

STANDARDS NEWS



November 2, 2012

Standards News Bulletin

SNB-23/12

TO: Recreation Park Trailer Manufacturers and Other Interested Parties

FROM: Bruce A. Hopkins, Vice President Standards and Education

SUBJECT: Recreation Park Trailer Measuring

This Standards News Bulletin is intended to address the issues associated with measuring the size and calculating the square footage of a Recreation Park Trailer (RPTs). RPTs built by RVIA members for sale in the U.S. must be 400 sq. ft. or less in gross trailer area. The RVIA position regarding what is included in the measurement will continue to be based on the “shadow rule.” This rule presumes that the square footage of any RPT or RV is based on the dimensions of a shadow cast by the unit at high noon with the roof removed. This position derives from a 1988 HUD interpretive bulletin HUD A-1-88 (See attached).

When measuring the dimensions of the recreation park trailer to calculate the square footage, measurements must be taken on the exterior. Square footage includes all siding, corner trims, moldings, storage spaces, and areas enclosed by windows but not the roof overhang. This means bay windows are included regardless of their height or location.

Porches, patios, decks, and enclosed door entries are not considered interior space and are not included in the square footage calculation. This position is supported by a letter from HUD dated July 20, 1989 (see attached.) To qualify as a porch, patio, or deck the area cannot be enclosed in any manner with the exception of guardrails and roof supports. Also the RPT must have an exterior finish material that makes the structure useable without the addition of the porch, patio, or deck. Porches manufactured as an integral part of the RPT must also meet all applicable requirements in Chapter 5 of ANSI A119.5.

Loft areas with a ceiling height of less than 5’0” are not considered as part of the square footage calculation. This position is supported by a letter from HUD dated August 1, 1997 (See attached). This means any loft floor areas with a ceiling height of 5’0” or greater must be added to the total square footage calculation. In some cases where the ceiling height of the loft varies from under 5 feet to over 5 feet, only that portion of the loft area(s) that exceeds 5 feet would need to be added to the calculation. If a park trailer contains a “second story” with a ceiling height of over 5’0” all square footage of the second story must be included in the calculation.



RECREATION VEHICLE INDUSTRY ASSOCIATION STANDARDS DEPARTMENT

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RPTs with single slope roofs are permitted only if they are useable as a standalone structure. This means the entire unit must have exterior finish material. This also means the RPT must contain a bathroom and a kitchen. Other features that are designed to accommodate the attachment of an entire additional structure (double wide) would not be permitted. For example a RPT with a single slope roof could not contain a loft without a staircase or vice versa. Another example would be a RPT that has a bathroom door that only opens to the exterior.

A step by step procedure for measuring RPTs and calculating their square footage is outlined below:

1. Measure the main box dimension (length and width) corner to corner. Determine the square footage of the main box including all siding, corner trim, moldings, etc.
2. Measure any bay windows, walk in bays or other projections that extend beyond the basic main box. Determine the square footage of the projections including moldings, trim, etc.
3. Measure the floor area of any loft area where the ceiling height is 5'0" or greater. This may only be a portion of the loft area. Determine the square footage of the qualifying loft area.
4. Determine the square footage of any voids created when the "basic box" was measured. A "void" is usually present when measuring the basic box from corner molding to corner molding. The void is created by the protrusion of the corner molding and can be seen between the measuring tape and the exterior siding. **[Note: To determine the square footage of voids, first determine the width of the void (typically the thickness of the corner molding) and then the length. The length of the void must be determined from the plan view. It will include all horizontal spaces along the exterior sidewall(s) that contain no moldings. It is possible that a bottom molding along the length and width of a unit or a horizontal molding between vertical and horizontal siding would eliminate any voids altogether.]**

For purpose of this step the following types of moldings must be considered:

- a. corner moldings
- b. window moldings
- c. door moldings
- d. bottom moldings
- e. horizontal moldings.

The following need not be considered as a part of square footage: (1) shutters (2) storm windows.

[Note: It should be noted that with the common thickness of a vinyl molding being 3/8", no more than a couple of square feet (2'-3' max.) can be gained through calculations. If the basic box and bays, etc. exceed 403', subtracting the voids would likely not help. With a log sided unit, the molding is usually 3/4", and the most that could be gained by subtracting the voids would still not likely exceed 6 square feet maximum.]

5. To determine the total square footage of the RPT, add the totals from steps 1, 2 and 3 above. Then subtract this total from step 4. The total must not exceed 400.00 sq. ft.

If you have questions please contact Matt Wald.
SE12139/gg

By regulation, the Department of Housing and Urban Development has exempted recreational vehicles, from the requirements for manufactured homes in the National Manufactured Housing Construction and Safety Standards Act of 1974 ("Act"). Recreational vehicles are defined in part as "a vehicle which is . . . 400 square feet or less when measured at the largest horizontal projections . . ." 24 C.F.R. § 3282.8(g)(2).

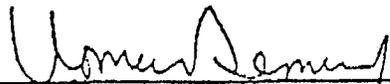
It has come to the Department's attention that confusion exists in both the manufactured housing and recreational vehicle industries. Specifically, questions have arisen concerning the correct method of measurement of homes for purposes of determining the applicability of the recreational vehicle exemption at 24 C.F.R. § 3282.8(g). In particular, there seems to be confusion about what is meant by the largest horizontal projection and what parts of the home are included in calculating the 400 square feet.

Accordingly, HUD interprets § 3282.8(g) as follows:

1. In calculating the square footage of a home, measurements shall be taken on the exterior of the home. The square footage includes all siding, corner trim, and molding, storage space, and area enclosed by windows but not the roof overhang.

This Interpretative Bulletin is issued pursuant to 24 C.F.R. §§ 3280.1(c) and 3282.113. The Secretary has received requests from both manufacturers and state officials urging immediate action on this matter so that home designs may be completed and policies clarified prior to the start of production for the new model year. Therefore, due to the need for an expeditious resolution of these issues, the Secretary deems it would not be in the public interest to issue this interpretation for public comment in the Federal Register or to otherwise treat this Interpretative Bulletin as rulemaking.

While this interpretation is effective immediately, the Department is aware that there has been genuine confusion on the part of certain manufacturers on how to calculate the qualifying measurements for the exemption and that there is a need for a time period in which to redesign homes that may be just over 400 square feet. Therefore, the Secretary will exercise his discretion to not enforce against manufacturers of such homes completed and ready for shipment prior to January 30, 1989 where the reason for exceeding 400 square feet was failure to measure all siding, corner trim or molding or failure to count the area enclosed by storage space or windows. However, the Secretary will not exercise this discretion and therefore may enforce with regard to homes where the floor decking in window projections is less than 12 inches higher than the regular home floor decking (sometimes known as "walk-a-bays") or where the projecting window area contains such a floor but also contains a shelf or platform that is designed to be removable. Such homes must immediately either comply with the requirements of Section 3282.8(g) or the construction and safety standards set forth in the Act and HUD regulations.



Thomas T. Demery
Assistant Secretary

OCT - 5 1988

Date: _____



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-8000

OFFICE OF THE ASSISTANT SECRETARY FOR
HOUSING-FEDERAL HOUSING COMMISSIONER

JUL 20 1989

RECEIVED
JUL 25 1989
RADCO, GOSHEN

RADCO
P. O. Box 812
Goshen, IN 46526

Dear Mr. Finn:

This responds to your recent letter concerning the floor space of an add-on patio unit of a manufactured home. You question whether or not the floor space of the add-on is included in the calculation of the total square feet of the structure to determine if the structure may be exempted from the Manufactured Home Construction and Safety Standards under the recreational vehicle exemption.

The patio space, being exterior space, would not be included. In Section 3280.2(a)(16), the definition of a manufactured home makes it clear that the calculation only includes interior space. This determination assumes that the interior living space module has been finished with an appropriate exterior covering so as to make the structure useable without the addition of the patio add-on.

Sincerely,

Donald R. Fairman
Chief, Standards and Products Branch
Manufactured Housing and Construction
Standards Division

HUD LOGO

U.S. Department of Housing and Urban Development
Washington, D.C. 20410-8000

OFFICE OF THE ASSISTANT SECRETARY
FOR HOUSING - FEDERAL HOUSING COMMISSION

AUG 1, 1997

Mr. Alan Murray
16825 Highway 101 N.
Smith River, California 95567

Dear Mr. Murray:

This is in response to your letters of July 25 and 28, 1997, addressed to Mr. Rick Mendlen of my staff, concerning whether certain construction used in park models subjects them to HUD's authority under the Manufactured Housing Act and Standards.

Specifically, you have asked if lofts in park model units which are less than 5'-0" in ceiling height are to be included in determining whether a structure is within or exceeds the 400 square foot or less requirement to be considered a recreational vehicle under the Department's Regulations, 24 CFR 3282.8(g) and Enforcement Interpretative Bulletin A-1-88.

Although this matter was not addressed in A-1-88, it has been the Department's practice not to consider areas which are less than 5'-0" in height as part of the gross floor area (24 CFR 3280.102 and .104). In view of this practice, any loft area which is less than 5'-0" in height would not have to be considered in determining whether a structure was subject to the Department's Standards and Regulations. However, this decision does not, in any way, affect actions which the Department of Housing and Community Development of the State of California may take under state law and authority to regulate the construction of park trailers.

If you have any questions, please contact Mr. Rick Mendlen of my staff at (202) 708-6423

Sincerely,

David R. Williamson
Director
Office of Consumer and
Regulatory Affairs

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