

PLAN CHECK GUIDELINES FOR STATE APPROVED FACTORY-BUILT HOUSING (FBH)

BACKGROUND

Factory-Built Housing (FBH) as defined and approved by the Department of Housing and Community Development (HCD) of the State (not to be confused with manufactured housing or mobile homes) follows the California Code of Regulations (CCR), Title 24, California Building Standards Code and FBH laws and regulations.

Plan review and inspection duties of FBH projects are shared by the local building department and HCD. Factory-built and assembled structures and components are reviewed and inspected by an HCD design approval agency. Site-built and assembled structures and components are reviewed and inspected by the local building department. The delineation of authority for plan review and inspection of FBH is further described under the 'California State Law' section below.

FBH is comprised of residential structures manufactured wholly or partially off-site, in sections or building components which are assembled at the installation site to form part of, or most of a completed unit. FBH components may consist of a wall, floor or roof panel utilizing rigid foam insulation enclosed by interior and exterior sheathing materials; or also may be a conventionally framed closed-system wall or roof panel containing plumbing, electrical, and other systems enclosed within plywood or steel panels. FBH may also consist of cargo container conversions to building modules per Information Bulletin, P/BC 2020-145. FBH is typically installed on a foundation designed to CCR Title 24 requirements.

CALIFORNIA STATE LAW

FBH law and regulations establish methods of quality control, using HCD's preemptive statewide authority for the design review and construction approval in the factory. The compliance with California requirement is demonstrated by placement of HCD "Insignia of Approval" on each unit or component. The Design Approval Agencies (DAA), certified by HCD, review the FBH designs and supporting calculations to both the requirements of the CBC and FBH regulations contained in Title 25 Chapter 3, Subchapter 1. FBH designs usually only consist of the portions of the dwelling manufactured off-site, but may also include the entire project including the foundation and other site-installed elements. If the FBH design submitted for HCD review consists only of a closed-system component or comprises only a portion of the entire dwelling, the approved FBH plans will provide all details addressing the transfer of the design loads to the remainder of the site-built structure and foundation, in order to allow the local building department to complete their review of the entire project.

HCD approved designs shall include a resume of work identifying the scope of work for which the Design Approval Agency (DAA) is responsible. The scope of work shall include plan review and

inspection responsibilities of all building components for both the DAA and local building department to facilitate coordination between the two agencies. See Appendix A for an example of a resume of work.

1. State laws establish two principal roles for local government:
 - a. Design approval of the portions of the project that are not subject to approval by HCD or an HCD third-party agency, and
 - b. Permit issuance and inspection of the installation and assembly of FBH units at the building site. The local authority (building department) permitting the use of FBH modules may relegate site use, configuration, installation and utility services and connections of the FBH units.
2. The State laws, further stipulate, pursuant to HSC 19981, that the local building department may not:
 - a. Require review of any FBH plans or charge plan check fees when plans have already been approved by HCD or an HCD-approved third-party DAA.
 - b. Require the alteration of any FBH unit, including any building component system, in order to meet any local code requirements other than local design loads, or aesthetic/architectural review standards, or location on the property.

LOS ANGELES MUNICIPAL CODE APPLICATION

In the Los Angeles Municipal Code, Section 91.107.2.1 of the Building Code requires the building permit fee to be based on “the total value of all construction work for which the permit is issued...” Furthermore, Section 91.107.3.1.1 of the Building Code requires the plan check fee to be “equal to 90 percent of the building permit fee.”

Review of construction documents and plans for conformance of FBH projects with the Los Angeles Municipal Code shall not exceed 4 weeks from the time of submittal. The review process shall be done in parallel with other applicable Departments (Fire, City Planning and Housing and Community Development). The target timeline for plan approval and permitting shall be 8 weeks from the time of submittal, in coordination with the designer of record. The final permitted set of construction documents shall include the State-approved plans for FBH structures and components.

BUILDING PERMIT VALUATION

Since the State laws stipulate that the local building department may not charge plan check fees for part of plans already approved by HCD or an HCD-approved third party DAA, the valuation used to determine the plan check fees shall be reduced as follows.

The amount of this reduction shall be based on the extent of the work to be plan checked by the Department. The plan check supervisor will determine the percentage reduction applicable to the project submitted for plan check based on the amount of portions already approved by HCD or an HCD-approved third-party DAA.

The following policy regarding the building permit valuation shall be used to determine the percentage of each portion of work.

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.

- 25% of the valuation towards the review of the zoning requirements of the project.
- 25% of the valuation towards the review of the foundation portions of the building.
- The remaining percentage of the valuation shall be divided up based on amount of portions consisting of the State approved component(s) and/or building system(s).

The Los Angeles Department of Building and Safety (LADBS), the Los Angeles Department of City Planning (LACP), the Los Angeles Fire Department (LAFD) and the Housing and Community Investment Department (HCID) have come together in the best interest of the City of Los Angeles (the City) to establish a joint partnership to improve development of factory-built housing. All Departments wished to memorialize this partnership by entering into a Memorandum of Understanding (MOU) for factory-built housing available [here](#) for reference.

APPENDIX A - SAMPLE RESUME OF WORK

Permanent Supportive Housing

"Address"

California Factory Built housing

Name of Designated Approval Agency (DAA) Certified by HCD, reviewing the project.

Manufacturer: _____

Delineation of Plan Review and Inspection

Section / Discription	Drawing No.	Plan Review		Inspection	
		DAA	LAHJ	DAA	LAHJ
Cover Page, Index and General Information	A000 thru A003	X ¹	X ¹	X ¹	X ¹
Site Plan	A101	X ¹	X ¹		X
Architectural (Floor Plans & Elevations)	A201 thru A301	X ¹	X ¹	X ¹	X ¹
Architectural (Sections, Floor Plans & Ceiling Plans)	A302 thru A602	X		X	
Stair Plan, Section & Details	A701	X ¹	X ¹		X
Architectural Details	A901 thru A903	X		X	
Mechanical	M100 thru M500	X ¹	X ¹	X ¹	X ¹
Electrical	E100 thru E403	X ¹	X ¹	X ¹	X ¹
Plumbing	P100 thru P500	X ¹	X ¹	X ¹	X ¹
Fire Protection	FP101 thru FP403	X ¹	X ¹	X ¹	X ¹
Fire Alarm	FA10 thru FA503	X ¹	X ¹	X ¹	X ¹
Energy report	T-24.1 thru T-24.6	X ¹	X ¹	X ¹	X ¹
Structural	S001 thru S406	X ^{1,2}	X ^{1,2}	X ^{1,2}	X ^{1,2}

1- When drawings and construction include both factory built and site built construction, plan review and inspection will be according to the following rules:

- a) Factory built elements will be reviewed and inspected by DAA
- b) Connections between factory built components or between factory built and site built components will be reviewed by DAA and inspected by LAHJ.
- c) Site built elements will be reviewed and inspected by LAHJ except for structural (see footnote 2)

2- Structural drawings and calculations (excluding foundations) will be entirely reviewed by DAA to maintain the structural integrity of the structure.

LAHJ will review foundation plans and calculations.

DAA will inspect factory built structural elements.

LAHJ will inspect all field construction and connections.

3- All other site work not mentioned above (Grading, Installation of Site Utilities, Stormwater Management System, Landscaping, etc.) will be reviewed and inspected by LAHJ.

DAA = Designated Approval Agency

LAHJ = Local Authority Having Jurisdiction

SAMPLE RESUME OF WORK