

March 10, 2026

Housing Committee

**RE: Testimony in Opposition to LD 2229 – An Act Regarding Municipal Inspection of the Electrical and Plumbing Components of a Manufactured Home**

Good afternoon Senator Curry, Representative Gere, and members of the Housing and Economic Development Committee.

My name is Sandra Hinkley and I have been in the manufactured home industry for almost 30 years, as both a retail supplier of homes, and a community owner. I appreciate the opportunity to testify in opposition to LD 2229.

This proposal raises significant concerns regarding federal preemption and potential conflicts with the federally required manufactured housing inspection and installation system.

Manufactured homes are built under the Manufactured Home Construction and Safety Standards and the Manufactured Home Procedural and Enforcement Regulations administered by the U.S. Department of Housing and Urban Development, or HUD. These federal standards regulate how manufactured homes are constructed in factories, how they are inspected, and how they are certified before leaving the manufacturing plant.

Under HUD's system, factory workers are not required to hold trade licenses or certifications. Instead, the federal regulatory framework places responsibility on the manufacturer through approved designs, quality assurance programs, and third-party inspections. Compliance is verified through federally approved inspection agencies, and homes receive a federal certification label confirming they meet HUD standards.

Because of this comprehensive federal framework, the construction process and labeling of manufactured homes are subject to federal preemption. States and municipalities cannot impose additional or conflicting requirements on the factory construction process that is already regulated under federal law.

This proposal risks creating confusion about the boundaries between federal oversight of manufacturing and state oversight of installation.

Maine already operates a HUD-approved installation program, which must meet or exceed HUD's minimum requirements. Federal rules require inspection of key elements when the home is installed at its final site. Those inspections include site preparation, foundation construction, anchorage, completion of ductwork, plumbing and fuel supply systems, electrical systems, exterior and interior close-up, skirting when installed, and final operational checks and adjustments.

Importantly, the completion of plumbing and electrical systems must be inspected at the installation site, where the home is connected to utilities and local infrastructure. Those elements cannot be fully inspected earlier in the process.

Changing or limiting the current inspection structure could therefore create conflicts with HUD's federally prescribed installation requirements, potentially leading to confusion, inconsistent enforcement, and delays in housing delivery.

Maine already has a federally compliant system that ensures manufactured homes are both properly constructed and properly installed.

For these reasons, I respectfully urge the committee to vote Ought Not to Pass on LD 2229, unless the bill is amended to remove this language.

Thank you for your time, and I would be happy to answer any questions.

Sandra Hinkley

Sandra Hinkley  
Falmouth  
LD 2229

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