



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

SEP 18 2014

MEMORANDUM FOR: All State Administrative Agencies
All Primary Inspection Agencies

FROM: Pamela Beck Danner, Administrator
Office of Manufactured Housing Programs

SUBJECT: Vertical Clearance for Combustible Cabinets above the Range

In several recent IBTS audits, an issue regarding the measurement of the height of kitchen cabinets above a range has been documented. Due to the potential for fire safety impact and the number of instances for which the issue was noted, the Department is issuing this memorandum to all IPIAs to clarify how the measure should be made.

Section 3280.204(e) of the Federal Manufactured Home Construction and Safety Standards states: "*Vertical clearance above the cooking top. Ranges shall have a vertical clearance above the cooking top of not less than 24 inches to the bottom of combustible cabinets.*"

The clearance is to be measured from the top most element of the cooking top burner to the lowest combustible part of the cabinet projection over the range (including any nominal framing.) For gas ranges the measurement would be made from the top of the burner grate and for electric ranges it would be from the top surface of the electric burner element.

To ensure clarity and uniformity for meeting the standard set forth above, the Department requests all IPIAs to review this issue with your IPIA field staff and revise your IPIA procedures, as necessary, to ensure that IPIA personnel understand how to assess compliance for this aspect of construction.

Please forward this memorandum to your manufacturer clients so they also understand how to assess compliance with the Standards regarding this issue. If you have any questions regarding this issue, please contact your agency's HUD liaison of this office at (202) 708-6423.