

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS**

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November 28, 2022

**INFORMATION BULLETIN 2022-11 (MH, MP, SOP)**

**TO:** City and County Building Officials  
Local Enforcement Agencies  
Mobilehome Park Operators and Residents  
Special Occupancy Park Operators and Residents  
Manufactured Home Manufacturers and Dealers  
Interested Parties

**FROM:** Kyle Krause, Deputy Director  
Division of Codes and Standards

**SUBJECT:** **HCD Permit Requirements—Alterations or Conversions**

This Information Bulletin clarifies the California Department of Housing and Community Development's (HCD's) permitting and inspection authority<sup>1</sup> for the alteration<sup>2</sup> or conversion of the following units<sup>3</sup> in California:

- Manufactured homes<sup>4</sup>
- Mobilehomes<sup>5</sup>
- Multifamily manufactured homes<sup>6</sup>
- Special purpose commercial modulars<sup>7</sup>
- Commercial modulars<sup>8</sup>

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<sup>1</sup> Health and Safety Code sections 18015 and 18029, and California Code of Regulations (CCR), title 25, section 4040

<sup>2</sup> CCR, title 25, section 4004(a)

<sup>3</sup> For the purposes of this Information Bulletin, "units" refers collectively to manufactured homes, mobilehomes, multifamily manufactured homes, special purpose commercial modulars, and commercial modulars.

<sup>4</sup> 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).

<sup>5</sup> Health and Safety Code section 18008

<sup>6</sup> Health and Safety Code section 18008.7

<sup>7</sup> Health and Safety Code section 18012.5

<sup>8</sup> Health and Safety Code section 18001.8

Pursuant to the Manufactured Housing Act of 1980<sup>9</sup> and California Code of Regulations, title 25<sup>10</sup>, **HCD has sole authority for permit issuance and inspections of alterations, conversions, or the change of use of units, or to conduct inspections to obtain insignia of approval.**<sup>11</sup>

Examples of conversions include changing the use, building type, or occupancy classification of a manufactured home/mobilehome (MH), or commercial modular. For example, converting from a commercial modular to a 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) and obtain a permit from HCD prior to commencing such work.

The following manufactured home/mobilehome alteration guidelines provide information on HCD’s permitting process, assist in determining what constitutes an alteration<sup>12</sup> to an MH, and assist in identifying when a form HCD MH 415 is or is not required. [Form HCD MH 415](#) can be obtained from an HCD Area Office or on HCD’s website at: <https://www.hcd.ca.gov/building-standards/permits-inspections/docs/hcdmh415.pdf>. When multiple alterations are proposed to the same MH, such as plumbing, electrical, and structural, the alteration scope of work may be combined on one HCD MH 415.

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<sup>9</sup> Health and Safety Code, division 13, part 2

<sup>10</sup> CCR, title 25, division 1, chapter 3

<sup>11</sup> Health and Safety Code section 18026

<sup>12</sup> For work that does not constitute an alteration or conversion or require an HCD MH 415 permit, see CCR, title 25, section 4041.

**MANUFACTURED HOME/MOBILEHOME ALTERATION GUIDELINES**

Organized by electrical, mechanical, plumbing, and structural &amp; general categories:

**ELECTRICAL**

<b>Electrical Type</b>	<b>Alteration Type</b>	<b>Permit (HCD MH 415)</b>	<b>Plan Review</b>	<b>Load Calculations Required</b>	<b>Comments</b>
Air Conditioning	Install—Add	Yes	No	Yes	Load calculations and the product manufacturer's specifications are required unless MH is factory A/C-ready and has a 100 amperage or higher main service disconnect device. Refer also to Mechanical.
Air Conditioning	Replace	Yes	No	Yes	Load calculations and the product manufacturer's specifications are required if A/C running-load-amperage or the full-load-amperage are increased. Refer also to Mechanical.
Appliance	Install (Add)— "Built-in" Electrical	Yes	No	Yes	N/A
Appliance	Replace—"Built-in" Electrical	Yes	No	No	Load calculations are not required unless amperage is increased.
Ceiling Fan	Install (Add)	Yes	No	No	N/A
Receptacle / Switch	Replace	No	No	No	N/A
Miscellaneous Electrical	Change— Electrical System (Upgrade/ Downgrade)	Yes	No	Yes	N/A

Miscellaneous Electrical	Install (Add)—Dedicated Branch Circuit	Yes	No	Yes	Examples: furnace, water heater, etc.
Miscellaneous Electrical	Install (Add)/Replace—Electrical Panel	Yes	No	No	Load calculations are not required unless de-amping the MH.
Miscellaneous Electrical	Install (Add)/Replace—Electrical Circuit	Yes	No	No	Load calculations are not required unless de-amping the MH.
Miscellaneous Electrical	Install—Meter Base	Yes	Yes	No	HCD detail is available for use.
Miscellaneous Electrical	Replace—Circuit Breaker or Fuse	No	No	No	Must be the same amperage and disconnect type.
Miscellaneous Electrical	Transition—Branch Circuits from Aluminum to Copper	Yes	No	No	Includes: pigtail, receptacles, and switches.

**MECHANICAL**

<b>Mechanical Type</b>	<b>Alteration Type</b>	<b>Permit (HCD MH 415)</b>	<b>Plan Review</b>	<b>Engineered Plans</b>	<b>Comments</b>
Air Conditioning/ Evaporative Cooler	Install—Air Conditioning (New or Replacement)	Yes	No	No	Refer also to Electrical.
Air Conditioning/ Evaporative Cooler	Install—Evaporative Cooler	Yes	No	No	N/A

Furnace/Heater/ Heat Pump/ Stove	Replace—Furnace (No system changes)	Yes	No	No	N/A
Furnace/Heater/ Heat Pump/ Stove	Replace—Furnace, Including Changes or Outside the MH	Yes	Yes	No	N/A
Furnace/Heater/ Heat Pump/ Stove	Replace or Install—Heater (Freestanding Gas or Oil Burning)	Yes	No	No	N/A
Furnace/Heater/ Heat Pump/ Stove	Replace or Install—Heat Pump	Yes	No	No	N/A
Furnace/Heater/ Heat Pump/ Stove	Replace or Install—Wood or Pellet Burning Stove	Yes	No	No	N/A
Gas Line	Install/Add to Length/Modify—Gas Line	Yes	Yes	No	N/A
Range, Oven, or Cooktop (Gas)	Replace—Built-in Oven, Range, Cooktop, or Freestanding Range	Yes	No	No	Same size, location, and BTU rating with no gas line changes.
Range Hood	Replace—Range Hood	No	No	No	HCD MH 415 is not required if range hood is the same size and location, including venting.
Water Heater	Replace or Install—Water Heater (Gas or electric)	Yes	No	No	Water heaters must be installed within the MH; not approved for exterior installation.

**PLUMBING**

<b>Plumbing Type</b>	<b>Alteration Type</b>	<b>Permit (HCD MH 415)</b>	<b>Plan Review</b>	<b>Engineered Plans</b>	<b>Comments</b>
Drain, Waste, and Vent	Install/Modify—Drain, Waste, and Vent (DWV) or Water System	Yes	Yes	No	HCD MH 415 is required if provided for bathtub, dishwasher, lavatory, shower, sink, toilet, washing machine, etc.
Drain, Waste, and Vent	Repair/Replace—DWV Tailpiece or Trap	No	No	No	N/A
Drain, Waste, and Vent	Replace—Kitchen Sink, Lavatory, or Toilet	No	No	No	HCD MH 415 is not required if there is no alteration to DWV or water system.
Drain, Waste, and Vent	Replace—Mechanical Auto Vent	No	No	No	N/A
Garbage Disposal	Install (Add)	Yes	No	No	N/A
Garbage Disposal	Replace	No	No	No	N/A
Washing Machine	Install/Replace	No	No	No	HCD MH 415 is required if water supply and/or drain line are newly installed or altered.
Miscellaneous Plumbing	Gas Lines	N/A	N/A	N/A	See Mechanical requirements.
Miscellaneous Plumbing	Water Heater	N/A	N/A	N/A	See Mechanical requirements.

**STRUCTURAL & GENERAL**

<b>Structural &amp; General Type</b>	<b>Alteration Type</b>	<b>Permit (HCD MH 415)</b>	<b>Plan Review</b>	<b>Engineered Plans</b>	<b>Comments</b>
Chassis or Frame	Repair	Yes	Yes	Yes	N/A
Doors (Exterior)	Replace—Door(s) with Same Size and Type	Yes / No	No	No	HCD MH 415 is required if changing size or type.
Floors	Repair—Decking	Yes	No	No	HCD MH 415 is required if over four (4) square feet.
Floors	Repair—Joist	Yes	Yes	No	N/A
Floors	Replace—Joist	Yes	No	No	N/A
Roof	California Roof	Yes	Yes	Yes	An engineered plan or design is required or when design criteria exceed an HCD-approved plan.
Roof	Built-Up or Overlay	Yes	Yes	Yes	N/A
Roof	Insulated/Thermoplastic Polyolefin Roof System	Yes	Yes	No	One (1) inspection required.
Roof	Re-Roof, Existing Roof Covering Removed	Yes	No	No	Two inspections are required (sheathing/underlayment and final). This does not include coating metal roof with approved material.
Roof	Repair—Rafter or Truss	Yes	Yes	Yes	N/A
Roof	Repair/Replace—Sheathing	Yes	No	No	N/A
Roof	Replace—Truss	Yes	Yes	Yes	N/A
Walls	Modify/Remove—Bearing Wall	Yes	Yes	Yes	N/A
Walls	Modify/Remove—Non-bearing Wall(s)	Yes	Yes	No	N/A

Walls	Wall Covering—Exterior	Yes	Yes	Yes / No	An engineered plan or design is required when installing stucco, concrete, or similar siding.
Walls	Wall Covering—Interior	Yes	No	No	Maximum flame spread 200 is required. Detail available for flame spread requirements.
Walls	Sidewall or Endwall Opening (New or Enlarged)	Yes	Yes	Yes / No	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	Yes / No	No	No	HCD MH 415 is 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 is required when replacing windows in kind, single pane window with dual pane window, or when installing bay window(s) requiring no additional support.
Structure Attachment	Attach—Awning (Wood), Garage, or Porch	Yes	Yes	Yes / No	Awning shall comply with CCR, 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). Requirement of engineered plans is dependent on design and type.

If the type of MH alteration to be performed is not identified in this Information Bulletin, contact an HCD Area Office for further assistance.

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City, county, state, and federal agencies are encouraged to share this Information Bulletin with interested parties and refer unit owners/applicants to HCD for HCD MH 415 permit applications, information, and assistance with unit alterations or conversions.

Questions regarding this Information Bulletin can be directed to HCD by emailing the Northern Area Office at [NAOStaff@hcd.ca.gov](mailto:NAOStaff@hcd.ca.gov) or Southern Area Office at [SAOStaff@hcd.ca.gov](mailto:SAOStaff@hcd.ca.gov) or calling (800) 952-8356.