



MANUFACTURED HOUSING CONSENSUS COMMITTEE

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To: MHCC

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Date: June 14, 2019

Subject: MHCC Letter Ballot VII – Actions as taken at April 30 - May 2, 2019 MHCC Meeting

Below are the final results from the letter ballot of actions as taken at the April 30 - May 2, 2019 MHCC meeting which took place in Washington D.C.

Ballot VII – Actions as taken at April 30 - May 2, 2019 MHCC Meeting

21 Members Eligible to Vote

20 Ballots Returned

1 Ballot Not Returned – Luca Brammer

The number of votes required to pass an item with a 2/3rds majority is based on number of ballots returned minus the number of abstentions. All items on this ballot received at least the required number of affirmative votes, thus all items passed.

The final voting results are summarized in the table below.

Ballot Item No.	Log No.	Section	MHCC Meeting Action	Affirm	Negative	Abstain
VII-1	Log 123	§ 3280.511(a)(2) Comfort cooling certificate and information	Disapprove	20	0	0
VII-2	Log 146	§ 3285.304 (b)(2) Pier configuration	Approve	20	0	0
VII-3	Log 147	§ 3285.304 (c)(3) Pier configuration	Approve	20	0	0
VII-4	Log 148	§ 3286.411 (b) Certifying installation	Approve	20	0	0
VII-5	Log 149	§ 3280.609(c)(1)(iii) Water distribution systems	Disapprove	20	0	0

Ballot Item No.	Log No.	Section	MHCC Meeting Action	Affirm	Negative	Abstain
VII-6	Log 150	§ 3280.103(b) Light and ventilation	Disapprove	20	0	0
VII-7	Log 155	§ 3280.504(a)(1) & 3280.504(d)(i) Ceiling vapor retarders	Approve	17	3	0
VII-8	Log 156	§ 3280.103(b)(5) & 3280.103(b)(6) Light and ventilation	Approve	20	0	0
VII-9	Log 157	§ 3280.109 Room requirements	Approve	20	0	0
VII-10	Log 158	§ 3280.309 Health Notice on formaldehyde emissions	Disapprove	20	0	0
VII-11	Log 164	§ 3285.2, paragraph (b)(4) Manufacturer installation instructions	Approve	20	0	0
VII-12	Log 165	§ 3285.5 Definitions	Approve as Modified	20	0	0
VII-13	Log 167	§ 3285.102 Installation of manufactured homes in flood hazard areas	Approve	20	0	0
VII-14	Log 168	§ 3285.102(d) Installation of manufactured homes in flood hazard areas	Approve as Modified	20	0	0
VII-15	Log 169	§ 3285.301(a) General	Disapprove	20	0	0
VII-16	Log 171	§ 3280.607(b)(5)(ii) Standpipes	Approve	20	0	0
VII-17	Log 172	§ 3282.255(a) Completion of information card	Approve	20	0	0
VII-18	Log 175	§ 3280.707 Heat producing appliances	Approve	20	0	0

Ballot Item No.	Log No.	Section	MHCC Meeting Action	Affirm	Negative	Abstain
VII-19	Log 176	§ 3280.714 Appliances, cooling	Approve	20	0	0
VII-20	Log 177	§ 3280.305 and 3280.306 Structural design requirements and Windstorm protection	Disapprove	20	0	0
VII-21	Log 178	§ 3282.352 State exclusive IPIA functions	Approve	20	0	0
VII-22	Log 181	§ 3282.14(c)(3) Alternative construction of manufactured homes	Approve	20	0	0
VII-23	Log 183	§ 3280.711 Instructions	Disapprove	20	0	0
VII-24	Log 184	§ 3280.304 (b)(1) Materials & 3280.307 Resistance to elements and use	Approve	20	0	0
VII-25	Log 185	§ 3280.106 Exit facilities; egress windows and devices	Approve	20	0	0
VII-26	Log 187	§ 3280.105 Exit facilities; exterior doors	Disapprove	20	0	0
VII-27	Log 188	§ 3280.607(b)(3)(i) Plumbing fixtures	Approve	20	0	0
VII-28	Log 189	§ 3280.113 Glass and glazed openings	Approve	20	0	0
VII-29	Log 191	§ 3280.404. Standard for egress windows and devices for use in manufactured homes	Disapprove	20	0	0

Ballot Item No.	DRC No.	Section	MHCC Meeting Action	Affirm	Negative	Abstain
VII-30	DRC 8	FR6030-N-01 – 24 CFR 3280.309	Reviewed and Considered – No Further Action Required	20	0	0
VII-31	DRC 11	FR6030-N-01 – 24 CFR part 3286.803	Reviewed and Considered – No Further Action Required	20	0	0
VII-32	DRC 13	FR6030-N-01 – 24 CFR Part 3286.803	Reviewed and Considered – No Further Action Required	20	0	0
VII-33	DRC 14	FR6030-N-01 – 24 CFR 3280.309	Reviewed and Considered – No Further Action Required	20	0	0
VII-34	DRC 19	FR6030-N-01 – Outdated Regulations	Reviewed and Considered – No Further Action Required	20	0	0
VII-35	DRC 22	FR6030-N-01 – Formaldehyde Notices	Reviewed and Considered – No Further Action Required	20	0	0
VII-36	DRC 31	FR6030-N-01 – Interpretive Bulletin	Reviewed and Considered – No Further Action Required	20	0	0
VII-37	DRC 93	FR6075-N-01 – On-site Rule Burdens	Reviewed and Considered – No Further Action Required	20	0	0
VII-38	DRC 94	FR6075-N-01 – On-site Rule Burdens	Reviewed and Considered – No Further Action Required	20	0	0
VII-39	DRC 95	FR6075-N-01 – On-site Rule Burdens	Reviewed and Considered – No Further Action Required	20	0	0
VII-40	DRC 96	FR6075-N-01 – On-site Rule Burdens	Reviewed and Considered – No Further Action Required	20	0	0
VII-41	DRC 99	FR6075-N-01 – On-site Rule Burdens	Reviewed and Considered – Reject Premise and Conclusion	20	0	0
VII-42	DRC 102	FR6075-N-01 – Installation Manual	Reviewed and Considered – No Further Action Required	20	0	0
VII-43	DRC 103	FR6075-N-01 – Installation Manual	Reviewed and Considered – No Further Action Required	20	0	0
VII-44	DRC 104	FR6075-N-01 – Installation Manual	Reviewed and Considered – No Further Action Required	20	0	0

Ballot Item No.	DRC No.	Section	MHCC Meeting Action	Affirm	Negative	Abstain
VII-45	DRC 105	FR6075-N-01 – Installation Manual	Reviewed and Considered – No Further Action Required	20	0	0
VII-46	DRC 106	FR6075-N-01 – Installation Manual	Reviewed and Considered – No Further Action Required	20	0	0
VII-47	DRC 107	FR6075-N-01 – Installation Manual	Reviewed and Considered – No Further Action Required	20	0	0
VII-48	DRC 150	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-49	DRC 151	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-50	DRC 152	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-51	DRC 153	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-52	DRC 154	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-53	DRC 156	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-54	DRC 157	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-55	DRC 158	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-56	DRC 169	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-57	DRC 170	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-58	DRC 171	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-59	DRC 172	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0

Ballot Item No.	DRC No.	Section	MHCC Meeting Action	Affirm	Negative	Abstain
VII-60	DRC 173	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-61	DRC 174	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-62	DRC 175	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-63	DRC 176	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-64	DRC 177	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-65	DRC 178	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-66	DRC 179	FR6075-N-01 – Frost-free	Reviewed and Considered – No Further Action Required	20	0	0
VII-67	DRC 247	FR6075-N-01 – Formaldehyde	Reviewed and Considered – No Further Action Required	20	0	0
VII-68	DRC 248	FR6075-N-01 – Formaldehyde	Reviewed and Considered – No Further Action Required	20	0	0

Ballot Item No.	Description of MHCC Motion	Affirm with Comment	Negative	Abstain
VII-69	MHCC Motion to Approve the Draft September 11-13, 2018 MHCC Committee Meeting Minutes.	20	0	0
VII-70	MHCC Motion: Approve and submit comments/answers to DOE's NODA on Energy Conservation Standards for Manufactured Housing to the Department of Energy. (<i>Appendix B</i>)**	20	0	0
VII-71	MHCC Motion: No changes are required to the current Part 3285— Model Manufactured Home Installation Standards regarding Frost-free Foundations. Request HUD to never finalize the proposed Interpretative Bulletin regarding Frost Free Foundations.	20	0	0

** The corresponding appendix can be found in the [MHCC April 30 – May 2, 2019 Meeting Minutes](#).

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

[Ballot Item VII-7: Log 155 - § 3280.504\(a\)\(1\) & 3280.504\(d\)\(i\) Ceiling vapor retarders](#)

MHCC Meeting Action - Disapprove (14 Affirm, 3 Negative, and 0 Abstain)

Comment(s) Received – 3

Affirmative – 0

Negative – 3

David Tompos: There are some inconsistencies between the MHCCS and the IRC that I think should be resolved before this is approved.

For this change to be acceptable the following changes should be made to 3280.504(d)(i)

The minimum free ventilating area shall be 1/150 of the area of the vented space.

Exception: The minimum net free ventilation area shall be 1/300 of the vented space provided one or more of the following conditions are met:

1. In Uo Value Zone 2 and 3, a Class I or II vapor retarder is installed on the warm-in-winter side of the ceiling.
2. Not less than 40 percent and not more than 50 percent of the required ventilating area is provided by ventilators located in the upper portion of the attic or more than 3 feet below the ridge or highest point of the space, measured vertically, with the balance of the required ventilation provided by eave or cornice vents. Where the location of wall or roof framing members conflicts with the installation of upper ventilators, installation more than 3 feet below the ridge or highest point of the space shall be permitted.

Where eave or cornice vents are installed, insulation shall not block the free flow of air. Not less than a 1-inch space shall be provided between the insulation and the roof sheathing and at the location of the vent.

Joseph Sadler: After discussing this issue with others on the committee, it is apparent that the vapor retarder may be needed on homes in certain climate areas, especially in the extreme Northern part of the US and Canada. I recommend this go to committee to modify for certain area of the country.

Michael Moglia: In the cold climates this will be an issue. Vapor retarder should remain required.

Abstain – 0

[Ballot Item VII-70: Approve and submit comments/answers to DOE's NODA on Energy Conservation Standards for Manufactured Housing to the Department of Energy.](#)

MHCC Meeting Action - Approve as Modified (17 Affirm, 0 Negative, and 0 Abstain)

Comment(s) Received – 1

Affirmative – 1

Stacey Epperson: Next Step supports energy efficiency for manufactured homebuyers and believes it is key to longer term affordability. Next Step opposes the creation of tiered system, whereby manufacturers may choose to adhere to a \$500, \$1,000 or \$1,500 standard or may opt out of adhering to the standard if the price of the home is less than or equal to the FHA Title I loan limit, currently set at \$69,686. Moving to such a system appears to put economic considerations against policy objectives, that by offering a suite of choices the environmental and energy considerations become secondary to economic considerations—prompting the likely result that manufacturers would chose the least costly option. It could be argued that creating a tiered system moves away from the purpose of the act, which is to bring manufactured homes up to the most recent IECC code, and focuses on a suite of options that fall far short without either an analysis of the cost benefit of each tier, or the extent to which each tier meets the standard. Potentially allowing the exemption of homes that meet or are below the FHA Title I loan limit would virtually ensure that lower price point homes, will not meet any aspect of the proposed rule. Purchasers of these homes (those who need it most) would receive none of the benefit of the proposed energy standard.

Negative – 0

Abstain – 0