



Ten Years Later- A Tiny House Code For Wheels Spins In Limbo

On April 22, 2026, the atmosphere inside the International Code Council (ICC) Public Comment Hearings in Connecticut was thick with a familiar, weary hope. Advocates for the tiny house movement arrived armed with over 14,000 signatures and two public comments for **Appendix BB Tiny Houses**, drafted by the very proponents and architects who first cracked the code door open years prior.

The drafting of the public comments also included highly respected structural engineers.

The proponents sought a legitimate regulatory path for relocatable tiny houses, otherwise known as tiny houses on wheels or "movable tiny houses"—dwellings that offer flexibility and sustainability in an era of housing scarcity. This is a type of home that could be placed as a single family dwelling, or as an ADU, or on leased land in a tiny home community.

Despite the historical success and widespread adoption of Appendix Q Tiny Houses, for the third time in ten years, those dreams were systematically dismantled.

The proponents successfully overturned the previous [disapproval](#) to ensure their voices were heard and they were allowed to present the two public comments they submitted, though once again, it was disapproved.

The hearing's most profound moment featured a witness who represents the very "lived experience" code officials often dismiss as theoretical. A 10-year-old boy stood before the committee to testify; he had been raised entirely within the walls of a tiny home.

The reality was palpable: the boy first appeared at an ICC hearing as an infant in his mother's arms that resulted in Appendix Q Tiny houses. He has grown from a baby to a young man in the time it has taken the committee to still fail to define his home in the code.

While he "stole the show" with his testimony, it was not enough to break through the barriers that have continued to block tiny houses on wheels as a viable housing type.

Appendix BB Tiny Houses: The 2024 IRC Tiny House Code

As a proponent explained " And a little bit of a reminder about how Appendix BB works. It starts with the requirement that you meet the provisions of the IRC, except as specifically modified by the appendix chapter. And so it very surgically and succinctly puts in the things that are different, that are important. And this PC-1 is very much extending that same pattern and coming in with very discrete important things that are changes for the relocatable tiny house and lay them all out.

And so please think of it in that context and that they're very surgically adding a limited number of provisions that are quite important. I wanted to speak in particular to the transit design load for attachment to the chassis. There's a formula in there that maybe doesn't look too familiar and it is in fact the anchorage of what's largely an IRC designed and constructed home onto a metal, usually steel chassis.

And the idea there is, and I've run some calculations on this, that in transit loads can be quite high and you don't want to damage or lose the home in transit to the final site. And so what you get in there is a calculation based largely on the Code of Federal Regulations Part 3280, Manufactured Home Construction Safety Code, otherwise commonly known as the HUD code. "

Reasons for Disapproval Included;

The opponents were in favor of the ICC 1215 standard to be included, which is currently being drafted.

The unit is an RV, and should not be regulated by the IRC.

It is a trailer that moves and does not belong in the IRC.

Building officials were not familiar with this type of vehicle and did not want to take on the liability to approve the unit.

The public comments were different from the initial proposal.

Should building officials be involved in DOT right of way.

There's still not enforceable language or safe enforceable language. It's relying on the building official to determine engineering standards that are acceptable to them.



Appendix Q Tiny Houses was a Pivotal Achievement

The 2018 International Residential Code (IRC) saw the birth of Appendix Q Tiny Houses, a pivotal achievement for the movement. It finally provided a legal framework for tiny houses—provided they were installed on a permanent foundation.

The appendix addresses ceiling heights, sleeping lofts, loft access, emergency egress and rescue, and many other details.

However, this success created a strategic regulatory trap. By codifying only foundation-based homes, the ICC effectively created a legal limbo for the "movable" sector.

Movable Tiny Houses were not Allowed in the Proposal

Co-author Andrew Morrison stated "I had to make some last minute changes to the proposed code language to remove the word "movable " from my original proposal entitled "Movable Tiny Houses." Unfortunately, the head of the ICC code approval process said that he would not accept the proposal as written because he believed it was what they call in the industry a "hijack" of the original proposal. After many conversations and emails with the official, I decided to amend the proposal so that he would allow it to move forward. After all, when he said "if you keep the movable details in there, I will throw the whole thing out" it became crystal clear what my options were."

[So What Exactly Is Tiny House Appendix Q?](#)

The Back Story of Appendix Q Tiny Houses and how it came about

Tiny house advocates and code enforcement officials alike have long recognized the need to establish code authority over tiny houses, but it wasn't until April 2016 that the process to codify requirements for them kicked off in earnest. That's when the IRC Building Code Action Committee, meeting in Kentucky, heard a proposal submitted by Richard Davidson, a retired building official from Oregon, to create exemptions for design elements that are specific to tiny houses such as minimum floor areas, ceiling heights, door sizes, and hallway widths, and for safety features such as guard rails and automatic fire sprinklers.

Although the committee voted to disapprove Davidson's proposed changes, it agreed that a more comprehensive approach to tiny houses was certainly needed in the code and suggested that the issue might be better addressed in an appendix.

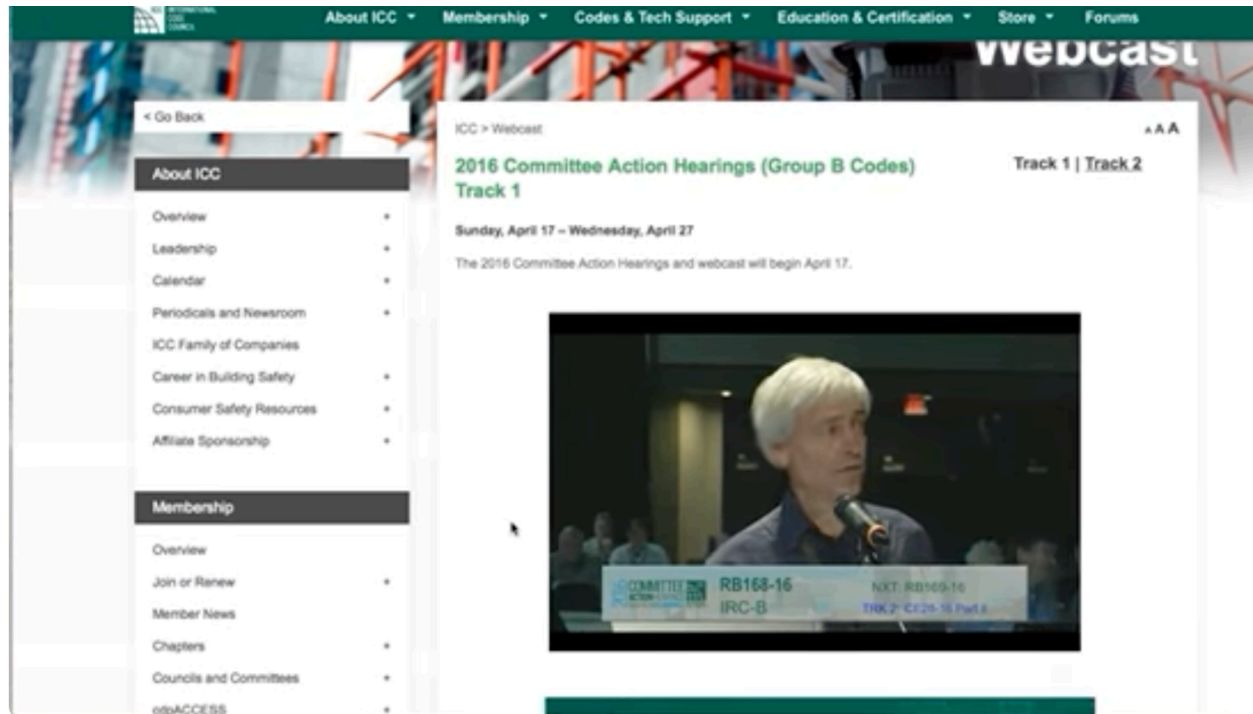
At the hearing, however, one person had testified in "friendly opposition" to the proposal: Martin Hammer, an architect who had co-authored the IRC's straw-bale construction appendix.

Following the hearing, Hammer received a call from his friend Andrew Morrison of TinyHouseBuild.com, a builder and educator who had helped Hammer write the appendix.

"Andrew asked if I thought we could submit a different proposal," Hammer recalled.

[The International Residential Code Has A Big Vision For Tiny Houses](#)

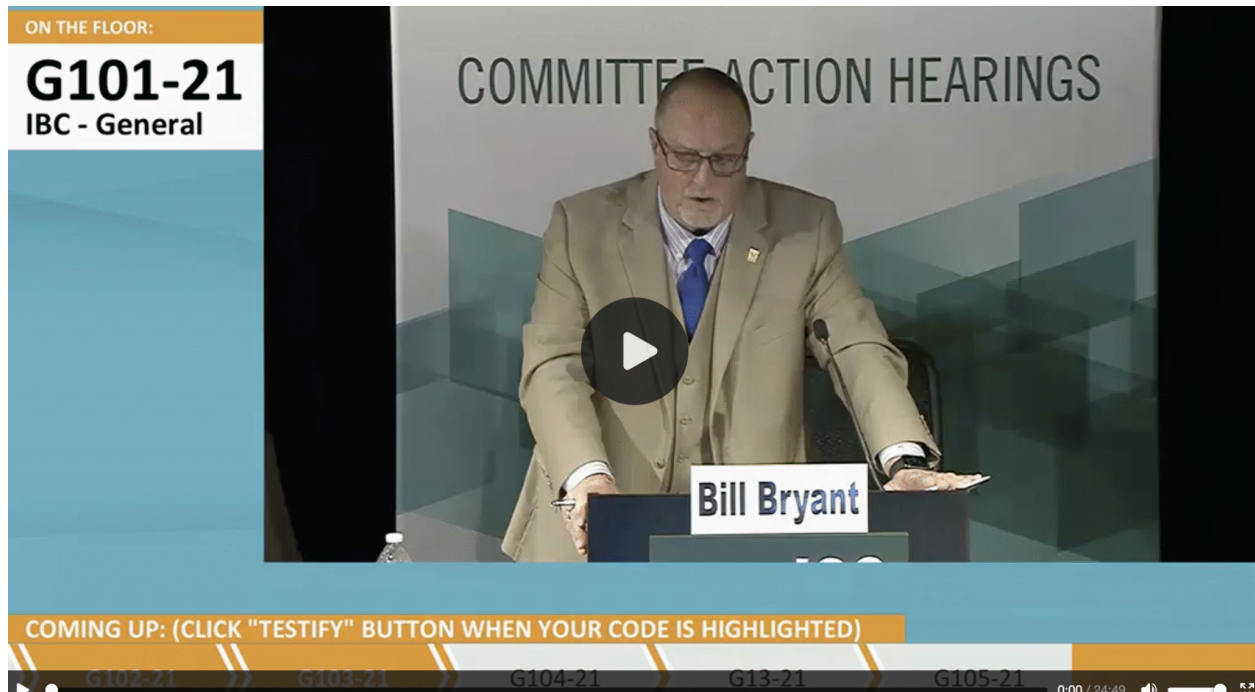
Video ICC Vote RB168-16



ICC Vote RB168-16: Proposal set forth by Richard Davidson for change in IRC for tiny houses

[Video ICC Vote RB168-16: Proposal set forth by Richard Davidson for change in IRC for tiny houses](#)

Second Disapproval For Tiny Houses At IBC 2024



Originally when [ICC/MBI 1200 and 1205](#) were developed, tiny homes were excluded, then included, but after the 2024 IBC hearing, when the standards were disapproved, they removed all the terms relating to tiny houses from the committee description, scope of the standards, and the body of the standards, with the 'notion' that tiny homes were inclusive, and there was no need to call them out.

[G102-21 Video Hearing](#)

International Building Code - General

2021 Group A - Report of the Committee Action Hearing Results

G102-21

Committee Action:

Disapproved

Committee Reason: This proposal was disapproved. The definition for off-site construction included modular buildings and components. Modular units are typically regulated by state specific requirements. The definition for off-site construction includes tiny houses. Tiny houses are not address by the code, but are in Appendix Q. This blanket exception for tiny houses is too broad. Would this cause a conflict with the tiny house emergency escape and rescue openings? The definition of off-site construction is too broad - it could be read to include items such as prefabricated trusses, the modular units and sleep pods in G101-21 or precast panels. (Vote: 13-1)

G102-21

Micah Chappell City Of Seattle, State Building Code Council was the first to make a motion to disapprove the standards, he stated;

" IRC Appendix Q is not required to be adopted by states or it is not required to be used, and tiny house is not defined in the IBC. This proposal would take the tiny house, which is just a dwelling unit, and take the review and application requirements of that dwelling unit and push it to a standard.

I do not agree with that. When we are talking about tiny houses and Appendix Q, they are very specific, but there are two criteria here that are not defined, a tiny house on wheels, or a tiny house like the other modular buildings where it is possibly driven in and then craned onto a foundation. So blanket items for tiny houses, I do not agree with. "

HUD's 2018 Final Rule the RV Exemption

Currently, tiny houses on wheels are typically built to recreational vehicle standards, so they can obtain VIN numbers, titles, insurance and chattel loans.

In 2018, the U.S. Department of Housing and Urban Development (HUD) issued a Final Rule revising the exemption for the manufacture of recreational vehicles. The purpose of that rulemaking was straightforward: to clarify which recreational vehicles qualify for exemption from HUD's Manufactured Home Construction and Safety Standards and its Manufactured Home Procedural and Enforcement regulations.

HUD adopted a recommendation from the Manufactured Housing Consensus Committee (MHCC), while expanding and refining the regulatory language. The final rule established that certain recreational vehicles would be exempt from HUD regulation if they meet specific criteria — including certification to updated consensus standards such as **ANSI A119.5-15** (for Park Model RVs) or **NFPA 1192**.

Importantly, HUD emphasized that the rule governs **manufacturing classification**, not consumer occupancy. HUD expressly stated:

“Because this rule does not prohibit or regulate the use of **manufactured homes or RVs, including tiny homes**, the secondary consequences described by certain commenters are moot, and HUD does not believe that there exists a need to address them individually.”

In other words, HUD clarified which standards apply at the point of manufacture and certification. It did not attempt to regulate how owners choose to use or occupy those units.

HUD Final Rule: RV Exemption 2018

“it is neither HUD’s intention nor goal with this rule to **regulate temporary, recreational structures in the form of RVs.**”

“How individuals decide to use their manufactured home or RV unit after purchase... **is beyond the scope of this final rule.**”

“The **regulation of use and occupancy** of RVs is the purview of **state and local authorities, not HUD.**”

HUD Does Not Regulate Use And Occupancy

HUD’s exemption for ANSI A119.5-certified PMRVs includes a required Manufacturer’s Notice. The notice must be **prominently displayed in a temporary manner in the kitchen**. The notice text is explicit that the unit is designed only for recreational use and not

as a primary residence or for permanent occupancy.

HUD does not have the Authority to Regulate Tiny Homes On Wheels less than the size below

“HUD lacks jurisdiction to regulate any tiny home that is less than eight body feet in width, 40 body feet in length, or 320 square feet, or any tiny home that is built on a foundation without a permanent chassis.”

HUD can choose what Units to Regulate

In The 2018 Final Rule, HUD stated:

“HUD takes the opportunity in this final rule to emphasize that while it possesses statutory authority to regulate the manufacture of certain types of RV, it nevertheless believes that exercising such authority is currently unnecessary.”

HUD immediately reinforced that point:

“HUD believes that the non-permanent design intent of RVs favors that they be exempt from such regulation, even in cases where they fall within the statutory definition of ‘manufactured home.’”

And HUD made the discretionary nature unmistakable:

“HUD maintains statutory jurisdiction over the manufacture and installation of all structures falling within the statutory definition of ‘manufactured home,’ but it elects not to regulate all structures that qualify for the RV exemption.”

[HUD Final Rule 2018 RV Exemption](#)

A Path Forward for Tiny Houses On Wheels exists through the Excluded Structures-Modular Homes

If a tiny house on wheels manufacturer does not want to be regulated by HUD, and builds the unit to building codes instead, HUD offers a compliance path for modular homes with very precise requirements.

There is a little known statute in the Code Of Federal Regulations that already exists for a path for the legal placement of tiny houses on wheels as a dwelling through the HUD code § 3282.12 Excluded structures—modular homes. HUD regulates units that meet the statutory definition of a manufactured home.

First you have to understand what the language means starting with the Statutory Definition Of A Manufactured Home

*Manufactured home means a structure, transportable in one or more sections, which in the traveling mode, is eight body feet or more in width or forty body feet or more in length, or, when erected on site, is three hundred twenty or more square feet, and which is built on a permanent **chassis** and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air-conditioning, and electrical systems contained therein. Calculations used to determine the number of square feet in a structure will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site. These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows. This term includes all structures which meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to **24 CFR 3282.13** and complies with the standards set forth in **24 CFR part 3280**.*

Second, it is important to understand that a permanent chassis means the main beams of the chassis remain with the structure.

Third, the requirements for self- certification of the manufacturer includes stamping of the foremost crossmember of the chassis with the VIN/Serial Number at the first stage of production, which serves as an identifier of the unit. It is important to know that the VIN or serial number can be one and the same. The first stage of production is the chassis.

As stated by HUD-” *In some states, the **Serial number** and **VIN number** may be one and the same; however, this can vary by State. HUD does not issue VIN numbers. The Department of Motor Vehicles or the state or local agency that regulates housing within your state may be able to assist you.*”

[HUD Resource](#)

[§ 3282.12 Excluded Structures—Modular Homes](#)

[ICC 1215 – Design, Construction, Inspection and Regulation of Small Residential Units and Tiny Houses for Permanent Occupancy](#)

The ICC/THIA 1215 standard was introduced under the banner of regulating tiny houses, but in practice it has redirected and subordinated them beneath an arbitrary category—the Small Residential Unit (SRU). Rather than advancing the existing, codified recognition of tiny houses, the standard elevates the Small Residential Unit into a primary regulatory position, displacing tiny houses as a subcategory underneath the SRU and severing them from established federal

and state compliance frameworks. This detour strips tiny houses on wheels of their lawful motor-vehicle compliance pathway, fragments regulatory authority, and replaces a working, recognized system with a new construct that lacks statutory grounding, uniform adoption, or clear placement authority. The result is not clarity or safety, but regulatory confusion, delayed approval, and the effective hijacking of tiny houses by a category that does not exist in code.

[ICC Press Release Introducing The Tiny House Standard](#)

Short summary of the Small Residential Unit issue

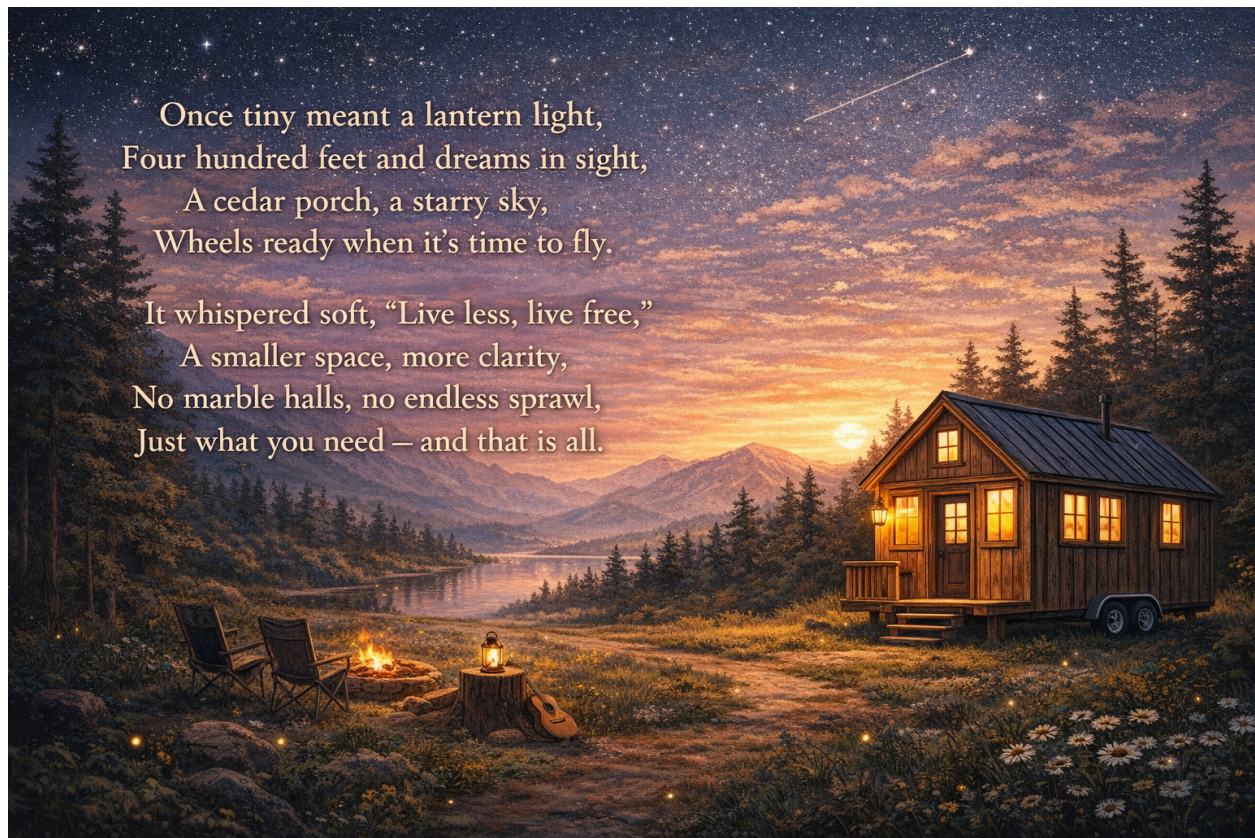
There has been a great debate in the OSMTH 1215 committee regarding the Small Residential Unit takeover of the standard which is the agenda of ICC.

Definitions In ICC 1215

SMALL RESIDENTIAL UNIT (SRU). *A dwelling that is 1200 square feet (111 m²) or less excluding lofts and is constructed as a permanent residential structure with or without a permanent chassis.*

TINY HOUSE. *A SMALL RESIDENTIAL UNIT 400 square feet or less with or without a PERMANENT CHASSIS system*

Note: *There has been discussion about changing the size down to 600 square feet but that has not been reflected in meeting notes that I have seen. That changes nothing.*

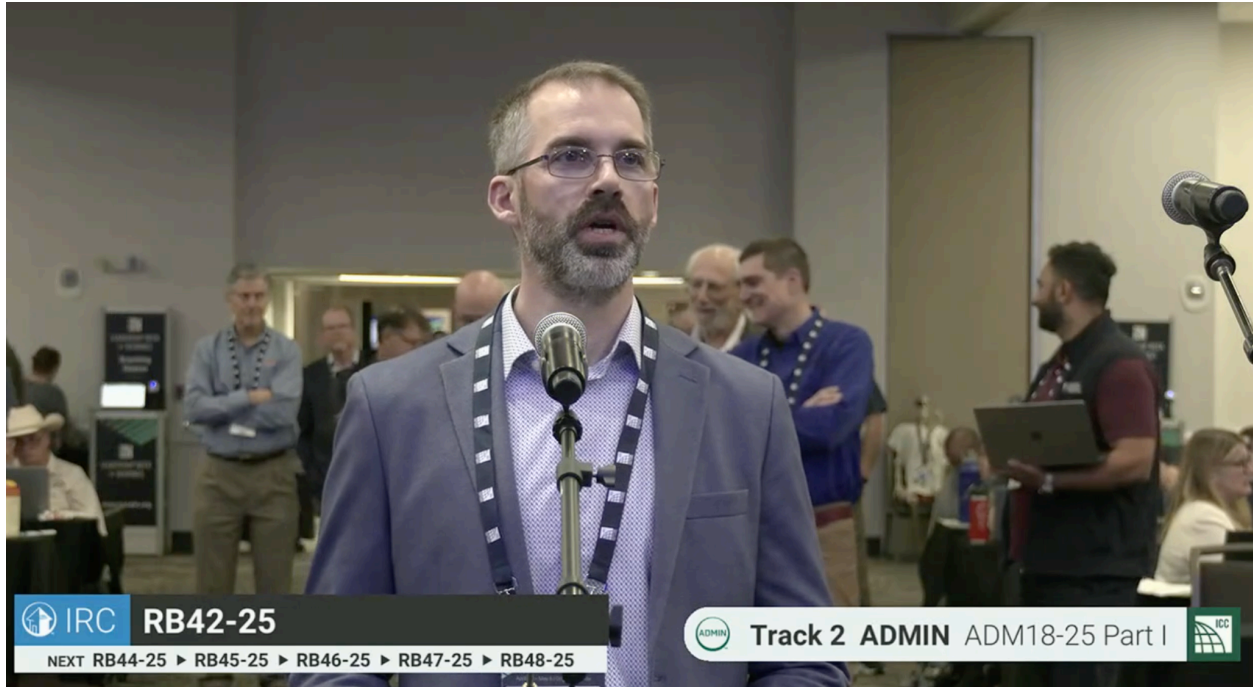


The 1200 -Square-Foot "Tiny" House: Inside the Controversial Rebranding of a Movement

The tiny house movement was born from a radical ethos of simplicity, mobility, and an uncompromising footprint typically under 400 square feet. This artisan-led ideal, however, is currently being dismantled by a calculated bureaucratic pivot. At the center of this transformation is the **ICC 1215 standard**, a regulatory framework that has evolved from a legitimization effort into a “radical expansion” of scope.

The central thesis is clear: the movement is being hijacked by corporate-backed interests. By redefining the very boundaries of what constitutes a “tiny” home, the International Code Council (ICC) is steering the market toward permanent, large-scale industrial construction.

The Small Residential Unit was strongly opposed at the first CAH Hearing in April 2025



[Listen To The Hearing](#)

Gary Ehrlich, Director Of Codes And Standards with the National Home Builders Association and another Structural Engineer with NAHB both were opponents. They were concerned about structural bracing, how this would affect all houses that were 1200 square feet, and stated that DOT requirements were beyond the scope of the building officials approval, and voiced a lot more concerns.

ICC ignored the opponents at the CAH hearing and two [petitions](#) that had over 700 signatures in objection to the Small Residential Unit which they added to the title of the standard.

Additional issues with ICC 1215

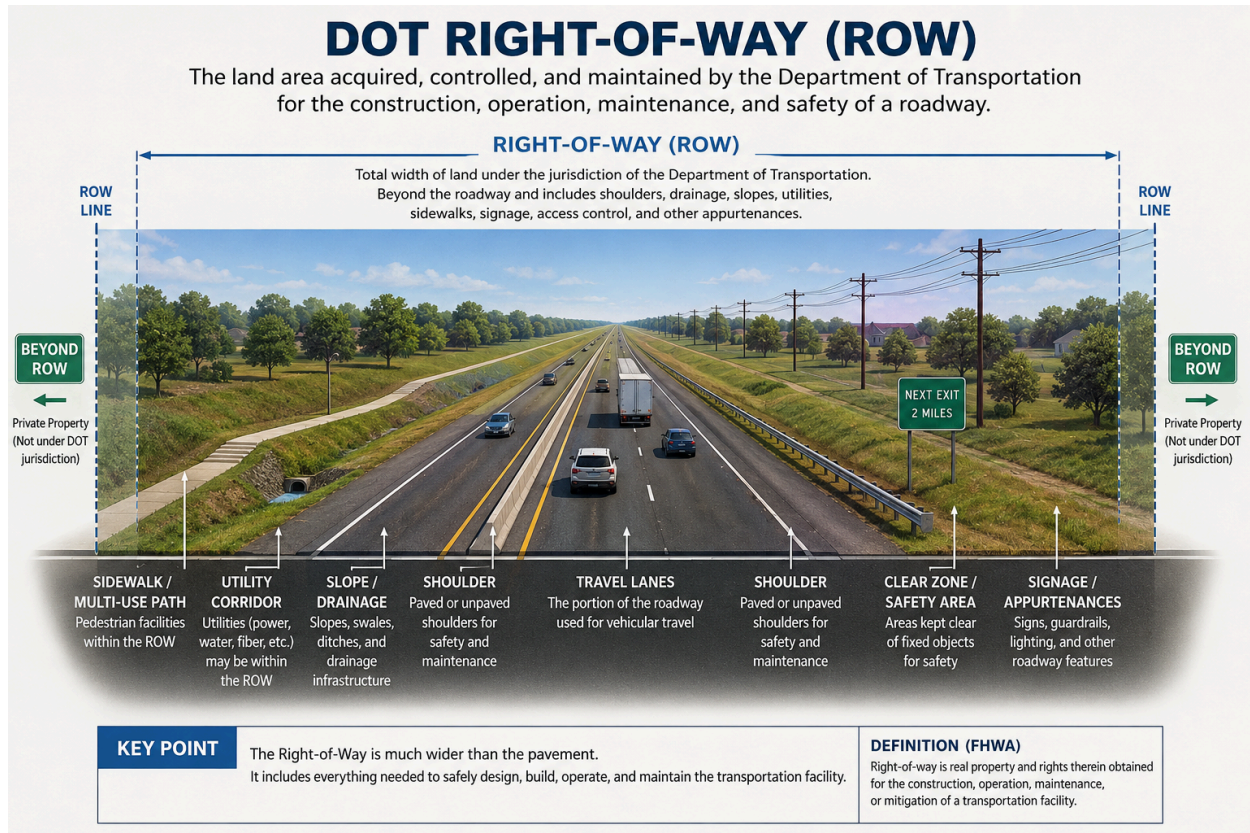
The ICC 1215 is Disregarding both Motor Vehicle and HUD Preemption

The International Code Council (ICC) has published its official response on two preemption inquiries on motor vehicle preemption that I submitted regarding the [ICC/THIA Standard 1215 on the Design, Construction, Inspection and Regulation of Tiny Houses for Permanent Occupancy](#). What's missing is the document that prompted it—my preemption inquiry outlining the federal legal conflicts at issue.

Where to find only ICC's Replies

To find only their response go to this [page](#), click on documents on the right, go to Resources and then click on **Preemption** where you will find both of their **replies to both of my preemption inquiries**.

[Learn More For a full record of my complaints, rebuttal, and their reply.](#)



[What Is DOT Right Of Way?](#)

Uniting the Motor Vehicle Path with The Structure Path is The Road To Legal Dwellings

For almost two years I have tried to persuade the ICC 1215 committee to recognize motor vehicle law. The duo nature of tiny houses on wheels must be recognized to create a legal dwelling to obtain a mortgage and to be accepted in jurisdictions. The path to compliance for tiny houses on wheels is to integrate the motor vehicle compliance path with requirements of a structure, so it meets both the requirements of the road, and for legal placement and for the structure to be recognized as real property. We also need to create provisions that allow tiny houses on wheels to be legally placed on leased land where the unit remains personal property.

The ICC 1215 committee is blocking the very steps needed.

Transportation Section in ICC 1215

ICCNTA has had an overreach in the involvement in the standard and has suggested that the committee avoid federal domains, including the FMVSS, HUD, and motor vehicle classification, at the same time that they are suggesting select HUD code provisions for the transportation section.

[Learn More](#)

It is a complete contradiction that a manufacturer would exclude themselves from HUD regulations, to then **build to select HUD code provisions as it is being suggested. HUD does not allow this.**

As HUD stated in **§ 3282.12 Excluded structures—modular homes;**

*“If a **manufacturer** wishes to construct a structure that is both a **manufactured home** and a modular home, the **manufacturer** need not make the certification provided for by this section and may meet both the Federal **manufactured home** requirements and any modular housing requirements. When the certification is not made, **all provisions of the Federal requirements shall be met.**”*

ICC 1215 is unenforceable

As written, ICC 1215 is an unenforceable standard and it is an obstacle to both motor vehicle and HUD preemption. The standard is setting the manufacturers up for criminal and civil liability with incorrect guidance.

A person may not manufacture for sale, sell, offer for sale, or introduce into interstate commerce any motor vehicle unless it complies with applicable federal motor vehicle safety standards and is covered by a federal certification.

49 U.S.C. § 30112(a)(1).

[Learn More](#)

The irony is that the opponents against the public comments at the recent PCH hearing were arguing that a relocatable tiny house is a **vehicle** and should not be regulated by building officials or inclusive in the IRC, while the ICC 1215 committee is **denying the motor vehicle path** and they are trying to find a work around federal law and preemption. Avoiding motor vehicle law is fully supported by the ICC board.

CHAPTER 7

TRANSPORTATION AND STORAGE

SECTION 701 GENERAL

701.1 General. Transportation of units that have been manufactured or constructed off-site shall comply with the provisions of this chapter. With each set of units that is to be installed in the same manner, the manufacturer shall provide instructions that include transport, lifting and placement procedures where applicable.

SECTION 702 TRANSPORTATION PERMITTING

702.1 Transportation permitting. Transportation of modules, panelized systems or modular components that have been manufactured or constructed off-site shall be in accordance with the applicable transportation permitting requirements for each jurisdiction that the shipment will enter.

702.2 Transportation route. The route used to transport modules, panelized systems or modular components that have been manufactured or constructed off-site shall be of a width and height to accommodate the load and the transportation vehicle.

702.3 Transportation weight. The gross weight of the modules, panelized systems or modular components to be transported and the transportation vehicle shall not exceed the permitted requirements for each jurisdiction that the shipment will enter.

SECTION 703 METHODS OF TRANSPORT

703.1 Methods of transport. Modules, panelized systems or modular components that have been manufactured or constructed off-site shall be transported using one or more of the following methods:

1. An integrated chassis with axels and wheels suitable to

support the weight and size of the object being transported.

2. A separate trailer suitable to support the weight and size of the object being transported.
3. Other transportation systems that are accepted by the applicable jurisdictions and are suitable to support the weight and size of the object being transported.

SECTION 704 LOADING AND UNLOADING

704.1 Loading and unloading. The manufacturer shall create with the erector a schedule that limits the need for storage and a loading and unloading manifest that protects the modules from stress and mechanical damage. The logistics for unloading the staging processes and the type of crane required for lifting the elements or modules are to be detailed by the erecting contractor.

SECTION 705 ON-SITE STORAGE OF MODULES

705.1 On-site storage. To minimize the number of modules to be stored, the erection contractor shall designate a staging area on-site.

705.2 Stacking. The erection contractor shall utilize stacking details provided by the manufacturer to counter additional vertical or horizontal loading on the modules while stacked in temporary storage. These details shall limit the maximum stacking of modules.

705.3 Weather and mechanical protection. The erection contractor shall take all steps to protect stacked and stored modules from weather events as well as mechanical damage.

705.4 Staging. The length of time any modules are staged shall be scheduled to minimize the length of time they are on site.

In the ICC/MBI 1200 standard under the transportation section, provisions include;

702.2 Transportation route. Acknowledges that a methods for transportation include a transportation 'vehicle'

702.3 Transportation weight. Acknowledges the gross weight which includes **the structure or components AND the transportation 'vehicle'**.

703. 2 Methods Of Transport. Acknowledges a **separate 'trailer'**.

All transportation systems are applicable to jurisdiction approval.

CHAPTER 7 TRANSPORTATION

SECTION 701 GENERAL

701.1 General. Units with an integral chassis which have been manufactured or constructed off-site shall comply with the provisions of this chapter. An SRU constructed off-site and its chassis shall be built to withstand the effects of highway movement such that the SRU is transported and installed as a habitable dwelling.

Exception: A chassis used as an independent carrier system to transport the SRU where no portion of that system is a permanent component of the building.

701.2 Chassis. SRUs are permitted to be built with or without an integral chassis.

SECTION 702 CHASSIS

702.1 Chassis. All chassis shall be built in compliance with DOT requirements and have verification by documentation indicating the chassis complies with DOT requirements for the loads and weights shown on the data plate.

SECTION 703 STRUCTURAL SUPPORT DURING TRANSPORTATION

703.1 Connection to an integral chassis. Connection of the SRU to the chassis for in-transit conditions shall be in accordance with acceptable engineering practice.

In ICC 1215 standard under the transportation, the committee renamed the **separate trailer** an '**independent carrier system**' in an obvious attempt to avoid motor vehicle law and preemption and gave it an exception from transportation requirements, while using the strategy of '**Silence**'.

[Learn More](#)

The Small Residential Unit was created for a Regulatory Capture Of The Tiny House Industry

A few opponents of the recent code change for tiny houses urged disapproval so the ICC 1215 could be completed. The standard is blocking the very steps for compliance now. The Small

Residential Unit will cause a complete reset of the tiny house industry and will create a patchwork of different regulations, exactly what preemption prevents.

In the forward of the standard that does not go through consensus, public, or ANSI review is a statement that is actually pointing toward the § 3282.12 – Excluded structures—modular homes. This should be front and center in the discussion with the committee and stakeholders.

“In the U.S., off-site constructed units with a permanent chassis and over 320 sq ft may be subject to requirements under the HUD code. If the Authority Having Jurisdiction adopts this standard as part of its building code, the tiny house may qualify for an exemption.”

1) Misleading statement. This is partially taken from the § 3282.12 – Excluded structures—modular homes.

2) False– they ARE subject to, NOT may be subject to

3) Misleading -“If the Authority Having Jurisdiction adopts this standard as part of its building code, the tiny house may qualify for an exemption. ”

It is misleading, because it is written in a manner that at first glance, you think it means that the standard has to be adopted first to qualify for a tiny house to qualify for an exemption.

Not true. False- the modular exclusion does **NOT** call it an **exemption**, it is referred to as an **exclusion**, and the steps are available right **NOW** for a manufacturer to be excluded from HUD regulation with a voluntary certification process and following exact steps so the unit can be built to building codes that include all the state and local requirements, all steps must be followed.

The standard is not needed for the exclusion.

ASTM E06.26 Tiny Houses

ICC and the Tiny Home Industry Association (THIA) disrupted the approval of a committee for tiny houses with ASTM International for one year after we had the interest of Colorado, New Hampshire, Canada, Australia, and Europe. The ICC CEO was successful in overturning the unanimous COTCO approved committee on tiny houses after we went through all the rigorous steps and industry consensus to have the committee approved and even had initial collaboration arranged with ICC.

Their claims included an I-code change to Appendix AQ Tiny Houses that was never submitted, duplication and that everything was already accomplished for tiny houses. The ICC CEO stated;

"If a unit is built on wheels and a permanent chassis, and if one of the following conditions is met—

greater than or equal to 8 feet wide, greater than or equal to 40 feet in length, or 320 square feet or more—then the HUD Manufactured Home Standards must be followed

unless the manufacturer elects to proactively construct the unit as a modular home.

In that case, it must comply with requirements based on a nationally recognized code or equivalent requirements recognized by the HUD Secretary.

*The codes currently recognized are the predecessors to the IRC. The requirement specifically calls for **a code (not a standard)** or equivalent requirements, which by nature would mean duplication of the content covered in the IRC."*

Note: What he was referring to is **§ 3282.12 Excluded structures—modular homes** that I previously wrote about. What he did not cover is that ASTM standards are referenced not only in the IRC, IBC, and state and local codes that become a part of their code and are included in ICC code criteria for referenced standards.

ICC also stated-*"If built off-site, ICC/MBI Standards 1200 and 1205 **govern the process for plan review, inspection, quality assurance, and certification.**"*

ICC does not have the authority to police or in force compliance to their own codes and standards. They chose to remove all tiny home terms from the standard after the IBC disapproval. They are voluntary consensus standards that become enforceable after they are adopted.

The first question that was asked at the [IBC hearing](#) when ICC/MBI 1200 and 1205 were turned down was: "Tom, by design, by adopting this particle standard, you intend to disrupt the certification programs that are in the 30 states that have their own program."

At the time of the ICC objection, I had advocated for the revision and reinstatement of [ASTME541](#) that had been withdrawn by accident that has now been published in 2022 that is in state statutes in over 10 states and referenced that would supersede an adopted standard, even as a withdrawn standard. HUD also references ASTME541 for their 3rd party requirements that certify manufactured homes.

ICC does not exclusively 'govern certification' as they stated, there are alternatives that have been in place for decades long before ICC/MBI 1205 was developed.

Currently both the state of Virginia and Utah allow for compliance to either ASTME541 or ICC/MBI 1205. [Learn More.](#)

After a long year of debate and overcoming all their objections, we had a hearing with COTCO, and we were granted a subcommittee for tiny houses.

Shortly after, ICC announced the ICC 1215 committee to ***develop a tiny house standard, and then the tiny house code failed again.***

ICC is duplicating the ASTM tiny house development which raises concerns with WTO Coherence and ANSI Essential Requirements.

ICC is co-branding the ICC 1215 standard with THIA and the committee is dominated by THIA board members. It is important to note that ICCNTA employee David Tompos Sr. was also on the board of THIA and a voting member of ICC 1215 representing the standard developer category when the committee was first established.

[Learn more](#)

Tiny Houses On Wheels are Trapped In Legal Limbo

The stark reality is that tiny houses on wheels remain trapped at the intersection of three separate regulatory worlds, with no unified pathway connecting them. HUD has never fully carved out a dedicated lane specifically for the tiny house industry, despite the growing demand for smaller, movable housing. It would have to reflect what the industry needs. 100% plant inspection is not a requirement that small manufacturers can afford and other requirements if they build to the HUD code or as a modular unit.

The RV industry, through RVIA, continues to strongly defend the position that recreational vehicle standards are strictly for temporary-use vehicles and should never be associated with permanent housing. In fact, RVIA has openly opposed state legislative efforts that attempted to use RV and Park Model RV standards as part of permanent tiny house housing frameworks, warning that affordable housing advocates were attempting to “co-opt” RV standards and definitions for residential use.

[RVIA Article: Affordable Housing Efforts Threaten RV Industry](#)

At the same time, the ICC 1215 process has increasingly rerouted tiny houses away from their existing identity and into the expanding “Small Residential Unit” framework, creating yet another layer of regulatory uncertainty.

The result is an industry that is continuously bounced between agencies, standards, and interpretations. HUD points toward federal manufactured housing definitions and exclusions. RVIA insists RV standards are not intended for permanent occupancy. ICC attempts to create new pathways through evolving standards frameworks. Meanwhile, small manufacturers, owner-builders, local jurisdictions, and consumers remain stuck in the middle trying to determine what a tiny house on wheels legally is, who regulates it, where it can be placed, and how it can

lawfully exist as housing.

Is A Tiny House On Wheels A Vehicle Or A Structure? It Is Both

The duo nature of tiny houses on wheels must be recognized to progress the industry. The pathway forward must integrate both compliance paths.

Tiny houses on wheels need their own classification—not another procedural delay or another decade of regulatory fragmentation that is detrimental to the small manufacturers and owner-builders who form the core of the grassroots tiny house movement.

Integration would **create a clear compliance pathway, preventing overlapping authority, and** misplaced liability—something that cannot be accomplished without acknowledging both Motor Vehicle and HUD preemption.

An opponent at the recent PCH hearing stated” *So I heard a very nice, very interesting proposal yesterday, which I think the proponents should consider. Let’s create an international tiny house code, and let’s put both the vehicles and the tiny houses in that, but don’t come and put them in the residential code, please. “*

For years, proponents, engineers, builders, advocates, and homeowners have attempted to bridge that divide through hearings, public comments, code proposals, standards development, and direct participation in the process. What they have encountered instead is a cycle of reclassification, jurisdictional avoidance, scope expansion, and regulatory detours that continue to push legal placement further out of reach for ordinary people seeking smaller, more sustainable housing options in a time of a housing crisis with no end in sight.

Humanity can land on the moon, develop self-driving vehicles, automate transportation systems, and invest hundreds of billions into futuristic mobility — yet tiny houses on wheels still struggle to achieve clear and consistent acceptance within many regulatory frameworks.

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Author’s Statement and Disclaimer

I was a **proponent who spearheaded the tiny-house effort within ASTM**, working collaboratively to establish the **E06.26 Tiny Houses Subcommittee** under the Committee on Performance of Buildings. I currently serve as **Membership Secretary** for the subcommittee.

Disclaimer: I do not represent ASTM International, and the views, findings, and conclusions expressed in this document are my own, based on my own experience, experience, public information and independent research. This submission is made in my individual capacity as President of Tiny House Alliance USA, in support of transparency, lawful compliance, and open participation in standards development.