

Manufactured Homes – floodplain management ordinance changes to remove 36-inch elevation provision for installation in “existing manufactured home parks and subdivisions”

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 have 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” 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 a 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. Starting with the 5th Edition Florida Building Code (FBC), all buildings within the scope of the FBC are required to be elevated or protected to at least BFE plus 1 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.

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}.

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 MFH: 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).

Because installation of manufactured homes is not governed by the FBC, 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
- **OR** require the lowest floor to be at or above the base flood elevation plus one foot (see Addendum)

See the SFMO's separate instructions to prohibit manufactured homes in flood hazard areas or to 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 option only affects areas where the depth of water for the base flood is deeper than 3 feet (BFE minus grade elevation). One approach to evaluate the impact is described starting on page 12.

Pre-engineered foundations for some flood conditions and some wind speeds are available in FEMA P-85, *Protecting Manufactured Homes from Floods and Other Hazards* https://www.fema.gov/media-library-data/20130726-1502-20490-8377/fema_p85.pdf.

INSTRUCTIONS

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 over the past 8 years has requirements for manufactured homes in *Section 304 Manufactured Homes*. Most communities renumbered the model ordinance sections to fit within their LDC/LDR or code of ordinance numbering scheme. In your community's regulations, identify the correct section number that is titled *Manufactured Homes*.

Please Note! All communities that elect to modify regulations must submit draft ordinances to the SFMO at least 30 days before the first reading.

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

Or send a request for the SFMO to prepare a draft for you.

3. **Be sure to use YOUR ADOPTED ordinance language as the basis to show the changes.** The language shown below is from the Model Ordinance – your community may have slightly modified it.
4. *Sec. 202 Definitions:*
 - a. Delete the definitions for “existing manufactured home park or subdivision,” “expansion to an existing manufactured home park or 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 some 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.”
5. *Sec. 304 Manufactured homes:* Modify Sec. 304.2 Foundations if the sentence shown struck-thru in the model language below appears (it may not appear in your ordinance).
6. 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 that are required in the FBC, Residential includes freeboard, and applies to manufactured homes. 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).
7. **Send your draft to the SFMO at least 30 days before the first reading.** Please put your community name in the subject line and send to floods@em.myflorida.com.

Please Note! Please consider including (or revising) requirements for at-grade accessory structures in the same ordinance you prepare for manufactured homes. The State Floodplain Management Office guidance is consistent with FEMA’s published policy and bulletin: <https://www.floridadisaster.org/dem/mitigation/floodplain/> (Community Resources).

<https://www.floridadisaster.org/dem/mitigation/floodplain/> (Community Rating System, CRS Class 8 Prerequisite (November 2020).
Revised May 24, 2021

COMMUNITIES WITH FLOOD ZONES A/AE ONLY

ORDINANCE NO. _____

AN ORDINANCE BY THE {community's governing body} AMENDING THE {insert appropriate chapter/section numbers} 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

WHEREAS, the **{name of community}** 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 such that the lowest floors are at 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 owners and occupants of 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 chapter/section numbers}** 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 chapter/section numbers}, 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 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 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 3. 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 4. 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 relettered 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 5. 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 6. EFFECTIVE DATE.

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

COMMUNITIES WITH FLOOD ZONES A/AE AND V/VE

ORDINANCE NO. _____

AN ORDINANCE BY THE {community's governing body} AMENDING THE {insert appropriate chapter/section numbers} 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

WHEREAS, the **{name of community}** 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 such that the lowest floors, or lowest horizontal structural members of the lowest floors, as applicable, are at 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 owners and occupants of 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 chapter/section numbers}** is amended as set forth in the following amendments, as shown in strikethrough and underline format in Section 2.

SECTION 1. RECITALS.

The foregoing whereas clauses are incorporated herein by reference and made a part hereof.

SECTION 2. AMENDMENTS.

The **{insert appropriate chapter/section numbers}**, 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 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 3. 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 4. 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 relettered 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 5. 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 6. EFFECTIVE DATE.

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

ADDENDUM: 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.

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 require 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

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 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

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 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 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 3 feet.

Illustrating Existing Requirement Compared to Full Elevation			
	Figure A illustrates the existing minimum NFIP requirement (foundation elements at least 36 inches above grade).	Figure B illustrates full elevation requirement based on bottom of the frame.	Figure C illustrates full elevation requirement based on 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 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 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>	
		