



Manufactured Housing Association for Regulatory Reform

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November 25, 2024

VIA FEDERAL EXPRESS

Hon. Russell Vought
Director-Designee
Office of Management and Budget
C/O 1100 S. Ocean Boulevard
Palm Beach, Florida 33480

Re: Impending Destructive Manufactured
Housing Federal “Climate Change” Regulation

Dear Director-Designee Vought:

On behalf of the manufacturer members of the Manufactured Housing Association for Regulatory Reform (MHARR), please accept our congratulations on your nomination to serve as Director of the Office of Management and Budget (OMB).

MHARR is a Washington, D.C.-based national trade organization representing the views and interests of producers of manufactured housing subject to comprehensive federal regulation by the U.S. Department of Housing and Urban Development (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.

In this regard, we are writing to bring to your attention an urgent regulatory matter affecting both the manufactured housing industry on a nationwide basis, as well as American consumers of affordable housing in a market where affordable homes are millions of units below existing demand. Specifically, DOE is on the verge of implementing extreme “energy conservation” standards for manufactured homes based on “climate change” alarmism that would undermine the inherent affordability of manufactured housing and decimate the national manufactured housing market and the lower/moderate-income consumers that it primarily serves.

www.manufacturedhousingassociation.org

Preserving the American Dream of Home Ownership Through Regulatory Reform


As the attached materials, already provided to President-Elect Trump and his transition team make clear, these standards lack any reasonable basis and are little more than a sop to “climate” special interests which seek to insinuate their extreme positions in the multi-billion dollar housing market by first insinuating them in the federally-regulated manufactured housing sector. As a result, they should be withdrawn and/or repealed, just as OMB did with an earlier iteration of the same standards in 2017.

Accordingly, we ask that OMB, under your leadership, take immediate steps to withdraw these destructive standards before they can further undermine the already struggling housing market.

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

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Weiss', with a long horizontal flourish extending to the right.

Mark Weiss
President and CEO

Attachments