

Testimony of
Pacific Resource Partnership

State of Hawaii
Department of Accounting and General Services
State Building Code Council
State Building Code Council (SBCC) Meeting

Proposed Amendments to the Hawaii State Residential Code
Tuesday, September 15, 2020
9:00 a.m.

Aloha Members of the State Building Code Council:

At the last Subcommittee of Building Officials Meeting on September 10, 2020, there was some discussion as to whether Appendix E, Manufactured Housing Used As Dwellings, of the 2018 International Residential Code (IRC) should be considered as an amendment to the Hawaii State Residential Code.

Pacific Resource Partnership **opposes** the adoption of Appendix E to the Hawaii State Residential Code. The National Manufactured Housing Construction and Safety Standards Act of 1974 authorizes HUD to establish federal standards for the design and construction of manufactured homes. HUD issues and enforces appropriate standards for the construction, design, performance, and installation of manufactured homes to assure their quality, durability, affordability, and safety.

More specifically, HUD regulation, 24 CFR § 3285, provides federal standards for the installation of manufactured homes. Homebuilders should follow these federal standards over the installation standards found in Appendix E to ensure compliance with federal requirements of which may preempt State and local laws.

Further, at the September 10, 2020 Subcommittee of Building Officials Meeting, Subcommittee Members stated that they are not recommending the adoption of administrative provisions from the 2018 IRC. Since Appendix E consists of administrative provisions, such as permitting, fees, and inspections, we hope the Subcommittee will remain consistent in their intent to avoid the adoption of administrative provisions and refrain from recommending the adoption of Appendix E as a part of the Hawaii State Residential Code.

Given the above, PRP respectfully request that the State Building Code Council not adopt Appendix E.

Thank you for this opportunity to provide written comments.

