

Manufactured Housing Consensus Committee

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TO: MHCC Committee Members
FROM: Robert E. Solomon
DATE: January 18, 2012
SUBJECT: Final Results of the Circulation of Votes on Part 3280
Letter Ballot 2011 – Log #2

The December 9, 2011 Circulation of Votes ballot deadline has yielded the following vote:

21 Members Eligible to Vote
18 Ballots Received
3 Ballot Not Received – Timothy King, Gregory Scott, Michael Wade

All votes were affirmative on all ballot items with the exception of those noted below and in the attached report.

Affirmative with Comments

<u>Proposal No.</u>	<u>Log No.</u>	<u>Section</u>	<u>Name</u>
3280	2	3280.112	S. Anderson, M. Lubliner

Negative

<u>Proposal No.</u>	<u>Log No.</u>	<u>Section</u>	<u>Name</u>
3280	2	3280.112	T. Desfosses, M. Luttich, M. Santana, W. Stamer, D. Tompos

Abstain

<u>Proposal No.</u>	<u>Log No.</u>	<u>Section</u>	<u>Name</u>
3280	2	3280.112	L. Poggione

Copies of the Affirmative with Comments, Negative and Abstentions are enclosed.
The MHCC requires a letter ballot or an equivalent formal recorded vote with approval of two-thirds of the *MHCC*. This item received the necessary 2/3rds affirmative vote to be submitted as a formal recommendation to HUD.

MHCC 2011 LETTER BALLOT ON PART 3280-LOG #2 COMMENTS

3280 LOG #2 – Section 3280.112

AFFIRMATIVE WITH COMMENTS:

STEVE ANDERSON: My affirmative vote is a reluctant vote and is only given because it is the best we can do for the moment given the circumstances. What is disheartening is that after contacting the Clayton Home and Champion Home dealerships in Salt Lake City and discovering that they don't offer any models without 36" hallway widths. It was further disheartening to learn that the salespersons at both establishments would strongly discourage any consumer from anything less than that for the following reasons:

1. Functionality
2. Resale of the Home in the Future
3. Safety
4. Future Accessibility

What bothers me is that the sales and marketing people who represent these manufacturers understand what is going on; however, the manufacturer's representatives who sit on this committee don't.

We deal with immigrants who, when they purchase a broken down pre-HUD home that is ready for the landfill from a less than reputable dealer, think they've bought the Taj Mahal – compared to what they lived in before. Those of us who are used to a higher standard know better. Do we want to leave the choice of hallway widths somebody who is completely unaware? I don't think so!

MICHAEL LUBLINER: I support 36" and further improvement.

NEGATIVE WITH COMMENTS:

THERESA M. DESFOSES: I do not agree with the proposal because it eliminates smaller homes.

MARK LUTTICH: I am unable to support Log #2 and the committee's statement because the statement and the submitter's substantiation did not:

1. Provide substantiation that the Standard's current hallway width is inadequate for egress,
2. Provide substantiation that the proposed revised hallway width would rectify the theoretical egress inadequacy,

3. Provide documentation that the proposed revised hallway width would rectify the access concern for persons using walkers and wheelchairs, and
4. Take into consideration multi-section homes made up of unequal section lengths.

MANUEL SANTANA: I voted against this proposal because there was no substantiation, evidence or arguments provided that addressed egress. The proposal in its original form was intended to address accessibility not egress. This proposal is using egress as a euphemism for accessibility. The minutes reflect that all of the substantiation was based on accessibility issues and concerns. The HUD code provides minimum safety and construction standards, accessibility issues should not be mandated in a building code. Proof of this can be found in the 2009 IRC, the IRC only requires residential buildings with 4 or more dwellings to consider accessible construction.
Source: 09 IRC §R322

WILLIAM H. STAMER: I am voting negative until all accessibility/life safety proposals are thoroughly discussed by the subcommittee and a formal recommendation is submitted to the full MHCC Committee with all back up material such as gurney sizes, wheel chair sizes, etc.

This proposal is for 1 floor width. All floor widths must be investigated.

DAVID TOMPOS: The benefit of the additional 2” change in the minimum horizontal dimension of hallways does not outweigh the cost of design changes and third party plan review costs. This change may also limit floor plan options and room sizes for the consumer. Currently the consumer has the option to purchase a home with the wider hallways at no added cost to the industry.

ABSTAIN

LEO POGGIONE: I believe the industry is already complying with this proposal and it is not necessary for that reason.