



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

ASSISTANT SECRETARY FOR HOUSING-
FEDERAL HOUSING COMMISSIONER

January 31, 2008

Richard Weinert
Codes and Standards Administrator
Dept. of Housing & Community Development
Manufactured Housing Section
1800 Third Street, Suite 260
Sacramento, CA 95814-6900

Dear Mr. Weinert:

Please be advised that we have reviewed the Wildland Urban Interface (WUI) Standards that California has enacted to provide minimum practices for fire/life safety in regard to dwellings constructed or installed in designated fire zones, CA HSC, Title 24, Part 2 Chapter 7A. As we read them, these standards establish exterior fire resistance requirements for housing sited in designated risk areas. Exterior fire resistance is an element of performance that is not addressed by the Federal Manufactured Home Construction and Safety Standards, 24 CFR 3280. Accordingly, we would not consider the application of the current WUI standards to manufactured housing to be a violation of the preemption provisions of the National Manufactured Housing Construction and Safety Standards Act, 42 USC 5403(d).

Thank you for your interest in the Department's programs.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Matchneer III".

William W. Matchneer III
Associate Deputy Assistant Secretary
Regulatory Affairs and Manufactured Housing