February 3, 2016

MEMORANDUM FOR: All Primary Inspection Agencies and Manufacturers

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

SUBJECT: Structural Design Requirements – Storage Live Load

Effective March 7, 2016, regulations published on September, 8, 2015, become effective for On-Site Completion of Construction of Manufactured Homes. As part of this Final Rule, the Department published changes to the structural design requirements establishing design live loads for attic floors [24 CFR 3280.305(k)]. As a reminder, these changes go into effect for manufactured homes that enter the first stage or phase of production on March 7, 2016.

This memorandum clarifies the intent of new standard, 24 CFR 3280.305(k)(2), established in part for homes having roofs with slopes less than 7:12 containing an attic area. This standard is intended to require manufacturers to design attic floors with a storage live load [20 pounds per square foot (psf)] for homes having roof slopes less than 7:12 only when the attic is provided with an access opening of at least 30 inches by 22 inches.

For homes having roof slopes less than 7:12 and provided with attic access openings that do not meet or exceed the previously stated dimensions, and the attic floors are not designed for the 20 psf storage live load, manufacturers must place a warning label on or adjacent to each access panel that states: “WARNING: ATTIC IS NOT DESIGNED OR TO BE USED FOR STORAGE. ACCESS IS PROVIDED FOR SERVICE OR INSPECTION ONLY.” The text of the label shall be at least ½ inch high and the label shall be at least 5 inches by 7 inches (see enclosed sample).

Please share this information with your client manufacturers and continue to ensure conformance to the Department’s requirements. If you have any questions regarding the matter addressed in this memorandum, please contact Jason McJury of this office at (202) 402-2480 or Rick Mendlen of this office at (202) 402-5608.
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