

Approved 1-31-91  
Date

MINUTES OF THE SENATE COMMITTEE ON TRANSPORTATION & UTILITIES

The meeting was called to order by Sen. Bill Morris at  
Chairperson

9:02 a.m./~~p.m.~~ on January 30, 1991 in room 254-E of the Capitol

~~All members were present except~~ Members present:

Senators Morris, Doyen, Brady, Hayden, F. Kerr, Rock, Sallee and Thiessen.

Committee staff present:

Ben Barrett, Legislative Research Department  
Hank Avila, Legislative Research Department  
Bruce Kinzie, Revisor of Statutes  
Louise Cunningham, Committee Secretary

Conferees appearing before the committee:

Bob Alderson, Kansas Manufactured Housing Association  
Terry Humphrey, Kansas Manufactured Housing Association  
Jim Kaup, League of Kansas Municipalities

Hearing on SB 11 - Codification of laws pertaining to manufactured housing. Re Proposal No. 7.

Bob Alderson said this bill was the result of an interim study by the Assessment and Taxation Committee. Kansas laws regulating manufactured housing reflect the industry's beginnings in that many laws still regard manufactured homes as vehicles. They have been subject to provisions regulating vehicle registrations and titling, traffic rules, etc. The industry has sought changes because these homes are not designed to be used on highways. Statutes have not been changed and they are still regulated as vehicles. They have conferred with the Director of Vehicles and there is agreement that these homes should be removed from the statutes and put in one place. He went through SB 11 explaining each section. A copy of his statement is attached. (Attachment 1).

Terry Humphrey and Mr. Alderson were questioned about whether there would be any changes in the taxes with this bill. This bill would have no effect on the taxes or on highway movement of these homes.

Mr. Alderson had some proposed amendments to the bill. A copy is attached. (Attachment 2).

Jim Kaup said they did not appear before the interim committee because they believed SB 11 would only deal with recodification and they felt no need to attend; however, they feel that Sec. 12 of SB 11 raises troubling questions. They feel there appears to be a broader prohibition in Sec. 12 on the state and local units than the prohibition that now exists under federal law. He is requesting the deletion of Sec. 12 from SB 11. A copy of his statement is attached. (Attachment 3).

A motion was made by Sen. Sallee and was seconded by Sen. F. Kerr to approve the Minutes of January 29, 1991. Motion carried.

Meeting was adjourned at 10:00 a.m. Next meeting to be January 31, 1991.

SENATE TRANSPORTATION AND UTILITIES COMMITTEE

Date 1-30-91 Place 254-E Time 9:02

GUEST LIST

NAME

ADDRESS

ORGANIZATION

Bob Anderson

TOPEKA

KMHA

Jim Kamp

TOPEKA

League of Municipalities

Lt. Bill Jacobs

TOPEKA

KS HIGHWAY PATROL

Terry Humphreys

TOPEKA

KMHA

Carl Hill

TOPEKA

KMCA

Pat Higgins

TOPEKA

Gov. Office

Joe Dick

TOPEKA

Dir of Motor Vehicles

Harold B. Tumbler

"

" " " "

D. Allen

TOPEKA

" " " "

ALDERSON, ALDERSON, MONTGOMERY & NEWBERY

ATTORNEYS AT LAW

2101 S.W. 21ST STREET

P.O. BOX 237

TOPEKA, KANSAS 66604-3174

W. ROBERT ALDERSON, JR.

ALAN F. ALDERSON

STEVEN C. MONTGOMERY

D. DAVID NEWBERY

JOSEPH M. WEILER

JOHN E. JANDERA

DANIEL B. BAILEY

TELEPHONE:

(913) 232-0753

FAX:

(913) 232-1866

MEMORANDUM

TO: Senate Committee on Transportation and Utilities

FROM: W. Robert Alderson, Attorney for  
Kansas Manufactured Housing Association

RE: 1991 Senate Bill No. 11

DATE: January 30, 1991

The purpose of this memorandum is to provide the Senate Committee on Transportation and Utilities with a brief overview of each section of 1991 Senate Bill No. 11. This bill was recommended by the Special Committee on Assessment and Taxation at the conclusion of its study under 1990 Interim Proposal No. 7. The focus of that study was 1990 Senate Bill No. 810, which was introduced by the Senate Committee on Federal and State Affairs, at the request of the Kansas Manufactured Housing Association, toward the end of last session.

The primary sections of the bill are New Sections 1 through 12, which are denominated by New Section 1 as the Kansas Manufactured Housing Act. The remaining substantive sections of SB 11 (Sections 13 through 45) amend existing statutes so as to be consistent with the Kansas Manufactured Housing Act.

For the most part, these amendments either remove references to "manufactured home" or "mobile home" because such existing references will be superseded by provisions of the Kansas Manufactured Housing Act, or the amendments change terminology so as to be consistent with the terms used in the Kansas Manufactured Housing Act, as defined in New Section 2 thereof.

The foregoing comments provide a background for the following statements concerning the sections of SB 11.

New Section 1. As noted above, the first twelve sections of SB 11 are new. They are designed to codify in a single location in the statute books all of the pertinent statutory regulations and requirements regarding manufactured housing. The only significant exception to such codification is the statutory provisions relating to assessment and taxation of manufactured homes and mobile homes. In some respects, the so-called Mobile Home Tie Down Law will continue to be an exception to the proposed codification, although mobile homes are technically not manufactured homes.

The new sections will be referred to collectively as the Kansas Manufactured Housing Act.

ATT. 1

T&U

1-30-91

**New Section 2.** This section provides pertinent definitions for the Kansas Manufactured Housing Act. Of note are the definitions of "manufactured home" and "mobile home." Currently, there are a variety of definitions for these terms scattered throughout the statutes. SB 11, in enacting the Kansas Manufactured Housing Act and making corresponding statutory amendments, will provide a single definition for each of these terms. Equally as important is the fact that these definitions will be consistent with the definitions of these terms established pursuant to the National Mobile Home Construction and Safety Standards Act of 1974 [42 U.S.C. §5402(6) (1976)], and regulations adopted by the Secretary of Housing and Urban Development pursuant thereto.

Most of the remaining definitions in New Section 2 are derived from the definitions now contained in K.S.A. 1990 Supp. 8-2401, the definition section of the Vehicle Dealers and Manufacturers Licensing Act. As will be noted subsequently, all of the relevant provisions relating to manufactured homes and mobile homes contained in the existing act will be removed by amendment and restated in the Kansas Manufactured Housing Act.

**New Section 3.** Even under existing law, manufactured homes and mobile homes are not defined as vehicles. (Vehicles "transport" persons or property; manufactured homes and mobile homes are "transportable.") Yet, many of the statutory regulations pertaining to manufactured homes and mobile homes are contained in the statutory provisions relating to the registration and titling of vehicles. New Section 3 restates and clarifies the fact that manufactured homes and mobile homes are not vehicles, and it further provides that they are not subject to regulatory provisions pertaining to vehicles, including statutory regulations regarding the registration and titling of vehicles and those regulating the manufacture, distribution and sale of vehicles.

However, this section makes it clear that, whenever a manufactured home or mobile home is moved upon the state's streets and highways, such movement is governed by the provisions of the Uniform Act Regulating Traffic on Highways that are applicable to the movement of house trailers. (See Section 17, amending K.S.A. 1990 Supp. 8-1911.)

**New Section 4.** Under certain conditions, manufactured homes and mobile homes are regarded as personal property and are classified, assessed and taxed as personal property. Thus, there must be some means for evidencing ownership of manufactured housing under these conditions. This is currently accomplished by issuing certificates of title to manufactured homes and mobile homes, pursuant to the statutes providing for the registration and titling of vehicles. As previously noted, though, manufactured homes and mobile homes are not vehicles, and one of the principal purposes of SB 11 is to remove all references to manufactured homes and mobile homes from the vehicle titling and registration statutes. However, New Section 4 restates the relevant provisions of these statutes, although provision is made in subsection (b) for the issuance of a distinctive certificate of title which is to be distinguishable from certificates of title issued to vehicle owners.

New Sections 5 through 11. One of the primary purposes of enacting the Kansas Manufactured Housing Act is to exclude persons engaged in manufacturing, distributing or selling manufactured homes or mobile homes from the regulations provided in and pursuant to the Vehicle Dealers and Manufacturers Licensing Act (K.S.A. 8-2401 et seq.). As previously noted, manufactured homes and mobile homes are not vehicles, and efforts to regulate their manufacture, distribution and sale concurrently with the regulation of the manufacture, distribution and sale of vehicles has been cumbersome, at best. New Sections 5 through 11 restate the provisions of the Vehicle Dealers and Manufacturers Licensing Act which have relevance to the regulation of persons engaged in manufacturing, distributing or selling manufactured homes and mobile homes. These new sections do not represent any significant change in existing law.

New Section 12. This section is a codification of current federal statutory and case law. It prohibits state and local governmental units from requiring a manufactured home to comply with any building, plumbing, heating or electrical code other than the Federal Manufactured Home Construction and Safety Standards. The section prefaces such prohibition on the fact that the manufactured home is in compliance with the Federal Manufactured Home Construction and Safety Standards. However, such condition is superfluous, to some extent, and could be deleted, since a definition (both by federal law and pursuant to New Section 2 of SB 11) must be in compliance with Federal Manufactured Home Construction and Safety Standards.

The language of Section 12 is patterned after K.S.A. 75-1218, which imposes a similar restriction on state and local governments with respect to mobile homes and recreational vehicles which comply with the standards imposed by the Uniform Standards Code for Mobile Homes and Recreational Vehicles (K.S.A. 75-1211, et seq.). However, the authority for Section 12 is provided by the federal Manufactured Home Construction and Safety Standards Act (42 U.S.C. §5401 et seq.).

The purpose and effect of that federal law is explained, in part, in Manufactured Housing in Residential Neighborhoods: A Manual for Kansas Cities and Counties, which was published in January of 1991 by the League of Kansas Municipalities. At page 14 of that publication, there is the following explanation, which should assist the Committee's understanding of Section 12:

"The HUD Code is a preemptive law, meaning that local and state governments cannot impose building standards on HUD Code manufactured housing that conflict with the HUD Code. 42 U.S.C. Sec. 5403(d) provides:

"'. . . no State or political subdivision of a State shall have any authority either to establish, or to continue in effect, with respect to any manufactured home covered, any standard regarding construction or safety applicable to the same aspect of performance of such manufactured home which is not identical to the Federal manufactured home construction and safety standard.'

"In Scurlock v. City of Lynn Haven, Florida, 858 F.2d 1521 (11th Cir. 1988) the United States Court of Appeals for the 11th Circuit interpreted this federal statute and held 'The language of the statute clearly precludes states and municipalities from imposing construction and safety standards upon mobile homes that differ in any respect from those developed by HUD.' No comparable decision has been rendered in the federal circuit court covering Kansas (the 10th Circuit)."

**Section 13.** K.S.A. 1990 Supp. 8-126, which is the definition section for the statutes governing the registration of vehicles, is amended by Section 13 of SB 11. This section highlights one of the primary reasons noted above for promulgating a separate enactment pertaining to manufactured homes and mobile homes. By definition in this statute and elsewhere throughout the Kansas statutes, neither a manufactured home nor a mobile home is a vehicle.

Accordingly, the amendment to 8-126 in Section 13 deletes the definition of "manufactured home" and, in order to avoid redesignating the subsections which follow the definition of "manufactured home," a definition of "division" is inserted in lieu thereof. The latter is a useful definition, but included primarily for convenience.

**Section 14.** This section amends K.S.A. 1990 Supp. 8-135, which contains the provisions for titling vehicles. The amendments merely delete all references to manufactured homes and mobile homes.

**Section 15.** K.S.A. 1990 Supp. 8-143 prescribes the procedure and fees necessary to register various classes of vehicles. It is amended to remove all references to manufactured homes and mobile homes.

**Section 16.** K.S.A. 8-1425 is one of the definition sections of the Uniform Act Regulating Traffic on Highways. It defines "house trailer," and as amended by Section 16, the defined term will not include a manufactured home or mobile home.

**Section 17.** K.S.A. 1990 Supp. 8-1911 also is a section of the Uniform Act Regulating Traffic on Highways. Even though manufactured homes and mobile homes are not vehicles and, thus, are not subject to this act, subsection (g) is amended by Section 17 to preserve the requirement that a manufactured home or mobile home which exceeds the lawful width requirements must obtain a permit and comply with the other requirements of subsection (g), in order to be moved upon the state's highways. Subsection (g) is further amended by providing that the definitions of "manufactured home" and "mobile home" are as provided in the Kansas Manufactured Housing Act.

**Sections 18 through 26.** Various sections of the Vehicle Dealers and Manufacturers Licensing Act are amended by these sections, so as to specifically exclude from this act persons engaged in manufacturing, distributing or selling manufactured homes or mobile homes and currently licensed under this act. As previously noted, New Sections 5 through 11 restate and incorporate the pertinent provisions of this act into the Kansas Manufactured Housing Act.

**Section 27.** This section amends K.S.A. 1990 Supp. 12-5221, which is the definition section of the Local Residential Housing Finance Law. Currently, subsection (g) defines "home" to include "manufactured housing" which meets the building codes of the city or county. This provision is stricken in SB 11, and in lieu thereof, "home" includes any manufactured home, as defined in Section 2 of the Kansas Manufactured Housing Act. This amendment is consistent with New Section 12, which precludes local governmental entities from requiring that manufactured homes comply with any building, plumbing, heating or electrical code, other than the Federal Manufactured Home Construction and Safety Standards.

The definition of "home" also includes a mobile home as defined by K.S.A. 8-126(v), which has a permanent foundation. This provision is amended only to change the definitional reference to Section 2 of the Kansas Manufactured Housing Act.

**Sections 28 through 31.** These sections make technical amendments to four sections of the Kansas Criminal Code. Two of these sections (21-3715 and 21-3716) currently reference a "mobile home," and they are amended so as to also reference a "manufactured home."

K.S.A. 21-3757 currently prescribes certain unlawful acts with respect to a motor vehicle's odometer. The amendment proposed by SB 11 clarifies the fact that manufactured homes and mobile homes are not vehicles and, therefore, not subject to this section's provisions.

K.S.A. 1990 Supp. 21-3758 makes it unlawful to transfer ownership to any vehicle or mobile home, without identifying the transferor on the transferred certificate of title. The amendment also makes this section applicable to manufactured homes.

**Section 32.** K.S.A. 58-227 provides for liens upon mobile homes. It is amended to extend its provisions to manufactured homes, as well.

**Section 33.** K.S.A. 58-2543 is the definition section of the Residential Landlord and Tenant Act. The definition of "dwelling unit" currently includes a mobile home, and it is amended by Section 33 so as to also include a manufactured home.

**Section 34.** A homestead is exempt from distribution under the Kansas Probate Code pursuant to the provisions of K.S.A. 59-401, which currently includes a mobile home within the definition of "homestead." Section 34 amends this statute to also include a manufactured home.

**Section 35.** The exemption of a person's homestead from forced sale is provided by K.S.A. 60-2301, a section of the Code of Civil Procedure. It currently includes a mobile home within the parameters of a homestead, and Section 35 would amend it to also include a manufactured home.

**Section 36.** K.S.A. 75-1226 provides the definitions for an act which is unofficially styled as the Mobile Home Tie Down Law. This statute is amended by Section 36 so as to define "mobile home" by reference to Section 2 of the Kansas Manufactured Housing Act.

**Section 37.** K.S.A. 77-201 prescribes certain rules of statutory construction applicable to all Kansas statutes. Included in its provisions are definitions of various terms which are to have application wherever these terms are used in the Kansas statutes, unless such definition would be inconsistent with legislative intent or repugnant to the context of the statute. Section 37 would amend this statute so as to include definitions of "manufactured home" and "mobile home" that are identical to the definitions of these terms included in Section 2 of SB 11.

**Sections 38 through 41.** These sections amend K.S.A. 79-335, 79-336, 79-337 and 79-340, respectively, so as to clarify the requirements for listing manufactured homes and mobile homes for taxation. The requirement that the listing be made at the time of registration or renewal of registration pursuant to the vehicle registration statutes is eliminated, consistent with the provisions of the Kansas Manufactured Housing Act and other amendatory sections. In addition, the pertinent terminology contained in Section 2 of the Kansas Manufactured Housing Act is made applicable to these sections.

**Section 42.** The only amendment made by this section to K.S.A. 79-3606, a section of the Kansas Retailers' Sales Tax Act, is to define "mobile homes" and "manufactured homes" in subsection (d) by reference to the definitions of these terms in Section 2 of the Kansas Manufactured Housing Act.

**Section 43.** This section amends K.S.A. 79-4502, a section of the Homestead Property Tax Refund Act. The definition of "homestead" in this statute currently includes a mobile home, and the amendment adds a manufactured home to this definition.

**Section 44.** K.S.A. 79-4511 also is a section of the Homestead Property Tax Refund Act. It currently requires that the amount of personal property taxes levied on a mobile home shall be set out on the personal property tax statement as a separate item. The amendment extends this requirement to personal property taxes levied on a manufactured home, as well.

**Section 45.** K.S.A. 79-5101 currently defines "motor vehicle" to include all motor vehicles required to be registered under Article 1 of Chapter 8 of the Kansas Statutes Annotated, with certain exceptions. One of these exceptions is "mobile homes." That exception is totally unnecessary, since manufactured homes and mobile homes are not motor vehicles. Section 45 amends this statute to eliminate that exception.



PROPOSED AMENDMENTS TO SENATE BILL NO. 11

---

On page 3, in line 43, by striking "salesmen" and inserting in lieu thereof "manufacturers";

On page 4, in line 33, by inserting after "and" the following: "it also shall contain the name and address of the owner, the manufacturer's name, the brand, model name or number, serial number, year of manufacture and the exterior dimensions of the manufactured home or mobile home. In addition, the certificate of title";

On page 5, in line 5, by striking "or mobile home"; in line 8, by striking "or mobile home";

On page 14, in line 41, by striking "franchise" and inserting in lieu thereof "manufactured home sales";

On page 15, in line 1, by striking "franchise" and inserting in lieu thereof "manufactured home sales"; in line 5, by striking "franchise" and inserting in lieu thereof "manufactured home sales"; in line 21, by striking "or mobile homes";

On page 16, following line 27, by inserting two new paragraphs to read as follows:

"(d) When any licensee is found to be allegedly violating any of the applicable provisions of the Kansas manufactured housing act, or any order or rule and regulation adopted pursuant thereto, the director

upon the director's own motion or upon complaint may commence a hearing against the licensee, which hearing shall be conducted in accordance with the provisions of the Kansas administrative procedure act.

"(e) Any person who is found to have violated any applicable provisions of the Kansas manufactured housing act, any rule and regulation adopted pursuant thereto or any applicable order of the director shall be subject to a civil penalty of not less than \$50 nor more than \$1,000 for each violation or such person's license may be suspended or revoked or both civil penalty and license suspension or revocation.";

Also on page 16, in line 28, by striking "(d)" and inserting "(f)" in lieu thereof; in line 31, by striking "(e)" and inserting "(g)" in lieu thereof; in line 36, by striking "&" and inserting "§" in lieu thereof;

On page 76, in line 43, by striking "of such mobile home" and inserting "thereof" in lieu thereof;



League  
of Kansas  
Municipalities

Muni |  
Legislative  
Testimony

An Instrumentality of Its Member Cities. 112 West Seventh Street, Topeka, Kansas 66603 913-354-9565 Fax 354-4186

TO: Senate Committee on Transportation  
and Utilities  
FROM: Jim Kaup, League General Counsel  
RE: SB 11--Manufactured Housing  
DATE: January 30, 1991

The League appears today to ask this Committee to delete Section 12 from SB 11.

Sec. 12 (page 16, lines 34:40) provides: "If a manufactured home is in compliance with the federal manufactured home construction and safety standards established pursuant to 42 U.S.C. (sec.) 5403, no agency of this state and no city, county or other municipality or local governmental body shall require such manufactured home to comply with any building, plumbing, heating or electrical code other than the federal manufactured home construction and safety standards."

The report of the 1990 interim committee on SB 11 states that the charge of the interim committee was "...to study the statutes relating to manufactured housing and consider whether they should be recodified separately from the statutes relating to motor vehicles." Given that charge, the League saw no need to participate in the work of the 1990 interim committee, and did not attend any of the committee's meetings relating to SB 11.

The League notes that Section 12 of SB 11 neither relates to recodification--there are no Kansas statutes at present dealing with the subject matter of Sec. 12--nor does Sec. 12 relate to "...the statutes relating to motor vehicles".

Frankly we were surprised to see Sec. 12 in SB 11, particularly in the absence of anything in the interim committee report to indicate testimony or discussion of the rationale of Sec. 12, or discussion of the ramifications it will have for not only cities and counties across the state of Kansas, but the state government itself.

Section 12 prohibits the state and local units of government from requiring that manufactured housing comply with the same "building, plumbing, heating or electrical code(s)" that must be complied with by site-built housing in the same jurisdiction. We do not understand how this proposed state prohibition relates to the interim committee's recommendation that "Legislation should be enacted to regulate the industry and its dealers separately from the motor vehicle industry. This will simplify the administration of the law and facilitate the Legislature's review of both industries." (emphasis added)

#### RAMIFICATIONS OF SECTION 12

Moving beyond the issue of whether Sec. 12 is a proper topic to be contained within SB 11, the League would like to call to this Committee's attention several substantive points regarding the prohibition contained in Sec. 12:

ATT. 3  
T&U  
1-30-91

(1) **Federal Preemption of State and Local Law.** Proponents of Sec. 12 may contend that it is merely a state law codification of federal preemption of manufactured housing construction and safety standards. The League would respond with two points to that argument. First, if that is in fact the rationale for Sec. 12, the state's statute books ought not to be burdened with mere acknowledgments of federal preemption. If the legislature decides to use the KSAs to repeat what the law already is, we are going to have to publish a considerable number of statute books. Second, the language of Sec. 12 appears to go well beyond the League's understanding of federal preemption in the area of manufactured housing. Section 12 does not track well with the language used in the provisions of the Code of Federal Regulations promulgated under authority of the federal statute cited in Section 12 (42 U.S.C. sec. 5403).

24 CFR Sec. 3282.11 is entitled "Preemption and Reciprocity" and reads in part as follows:

(a) No State manufactured home standard regarding manufactured home construction and safety which covers aspects of the manufactured home governed by the Federal standards shall be established or continue in effect with respect to manufactured homes subject to the Federal standards and these regulations unless it is identical to the Federal standards...

(C) States may participate in the enforcement of the Federal standards enforcement program under these regulations...These regulations establish the exclusive system for enforcement of the Federal standards. No State may establish or keep in effect through a building code enforcement system or otherwise, procedures or requirements which constitute systems for enforcement of the Federal standards or of identical State standards which are outside the system established in these regulations or which go beyond this system to require remedial actions which are not required by the Act and these regulations...

(e) No State or locality may establish or enforce any rule or regulation or take any action that stands as an obstacle to the accomplishments and execution of the full purposes and objectives of Congress. The test of whether a State rule or action is valid or must give way is whether the State rule can be enforced or the action taken without impairing the Federal superintendence of the manufactured home industry as established by the Act.

It is the League's position that if Sec. 12 of SB 11 is simply meant to reflect federal preemption, then (1) it is not necessary, but (2) if it nonetheless is going to end up in the statute books it ought to parallel the federal language in order to avoid confusion and litigation over the significance of the differences in wording between the federal law and the Kansas law.

(2) **Residential Standards for Manufactured Housing.** As explained above, Sec. 12 appears to the League to be a broader prohibition upon the state and local units than the prohibition that now exists under federal law. If that is an accurate assessment, then Sec. 12 raises questions as to the ability of cities and counties to continue to impose certain appearance and design standards upon manufactured housing that are intended to ensure the compatibility of that housing with site-built housing in the same community. For example, could a city, under Sec. 12, enforce building code provisions requiring pitched (sloped) roofs, prohibiting certain types of exterior siding or other standards relating to the aesthetics of the house? Could requirements of attached garages, permanent foundations, removal of wheels and axles and containment of fuel supply systems within the foundation be enforced if those requirements were part of the local code?

The point, and the question, simply put is how broadly should Sec. 12's wording of "...any building, plumbing, heating or electrical code" be read?

(3) **Non-Residential Uses of Manufactured Housing.** SB 11, Sec. 2(a) defines "manufactured home" as a structure "...designed to be used as a dwelling...". It does not qualify that definition so as to exclude non-residential uses of "manufactured homes". The League believes this is a serious omission that should be dealt with if Section 12 remains in SB 11. Many cities have local codes that set significantly different requirements for non-residential use structures open to the public than the requirements set for private, residential structures. For example, local building codes might require fire sprinklers, emergency exits, or accessibility to the handicapped for non-residential structures open for public entry (e.g. a barbershop operating as a "home occupation" and located within a manufactured house). If Section 12 becomes law could those code requirements be enforced?

#### LEAGUE AMENDMENT TO SB 11

The League believes Sec. 12 of SB 11 raises troubling questions. Moreover, we note that Sec. 12, unlike the balance of SB 11, relates to the location and placement of manufactured housing, and that another bill being considered at the 1991 session--SB 23-- would be a more appropriate forum for consideration of the subject of Sec. 12.

We respectfully ask the Committee's consideration of an amendment to delete Section 12 from SB 11.