



MHCC Proposed Changes

November 20, 2014

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Log # 87 § 3280.112 Hallways		Date: 11/18/2014
Submitter:	Steve Anderson	
Requested Action:	Revised Text	
Proposed Change:	<p>§ 3280.112 Hallways. Hallways shall have a minimum horizontal dimension of 2836 inches measured from the interior finished surface to the interior finished surface of the opposite wall. When appliances are installed in a laundry area, the measurement shall be from the front of the appliance to the opposite finished interior surface. When appliances are not installed and a laundry area is provided, the area shall have a minimum clear depth of 2735 inches in addition to the 2836 inches required for passage. In addition, a notice of the available clearance for washer/dryer units shall be posted in the laundry area. Minor protrusions into the minimum hallway width by doorknobs, trim, smoke alarms or light fixtures are permitted.</p>	
Reason:	<p>The justification has nothing to do with cost. It has everything to do with fire safety. Basic physics teach us that the narrowed the hallway, the greater the velocity. This means that there is a greater chance of the chimney effect occurring in homes with narrower hallways than with wider hallways. Most building codes recognize these factors by enlarging hallway widths. Most local building codes require hallway widths to be from 36" to 48". Florida state code puts them at either 42" or 48" – depending on whether it is handicapped accessible or not. Los Angeles County Building Code is 36". Salt Lake City has adopted the 2012 version of the IBC, which places the width at 36 inches.</p>	
Substantiating Documents:	No	
Additional Cost:	Unknown	
Cost Benefit Explanation:	<p>This proposal does not pretend to be of any financial benefit – with regards to cost savings in the construction of the homes. Instead, the benefit comes from making the homes safer and the potential loss of life lessened. The question regarding cost savings comes from the problem of defining the worth of human life. To me, the cost is high – others have a different point of view.</p>	
Subcommittee Recommendation:		
Subcommittee Vote:		
Subcommittee Modification of Proposed Change:		
Consensus Committee Action:		
Vote:		
Current Status	Received by Secretariat	
Log History		

Log # 88 § 3280.715 Circulating Air Systems		Date: 10/08/2014
Submitter:	Task Force: Manuel Santana (chair), Debra Blake, & Tim O'Leary	
Requested Action:	Revise as follows:	
Proposed Change:	<p>§ 3280.715 Circulating air systems.</p> <p>(a)(1) Supply air ducts, fittings, and any dampers contained therein must be made of galvanized steel, tin-plated steel, or aluminum, or must be listed as Class 0 or Class 1 air ducts and air connectors in accordance with UL 181– 2003, Factory-Made Air Ducts and Air Connectors (incorporated by reference, see § 3280.4). Class 1 air Air ducts and air connectors must be located at least within 3 feet from of the furnace discharge bonnet or plenum must be rated to withstand the maximum discharge air temperature of the <u>equipment</u>. Air connectors must not be used for exterior manufactured home duct connection. A duct system integral with the structure must be of durable construction that can be demonstrated to be equally resistant to fire and deterioration as required by this section. Furnace supply plenums must be constructed of metal that extends a minimum of 3 feet from the heat exchanger measured along the centerline of airflow. Ducts constructed from sheet metal must be in accordance with the following table:</p>	
Reason:	Adding the requirement that the duct be rated to at least the maximum air discharge temperature of the equipment satisfies the fire safety concern and covers all installation cases without needing to specify type of equipment or type of duct.	
Substantiating Documents:	no	
Additional Cost:	<i>Missing</i>	
Cost Benefit Explanation:	<i>Missing</i>	
Subcommittee Recommendation:		
Subcommittee Vote:		
Subcommittee Modification of Proposed Change:		
Consensus Committee Action:		
Vote:		
Current Status	Received by Secretariat – Missing Cost/Benefit Information	
Log History	10/08/2014: Log 88 was submitted by a Task Force consisting of Manuel Santana (chair), Debra Blake, and Tim O'Leary. The TF was responsible for turning Action Item 1 – Supply Air Ducts Letter into a proposed change. Log 88 is the resulting proposed change. The proposed change is missing Cost/Benefit Information.	

Log # 89 § 3282.8 Applicability	Date: 11/19/2014
Submitter:	Mark Weiss
Requested Action:	Revised Text
Proposed Change:	<p>Revise 24 CFR 3280.2 Definitions as follows:</p> <p>Dwelling unit means one or more habitable rooms which are designed to be occupied by one family with facilities for living, sleeping, cooking and eating a structure designed and constructed for use as a permanent residence by one or more persons, with facilities for sleeping, eating, cooking, and sanitation, which constitutes an independent living unit. The term "dwelling" (as defined in 24 C.F.R. 3282.8(g) does not include recreational vehicles or other transportable structures designed, constructed, and utilized exclusively for temporary, non-residential occupancy.</p> <p>Manufactured home means a structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width or 40 body feet or more in length or which when erected on-site is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air-conditioning, and electrical systems contained in the structure. This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and complies with the construction and safety standards set forth in this part 3280. The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site. These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows. Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards (HUD Handbook 4900.1) or that it is automatically eligible for financing under 12 U.S.C. 1709(b).</p> <p>Revise 24 C.F.R. 3282.8 Applicability as follows:</p> <p>3282.8 (g) Recreational vehicles. Recreational vehicles are not subject to this part, part 3280, or part 3283. A recreational vehicle is a vehicle which is:</p> <ul style="list-style-type: none"> (1) Built on a single chassis; (2) 400 Square feet or less when measured at the largest horizontal projections; (3) Self-propelled or permanently towable by a light duty truck; and (4) Designed primarily not for use as a permanent dwelling but as temporary living quarters for recreational, camping, travel, or seasonal use. A recreational vehicle is a self-propelled or towable vehicle, or other transportable structure, not affixed to land either permanently or temporarily, that is neither designed, constructed nor utilized as a dwelling.

Reason:	At the urging of the recreational vehicle (RV) industry, legislation has been introduced in Congress (i.e. H.R. 5658) that would exempt certain RVs from the definition of “manufactured home” contained in the National Manufactured Housing Construction and Safety Standards Act of 1974 (as amended) (42 U.S.C. 5402(6)) (“Act”). Currently, the Act expressly exempts only “self-propelled recreational vehicle[s]” from the statutory definition of “manufactured home” and potential regulation by HUD pursuant to the Act. H.R. 5658 would create an extremely broad statutory exemption for “towed” RVs, with no size or single-chassis limitation, and for an undefined class of “Park Model” RVs with a “gross area of not greater than 400 square feet...” Given the fact that the Act, by its express terms, is a “housing” law and, in its original form, included no reference to RVs, expanded statutory RV exemption language would only exacerbate the problems caused by the later inclusion of “self-propelled” RVs. Such a broad statutory exemption, moreover, which could effectively create a class of unregulated de facto homes and thereby expose consumers to significant safety risks and home value issues, among other negative impacts, is unnecessary to address any potentially valid concerns raised by RV interests. It would also invite potentially unlimited requests for similar statutory exclusions for other types of existing structures and/or structures that could evolve with new technology in the future. Instead, since the Act defines regulated “manufactured homes” as designed for use as a “dwelling,” and there is no dispute that RVs are not designed for use as a “dwelling,” the sections cited above should be modified to exclude non-dwelling RVs from HUD regulation pursuant to the Act. Such regulation, based on the design, construction and use of RVs versus manufactured homes, would eliminate continuing disputes over the current definitions and exclusions based on size parameters and dimensions, as well as administrative interpretations regarding the proper measurement of those parameters, and create a firewall between manufactured homes designed and constructed as permanent residences and RVs.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	MHARR does not anticipate any impact on the cost of manufactured housing to the public as defined by the Act (42 U.S.C. 5403(e)) as a result of adoption of the proposed amendments.
Subcommittee Recommendation:	
Subcommittee Vote:	
Subcommittee Modification of Proposed Change:	
Consensus Committee Action:	
Vote:	
Current Status	Received by Secretariat
Log History	