

# ***DICK MOORE, Inc.***

Housing the Mid-South since 1958

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Regulations Division  
Office of General Counsel  
Department of Housing & Urban Development  
451 Seventh Street, S.W. room 10276  
Washington, DC 20410

Attention: Executive Order 13777

This missive is offered in support of Executive Order 13777, asking for comments on reforms needed with respect to the HUD Code manufactured housing program's administration and regulation.

As a manufactured housing professional with over 3 decades of experience, I can verify that our nation is facing one of the largest shortages of ***affordable*** housing in my recollection. The scope of this issue is so great that even the federal government cannot commit to paying to fix the problem!

This is not my singular opinion. National associations of home providers concur.

The National Assn. of Realtors (NAR) openly acknowledges that they do not have an adequate supply of 'affordable' homes. The upcoming market of "millennials" is looking for specifically that: affordable homes.

The National Assn. of Home Builders (NAHB) verifies they are almost at their limit of their ability to access the labor needed to keep up with the demand. They also admit they have very limited ability to produce homes under the \$150,000 price tag, without taxpayer subsidies. The main market for this type of housing will be first time homebuyers and downsizing retirees.

The 2017 study by the NLIHC.org confirmed the fact that "The U.S. has a shortage of 7.4 MILLION affordable and available rental homes for ELI renter households, resulting in 35 affordable and available units for every 100 ELI renter households." That puts in it a very clear perspective.

A recent Realtor.org survey also brought to light that "68 percent of millennials said they have saved less than \$1,000 for a down payment" on a home. At that savings rate, that market segment is 10 years away from qualifying for home ownership. With this savings pattern, it become even more important that first time homebuyers have access to the resources ( available homes ) they can best achieve. Manufactured housing has the lowest entry cost of any non-taxpayer subsidized home ownership sector in today's market.

The HUD Code manufactured housing industry can meet these present and future needs. An increased emphasis by HUD on the features and benefits of our homes would be a win for this country in a lot of ways, in addition to reducing the housing shortage. Other estimated benefits of a full enforcement of the Act could include up to 1.5 million jobs over the next 5 years and the reduction of or the complete elimination of federal housing subsidies for millions of Americans.

Today's manufactured homes are built stronger and safer than ever. The energy efficiency of today's manufactured homes can exceed that of many site-built dwellings. But the buying public still mistakes today's manufactured homes for the "trailers" or "mobile homes" of 40+ years ago.

We in the industry know the differences in today's product. Congress realized the importance of manufactured housing 17 years ago, with the passage of the Manufactured Housing Improvement Act of 2000 (the Act). A former HUD manufactured housing program director went on record that our homes are about half the cost, and of comparable quality to moderate site built housing. Even with all those accolades, there needs to be more sharing of those benefits with the American public. It is not uncommon to hear our homes referred to as trailers or mobile homes, which they are NOT. For years, manufactured housing professionals have tried to get HUD to step up to the plate and fully embrace the industry that it is charged with protecting and promoting its growth.

The main thing needed for HUD to more fully support the manufactured housing industry is for HUD to robustly implement and enforce all the requirements of the Act. A major part of that implementation concerns the program director, which, by law, should be a non-career appointee. The director currently in place has overseen the implementation of many regulatory burdens and costs in her 3-year tenure, all of which served mainly to increase costs of the manufacturing process while adding little to no real value to the house itself. It is my belief that many federal employees working in the department have honorable intentions, but it appears that some of the program's personnel and direction have consistently worked to promote the status quo (their jobs?), with very little done to properly represent HUD Code homes to the buying public. Sadly, that will never happen as long as the current staffing exists in the program. That would also apply to HUD's General Counsel, should that office not be able to enforce the enhanced preemptions, as Counsel was charged to do under the Act. That is what the president was referring to in the need to 'drain the swamp', in this instance at the HUD Code program administration level.

Manufactured housing is the **best** choice available for affordable housing to today's prospective homebuyer. HUD should be singing the praises of manufactured housing to the country. With the appointment of our new Secretary, (hopefully) the appointment of a new program administrator (*to bring the program into compliance with the law*), and new administrative personnel in place, American homebuyers would potentially have the means available to them for safe, comfortable, efficient and **affordable** housing, provided by an industry that has the capacity to meet the demands of the homebuyers of today, tomorrow and the future.

This is a very exciting opportunity for manufactured housing, and I would like to urge you to pursue with extreme vigor these steps, and others, to fully engage the private sector free market to work toward the elimination of the shortage of affordable housing in today's America.

Thank you for your time and consideration.

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