

SUBJECT: HCD Permit Requirements - Alterations or Conversions

This Information Bulletin (IB) is issued to clarify the Department of Housing and Community Development's (HCD) permitting and inspection authority¹ for the alteration² or conversion to the following units³ in California:

- Manufactured Homes⁴
- Mobilehomes⁵
- Multifamily Manufactured Homes⁶
- Special Purpose Commercial Modulares⁷
- Commercial Modulares⁸

Pursuant to the Manufactured Housing Act of 1980⁹ and regulations¹⁰, **HCD has the sole authority to conduct inspections to obtain insignia of approval¹¹, or for permit issuance and inspections of alterations, conversions, or the change of use to units.**

Examples of conversions includes changing the use, building type, or occupancy classification of a manufactured home/mobilehome (MH), or commercial modular, such as converting from a commercial modular to mobilehome, or converting a commercial modular from a "B" occupancy classification to an "A" occupancy classification.

Unit owners, or their agents (e.g., General Manufactured Housing Contractor (C-47)), intending to alter or convert a unit, must submit an Application for Alteration or Conversion (HCD MH 415) to HCD prior to commencing work.

The following Manufactured Home/Mobilehome Alterations Guidelines provides information on the HCD's permitting process, assist in determining what constitutes¹² an alteration to a MH, and assist in identifying when an HCD MH 415 is, or is not, required. The HCD MH 415 can be obtained from an HCD Field Office or on HCD's website through the following link. When multiple alterations are proposed to the same MH such

¹ California Health and Safety Code, sections 18015 and 18029, and title 25 of the California Code of Regulations, section 4040

² California Code of Regulations, title 25, section 4004(a)

³ For the purposes of this Information Bulletin, "units" refers collectively to manufactured homes, mobilehomes, multifamily manufactured homes, special purpose commercial modulares, and commercial modulares.

⁴ California Health and Safety Code, section 18007; HCD is granted authority for alterations and conversions of manufactured homes once they are under the ownership of a first or subsequent user(s).

⁵ California Health and Safety Code, section 18008

⁶ California Health and Safety Code, section 18008.7

⁷ California Health and Safety Code, section 18012.5

⁸ California Health and Safety Code, section 18001.8

⁹ California Health and Safety Code, division 13, part 2

¹⁰ California Code of Regulations, title 25, division 1, chapter 3

¹¹ California Health and Safety Code, section 18026

¹² For work that do not constitute an alteration or conversion or an HCD MH 415 permit, see California Code of Regulations, title 25, section 4041.

as plumbing, electrical, and structural, the alteration scope of work may be combined on one HCD MH 415.

HCD MH 415: <https://www.hcd.ca.gov/manufactured-and-mobilehomes/modifying-mobilehome>

MANUFACTURED HOME/MOBILEHOME ALTERATION GUIDELINES

Organized by electrical, mechanical, plumbing, and structural/general categories:

ELECTRICAL

Air Conditioning

Install (Add) – Air Conditioning:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Load Calculations Required - *Yes
- Comments - *Load calculations required unless home MH is factory A/C-ready and has a 100 amperage or higher main service disconnect device. Refer also to Mechanical.

Replace – Air Conditioning:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Load Calculations Required - *Yes
- Comments - * Load calculations required if A/C running-load-amperage or the full-load-amperage are increased. Refer also to Mechanical.

Appliance

Install (Add) – “Built-in” Electrical Appliance:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Load Calculations Required - Yes
- Comments - None

Replace – “Built-in” Electrical Appliance:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Load Calculations Required - *No
- Comments - * Load calculations are not required unless amperage is increased.

Ceiling Fan

Install (Add) – Ceiling Fan:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Load Calculations Required - No
- Comments - None

Receptacle/Switch

Replace – Receptacle/Switch:

- Permit (HCD MH 415) - No

- Plan Review - No
- Load Calculations Required - No
- Comments - None

Miscellaneous Electrical

Change – Electrical System (Upgrade/Downgrade):

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Load Calculations Required - Yes
- Comments - None

Install (Add) – Dedicated Branch Circuit:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Load Calculations Required - Yes
- Comments – Examples: furnace, water heater, etc.

Install (Add)/Replace – Electrical Panel:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Load Calculations Required - *No
- Comments - *Load calculations are not required unless de-amping the MH.

Install (Add)/Replace – Electrical Circuit:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Load Calculations Required - *No
- Comments - *Load calculations are not required unless de-amping the MH.

Install – Meter Base:

- Permit (HCD MH 415) - Yes
- Plan Review - *Yes
- Load Calculations Required - *No
- Comments - *HCD detail is available for use.

Replace – Circuit Breaker or Fuse:

- Permit (HCD MH 415) - No
- Plan Review - No
- Load Calculations Required - No
- Comments - Must be the same amperage and disconnect type.

Transition – Branch Circuits from Aluminum to Copper:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Load Calculations Required - No
- Comments - Includes: pigtail, receptacles, and switches.

MECHANICAL

Air Conditioning / Evaporative Cooler

Install – Air Conditioning (New or Replacement):

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Engineered Plans - No
- Comments - Refer also to Electrical.

Install – Evaporative Cooler:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Engineered Plans - No
- Comments - None

Furnace / Heater / Heat Pump / Stove

Replace – Furnace (No system changes):

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Engineered Plans - No
- Comments - None

Replace – Furnace, Including Changes or Outside the MH:

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - No
- Comments - None

Replace or Install – Heater (Freestanding Gas or Oil Burning):

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Engineered Plans - No
- Comments - None

Replace or Install – Heat Pump:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Engineered Plans - No
- Comments - None

Replace or Install – Wood or Pellet Burning Stove:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Engineered Plans - No
- Comments - None

Gas Line

Install/Add to Length/Modify – Gas Line:

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - No
- Comments - None

Range, Oven, or Cooktop (Gas)

Replace – Built-in Oven, Range, Cooktop, or Freestanding Range:

- Permit (HCD MH 415) - Yes

- Plan Review - *No
- Engineered Plans - No
- Comments - Same size, location, and BTU rating with no gas line changes.

Range Hood

Replace – Range Hood:

- Permit (HCD MH 415) - *No
- Plan Review - No
- Engineered Plans - No
- Comments - * HCD MH 415 not required if the same size and location, including venting.

Water Heater

Replace or Install – Water Heater (Gas or electric):

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Engineered Plans - No
- Comments - Water heaters must be installed within the MH; not approved for exterior installation.

PLUMBING

Drain, Waste, and Vent

Install/Modify – Drain, Waste, and Vent (DWV) or Water System:

- Permit (HCD MH 415) - *Yes
- Plan Review - Yes
- Engineered Plans - No
- Comments - * HCD MH 415 required if provided for bathtub, dishwasher, lavatory, shower, sink, toilet, washing machine, etc.

Repair/Replace – DWV Tailpiece or Trap:

- Permit (HCD MH 415) - No
- Plan Review - No
- Engineered Plans - No
- Comments - None

Replace – Kitchen Sink, Lavatory, or Toilet:

- Permit (HCD MH 415) - *No
- Plan Review - No
- Engineered Plans - No
- Comments - * HCD MH 415 not required if there is no alteration to DWV or water system.

Replace – Mechanical Auto Vent:

- Permit (HCD MH 415) - No
- Plan Review - No
- Engineered Plans - No
- Comments - None

Garbage Disposal

Install (Add) – Garbage Disposal:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Engineered Plans - No
- Comments - None

Replace – Garbage Disposal:

- Permit (HCD MH 415) - No
- Plan Review - No
- Engineered Plans - No
- Comments - None

Washing Machine

Install/Replace – Washing Machine:

- Permit (HCD MH 415) - *No
- Plan Review - No
- Engineered Plans - No
- Comments - * HCD MH 415 required if water supply and/or drain line are newly installed or altered.

Miscellaneous Plumbing

Gas Lines:

- See Mechanical requirements.

Water Heater:

- See Mechanical requirements.

STRUCTURAL & GENERAL

Chassis or Frame

Repair – Chassis/Frame:

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - Yes
- Comments - None

Doors (Exterior)

Replace – Door(s) with Same Size and Type:

- Permit (HCD MH 415) - *Yes/No
- Plan Review - No
- Engineered Plans - No
- Comments - * HCD MH 415 required if changing size or type.

Floors

Repair – Decking:

- Permit (HCD MH 415) - *Yes
- Plan Review - No
- Engineered Plans - No
- Comments - * HCD MH 415 required if over four (4) square feet.

Repair – Joist:

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - No

- Comments - None

Replace – Joist:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Engineered Plans – No
- Comments - None

Roof

California Roof:

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - *Yes
- Comments - *An engineered plan or design is required or when design criteria exceed an HCD-approved plan.

Built-Up or Overlay:

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - Yes
- Comments - None

Insulated/Thermoplastic Polyolefin Roof System:

- Permit (HCD MH 415) - *Yes
- Plan Review - Yes
- Engineered Plans - No
- Comments - *One inspection required.

Re-Roof, Existing Roof Covering Removed:

- Permit (HCD MH 415) - *Yes
- Plan Review - No
- Engineered Plans - No
- Comments - *Two inspections required (underlayment and final). This does not include coating metal roof with approved material.

Repair – Rafter or Truss:

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - Yes
- Comments - None

Repair/Replace – Sheathing:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Engineered Plans - No
- Comments - None

Replace – Truss:

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - Yes
- Comments - None

Walls

Modify/Remove – Bearing Wall:

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - Yes
- Comments - None

Modify/Remove – Non-bearing Wall(s):

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - No
- Comments - None

Wall Covering – Exterior:

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - *Yes/No
- Comments - *An engineered plan or design is required when installing stucco, concrete, or similar siding.

Wall Covering – Interior:

- Permit (HCD MH 415) - Yes
- Plan Review - No
- Engineered Plans - No
- Comments - Maximum flame spread 200 required. Detail available for flame spread requirements.

Sidewall or Endwall Opening (New or Enlarged):

- Permit (HCD MH 415) - Yes
- Plan Review - Yes
- Engineered Plans - *Yes/**No
- Comments - *Engineered plan is required when endwall shear is affected.
**Engineered plan is not required if using HCD's header schedule.
Openings on endwalls cannot cross over the MH marriage line.

Windows

Replace – Windows, Same Size and Type:

- Permit (HCD MH 415) - *Yes/No
- Plan Review - No
- Engineered Plans – No
- Comments - * HCD MH 415 required when openings are enlarged or reduced, when egress windows are replaced, or when structural change to window framing or header is necessary. No HCD MH 415 required when replacing windows in kind, single pane window with dual pane window, or when installation of bay window(s) requiring no additional support.

Structure Attachment

Attach – Awning (Wood), Garage, or Porch:

- Permit (HCD MH 415) - *Yes
- Plan Review - Yes
- Engineered Plans – **Yes/No

- Comments - Awning shall comply with the California Code of Regulations, title 25, section 1468. *HCD MH 415 is required from HCD and an additional permit may be required from the local government (verify with the local enforcement agency and/or building department as necessary). **Dependent on design and type.

If the type of MH alteration to be performed is not identified in this IB, contact an HCD Field Office, noted below, for further assistance.

Northern Area Field Office
9342 Tech Center Dr., Suite 550
Sacramento, CA 95826
(800) 952-8356
NAOStaff@hcd.ca.gov

Southern Area Field Office
3737 Main Street
Riverside, CA 92501
(800) 952-8356
SAOStaff@hcd.ca.gov

Cities, counties, state, and federal agencies are encouraged to share this IB with interested parties and refer unit owners/applicants to HCD for the HCD MH 415 permit applications, information, and assistance with unit alterations or conversions.