

Factory Assembled Structures Advisory Board Meeting

Labor & Industries

February 15, 2024

10 a.m. – 12 p.m.

TEAMS

ATTENDEES:

Board Members Present: Calvin Dahl – Board Chair, Craig Hillis – Vice Chair, Todd Blevins, James Farley, Kevin McShane, Lance Clark

Absent: Lori Johnson

L&I Staff: Chris Rarig, Barbara Skiles, Matthew Erlich, Charles Parton, Alicia Curry

Public: Brady Peeks, Brian Parsons, Tisha Busey, Tim Johnson

PROCEDURAL:

- Meeting called to order by Calvin Dahl at 10:02am
- Minutes approved

PROGRAM UPDATE:

- Program update and staffing:
 - Plans Examiners
 - One open full time Plans Examiner position, interview process has begun.
 - One part-time Plans Examiner on staff
 - Inspectors – all positions filled
- Workloads and backlog fluctuates from week to week.
 - FBS – 10 wks.
 - MH – 1 wk.
 - RPT – 2 wks.
 - CC – current
 - TWH - current
 - Vendors – 3 wks.
 - RV – 2 wks.
- Out of State inspections
 - Out of state/Out of country builders
 - These inspections are not going away, they seem to increase. We have four factories in Canada at this time and receive inquiries from other countries. The more we're out of state and out of country the less we're paying attention to our customers in Washington.

RULES & LEGISLATION:

- Rules & Legislation – Alicia Curry
 - Continuing to move forward with the rulemaking for HB 1514 and SB 5089. HB 1514 allows RV and Park Model RV manufacturers to continue to be able to request and purchase insignia while their plans are still being reviewed. Agency request SB 5089 expands the FAS Advisory Board to at least 11 members as well as some technical changes and adding representatives for

Allied Trades, diversity consideration and members would have to reapply for reappointment if they were applying for consecutive terms.

We are looking to file the CR-102 on March 19th and that stage of the rulemaking opens up the public comment period, tentatively scheduled for April 29th. If the rules are adopted we're looking at a June 19th adoption date. The rules would take effect July 22nd.

- Craig Hillis –What are Allied Services?
 - Chris Rarig – Allied Trades are anyone who is in the trades that may be affiliated with the Modular industry or any other of our factory built structures.
- Installer program update
 - Chris Rarig – There's been some testimony from Stoyan for bill 2452 addressing the inventory as being exempt if built prior to March 15, 2024.
 - Todd Blevins – Stoyan has asked for an interpretation from the AG. If the AG says it's a HUD thing the jurisdictions are out.
SB 6120 – For most jurisdictions it will shut down WUI, the Department of Natural Resources would have to redraw maps.
 - Charles Parton – We had a 100% passing rate for the most recent installer training. Putting together a longer training for CE, virtual training.
 - Calvin Dahl – We have a video we're working on, we'd like to help.
 - Charles Parton – I'll take the help, we just have to make sure it fits what we're trying to do as Washington State Labor and Industries, our state program.
 - Calvin Dahl – I know LNI certifies Installers, you have to set it to the Manufacturers specs, and my goal is to get Manufacturers to sign off on Installers.
 - Chris Rarig – We're currently looking to have rulemaking to address the Installer code, specifically WAC 296-150I-0340. That is the section that defines a hazardous location. It doesn't make sense to move forward with an emergency rule, we will be moving forward with regular rulemaking.
 - Calvin Dahl – We would like the Director to make a statement saying where LNI stands on WUI.
 - Craig Hillis – Is it substantially more expensive to have the homes comply with the new standard?
 - Calvin Dahl – It's about \$2500-3000 more to bring in a WUI home.
 - Jim Farley – Essentially what they're looking for is fire rated exterior, makes the home heavier.
 - Calvin Dahl – The educational process should be number one, go to homeowners and educate them on defensible space.
 - Lance Clark – A materials list element, guidance documents for what materials to use.
 - Charles Parton – California has a materials list that tells them what they can use to meet the WUI requirements.
 - Calvin Dahl – right now we need a letter that Labor and Industries is not regulating this. There's nothing enforceable at this time.
 - Charles Parton – the authority we have over Manufactured Housing is IPIA, we're an exclusive IPIA state. We have no say in the design.
 - Kevin McShane – California has a DAPIA page, we're working on a DAPIA page for Washington, what does that do for me as a dealer? If you see a DAPIA page in your inspection at the local level, is that DAPIA page going to suffice as part of the inspection?

- Charles Parton - As an inspector in the plant, if they have a DAPIA detail that says this is how we're going to build this house for Washington WUI amendments, this is what we follow.
- Todd Blevins – Bill 5657 Kit Homes, this is a ten year home. The adapted rules are that LNI would have to inspect these. Section 3 says that if it's under 800 square feet it's exempt from that chapter.
 - Chris Rarig – Labor and Industries does have a stance, the most recent definition isn't even a definition. It doesn't tell us anything about what a Kit Home is. We had a definition we proposed. If it's over 800 square feet it's not exempt from 1927, which means it meets the Washington State Building Code and everything that applies.

NEW AND OTHER BUSINESS:

- Todd Blevins – The Fire Marshall's are getting together to do a group approval, all of the agencies in the Tri-cities areas. Food trucks can come to one place, all of the jurisdiction will come, do the one inspection, they get one sticker and they can go anywhere in the tri-cities. We're trying to make it a little easier on the food trucks.
- Craig Hillis – Can we come together for the August board meeting in person?
 - Chris Rarig – Right now it depends on where people are coming from, the program would be responsible for the cost, we don't have the ability to do that right now. If everyone wants travel and pay their own way then maybe that's something we would consider.
 - Craig Hillis – I would pay for going down there.
 - Calvin Dahl – If we have it once a year and make it optional.
 - Barb Skiles –I can schedule one.

Meeting adjourned at 11:35 am

Calvin Dahl, Chair

Chris Rarig, Secretary to the Board