



FLORIDA DIVISION OF EMERGENCY MANAGEMENT

Office of Floodplain Management

GUIDANCE FOR MANUFACTURED HOMES: Ordinance changes to remove the 36-inch option provision for installation in “existing manufactured home parks and subdivisions”

Office of Floodplain Management

Florida Division of Emergency Management

Helpline: 850-815-4556 and floods@em.myflorida.com

January 2024

OBJECTIVE: Modify local floodplain management regulations to require all manufactured homes to be elevated to the base flood elevation plus one foot, or higher in communities that locally adopt higher freeboard.

DESCRIPTION: The National Flood Insurance Program regulations (44 CFR Section 60.3) allow manufactured homes that are installed in “existing manufactured home parks or subdivisions” (a defined term) to be elevated on “reinforced piers or other foundation elements of at least equivalent strength that are no less than 36 inches in height above grade,” even if that means the lowest floors are below the base flood elevation. However, this option is not available when a manufactured home is substantially damaged by flooding. This provision is known as the “36-inch option.”

The NFIP Community Rating System (CRS) establishes prerequisites for participation in the program and prerequisites to achieve certain classification levels. In 2020, FEMA announced new prerequisites for CRS communities to attain or retain a Class 8 or better. See the 2021 Addendum to the 2017 *CRS Coordinator’s Manual* to learn more about prerequisites: <https://crsresources.org/manual/>. CRS communities that do not satisfy the Class 8 prerequisites can expect to be retrograded to Class 9.

A CRS Class 8 prerequisite is to adopt and enforce a requirement of at least one foot of freeboard for all residential structures, including all manufactured homes. Starting with the 5th Edition Florida Building Code (2014 FBC), all buildings within the scope of the FBC are required to be elevated or protected to at least BFE plus one foot, including one- and two-family dwellings. Nearly 60 Florida communities have adopted local technical amendments to the FBC to require even more additional height above BFE.

Because the FBC does not govern the installation of manufactured homes, CRS communities must eliminate the 36-inch option from their ordinances to fully meet the CRS Class 8 prerequisite for at least one foot of freeboard for all residential structures. **Use these instructions to prepare draft amendments to ordinances to eliminate the 36-inch option in existing manufactured home parks and subdivisions and:**

- **EITHER** require the bottom of the frame to be at or above the elevation required in FBC, R322

DEFINITION: Existing manufactured home park or subdivision.

A manufactured home park or subdivision for which the construction of facilities for servicing the lots on which the manufactured homes are to be affixed (including, at a minimum, the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads) is completed before {date the community’s first floodplain management ordinance was adopted}.

Note: It is common to refer to these existing parks and subdivisions as “pre-FIRM,” but that can be misleading when FIRMs are revised.

How the FBC, Residential addresses Manufactured Homes:

The FBC, Residential, Section R322.1.9 Manufactured homes, explicitly states that the applicable provisions of the local floodplain management ordinance apply, in addition to the requirements of the state agency with jurisdiction over the installation of manufactured homes (Florida Department of Highway Safety and Motor Vehicles).

- **OR** require the lowest floor to be at or above the base flood elevation plus one foot (see Addendum)

See separate instructions to:

- Not permit new installations in floodways or Zone V, except in existing manufactured home parks and subdivisions (a defined term).
- Not permit manufactured homes in flood hazard areas or state that manufactured homes are not permitted in the community.

Some communities considering eliminating the 36-inch option may need to consider the impacts. On the one hand, it is reasonable that owners and occupants of manufactured homes in existing parks and subdivisions have their property protected higher than the base flood elevation, as are single-family homes. On the other hand, requiring full elevation of replacement units in existing manufactured home parks and subdivisions adds additional cost depending on how high the BFE is above grade. Eliminating the 36-inch elevation option only affects areas where the depth of water for the base flood is deeper than three feet (BFE minus ground elevation). One approach to evaluating the impact is described starting on page 12.

Pre-engineered manufactured home foundation specifications for some flood conditions and some wind speeds are available in FEMA P-85, *Protecting Manufactured Homes from Floods and Other Hazards* www.fema.gov/sites/default/files/2020-08/fema_p85.pdf.

INSTRUCTIONS: You can prepare the first draft or contact the OFM to ask for assistance.

1. Be sure you start with the correct model language shown below based on the flood zones on your community’s FIRMs:
 - a. If your community has only flood zones that start with “A” (A, AE, A1-30, AO, AH), use the model ordinance that starts on page 4.
 - b. If your community has flood zones that start with “A” **and** “V,” use the model ordinance that starts on page 7.
2. The model ordinance used by Florida communities since about 2012 has requirements for manufactured homes in *Section 304 Manufactured Homes*. Most communities renumbered the model ordinance sections to fit in their LDC/LDR or code of ordinance numbering scheme. In your community’s regulations, locate the section titled *Manufactured Homes*.
3. Tailor content that appears in bold in curly brackets like this **{community’s governing body}**.
4. Follow your community’s standard practice to prepare the title and closing statements.
5. Follow your community’s standard practice to show the entire ordinance or only those sections that are amended.
6. **Be sure to use YOUR ADOPTED ordinance language as the basis to show the changes.** The language shown below is from the Model Ordinance for communities with Zone A/AE and Zone V. Your ordinance text may vary depending on the flood zones on the FIRM or if it was modified from the model. **DO NOT COPY TEXT IN THIS FILE SHOWN WITH STRIKE-THROUGH.**

IMPORTANT NOTE!

All communities that amend their local floodplain regulations or the FBC must submit draft ordinances to the OFM at least 30 days before presenting proposals to planning boards or elected officials.

Please put the community name in the subject line and send to floods@em.myflorida.com.

Or send a request for the OFM to work with you to prepare a draft.

7. *Sec. 202 Definitions:*

- a. Delete the definitions for “existing manufactured home park or subdivision,” “expansion to an existing manufactured home park or subdivision,” “manufactured home park and subdivision,” and “new manufactured home park or subdivision” because provisions that use those terms are being removed.
 - b. Retain the definition “manufactured home” because the term is used.
 - c. Retain the definition for “manufactured home park or subdivision” because requirements for subdivisions apply when someone proposes to develop a new park or subdivision in the SFHA.
 - d. Retain the term in the definition “Start of construction.”
8. *Sec. 304 Manufactured homes: Modify Sec. 304.2 Foundations.* Some communities adopted the sentence shown struck-thru in the model language below. Your community may not have adopted that sentence.
9. If your community enforces more than one foot of freeboard, that freeboard is already in your local technical amendment to the Florida Building Code, Residential. That means the reference to the elevations required in the FBC, Residential includes freeboard and applies to manufactured homes. Therefore, you do not need to specify freeboard again in the Manufactured Home section of your floodplain management regulations. However, you may decide to replace the reference to the FBC, Residential, with “at or above the base flood elevation plus one (1) foot” (or your freeboard, if higher).
10. Send your draft to the OFM at least 30 days before presenting it to your planning board or elected officials. Please put your community name in the subject line and send it to floods@em.myflorida.com.

www.floridadisaster.org/dem/mitigation/floodplain/community-resources/ (Guidance, Ordinance Amendments, FBC Amendments, and Sample Forms).

COMMUNITIES WITH FLOOD ZONES A/AE ONLY

ORDINANCE NO. ____

AN ORDINANCE BY THE {community’s governing body} AMENDING THE {insert appropriate citation} TO SPECIFY ELEVATION OF MANUFACTURED HOMES IN FLOOD HAZARD AREAS; PROVIDING FOR APPLICABILITY AND SEVERABILITY; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the Legislature of the State of Florida has, in **{Chapter 125 – County Government or Chapter 166 – Municipalities}**, Florida Statutes, conferred upon local governments the authority to adopt regulations designed to promote the public health, safety, and general welfare of its citizenry; and

WHEREAS, the **{name of community}** participates in the National Flood Insurance Program and participates in the NFIP’s Community Rating System, a voluntary incentive program that recognizes and encourages community floodplain management activities that exceed the minimum program requirements and achieved a CRS rating of Class **{insert CRS Class #}**, making citizens who purchase NFIP flood insurance policies eligible for premium discounts; and

WHEREAS, in 2020, the NFIP Community Rating System established certain minimum prerequisites for communities to qualify for or maintain class ratings of Class 8 or better; and

WHEREAS, to satisfy the prerequisite and for **{name of community}** to maintain the current CRS rating, all manufactured homes installed or replaced in special flood hazard areas must be elevated to or above at least the base flood elevation plus 1 foot, which necessitates modification of the existing requirements; and

WHEREAS, the **{community’s governing body}** determined that it is in the public interest to amend the floodplain management regulations to better protect manufactured homes and to continue participating in the Community Rating System at the current class rating.

NOW, THEREFORE, BE IT ORDAINED by the **{community’s governing body}** of the **{name of community}** that the **{insert appropriate citation}** is amended as set forth in the following amendments, as shown in ~~strikethrough~~ and underline format in Section 1.

SECTION 1. AMENDMENTS

The {insert appropriate citation}, is hereby amended by the following amendments.

Modify Section 202 Definitions, by deleting the following definitions.

~~**Existing manufactured home park or subdivision.** A manufactured home park or subdivision for which the construction of facilities for servicing the lots on which the manufactured homes are to be affixed (including, at a minimum, the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads) is completed before {date the community’s first floodplain management ordinance was adopted}.~~

~~**Expansion to an existing manufactured home park or subdivision.** The preparation of additional sites by the construction of facilities for servicing the lots on which the manufactured homes are to be affixed (including the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads).~~

~~**New manufactured home park or subdivision.** A manufactured home park or subdivision for which the construction of facilities for servicing the lots on which the manufactured homes are to be affixed (including at a minimum, the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads) is completed on or after {date the community's first floodplain management ordinance was adopted}.~~

Modify Section 304 Manufactured Homes, as follows:

SECTION 304 MANUFACTURED HOMES

304.1 General. All manufactured homes installed in flood hazard areas shall be installed by an installer that is licensed pursuant to section 320.8249, F.S., and shall comply with the requirements of Chapter 15C-1, F.A.C. and the requirements of this ordinance.

304.2 Foundations. All new manufactured homes and replacement manufactured homes installed in flood hazard areas shall be installed on permanent, reinforced foundations that are designed in accordance with the foundation requirements of the *Florida Building Code Residential Section R322.2* and this ordinance. ~~Foundations for manufactured homes subject to Section 304.6 of this ordinance are permitted to be reinforced piers or other foundation elements of at least equivalent strength.~~

304.3 Anchoring. All new manufactured homes and replacement manufactured homes shall be installed using methods and practices which minimize flood damage and shall be securely anchored to an adequately anchored foundation system to resist flotation, collapse or lateral movement. Methods of anchoring include, but are not limited to, use of over-the-top or frame ties to ground anchors. This anchoring requirement is in addition to applicable state and local anchoring requirements for wind resistance.

[See Addendum (page 10) for language to allow elevation of the lowest floor (rather than the bottom of the frame) of units in existing manufactured homes parks to be at or above the base flood elevation plus one foot.]

304.4 Elevation. All manufactured homes that are placed, replaced, or substantially improved in flood hazard areas shall be elevated such that the bottom of the frame is at or above the elevation required, as applicable to the flood hazard area, in the *Florida Building Code, Residential Section R322.2 (Zone A)*. ~~Manufactured homes that are placed, replaced, or substantially improved shall comply with Section 304.5 or 304.6 of this ordinance, as applicable.~~

~~**304.5 General elevation requirement.** Unless subject to the requirements of Section 304.6 of this ordinance, all manufactured homes that are placed, replaced, or substantially improved on sites located: (a) outside of a manufactured home park or subdivision; (b) in a new manufactured home park or subdivision; (c) in an expansion to an existing manufactured home park or subdivision; or (d) in an existing manufactured home park or subdivision upon which a manufactured home has incurred "substantial damage" as the result of a flood, shall be elevated such that the bottom of the frame is at or above the elevation required, as applicable to the flood hazard area, in the *Florida Building Code, Residential Section R322.2 (Zone A)*.~~

~~**304.6 Elevation requirement for certain existing manufactured home parks and subdivisions.** Manufactured homes that are not subject to Section 304.5 of this ordinance, including manufactured homes that are placed, replaced, or substantially improved on sites located in an existing manufactured home park or subdivision, unless on a site where substantial damage as a result of flooding has occurred, shall be elevated such that either the:~~

- ~~1. Bottom of the frame of the manufactured home is at or above the elevation required in the *Florida Building Code, Residential Section R322.2 (Zone A)*; or~~
- ~~2. Bottom of the frame is supported by reinforced piers or other foundation elements of at least equivalent strength that are not less than 36 inches in height above grade.~~

304.5 304.7 Enclosures. Enclosed areas below elevated manufactured homes shall comply with the requirements of the *Florida Building Code, Residential Section R322.2* for such enclosed areas.

304.6 304.8 Utility equipment. Utility equipment that serves manufactured homes, including electric, heating, ventilation, plumbing, and air conditioning equipment and other service facilities, shall comply with the requirements of the *Florida Building Code, Residential Section R322*

SECTION 2. APPLICABILITY.

For the purposes of jurisdictional applicability, this ordinance shall apply in **{insert name of community or all unincorporated areas of the county}**. This ordinance shall apply to all applications for development, including building permit applications and subdivision proposals, submitted on or after the effective date of this ordinance.

SECTION 3. INCLUSION INTO THE CODE OF ORDINANCES.

It is the intent of the **{community's governing body}** that the provisions of this ordinance shall become and be made a part of the **{name of community's}** Code of Ordinances and that the sections of this ordinance may be renumbered or re-lettered. The word "ordinance" may be changed to "section," "article," "regulation," or such other appropriate word or phrase in order to accomplish such intentions.

SECTION 4. SEVERABILITY.

If any section, subsection, sentence, clause, or phrase of this ordinance is, for any reason, declared by the courts to be unconstitutional or invalid, such decision shall not affect the validity of the ordinance as a whole, or any part thereof, other than the part so declared.

SECTION 5. EFFECTIVE DATE.

This ordinance shall take effect on **{insert date}**.

Use your community's standard signature block.

COMMUNITIES WITH FLOOD ZONES A/AE AND V/VE

ORDINANCE NO. _____

AN ORDINANCE BY THE {community's governing body} AMENDING THE {insert appropriate citation} TO SPECIFY ELEVATION OF MANUFACTURED HOMES IN FLOOD HAZARD AREAS; PROVIDING FOR APPLICABILITY AND SEVERABILITY; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the Legislature of the State of Florida has, in **{Chapter 125 – County Government or Chapter 166 – Municipalities}**, Florida Statutes, conferred upon local governments the authority to adopt regulations designed to promote the public health, safety, and general welfare of its citizenry; and

WHEREAS, the **{name of community}** participates in the National Flood Insurance Program and participates in the NFIP's Community Rating System, a voluntary incentive program that recognizes and encourages community floodplain management activities that exceed the minimum program requirements and achieved a CRS rating of Class **{insert CRS Class #}**, making citizens who purchase NFIP flood insurance policies eligible for premium discounts; and

WHEREAS, in 2020, the NFIP Community Rating System established certain minimum prerequisites for communities to qualify for or maintain class ratings of Class 8 or better; and

WHEREAS, to satisfy the prerequisite and for **{name of community}** to maintain the current CRS rating, all manufactured homes installed or replaced in special flood hazard areas must be elevated to or above at least the base flood elevation plus 1 foot, which necessitates modification of the existing requirements; and

WHEREAS, the **{community's governing body}** determined that it is in the public interest to amend the floodplain management regulations to better protect manufactured homes and to continue participating in the Community Rating System at the current class rating.

NOW, THEREFORE, BE IT ORDAINED by the **{community's governing body}** of the **{name of community}** that the **{insert appropriate citation}** is amended as set forth in the following amendments, as shown in ~~strikethrough~~ and underline format in Section 1.

SECTION 1. AMENDMENTS.

The {insert appropriate citation}, is hereby amended by the following amendments.

Modify Section 202 Definitions, by deleting the following definitions.

~~**Existing manufactured home park or subdivision.** A manufactured home park or subdivision for which the construction of facilities for servicing the lots on which the manufactured homes are to be affixed (including, at a minimum, the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads) is completed before {date the community's first floodplain management ordinance was adopted}.~~

~~**Expansion to an existing manufactured home park or subdivision.** The preparation of additional sites by the construction of facilities for servicing the lots on which the manufactured homes are to be affixed (including the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads).~~

~~**New manufactured home park or subdivision.** A manufactured home park or subdivision for which the construction of facilities for servicing the lots on which the manufactured homes are to be affixed (including at a minimum, the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads) is completed on or after {date the community's first floodplain management ordinance was adopted}.~~

Modify Section 304 Manufactured Homes, as follows:

SECTION 304 MANUFACTURED HOMES

304.1 General. All manufactured homes installed in flood hazard areas shall be installed by an installer that is licensed pursuant to section 320.8249, F.S., and shall comply with the requirements of Chapter 15C-1, F.A.C. and the requirements of this ordinance. If located seaward of the coastal construction control line, all manufactured homes shall comply with the more restrictive of the applicable requirements.

304.2 Foundations. All new manufactured homes and replacement manufactured homes installed in flood hazard areas shall be installed on permanent, reinforced foundations that:

1. In flood hazard areas (Zone A) other than coastal high hazard areas, are designed in accordance with the foundation requirements of the *Florida Building Code, Residential* Section R322.2 and this ordinance. ~~Foundations for manufactured homes subject to Section 304.6 of this ordinance are permitted to be reinforced piers or other foundation elements of at least equivalent strength.~~
2. In coastal high hazard areas (Zone V), are designed in accordance with the foundation requirements of the *Florida Building Code, Residential* Section R322.3 and this ordinance.

304.3 Anchoring. All new manufactured homes and replacement manufactured homes shall be installed using methods and practices which minimize flood damage and shall be securely anchored to an adequately anchored foundation system to resist flotation, collapse or lateral movement. Methods of anchoring include, but are not limited to, use of over-the-top or frame ties to ground anchors. This anchoring requirement is in addition to applicable state and local anchoring requirements for wind resistance.

[See Addendum (page 10) for language to allow elevation of the lowest floor (rather than bottom of the frame) of units in existing manufactured homes parks to be at or above the base flood elevation plus one foot.]

304.4 Elevation. All manufactured homes that are placed, replaced, or substantially improved in flood hazard areas shall be elevated such that the bottom of the frame is at or above the elevation required, as applicable to the flood hazard area, in the *Florida Building Code, Residential* Section R322.2 (Zone A) or Section R322.3 (Zone V and Coastal A Zone). ~~Manufactured homes that are placed, replaced, or substantially improved shall comply with Section 304.5 or 304.6 of this ordinance, as applicable.~~

304.5 General elevation requirement. ~~Unless subject to the requirements of Section 304.6 of this ordinance, all manufactured homes that are placed, replaced, or substantially improved on sites located: (a) outside of a manufactured home park or subdivision; (b) in a new manufactured home park or subdivision; (c) in an expansion to an existing manufactured home park or subdivision; or (d) in an existing manufactured home park or subdivision upon which a manufactured home has incurred "substantial damage" as the result of a flood, shall be elevated such that the bottom of the frame is at or above the~~

elevation required, as applicable to the flood hazard area, in the *Florida Building Code, Residential* Section R322.2 (Zone A) or Section R322.3 (Zone V).

304.6 Elevation requirement for certain existing manufactured home parks and subdivisions. Manufactured homes that are not subject to Section 304.5 of this ordinance, including manufactured homes that are placed, replaced, or substantially improved on sites located in an existing manufactured home park or subdivision, unless on a site where substantial damage as a result of flooding has occurred, shall be elevated such that either the:

- (1) Bottom of the frame of the manufactured home is at or above the elevation required, as applicable to the flood hazard area, in the *Florida Building Code, Residential* Section R322.2 (Zone A) or Section R322.3 (Zone V); or
- (2) Bottom of the frame is supported by reinforced piers or other foundation elements of at least equivalent strength that are not less than 36 inches in height above grade.

304.5 304.7 Enclosures. Enclosed areas below elevated manufactured homes shall comply with the requirements of the *Florida Building Code, Residential* Section R322.2 or R322.3 for such enclosed areas, as applicable to the flood hazard area.

304.6 304.8 Utility equipment. Utility equipment that serves manufactured homes, including electric, heating, ventilation, plumbing, and air conditioning equipment and other service facilities, shall comply with the requirements of the *Florida Building Code, Residential* Section R322, as applicable to the flood hazard area.

SECTION 2. APPLICABILITY.

For the purposes of jurisdictional applicability, this ordinance shall apply in **{insert name of community or all unincorporated areas of the county}**. This ordinance shall apply to all applications for development, including building permit applications and subdivision proposals, submitted on or after the effective date of this ordinance.

SECTION 3. INCLUSION INTO THE CODE OF ORDINANCES.

It is the intent of the **{community’s governing body}** that the provisions of this ordinance shall become and be made a part of the **{name of community’s}** Code of Ordinances and that the sections of this ordinance may be renumbered or re-lettered and the word “ordinance” may be changed to “section,” “article,” “regulation,” or such other appropriate word or phrase in order to accomplish such intentions.

SECTION 4. SEVERABILITY.

If any section, subsection, sentence, clause, or phrase of this ordinance is, for any reason, declared by the courts to be unconstitutional or invalid, such decision shall not affect the validity of the ordinance as a whole, or any part thereof, other than the part so declared.

SECTION 5. EFFECTIVE DATE.

This ordinance shall take effect on **{insert date}**.

Use your community’s standard signature block.

ADDENDUM: To allow elevation of the lowest floor (rather than the bottom of the frame) of units in existing manufactured homes parks to be at or above the base flood elevation plus one foot.

1. Do not delete the definitions.
2. The applicant (or installer) must know the depth of the frame and floor system of the unit to be placed in order to determine the height of foundation elements that will result in the lowest floor at or above the required elevation.
3. Communities are reminded of the requirement for utility equipment to be elevated.
4. Some communities may elect another alternative by reducing the level of protection by replacing “bottom of the frame” with “lowest floor” in the model language above.

COMMUNITIES WITH FLOOD ZONES A/AE ONLY (ADDENDUM)

Note: retain this phrase in 304.2 Foundations: “Foundations for manufactured homes subject to Section 304.6 of this ordinance are permitted to be reinforced piers or other foundation elements of at least equivalent strength.”

304.4 Elevation. Manufactured homes that are placed, replaced, or substantially improved shall comply with Section 304.5 or 304.6 of this ordinance, as applicable.

304.5 General elevation requirement. Unless subject to the requirements of Section 304.6 of this ordinance, all manufactured homes that are placed, replaced, or substantially improved on sites located: (a) outside of a manufactured home park or subdivision; (b) in a new manufactured home park or subdivision; (c) in an expansion to an existing manufactured home park or subdivision; or (d) in an existing manufactured home park or subdivision upon which a manufactured home has incurred "substantial damage" as the result of a flood, shall be elevated such that the bottom of the frame is at or above the elevation required, as applicable to the flood hazard area, in the *Florida Building Code, Residential* Section R322.2 (Zone A).

304.6 Elevation requirement for certain existing manufactured home parks and subdivisions. Manufactured homes that are not subject to Section 304.5 of this ordinance, including manufactured homes that are placed, replaced, or substantially improved on sites located in an existing manufactured home park or subdivision, unless on a site where substantial damage as a result of flooding has occurred, shall be elevated such that the lowest floor is at or above the base flood elevation plus one (1) foot. ~~Either the:~~

~~(1) Bottom of the frame of the manufactured home is at or above the elevation required in the *Florida Building Code, Residential* Section R322.2 (Zone A); or~~

~~(2) Bottom of the frame is supported by reinforced piers or other foundation elements of at least equivalent strength that are not less than 36 inches in height above grade.~~

304.7 Enclosures. Enclosed areas below elevated manufactured homes shall comply with the requirements of the *Florida Building Code, Residential* Section R322.2 for such enclosed areas.

304.8 Utility equipment. Utility equipment that serves manufactured homes, including electric, heating, ventilation, plumbing, and air conditioning equipment and other service facilities, shall comply with the requirements of the *Florida Building Code, Residential* Section R322.

COMMUNITIES WITH FLOOD ZONES A/AE AND V/VE (ADDENDUM)

Note: retain this phrase in 304.2 Foundations: “Foundations for manufactured homes subject to Section 304.6 of this ordinance are permitted to be reinforced piers or other foundation elements of at least equivalent strength.”

304.4 Elevation. Manufactured homes that are placed, replaced, or substantially improved shall comply with Section 304.5 or 304.6 of this ordinance, as applicable.

304.5 General elevation requirement. Unless subject to the requirements of Section 304.6 of this ordinance, all manufactured homes that are placed, replaced, or substantially improved on sites located: (a) outside of a manufactured home park or subdivision; (b) in a new manufactured home park or subdivision; (c) in an expansion to an existing manufactured home park or subdivision; or (d) in an existing manufactured home park or subdivision upon which a manufactured home has incurred "substantial damage" as the result of a flood, shall be elevated such that the bottom of the frame is at or above the elevation required, as applicable to the flood hazard area, in the *Florida Building Code, Residential* Section R322.2 (Zone A) or Section R322.3 (Zone V).

304.6 Elevation requirement for certain existing manufactured home parks and subdivisions. Manufactured homes that are not subject to Section 304.5 of this ordinance, including manufactured homes that are placed, replaced, or substantially improved on sites located in an existing manufactured home park or subdivision, unless on a site where substantial damage as a result of flooding has occurred, shall be elevated such that ~~either~~ the:

(1) The lowest floor is at or above the base flood elevation plus one foot in flood hazard areas other than coastal high hazard areas.

(2) The bottom of frame is at or above the base flood elevation plus one foot in coastal high hazard areas.

~~-(1) Bottom of the frame of the manufactured home is at or above the elevation required, as applicable to the flood hazard area, in the *Florida Building Code, Residential* Section R322.2 (Zone A) or Section R322.3 (Zone V); or~~

~~-(2) Bottom of the frame is supported by reinforced piers or other foundation elements of at least equivalent strength that are not less than 36 inches in height above grade.~~

304.7 Enclosures. Enclosed areas below elevated manufactured homes shall comply with the requirements of the *Florida Building Code, Residential* Section R322.2 or R322.3 for such enclosed areas, as applicable to the flood hazard area.

304.8 Utility equipment. Utility equipment that serves manufactured homes, including electric, heating, ventilation, plumbing, and air conditioning equipment and other service facilities, shall comply with the requirements of the *Florida Building Code, Residential* Section R322, as applicable to the flood hazard area.

EVALUATING THE IMPACT OF ELIMINATING THE “36-INCH OPTION”

The State Floodplain Management Office is aware that a number of communities have taken different approaches to evaluate the impact of eliminating the 36-inch option for replacement homes in existing manufactured home parks and subdivisions. See the table below, which refers to the figures on the next page. One way to evaluate the impact is to:

1. Identify existing manufactured home parks and subdivisions (as that term is defined, meaning established before the community joined the NFIP).
2. Determine if those existing manufactured home parks and subdivisions have pads or lots in the SFHA.
3. Determine how many pads or lots are in the SFHA.
4. Estimate how many of the pads or lots in the SFHA are affected by base flood depths that are less than, equal to, and greater than three feet.

Illustrating Existing Requirements Compared to Full Elevation			
	Figure A illustrates the existing minimum NFIP requirement (foundation elements at least 36 inches above grade).	Figure B illustrates the full elevation requirement based on the bottom of the frame.	Figure C illustrates the full elevation requirement based on the lowest floor.
If the base flood depth* is less than 3 feet:	Then the bottom of the frame is always 3 feet above grade (and the lowest floor ~ 4 feet above grade)	Then the bottom of the frame is always flood depth plus 1 foot (could be lower than 4 feet above grade).	Then the lowest floor is always flood depth plus 1 foot (could be lower than 4 feet above grade).
If the base flood depth* is equal to 3 feet:	Then the bottom of the frame is approximately 3 feet above grade (i.e., 1 foot freeboard).	Then the bottom of the frame is always flood depth plus 1 foot	Then the lowest floor is always flood depth plus 1 foot
If the base flood depth* is greater than 3 feet:	Then the bottom of the frame is approximately 4 feet above grade and the lowest floor is below the BFE where flood depth is greater than 4 feet.	Then the bottom of the frame is always flood depth plus 1 foot.	Then the lowest floor is always flood depth plus 1 foot.
*Base flood depth = BFE minus ground. In unnumbered Zone A, it is the depth determined in accordance with the community’s floodplain management regulations.			

Figure A	Figure B	Figure C
<p>Minimum NFIP allows ONLY for replacement units in “existing manufactured home parks and subdivisions” (defined term), except if replacing a unit substantially damaged by flooding.</p>	<p>Elevate the bottom of the frame to the elevation specified in the FBC, Residential (minimum BFE + 1 ft). Some communities modify the FBC, R to require additional freeboard.</p>	<p>Elevate the lowest floor to the base flood elevation + 1 foot. The depth of the frame and floor systems must be known.</p>
<p>Allows replacements units to have the lowest floor below the BFE.</p>	<p>Eliminating the 36-inch option affects ONLY replacements units in “existing manufactured home parks and subdivisions” where the base flood depth is greater than 3 feet. All other units already are required to be fully elevated.</p>	
		