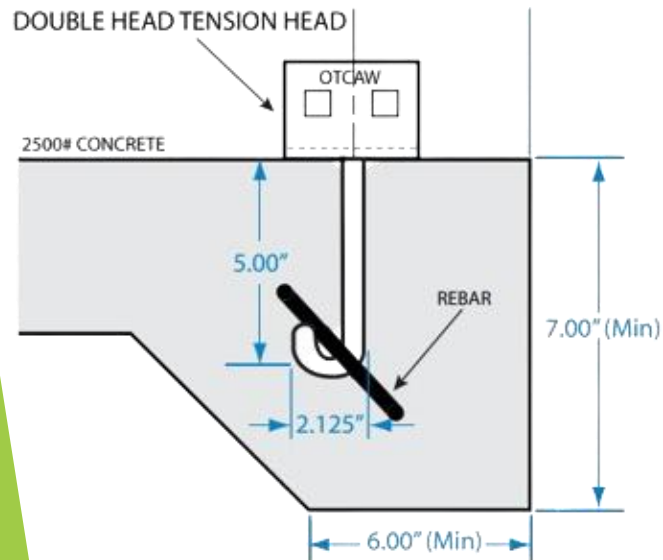
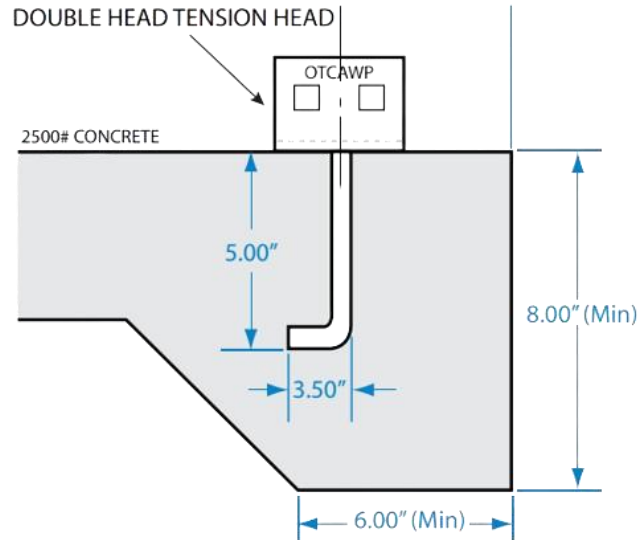
Minimum slab or footer area:

4" slab - 95 sf

6" slab - 65 sf

8" slab - 48 sf

Wet Set Concrete Anchors



The maximum load per anchor is 4725 lbs.

A minimum anchor embedment of 5" is required.

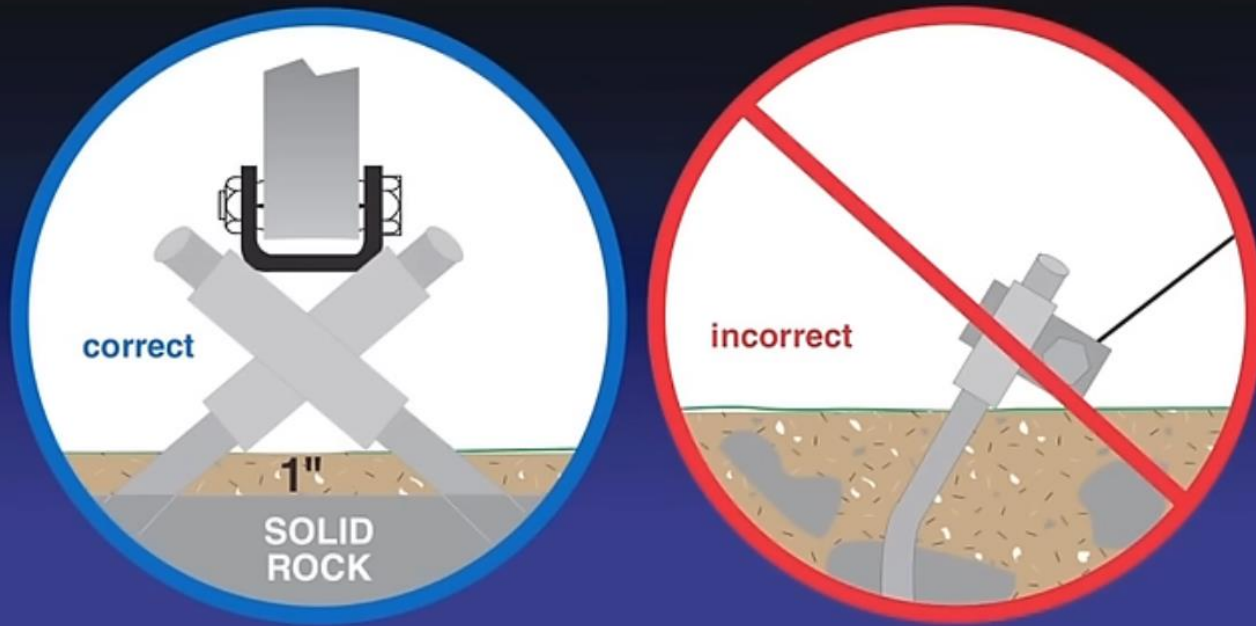
Minimum slab or footer area:

4" slab - 95 sf

6" slab - 65 sf

8" slab - 48 sf

Rock Anchor Installation



Rock Anchors

Rock Anchors are to be installed in Solid Rock only.

Rock anchors are not intended for use in hard compacted soils.

Vertical and Lateral Anchoring



Proper Ground Anchor Installation



Safety is our concern

- ▶ **Understanding Wind Zones and Soil Conditions:** Proper assessment of the wind zones and the soil classes helps to ensure the home performs as designed.
- ▶ **Selecting the Correct Anchor Type:** Whether using ground anchors, rock anchors, or concrete anchors, selecting the appropriate type based on soil class or concrete is vital for achieving maximum stability and safety
- ▶ **Following Installation Best Practices:** Utilizing tools like the Soil test probe to verify soil classification and adhering to installation instructions will ensure anchors are properly placed and secured.
- ▶ **Compliance with Regulations:** Always follow the installation instructions for the home manufacturer and anchor manufacturer