



Department of Forestry & Fire Protection
Office of the State Fire Marshal

WILDLAND-URBAN INTERFACE BUILDING STANDARDS INFORMATION BULLETIN

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APPLICATION OF WILDLAND-URBAN INTERFACE BUILDING STANDARDS TO MANUFACTURED HOMES

The purpose of this Information Bulletin is to provide clarification regarding the applicability of the Wildland-Urban Interface Building Standards contained in Title 24, Part 2 California Building Code (CBC), Chapter 7A to manufactured homes, mobilehomes, multifamily manufactured homes, and commercial modulars.

Most provisions of CBC Chapter 7A building standards will apply to manufactured homes, mobilehomes, multifamily manufactured homes, and commercial modulars installed in State Responsibility Areas (SRA), Local Responsibility Areas (LRA), and Wildland-Urban Interface (WUI) areas as established by local governments. The application of Chapter 7A is being made specific through the Department of Housing and Community Development's (HCD) emergency adoption of exterior fire resistive construction standards, including adoption of portions of Chapter 7A by reference into the California Code of Regulations, Title 25, Division 1, Chapter 3, Subchapter 2, (25 CCR) Article 2.3 (commencing with section 4200).

The regulations contained in 25 CCR Article 2.3 apply to the design, construction, and installation of exterior fire resistive construction systems on manufactured homes, mobilehomes, multifamily manufactured homes and commercial modulars including materials, systems and methods of construction. Additionally, specified parts of CBC Chapter 7A apply to assemblies and structures installed or added as mobilehome accessory structures or buildings (as defined in HSC Section 18213) to manufactured homes, mobilehomes, multifamily manufactured homes, or commercial modulars such as awnings, carports, decks, porches, ramadas, ramps, and cabanas.

Depending on whether the work involves the main structure (e.g., manufactured home) or a mobilehome accessory structure (e.g. cabana), the work also is subject to the construction and permit provisions of the Manufactured Housing Act (Division 13, Part 2, commencing with HSC Section 18000) and 25 CCR Division 1, Chapter 3, Subchapter 2, commencing with section 4000); or the Mobilehome Parks Act (Division 13, Part 2.1, commencing with HSC Section 18200) and Title 25, CCR, Division 1, Chapter 2, commencing with Section 1000).

Except as provided within 25 CCR, Article 2.3, HSC Section 18030.5 prohibits the enforcement of local ordinances or regulations prescribing requirements in conflict with, or in excess of, the standards prescribed by California law and regulations adopted thereto.

The Manufactured Home Construction and Safety Standards (24CFR, Part 3280) promulgated by the U.S. Department of Housing and Urban Development (HUD) for the construction of manufactured housing are preemptive over any State or local standard in conflict with these Federal standards. However, in this instance the HUD standards do not address construction of manufactured homes relevant to exterior fire resistive construction systems and therefore are not preemptive as there is no conflict.

Similarly, HCD's standards for mobilehomes, manufactured homes (if not subject to the National Manufactured Housing Construction and Safety Standards Act of 1974), multifamily manufactured homes, and commercial modulars preempt local government rules and regulations (HSC Section 18015) except where local authority is expressly established by the Legislature. In addition, HCD standards for physical operation and construction of mobilehome parks and installation of manufactured homes, mobilehomes and multifamily manufactured housing inside or outside of mobilehome parks preempt most local government authority (HSC Section 18300).

Any person buying, selling, altering, or installing a manufactured home, mobilehome, multifamily manufactured home, or commercial modular, or any person involved in the inspection or approval of those units upon installation or alteration, should review 25 CCR, Article 2.3 to ensure that the CBC Chapter 7A building standards are properly applied and that the proper procedures for HCD or local government permits and inspections are complied with.

Questions regarding the application of CBC, Chapter 7A as it relates to manufactured homes, mobilehomes, multifamily manufactured homes or commercial modulars should be directed to HCD's Manufactured Housing Program at (916) 445-3338 or HCD's Mobilehome and Special Occupancy Parks Program at (916) 445-9471, or, for either, through the HCD web comment form at www.hcd.ca.gov/comments/ .

Other questions or comments regarding this Information Bulletin should be directed to Kevin Reinertson, Regulations Coordinator at (916) 327-4998, or by electronic mail to kevin.reinertson@fire.ca.gov.