Manufactured Housing Consensus Committee
Technical Structure and Design Subcommittee
Conference Call 6-15-11
Re-Draft

Tech Structure Roll Call	
Members	Attendance
Steven Anderson	Y
Ishbel Dickens	Y
Kevin Jewell	Y
Tim Sheahan	Y
Michael Wade	Y (not present at roll call but joined shortly after)
Greg Scott	N
Jeff Legault	Y
Frank Walter	Y
Richard Weinert	Y
David Tompos - Chair	Y
Adam Rust	N
Bill Stamer	Y
AO	
Joe Nebbia	
HUD	
Liz Cocke	
Guests	
Mark Weiss, MHARR	
Lois Starkey, MHI	

Highlights and Action Items

- MHI to send new draft of sprinkler proposal to AO for distribution
- AO to distribute the new draft of the sprinkler proposal to the subcommittee
    - There was a request that this document also be distributed to non-member interested parties
- AO to send out scheduling poll for call the week of June 27
    - There was a request that the scheduling poll be distributed to non-member interested parties
- Actions on Logs:
    - Log #76 – tabled until next conference call and circulation of new draft (one opposed)
    - Log #14 – Unanimous approval
    - Log #15 – Unanimous rejection
    - Log #34 – Approval – 2 abstentions
    - Logs #38-49 – Unanimous Approval
    - Logs #52-56 and 73 – Unanimous approval
    - Log #74 – Unanimous approval
    - Log #77 – Unanimous to table discussion

- Log #78 – Unanimous approval

Discussion

Meeting called to order at 1:03 p.m. eastern time.

Approval of minutes: from 1/25 and 2/25. Start with minutes on 1/25.

Mr. Walter made a motion to accept the minutes from 1/25 and 2/25. Mr. Weinert Seconded.

Vote: Unanimous approval

Mr. Anderson made a motion to accept the minutes from March 8. Mr. Walter seconded.

Vote: Unanimous approval

The group then discussed logs on the agenda.

Log #76
Fire sprinkler topic. The chair introduced the topic. MHI has a proposal for a design standard. There has been discussion about changing what they proposed to add pre-emptive language that says "fire sprinklers are not required by this sub-part." Follow that this section would establish the requirements when a manufacturer elects to install.

There was discussion how much sprinklers would improve safety. Some of the stats from NFPA show a high rate of survival from just smoke detectors. FEMA report showing deaths in all homes (page 116) – 3390 people killed in fires in 2005. Smoke alarms were not present in 42% of fires. Putting sprinklers in would only increase the survival rate by 0.19%. It would be a potential life savings of 2.5 people in 2005 assuming all deaths occur in manufactured housing. In that year there were nearly 150,000 manufactured homes. Typical cost of sprinkler system of about $2,000 (may be low) – to save 2.5 people with a cost to industry of $300 million potential.

There was a comment that the NFPA report was inflammatory – portrayed manufactured housing homeowners as alcoholics and smokers. Over 50% of homes in the report were pre-HUD. In some cases the hallways acted as chimneys. The materials they were built of were highly combustible back then. The report did not differentiate between pre-HUD and newer homes. The fire sprinklers in themselves, people will interfere with the sprinkler system. The systems will fail.

There was a comment that the MHCC needs to push HUD to add language and stand behind the industry saying current code does address fire safety and is preemptive. We need to add language if manufacturers elect to, to keep cost down.

MHARR supports the preemption item, but objects to a "where required" approach. It's likely that the preemption language could be deleted only leaving the "where required" standard.

There was subcommittee support for the idea of preemptive language, but one member expressed concerns about technical aspects of the proposal.

MHI stated that they support the change to add the preemptive language and to change the "where required" language to deal with situations where a builder chooses to install sprinklers or where a consumer requests it.

There was confirmation that no where required language in new draft, but that the draft has not been distributed to the group.

There was a request to see the new language.
There was a request to see it. MHI volunteered to send the new draft to the AO for distribution.

There was a question on why a standard is needed if this would be limited to manufacturer election or customer request. The concern is that it would be converted to an across the board standard.

There was a request for subcommittee members to give their opinions.

There was support from a subcommittee member expressing support for the MHI proposal.

There was another comment form a subcommittee member that if the standard preempts, the group then needs to discuss whether or not to require sprinklers. If preemption is not present, the MHCC wouldn't have to make that evaluation.

There was a comment from a subcommittee member that from a state government perspective, this is a good proposal. Local governments find ways to require unless preempted. With an "as needed standard" with HUD preemption, HUD then becomes the building department (or their SAA) There was also a comment that the NAHB information that was provided on sprinklers was very informative.

There was a subcommittee member question on whether sprinklers were required for stick built homes and a comment that if they are, why they wouldn't be required for manufactured homes as well.

There was clarification that sprinklers are not required nationwide, and that in Maryland where it was adopted statewide, it still has to be adopted by localities. There was a comment that fire marshals are having a lot of complaints about sprinkler requirements in California.

There was a suggestion that in jurisdictions where stick built homes are required to have sprinklers, manufactured housing should have a standard.

Mr. Walter made a motion to table until the next conference call and until the new draft proposal was distributed to the subcommittee. Mr. Anderson seconded.

Vote – 1 opposed. Motion passes.

MHI commented that they would like any feedback on the technical aspects of the proposal as well.

There was a request that the AO send out a scheduling poll for a call the week of June 27.
There was a request that non-members with interest be included in emails about that call and in the scheduling poll as well.

Log #14
This is a proposal to change AAMA standards in 3280.403B, 404B and 405B – a general update to the standard which makes it easier to get copies of the standard. Most current are the 2002 version. There was nothing identified as a significant change in this version. The log alludes to the cost of window and door flashing.

The group discussed current practices on flashing and there was general agreement that this would not add significant additional cost as most manufacturers already used some system of flashing.

Mr. Anderson made a motion to accept. Mr. Weinert seconded.

Vote: Unanimous approval.

Log #15

There was no specific language or change being suggested. There was a concern expressed that this was change dealt with a proprietary system.

Mr. Legault made a motion to reject. Mr. Anderson seconded.

Reason: Proprietary system and not in code language.

Vote: Unanimous – reject.

Log #34
Update to HPVA. There was one approved January 2010. The log recommends 2004 version.

There was a comment that HUD needs to adopt the up to date standard. There was a correction that this is not accurate. The requirement is for HUD to have 2 copies of the standard. If HUD can't get the standard, that's why they have to adopt a more recent version. That is what happened with NEC.

There was a comment that there was no problem with 2004, but there are technical problems with 2009. It requires more than double loading ratios than what department requires. There was a recommend not to accept 2009.

Mr. Walter made a motion to accept the 2004 standard by approving log #34. Mr. Anderson seconded.

Vote: Motion passes. 2 abstentions – Kevin Jewell and Ishbel Dickens. The reason - because the description of the issue was unclear.

Logs #38-49 are revisions to updating the standards. APA standards. According to the logs, there are no significant changes that would add cost.

Mr. Anderson made a motion to accept. Mr. Sheahan seconded.

There was a question on whether these standards were the most up to date version. Response - they are believed to be the most recent version and the MHCC and HUD will look at them as

well. There was a comment that these are already used anyway because they are done by suppliers. There was a comment that it would be good to know for sure that these are the most up to date versions in the full committee.

Vote: Unanimous approval.

Logs #52-56 and 73
These are all updates to ANSI standards.

Mr. Anderson moved to accept. Mr. Sheahan seconded.

Vote: Unanimous approval

Log #74
Submitted by the subcommittee chair – clarification of standard. This proposal is meant to address issues when there is a gypsum covered panel (covered with paper or vinyl). When this section was written, vinyl was not being used. This proposal is trying to clarify exemption for flame spread of 75 or less. Testing shows products in use are not close. It should be non-issue.

Mr. Anderson made a motion to accept. Mr. Weinert – seconded.

There was a question for the reason behind choosing a flame spread of 76-200 instead of 25-200? Response – just trying to clarify. In section 203, it talks about exemptions for flame spread at 76-200. This includes gypsum with decorative wall paper. This just clarifies that it also includes vinyl.

Vote: Unanimous approval.

Log #77
Submitted by subcommittee member – deals with quality control.

For years, in 3280.303b there has been antiquated language which refers to journeyman quality. It makes reference to construction being equal to journeyman quality. That's an antiquated phrase. In factories in US, while we have years of experience, we don't per say have journeyman workers that that language was suggesting. Lawyers have gotten a hold of that language and used it against the industry. Want to update the language.

There was a comment that the key word is construction methods. It's not talking about cosmetic quality of homes – meaning how homes meet the standard. The way it's proposed is under 3280.303B – "all construction methods shall be in conformance with …..Proposing addition of "with an approved quality assurance manual"

There was a suggestion of a friendly amendment. Instead of "an approved" say "the manufacturer's"

There was a comment that it was fine to strike the "journeyman" language as manufacturers already have to follow a quality assurance manual.

There was a comment that this language was not in the package distributed to the subcommittee and a suggestion that discussion should possibly be tabled until the group gets comments from plaintiff's lawyers. .

Mr. Jewell made a motion to table. Mr. Walter seconded. Ask that the language be re-circulated to subcommittee members.

Vote: Unanimous – table discussion.

The DFO commented that a lot of people at HUD would agree that "journeyman quality" is vague. They would also agree with the concern that it is a liability issue often. If there are attorney's that work in this area, the group may want to get feedback from consumer's lawyers. However, dropping altogether any requirement for quality of staff, HUD would not support. There needs to be a substitution of something that is more clear or used in other design and construction areas. More research needs to be done.

There was a suggestion to get language similar to what's in the statute… "meets high standards of quality."

There was a comment that when you talk about quality it can be subjective. Need to avoid talking about cosmetic issues instead of quality in meeting the standard.

There was a comment that while "journeyman" doesn't need to be there, there needs to be a substitution.

Log #78
This proposal is from a subcommittee member. Currently manufacturers purchase "kiln-dried" treated lumber. It's expensive. What this proposal tries to accomplish is specify that for construction totally exposed to ambient air – simplifies that it can be standard treated lumber and not kiln-dried. If moisture content doesn't matter because it's exposed to the elements, standard treated lumber should be acceptable.

There was a question on whether there is going to be disagreement on what "fully exposed to ambient air" means.

There was a question on why kiln-dried wood was ever needed. Response – if the treated lumber extends into cavity of home, moisture inside the home could cause problems. This would be treated lumber with ventilation to it. With pressure treated decking, typically moisture content is very high, and it can't be used on interior of the home.

There was clarification that the purpose of the change is that for exposed portions of constructions we can use normal pressure treated lumber. It's a cost savings.

There was a question on whether anyone in the group saw a down-side to this change.

There was a question on the maximum moisture content that would be allowed. Response – maximum doesn't matter if it's exposed to the air. Pressure treated lumber is more moist because it's been treated. This change doesn't change anything about requirements for storage of materials.

There was a question about shrinkage of lumber. No one had data on that.

Mr. Anderson made a motion to accept. Mr. Wade seconded.

Vote: Unanimous approval.

The chair asked if anyone had additional business.

MHI commented that they appreciate hearing from other people outside industry on these issues. And urged subcommittee members not to hesitate to ask questions or give input.

Motion to adjourn and second.
Vote: Unanimous approval