



Manufactured Housing Association for Regulatory Reform

1331 Pennsylvania Avenue, NW • Suite 512 • Washington, DC 20004 • 202-783-4087 • Fax 202-783-4075 • mharrdg@aol.com

November 25, 2024

VIA FEDERAL EXPRESS

Hon. Scott Turner
Secretary-Designee
U.S. Department of Housing and Urban Development
C/O 1100 S. Ocean Boulevard
Palm Beach, Florida 33480

Dear Secretary-Designee Turner:

On behalf of the manufacturer members of the Manufactured Housing Association for Regulatory Reform (MHARR), please accept our congratulations on your nomination to become Secretary of the U.S. Department of Housing and Urban Development (HUD).

MHARR is a Washington, D.C.-based national trade organization representing the views and interests of producers of manufactured housing regulated by HUD pursuant to the National Manufactured Housing Construction and Safety Standards Act of 1974 (42 U.S.C. 5401, et seq.) as amended by the Manufactured Housing Improvement Act of 2000 (2000 Reform Law). MHARR's members are independent businesses located in all regions of the United States.

As you may already be aware, HUD Code manufactured housing is the only type of residential construction that is directly and comprehensively regulated by the federal government. In the unique instance of manufactured housing, which is routinely transported across state lines, federal regulation – resting on a three-part structure of robust federal preemption, uniform federal standards and uniform federal enforcement – is critical to maintaining both the availability and affordability of HUD Code homes for moderate and lower-income American families. Moreover, sound judgment in the exercise of this authority is essential not only to the health of the industry – which provides tens of thousands of much-needed manufacturing jobs across the country – but also in meeting the needs of consumers who rely on the industry and its homes every day.

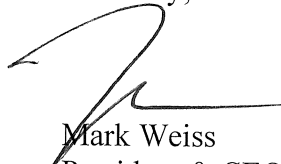
In this regard, we wish to bring to your attention an urgent regulatory matter that could have a disastrous impact on both the industry and the availability of affordable housing in a market that is already millions of units short of needed supply. Specifically, the U.S. Department of Energy (DOE) as part of its extremist “climate change” agenda, is about to issue destructive manufactured housing “energy conservation” standards (with a parallel regulatory component at HUD) that would wholly undermine both HUD’s superintendence of the manufactured housing industry as well as the historically inherent affordability of manufactured housing. We have already brought this matter to the attention of President-Elect Trump and his transition team (see

attached document). For the reasons explained in those materials, this impending rule should be withdrawn and/or repealed in all its aspects at both DOE and HUD.

Beyond this immediate regulatory matter, we look forward to working with you and your staff to complete the full and proper implementation of all the reforms legislated by Congress in the 2000 Reform Law. Toward that end, we will contact your office following your confirmation to arrange an introductory meeting and the start of a constructive dialogue regarding the federal manufactured housing program and the positive role that it can play under your leadership during the Trump Administration.

Again, congratulations on your nomination. We look forward to meeting with you soon.

Sincerely,



Mark Weiss
President & CEO

Attachments