



DEPARTMENT OF FIRE, BUILDING AND LIFE SAFETY

MARICOPA COUNTY
1110 West Washington, Suite 100
Phoenix, Arizona 85007
(602) 364-1003
(602) 364-1052 FAX

OFFICE OF ADMINISTRATION * OFFICE OF MANUFACTURED HOUSING * OFFICE OF STATE FIRE MARSHAL

May 24, 2010

RE: DESIGN ROOF LOAD ZONE "SOUTH" IN ARIZONA

Dear Local/County Jurisdiction:

The purpose of this letter is to confirm the Arizona Department of Fire, Building and Life Safety's position on snow load requirements throughout Arizona. Simply stated, the Department fully supports any zoning requirement set by a local jurisdiction as long as that requirement complies with the federal preemption related to the construction of manufactured homes. Specifically, and to further clarify:

24 CFR 3280 the United States Department of Housing and Urban Development's ("HUD") construction standards for manufactured homes are regulations that preempt any State or local requirement; therefore, no State or local jurisdiction can require the construction of a manufactured home to exceed this standard. **The HUD construction standard for Snow Roof Loads designates all of Arizona as Design Roof Load Zone "South" or a 20 pound roof load zone.**¹

24 CFR 3285.103 installation standards for manufactured homes are regulations that apply to **NEW** manufactured homes. These regulations **do not preempt** State or local jurisdictions and; therefore, the State or local jurisdiction may require the installation of a **NEW** manufactured home to exceed this standard.²

(Note: federal regulations do not address pre-owned or used manufactured homes).

Therefore, a local jurisdiction may set a snow load requirement of 30 PSF (Middle Zone) or 40 PSF (North Zone) to protect residents and based on that requirement, must accept manufactured homes that either:

1. Have been constructed with a 30 or 40 PSF roof load (*these homes may require a special foundation system designed by an Arizona Registered Engineer and approved by the State*); or
2. Have been constructed with a 20 PSF (South Zone) roof load AND will be installed with an alternative option to meet the local snow load requirement. The local jurisdiction must define the alternative option(s) which may include a protective roof cover, a roof snow load maintenance plan, and/or an alternative reasonable option.

¹ <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&rgn=div5&view=text&node=24:5.1.3.1.1&idno=24>

² [http://ecfr.gpoaccess.gov/cgi/t/text/text-](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=5ef694d3c382ebc4a47fa643cc3e041b&rgn=div6&view=text&node=24:5.1.3.1.4.2&idno=24)

[idx?c=ecfr&sid=5ef694d3c382ebc4a47fa643cc3e041b&rgn=div6&view=text&node=24:5.1.3.1.4.2&idno=24](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=5ef694d3c382ebc4a47fa643cc3e041b&rgn=div6&view=text&node=24:5.1.3.1.4.2&idno=24)

On July 24, 2009, the Department issued a letter to all local jurisdictions to clarify HUD's regulations and standards and announce the new Arizona Installation Program and provided the following information:

- Arizona's new Installation Program was fully implemented on January 1, 2009 and applied to all **NEW** manufactured homes constructed after January 1, 2009, with two exceptions:
 - i. Existing inventory on dealer lots throughout the state could be installed in any area with a Design Roof Load Zone "South"; and
 - ii. Any fully executed purchase contract for a **NEW** manufactured home dated prior to January 1, 2009 where the manufactured home would be constructed over the next couple of month into 2009 could also be installed in any area with a Design Roof Load Zone "South".

(Note: All bolded words and phrases have been added for emphasis)

The Department appreciates the cooperative support of the local jurisdictions for the above exceptions and believes that such a consensus is necessary for the successful implementation of the Department's Program and an efficient reduction of existing inventory of homes for the manufactured housing industry.

Thank you.

Debra Blake

Debra Blake, Deputy Director
Department of Fire, Building and Life Safety
(602) 364-1022
debra.blake@dfbls.az.gov

cc: Chuck Kisseberth, Department's Installation Program Manage