



CITY OF BALTIMORE  
MAYOR BRANDON M. SCOTT

<b>TO</b>	The Honorable President and Members of the Baltimore City Council
<b>FROM</b>	Alice Kennedy, Housing Commissioner
<b>DATE</b>	September 10, 2024
<b>SUBJECT</b>	<b>23-0204R Informational Hearing – Modular and Tiny Houses – Benefits and Challenges</b>

The Honorable President and  
Members of the City Council  
City Hall, Room 400

9/10/24

*Theo Ngongang Ouandji*

**Position: Support**

## Introduction

The Department of Housing and Community Development (DHCD) has reviewed City Council Resolution 23-0204R Informational Hearing – Modular and Tiny Houses – Benefits and Challenges for the purpose of inviting representatives from the Department of Housing and Community Development, the Department of Planning, the Board of Municipal and Zoning Appeals, the Department of Transportation, the Department of Public Works, and other relevant stakeholders to discuss issues pertinent to Modular and Tiny Houses in Baltimore City.

City Council Resolution 23-0204R invites various representatives with an interest in the topic to discuss:

- (1) The benefits of increasing modular and tiny housing in Baltimore City
- (2) Common challenges that arise when a homeowner is constructing a modular or tiny house
- (3) How City agencies can streamline processes to better facilitate construction of modular and tiny houses in Baltimore City.

## Introduction

Baltimore City already allows for Manufactured Housing and Tiny Housing in our Building Fire and Related Codes (BFRC). DHCD first adopted Tiny Housing into our codes with our 2020 update and continued to include it in our 2024 update. Both Tiny Houses as well as Manufactured Homes are currently allowed in the City of Baltimore, reflected by the adoption of *Appendix E – “Manufactured Housing Used as Dwellings”* and *Appendix Q: “Tiny Houses”* of

the International Residential Code 2018 (IRC), in the appendices of our Building Fire and Related Codes (BFRC).

Appendix E: of the International Residential Code (IRC) regulates the installation, maintenance, repair, and relocation of manufactured housing, including mobile homes. It covers a range of topics, including: Permits and fees, Inspections, Utility service, Location on a lot, and Foundation systems. They are intended to be used in conjunction with federal laws that govern the construction of manufactured housing. Federal standards regulate the design and construction of parts of the manufactured housing that are above the foundation.

Appendix Q: of the International Residential Code (IRC) allows for certain modifications of the building code to relax requirements for houses that are 400 square feet or less. The appendix for tiny homes largely focuses on features like ceiling height, stairs, lofts and emergency escape and rescue opening requirements.

Neither Tiny Houses nor Manufactured Housing are covered in our Zoning Code. Presumably, Tiny Homes and Manufactured Housing could be installed or erected where certain residential uses are permitted. They would be required to obtain a building permit and meet other code requirements for lot area, building height, lot coverage, and setbacks, or request a variance from the BMZA.

## DHCD Analysis

We look forward to the opportunity to discuss this topic with partner agencies and members of the City Council. Manufactured Housing and Tiny Housing have the potential to reduce construction costs and make building new homes more affordable. These types of housing opportunities could provide for cost savings, shorter development timelines and a more efficient development process. Expansion of Manufactured Homes and Tiny Houses may aide efforts already underway to support development in targeted areas of the City.

Presently, Manufactured Housing and Tiny Housing represent a very small segment of the residential construction occurring in Baltimore and is largely market driven. It is unclear why this type of housing is not more prevalent in the City of Baltimore but it should be noted that the cost to connect to utilities can be high and offset any potential cost savings. In Baltimore Manufactured Housing and Tiny Housing must be tied down and connected to City utilities, they cannot remain on wheels. Some may find that it is more affordable to rehab a vacant property already connected to the City's infrastructure than the time and cost required for connecting or adding service lines with a Modular or Tiny Home.

DHCD has not had any particular challenges in assisting homeowners that desire to construct a modular or tiny house but have had very few applications. Most problems of the past were addressed by the adoption of *Appendix E* and *Appendix Q* of the International Residential Code. Additionally, the upcoming update to DHCD's Permits system should diminish the likelihood of obstacles in the future.

The Resolution seeks to clarify regulatory requirements and discuss obstacles for individuals and developers seeking to develop Manufactured Homes and Tiny Houses in the City of Baltimore. Manufactured Homes and Tiny Houses have the potential to address Baltimore's affordable housing shortage and create new housing opportunities that are desperately needed but we have yet to see a large push towards this type of housing in the City of Baltimore.

## Conclusion

DHCD respectfully requests a **favorable** Report on City Council Resolution 23-0204R.