

# WITHDRAWAL SHEET

## Clinton Library

**Collection:** Domestic Policy Council,  
 Rasco, Carol  
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**Date:** 9/21/04

DOCUMENT NO. & TYPE	SUBJECT/TITLE	DATE	RESTRICTION
1. Memo	To Deborah L. Coyle from Carol Rasco re: Message for Bruce, 1p	7/24/94	P6/B6
2. Fax cover	To Bruce Lindsey from Mary Anne Salmon, 1p	n.d.	P6/B6
3. Letter	To President Clinton from Hal Hunnicutt, 5p	n.d.	P6/B6
4. Letter	To President Clinton from Hal Hunnicutt, 4p	n.d.	P6/B6
5. Memo	To President Clinton from Nancy Hernreich	6/29/94	P6/B6

- P1** National security classified information [(a)(1) of the PRA].  
**P2** Relating to appointment to Federal office [(a)(2) of the PRA].  
**P3** Release would violate a Federal statute [(a)(3) of the PRA].  
**P4** Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA].  
**P5** Release would disclose confidential advice between the President and his advisors, or between such advisors [(a)(5) of the PRA].  
**P6** Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA].  
**PRM** Personal records misfile defined in accordance with 44 USC 2201 (3).

### RESTRICTIONS

- B1** National security classified information [(b)(1) of the FOIA].  
**B2** Release could disclose internal personnel rules and practices of an agency [(b)(2) of the FOIA].  
**B3** Release would violate a Federal statute [(b)(3) of the FOIA].  
**B4** Release would disclose trade secrets or confidential commercial financial information [(b)(4) of the FOIA].  
**B6** Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA].  
**B7** Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA].  
**B8** Release would disclose information concerning the regulation of financial institutions [(b)(9) of the FOIA].  
**B9** Release would disclose geological or geophysical information concerning wells [(b)(9) of the FOIA].

THE WHITE HOUSE  
OFFICE OF DOMESTIC POLICY

CAROL H. RASCO  
Assistant to the President for Domestic Policy

To: CHR

Draft response for POTUS  
and forward to CHR by: \_\_\_\_\_

Draft response for CHR by: \_\_\_\_\_

Please reply directly to the writer  
(copy to CHR) by: \_\_\_\_\_

Please advise by: \_\_\_\_\_

Let's discuss: \_\_\_\_\_

For your information: \_\_\_\_\_

Reply using form code: \_\_\_\_\_

File: \_\_\_\_\_

Send copy to (original to CHR): \_\_\_\_\_

Schedule? :  Accept  Pending  Regret

Designee to attend: \_\_\_\_\_

Remarks: \_\_\_\_\_

THE LONG-AWAITED  
HUD response on manufactured  
housing.

Carol -

Should we do anything  
more on this?

Roz

P.S. as far as I know,  
Bruce has not returned  
your call or mine - right?

THE WHITE HOUSE  
WASHINGTON

SEP 14 REC'D

Carol / Roz -

Nancy would like  
you to follow up  
on this since it has  
been two weeks.

Thanks!

Kelly

10/19/94

Need to know how  
we would get  
out to work with you

at least out - need  
9/19/94

! struggling  
left msg.  
pills



~~Roz~~

Call Bruce Katz  
at HUD to  
follow up on  
my conversation  
with him -  
any letter  
sent?  
set?

meaning response  
back to Subhani

---

THE WHITE HOUSE  
WASHINGTON

Jeremy King on  
response by  
HMO



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20410-0001

FAX TRANSMISSION

DATE: 10/17/94

NUMBER OF PAGES (including this page) 5

To: Carol Rasco

FROM: Bruce Katz

PHONE: \_\_\_\_\_

708-2713

COMMENTS: FYI, attached is the letter from and  
our response to the ARA.



OFFICE OF THE ASSISTANT SECRETARY  
FOR HOUSING-FEDERAL HOUSING COMMISSIONER

OCT - 6 1994

Mr. Danny D. Ghorbani  
President  
Association for Regulatory Reform  
1331 Pennsylvania Avenue, N.W.  
Suite 508  
Washington, DC 20004

Dear Mr. Ghorbani:

On behalf of Secretary Cisneros, thank you for your letter of August 18, 1994, regarding the meetings between Departmental staff, representatives from the American Association of Retired Persons ("AARP"), and representatives from the Manufactured Housing Institute ("MHI").

As you know, the Department supported the work of the National Commission on Manufactured Housing and was disappointed when the Commission's final report and legislative proposals did not represent a consensus of the Commission's members. In an effort to present Congress with a meaningful legislative package that can achieve broad support from consumers, industry and federal, state and local government, talks between the Department, AARP and MHI began.

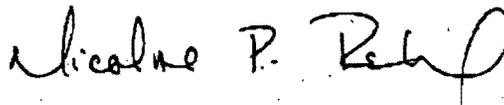
The goal of this process is to find acceptable solutions to the important issues on which the Commission was unable to reach a consensus. We hope that these discussions will bring to fruition the intent of the Commission as reflected in their Interim Report.

At these meetings, the attendants are equal partners negotiating terms on a legislative package they believe will be acceptable to interested parties, including your organization. Accordingly, the negotiations do not fall within the purview of the Federal Advisory Committee Act. AARP and MHI are not providing, nor is the Department seeking, advice or recommendations on Departmental policies or the Department's duties in Manufactured Housing Program. The meetings are, as you say in your letter, "negotiations" on a joint legislative package.

-2-

HUD would welcome, however, your reactions to the preliminary resolutions we are considering for inclusion in the legislative package. To this end, my Special Assistant, Sarah Rosen, will be available to meet with you to discuss this matter further. Please contact her at 708-3600 to arrange a meeting date.

Sincerely yours,



Nicolas P. Retsinas  
Assistant Secretary for Housing-  
Federal Housing Commissioner

# Association For Regulatory Reform

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1331 Pennsylvania Avenue, N.W., Suite 508 • Washington, D.C. 20004 • 202/783-4087 • FAX 202/783-4075

August 18, 1994

Hon. Henry G. Cisneros  
Secretary  
U.S. Department of Housing  
and Urban Development  
Room 10000  
451 Seventh Street, S.W.  
Washington, D.C. 20410

Re: Closed-Door Negotiations Regarding Manufactured  
Housing Legislation

Dear Secretary Cisneros:

As you are aware, the National Commission on Manufactured Housing ("Commission") was created in 1990 to provide recommendations to Congress regarding the modernization of the National Manufactured Home Construction and Safety Standards Act of 1974 ("Act"). The Commission, which, by its enabling legislation, is subject to the terms of the Federal Advisory Committee Act ("FACA") 5 U.S.C. App. 2 § 1, et seq, was constituted in 1992, with the appointment of commissioners representing HUD, homeowners, consumer groups, the industry, elected officials and building code officials, and began holding formal meetings in January 1993. Since that time, the Commission has conducted monthly meetings, in accordance with FACA § 10(a)(1) (open meetings). These sessions culminated with the publication of a Final Report on August 1, 1994, incorporating policy recommendations and proposed legislation approved by a fractious vote of 10-6-1 (with HUD abstaining).

When it became clear in May 1994, that the Commission would not be able to formulate a consensus recommendation and that Congress, at the same time, would not consider anything other than a consensus report, word began to circulate within the industry that closed-door "negotiations" were being commenced between HUD, the American Association of Retired Persons ("AARP") and a segment of the manufactured housing industry, in order to develop "compromise" legislation based on the Commission's recommendations. The fact that such closed-door meetings actually occurred -- and are still taking place -- was subsequently confirmed at the August 1994 meeting of the Commission by a HUD official. Moreover, that official acknowledged that the Executive Director of the Commission had, in fact, participated in the meetings as an "historian" of the Commission's actions and views.

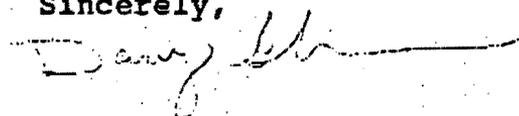
Having officially confirmed the existence of this closed-door negotiating process, ARR must now object to its continuation in the strongest possible terms. There can be no serious dispute but that these "negotiations" relate to and are a continuation of the substantive work of the Commission. The proposals are the same, the arguments are the same and many of the participants are the same. The one major difference is that a significant portion of the industry has been totally excluded from this process, while the industry Commissioners have been disenfranchised and effectively bypassed. The result, both de facto and de jure, is a "rump" Commission, including both governmental and private participants, fashioning legislation that apparently will go to Congress with the imprimatur of "the Commission," but without the full participation of the industry.

Recent court decisions leave no room for doubt that such secret conclaves are barred by the FACA. See e.g., Northwest Forest Resource Council v. Espy, Docket No. 93-1621 (D.D.C. 1994) (and cases cited therein). Accordingly, we must respectfully insist that the ongoing closed-door negotiations be halted or, alternatively, that they be opened to full participation by the entire manufactured housing industry, in order to ensure that its interests are properly represented. In addition, and in order to facilitate such participation, we would request that all minutes, notes and other documentation concerning prior negotiating sessions be made public immediately.

Since you first assumed office in 1993, ARR has made every effort to work cooperatively with both you and your staff. HUD's participation in a closed-door, exclusionary process as described above, however, is improper and must come to an end.

We would be pleased to meet with you to discuss this matter further, at your convenience.

Sincerely,



Danny Ghorbani,  
President

cc: Members, House and Senate Banking Committees  
Office of Management and Budget  
HUD General Counsel

EXECUTIVE OFFICE OF THE PRESIDENT

24-Jul-1994 07:10pm

TO: Deborah L. Coyle  
FROM: Carol H. Rasco  
Economic and Domestic Policy  
CC: Kelly A. Crawford  
SUBJECT: Message for Bruce

JUL 30 1994

(Kelly: I've cc'd you so you can show Nancy item #2. Thanks.)

1. You will receive on Monday a copy of a memo to the President which talks about the Florida issue, mentions that you will call Buddy and it will give you the names that Chiles' DC person told me as to legal person in Chiles's office and in Justice.
2. Hal Hunnicutt: You had sent up the latest letter from him asking if there is something else we should do. I have talked to Sally Katzen (without subjecting her to the Hal story) about follow up on regulatory matters like this and she suggests that we might want to talk to Cisneros about the fact we are STILL hearing a great deal about this reg and its perceived potential for a negative impact on the industry. We could ask him if it is okay for us to say that the Secretary has told us that he will continue to monitor the reg very carefully, will decide in 12 months if a full review should be done in order to determine if modifications to the reg should be made. Would you like for me to discuss this with Cisneros?

Yes, if  
this is  
U.H.  
Can't  
directly  
Thanks.

0725.017m

THIS FORM MARKS THE FILE LOCATIN OF ITEM NUMBER 1  
LISTED IN THE WITHDRAWAL SHEET AT THE FRONT OF THIS FOLDER.

THIS FORM MARKS THE FILE LOCATIN OF ITEM NUMBER 2  
LISTED IN THE WITHDRAWAL SHEET AT THE FRONT OF THIS FOLDER.

THIS FORM MARKS THE FILE LOCATIN OF ITEM NUMBER 3  
LISTED IN THE WITHDRAWAL SHEET AT THE FRONT OF THIS FOLDER.

THE WHITE HOUSE  
OFFICE OF DOMESTIC POLICY

CAROL H. RASCO  
Assistant to the President for Domestic Policy

To: \_\_\_\_\_  
\_\_\_\_\_

Draft response for POTUS  
and forward to CHR by: \_\_\_\_\_

Draft response for CHR by: \_\_\_\_\_

Please reply directly to the writer  
(copy to CHR) by: \_\_\_\_\_

Please advise by: \_\_\_\_\_

Let's discuss: \_\_\_\_\_

For your information: \_\_\_\_\_

Reply using form code: \_\_\_\_\_

File: \_\_\_\_\_

Send copy to (original to CHR): \_\_\_\_\_

Schedule ? :       Accept       Pending       Regret

Designee to attend: \_\_\_\_\_

Remarks: \_\_\_\_\_

Call left for Honowitz  
to call me

MaryBeth Souman - PIAI  
Wind Standards

many Housing 20,000 dollars  
Lab Fuller  
Katon

① Dept in late 93  
into effect July 13  
which increased  
wind standards  
just in effect in  
coastal areas  
Some states already sued

~~the other talked  
in the  
minutes~~  
Comm's recs  
Industry walked  
toward end

major partners  
Hud have come  
AARP  
MHI  
work  
to table  
w/

① Install. stand. full  
② Warranties  
& if agree in next MO.  
sun in  
June

NCSBES  
Court inquiry  
denied

Substance <sup>Wilson</sup>  
reviewing  
under way  
by court

Loss of <sup>Lib</sup> <sup>Stacy Martin</sup> <sup>is Rel.</sup>  
of <sup>to married</sup> <sup>to former</sup> <sup>also - Nest</sup>  
Comm. on <sup>top manufacturers</sup> <sup>(she goes to</sup> <sup>all the</sup> <sup>info)</sup>  
Mamm. Henshaw

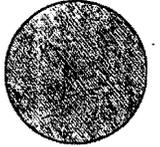
THIS FORM MARKS THE FILE LOCATIN OF ITEM NUMBER 4  
LISTED IN THE WITHDRAWAL SHEET AT THE FRONT OF THIS FOLDER.

THIS FORM MARKS THE FILE LOCATIN OF ITEM NUMBER 5  
LISTED IN THE WITHDRAWAL SHEET AT THE FRONT OF THIS FOLDER.



Phone: 501-327-1108

JUN 28 REC'D



DATE: 6-27-94

TO: Nancy Herrreich

COMPANY:

FROM: Hal Hummelt

Number of Pages Including Cover Sheet: 4

RE: Golf 1111 lot really

Econ-impact Study

1-800-555-2000  
Hummett #01039



JUL 7 REC'D

DATE: 7.7.94

TO: Carol Rasco

COMPANY: \_\_\_\_\_

FROM: Hal Hummel

Number of Pages Including Cover Sheet: ①

*Carol-*

I will be leaving Arkansas until Monday AM -  
I am going to give you 3 phone #'s  
Where I can be reached - if you need me -  
Friday AM 214-242-5542  
SAT & SUN 817-851-9402  
STAY @ RAMADA INN Wichita Falls, TX  
817 766-6000

There is a contact man in DC - that  
said Dan Quayle took care of all legislation  
& regulations during the Bush Admin.  
His name is Danny Gorham -  
~~his~~ his # 202 783 4081 -  
You can't trust him! Thanks in adva  
Hal

THE WHITE HOUSE  
OFFICE OF DOMESTIC POLICY

**CAROL H. RASCO**  
*Assistant to the President for Domestic Policy*

To: \_\_\_\_\_  
\_\_\_\_\_

Draft response for POTUS  
and forward to CHR by: \_\_\_\_\_

Draft response for CHR by: \_\_\_\_\_

Please reply directly to the writer  
(copy to CHR) by: \_\_\_\_\_

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Reply using form code: \_\_\_\_\_

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Send copy to (original to CHR): \_\_\_\_\_

Schedule ? :       Accept       Pending       Regret

Designee to attend: \_\_\_\_\_

Remarks: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20410-0001

JUL 7 REC'D

~~JUL 6 REC'D~~

**FAX TRANSMISSION**

**DATE:** July 6, 1994

**NUMBER OF PAGES (including cover sheet)** 9

**TO:** Carol Rasco

**FROM:** Bruce Katz

WH - Office of Domestic

HUD - Chief of Staff

Policy

**PHONE #:** (202) 456-2216

(202) 708-2713

FAX: (202) 456-2878

**COMMENT LINE:** As you requested.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**The phone number of this fax machine is (202) 708-2476**



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20410-0001

MEMORANDUM

TO: Carol Rasco, Assistant to the President for Domestic Policy

FROM: Bruce Katz, Chief of Staff, HUD *B. Katz*

SUBJ: Manufactured Housing Wind Standards

DATE: July 6, 1994

I provide below some background and talking points concerning HUD's new wind standards for manufactured housing.

- A 1974 Act charged HUD with promulgating federal preemptive Manufactured Home Construction and Safety Standards.
- On August 24, 1992, Hurricane Andrew struck southern Dade County, Florida. Winds reaching 95-135 mph caused extensive damage.
- Approximately 97% of manufactured homes in Dade County were destroyed, but only 11% of stick-built; almost 36% of all housing units destroyed by the hurricane were manufactured homes.
- In addition, flying debris from manufactured homes inflicted property damage on neighboring structures.
- HUD was criticized for ignoring earlier warning signs that its wind resistance standards for manufactured homes were too low.
- Secretary Kemp ordered a review of the HUD wind standards, seeking to implement higher standards before the next hurricane season (June 1993).
- National Institute of Standards and Technology recommended a standard known as ASCE 7-88, which would require homes to resist sustained winds of 100-110 mph in coastal zones and lower levels in the rest of the country.

- The new administration decided that public comment should be sought before the higher standards were rushed into effect and so published standards as a proposed rule.
- This delay to allow full consideration of industry concerns meant that another hurricane season went by. We risked that the inevitable next hurricane would strike and HUD would be criticized for failure to act to prevent the damage.
- After public comment and consultation with the Manufactured Home Advisory Council, Secretary Cisneros decided to go forward with higher standards, but to apply them only to the high wind coastal areas, leaving the standards as they were in the rest of the country pending further review.
- This decision reflected a balance between preserving affordability of low-cost housing and protecting individuals and their property. HUD concluded that higher costs could only be justified where the danger of high winds was greatest.
- HUD estimated that the higher standards will cause some homes to increase in cost from 3 to 6 percent. The industry estimated increases between 3 and 36 percent.
- The final rule was published on January 14, 1994 and is scheduled to go into effect on July 13, 1994.
- Florida manufacturers and dealers, with support from state trade groups in North Carolina, Alabama, Georgia, and Mississippi have filed a lawsuit seeking to overturn the rule. The primary national trade organization, the Manufactured Housing Institute (MHI), has not joined the litigation.
- The plaintiffs first asked the Secretary to delay implementation of the rule, which he denied. They then asked the Eleventh Circuit to enjoin implementation of the rule, which request was also denied. They are now seeking to have the rule overturned, but the litigation will not resolve the issues before the rule goes into effect on July 13th.

I also attach for your review a copy of the Department's press release upon the publication of the final rule.

Attachment



U.S. Department of Housing  
Office of Public Affairs

Urban Development

*Wind Concept*

Washington, D.C. 20410

# News Release

HUD No. 94-11  
Angelina Ornelas (202) 708-0685 x112  
Bob Nipp (202) 708-0685 x115

FOR RELEASE:  
Tuesday,  
January 18, 1994

## HUD ISSUES FINAL WIND RESISTANCE STANDARDS FOR MANUFACTURED HOMES IN HIGH-WIND AREAS

HUD has published a final rule establishing wind resistance standards for manufactured homes in high-wind areas.

"This rule will help protect residents of new manufactured homes in hurricane-prone areas from danger and property loss while maintaining the affordability of an important source of low-cost housing," said HUD Secretary Henry Cisneros. "We think this rule strikes the right balance."

HUD estimates that the new standard will result in net benefits and savings of \$32 million annually including reduced personal and property damage and clean-up and relief costs. The average cost to consumers of manufactured homes built to these standards may increase between three and six percent.

The new standard divides the country into three zones. New manufactured homes sited in Zone III, which includes the southern portions of Florida and Louisiana, the coasts of North Carolina and Alaska, and all of Hawaii, American Samoa, Guam, Northern Mariana Islands, Puerto Rico, Trust Territory of the Pacific Islands, and the U.S. Virgin Islands, must withstand winds of at least 110 mph.

-more-

HUD No. 94-11

-2-

In Zone II, which includes the rest of Florida and many coastal areas from Texas to Maine, manufactured homes must meet a 100 mph standard. (See the attached Zone Map and list of affected jurisdictions.)

The standard in the remainder of the country will not change from the current level of approximately 60 mph.

The rule indicates, however, that HUD plans further study of the appropriate design wind speed in Zone I, where sustained high winds are less likely. HUD also is studying how it can work with State and local governments to ensure that manufactured homes are properly installed.

A few communities have set even higher wind standards for site-built homes than the new HUD rule establishes for manufactured homes. The rule indicates that HUD will consider, on a case-by-case basis, requiring manufactured housing in those communities to meet wind load requirements comparable to those in local building codes.

HUD began the review of the wind resistance standards after Hurricane Andrew inflicted devastating damage to manufactured homes in its path. Approximately 97% of manufactured homes in Dade County were destroyed and almost 36% of all housing units destroyed by the Hurricane were manufactured homes. In addition, manufactured homes, shredded by Hurricane Andrew's winds, become dangerous flying missiles inflicting property damage on neighboring structures.

The National Institute of Standards and Technology recommended early last year that HUD adopt a standard known as ASCE 7-88, a building design load standard developed by the American Society of Civil Engineers. The final rule adopts this standard in Zones II and III.

-more-

HUD No. 94-11

-3-

The new standard, published in the January 14 Federal Register, does not go into effect for six months to give manufacturers a chance to modify designs and production to build homes that comply with the new standard.

In 1974, Congress gave HUD authority to establish construction and safety standards for manufactured housing across the country.

(Attached are communities which are affected by the new wind standards.)

# # #

To Accompany HUD No. 94-11

Page 1 of 3

Wind Zone I

Wind Zone I consists of those areas on the Basic Wind Zone Map that are not identified as being within Wind Zone II or III.

Wind Zone II

The following areas are deemed to be within Wind Zone II of the Basic Wind Zone Map (listed by counties, unless specified otherwise):

<u>Alabama:</u>	Baldwin and Mobile.
<u>Florida:</u>	All counties except those identified as within Wind Zone III.
<u>Georgia:</u>	Bryan, Camden, Chatham, Glynn, Liberty, McIntosh.
<u>Louisiana:</u>	Parishes of Acadia, Allen, Ascension, Assumption, Calcasieu, Cameron, East Baton Rouge, East Feliciana, Evangeline, Iberia, Iberville, Jefferson, Jefferson Davis, LaFayette, La Fourche, Livingston, Orleans, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. Helena, St. James, St. John the Baptist, St. Landry, St. Martin, St. Mary, St. Tammany, Tangipahoa, Terrabonne, Vermillion, Washington, West Baton Rouge, and West Feliciana.
<u>Maine:</u>	Hancock and Washington.
<u>Massachusetts:</u>	Barnstable, Bristol, Dukes, Nantucket, and Plymouth.
<u>Mississippi:</u>	George, Hancock, Harrison, Jackson, Pearl River, and Stone.
<u>North Carolina:</u>	Beaufort, Brunswick, Camden, Carteret, Chowan, Columbus, Craven, Currituck, Dare, Hyde, Jones, New Hanover, Onslow, Pamlico, Pasquotank, Pender, Perquimans, Tyrrell, and Washington.
<u>South Carolina:</u>	Beaufort, Berkeley, Charleston, Colleton, Dorchester, Georgetown, Horry, Jasper, and Williamsburg.
<u>Texas:</u>	Aransas, Brazoria, Calhoun, Cameron, Chambers, Galveston, Jefferson, Kenedy, Kleberg, Matagorda, Nueces, Orange, Refugio, San Patricio, and Willacy.
<u>Virginia:</u>	Cities of Chesapeake, Norfolk, Portsmouth, Princess Anne, and Virginia Beach.

To Accompany HUD No. 94-11

Page 2 of 3

Wind Zone III

The following areas are considered to be within Wind Zone III of the Basic Wind Zone Map:

States and Territories:

The entire State of Hawaii, the coastal regions of Alaska (as determined by the 90 mph isotach on the ANSI/ASCE 7-88 map), and all of the U.S. Territories of American Samoa, Guam, Northern Mariana Islands, Puerto Rico, Trust Territory of the Pacific Islands, and the United States Virgin Islands.

Local governments: (listed by counties, unless specified otherwise):Florida:

Broward, Charlotte, Collier, Dade, Franklin, Gulf, Hendry, Lee, Martin, Manatee, Monroe, Palm Beach, Pinellas, and Sarasota.

Louisiana:

Parishes of Jefferson, La Fourche, Orleans, Plaquemines, St. Bernard, St. Charles, St. Mary, and Terrabonne.

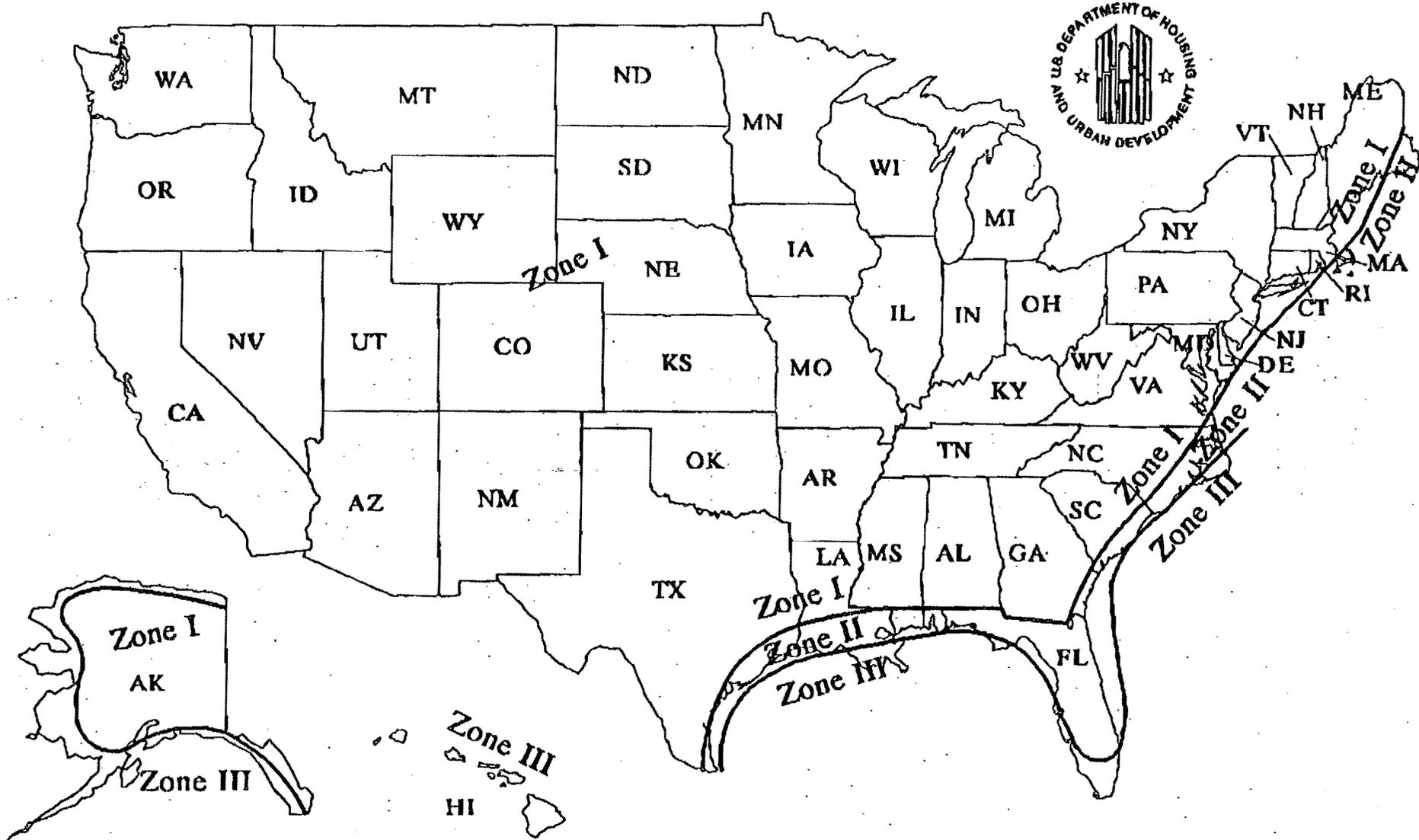
North Carolina:

Carteret, Dare, and Hyde.

Consideration of local requirements.

For areas where local building code requirements exceed the design wind speed requirements of these standards, the Department will consider the adoption through rulemaking of the more stringent requirements of the State or local building authority.

# Basic Wind Zone Map for Manufactured Housing



**NOTE:** See Section 3280.305(c)(2) for areas included in each Wind Zone.