



3063

RECEIVED
IRRC

2015 JUL 29 PM 2:00

July 24, 2015

Mark Conte, Director
PA Department of Community and Economic Development
Commonwealth Keystone Building
400 North Street, 4th Floor
Harrisburg, PA 17120-0225
mconte@state.pa.us

Re: (12 PA. CODE CH. 145) Industrial Housing and Components

Dear Mr. Conte,

I am writing to publicly comment on the "Advanced Notice of Final Rulemaking" (12 PA. CODE CH. 145) Industrial Housing and Components. If this regulation were to pass as written, organizations throughout the Commonwealth from small 501(c)(3) non-profits on up to and including the largest publically traded for profit companies would be negatively affected financially going forward due to significantly increased cost for the foundation system as laid out within Chapter 145, and also by the anticipated difficulty to relocate existing commercial modular structures.

- Restricting engineer designed foundation construction which utilizes earth anchors and tension steel strapping in lieu of what is considered industry standard and IBC Code compliant does nothing but add cost to the end user. These engineered systems are allowed in every other industrialized program in the nation.
- There is also no language within Chapter 145, as it is currently written, to address an existing and previously manufactured commercial modular building that is being relocated to another customer, either in the same or different jurisdiction. This same statement also will apply to existing "PA Labeled" commercial modular buildings once the label program is inacted. There is also nothing to address how code officials are to handle this very common circumstance, during a building permit application review process after the effective date of these rules and regulations takes place.

There is not a single private or public entity within the Commonwealth of Pennsylvania that does not rely on "permanent" and/or "re-locatable" commercial modular buildings (whether for permanent or temporary applications) as their organizations expand or contract over time.

The following is a partial market segment list of "Re-locatable" commercial modular building users within the Commonwealth of Pennsylvania. Vanguard Modular has current operating leases with commercial modular buildings to each and every one of these business segments. In all cases, the



VANGUARD
MODULAR BUILDING SYSTEMS
www.vanguardmodular.com

modular leases will end and the previously manufactured modular buildings will ultimately be relocated to another customer.

- State / County Corrections
- Primary Education (Public & Private)
- Higher Education (University, Community College, Trade Schools, etc.)
- Public Transportation
- Commercial Aviation
- Municipal Authority (State, County, City, Township, etc.)
- Government (Federal, State)
- Emergency Response
- Industrial / Energy / Utility
- Mining / Gas Extraction
- Healthcare (Hospitals, Veterans Administration, Outpatient Clinics, Veterinary, etc.)
- Manufacturing
- Child Care / Day Care
- Commercial / Retail (Auto Dealers, Waste Management, Farming)

Once again, there are two main points here that are not addressed within this regulation, with the first being relocating commercial modular buildings that are PA labeled under this program. The second is relocating existing buildings that have had previous PA occupancy but manufactured prior to a state label program being enacted.

By hindering the ability to service the space needs of the above listed industry segments with “previously manufactured and relocated” buildings has far reaching negative effects for Pennsylvania modular users, the modular manufacturers and finally the modular dealers/installers.

Sincerely,

Chris Brown



1449 River Road
PO Box 127
Marietta, PA 17547

(717) 426-1028

cbrown@vanguardmodular.com
www.vanguardmodular.com