## Factory-Built Housing for Affordability, Efficiency, and Resilience

## <u>Highlights</u>

- Increasing the supply of factory-built housing including manufactured housing, modular housing, and accessory dwelling units — is one of several approaches to address ongoing challenges to housing affordability.
- Manufactured housing is the largest source of unsubsidized affordable housing in the United States.
- Federal, state, and local governments can take steps to mitigate the demand, regulatory, and financing barriers that have prevented wider adoption of factory-built housing.

The Joint Center for Housing Studies of Harvard University's *The State of the Nation's Housing, 2019* report notes that a "continuing shortfall in supply" of housing "is keeping the pressure on house prices and rents, eroding affordability...."1 Increasing the supply of factory-built housing, one of several potential approaches to address this shortfall, may ease price and rent pressures and offer options for affordable and sustainable rental and ownership. One type of factory-built housing, manufactured housing, is already the largest source of unsubsidized affordable housing in the United States.2 A variety of demand, regulatory, zoning, and other barriers, however, have limited the reach of this promising affordability solution. The construction of new factory-built housing not only offers an affordable housing option but also presents the opportunity to add units with improved energy efficiency and resilience to weather and natural disasters. This article discusses the realized and potential benefits of factory-built housing, the barriers to its wider use, and ways to overcome those barriers.



In northern California, multifamily housing builder Factory\_OS hosts an Innovation Lab of the Terner

Center for Housing Innovation to study and advance factory construction techniques. *Photo courtesy of Nancy Holliday Photography* 

## Factory-Built Housing: An Overview

Unlike traditional site-built housing, in which building materials are shipped to and assembled onsite, factory-built housing is assembled in a factory setting and shipped either complete or in substantially complete parts that are installed at the site. Both single- and multifamily housing can be factory built, and new research illuminates the potential for this construction method, particularly for multifamily housing.3

Factory-built housing falls under four general types: manufactured, modular, panelized, and precut. Manufactured homes, also known as HUD Code homes, are built in a factory to the federal building code (HUD Code) and have a permanent chassis on which they can be transported. Manufactured homes, when sited, may be placed on a foundation that meets conventional lending requirements. Modular homes are also built in a factory and transported in sections to be installed on a fixed foundation. Unlike manufactured homes, however, modular homes are built to conform to local codes. Other categories of factory-built housing include panelized construction, in which factory-built wall panels are shipped to a site for assembly, and precut housing, in which materials are cut to size before being shipped to a site for assembly.4 This article focuses on manufactured and modular homes, which are substantially built and assembled in a factory setting. (For more information on panelized housing, please see the Spring 2017 issue of *Evidence Matters*.)

Manufactured housing has been subject to the HUD Code since 1976; it preempts local codes and facilitates production at scale to make the housing marketable across state lines.5 The HUD Code has evolved over time. The Manufactured Housing Improvement Act of 2000 mandated updates to the HUD Code and required HUD to develop Model Manufactured Home Installation Standards and create a federal installation oversight program while leaving states and local governments to oversee installations in their jurisdictions. After 2007, states could retain responsibility for installation oversight or defer to HUD standards. (Currently, 36 states retain this responsibility, and 14 have deferred to HUD standards.)6

In 2018, information reported to the U.S. Census Bureau included data for approximately 55,000 new manufactured (HUD Code) homes that were sold and placed in the United States. Of these, 37 percent were placed in manufactured housing communities (parks, courts, or subdivisions). Most (65%) were placed on piers (also known as blocks), and slightly less than a quarter (23%) were placed on foundations of masonry or concrete. These new manufactured homes were concentrated in the South, where 61 percent were sited; 16 percent were in the Midwest, 16 percent were in the West, and 7 percent in the Northeast. New manufactured homes in the South were typically placed on piers, and most new homes were placed outside of manufactured home communities. New homes in the Northeast and Midwest, on the other hand, were more likely to be placed in manufactured home communities.7 Durst and Sullivan stress the variation within manufactured housing in terms of location (rural or metropolitan) and tenure (owner occupied or rental).8 The average sales price of a new manufactured home in 2018 was \$78,500 (\$52,400 for a single-piece home and \$99,500 for a two-piece home).9 The Manufactured Housing Institute (MHI) estimates that 22 million people with a median annual household income of \$30,000 live in manufactured homes.10 Nearly one-guarter of residents of manufactured homes are between 8 and 29 years old, and 19 percent are older than 60. More than half (55%) earn less than \$30,000 per year.11 Although an estimated 80 percent of manufactured home residents own their home, most rent the land on which it is sited.12

Modular homes account for a comparatively smaller share of the housing market than manufactured housing. In 2018, site-built homes accounted for 97 percent, and modular homes just 1 percent, of all privately owned, single-family construction exclusive of manufactured homes in the United States. Regional differences exist in the use of modular, panelized, and precut construction methods. Of the U.S. Census Bureau's four national subregions, the Northeast has the highest percentage of single-family homes constructed offsite exclusive of manufactured homes, with 7 percent of new homes being modular and 3 percent of homes built with panelized sections or precut materials in 2018. By contrast, in the

West, 1 percent of new single-family homes were modular and an additional 1 percent were built with panelized sections or precut materials in 2018.13 Modular construction remains a very small part of the multifamily construction market as well; as of 2018, 99 percent of the nation's multifamily buildings were built onsite.14

### **Benefits of Factory-Built Housing**

The potential benefits of factory construction have been a subject of longstanding interest. HUD's Operation BREAKTHROUGH, which began in 1969, was founded on the premise that shifting from onsite to factory construction could reduce housing costs. Although the program's impact on the industry was limited, a National Academies Press report credits Operation BREAKTHROUGH with achieving "marketplace acceptance that increased factory production of housing improves construction efficiency, quality, and affordability."15 Constructing housing in a factory setting and transporting it to the site offers numerous benefits, including reduced labor, materials, and financing costs; a compressed construction schedule; and conditions favorable for quality control. Factory construction facilitates the standardization of construction processes, and the controlled factory environment protects materials from exposure to the elements and avoids construction delays because of adverse weather. Factory construction also reduces noise, traffic and parking disruption, and environmental and other impacts.16



New manufactured homes typically have the same appliances, fixtures, and amenities that you would find in a site-built home. *Photo courtesy of Amanda Belue* 

**Cost savings and affordability.** The cost savings from factory construction promise increased affordability for homeowners and renters. These savings are not guaranteed, however, and building and equipping a factory and creating repeatable designs generates considerable upfront costs. Bertram et al. suggest that cost savings will be greatest when production achieves high scale and repeatability, and they should improve with technological advances and continued research. Under such conditions, they estimate that modular construction could achieve an overall savings of up to 20 percent over traditional construction.17 MHI reports that the average price per square foot of a manufactured home is \$49 compared with \$107 for a site-built home.18 Overall, Schlottmann and Boehm find that manufactured housing is "a low-cost housing alternative... [that] is observed to have higher average quality rankings across both the neighborhood and structural dimensions of housing services than rental units."19 "There is really no competition in terms of the cost to produce factory-built housing," says Esther Sullivan, assistant professor of sociology at the University of Colorado Denver.20

Several factors, including labor and materials, could potentially contribute to cost savings. Factories can break the construction process into repetitive tasks that require less skill and eliminate the need for subcontractors. Factory quality control procedures could reduce the need for (or time lost associated with) rework and more efficiently detect and remedy defects in materials. Work schedules can be managed more efficiently and predictably.21 Finally, factories can be located in areas with lower prevailing wages. In a 2001 study, Winter et al. report that the labor cost of a factory-built home ranges from 8 to 12 percent of the total construction cost compared with 40 to 60 percent of the total cost for a site-built home.22 Bertram et al. estimate that modular construction can achieve an overall labor savings of up to 25 percent on a project compared with traditional onsite construction.23

Factory construction can also reduce the cost of materials. Factories can buy materials in bulk, typically at a savings, and can buy a greater proportion of materials directly from suppliers rather than through intermediaries such as subcontractors.24 Factories with precision, computer, and laser tools can reduce mistakes and waste, and recycling or disposal of what waste remains is more efficient in a factory setting. A controlled environment not only protects materials from weather-related damage, loss, and the need for replacement but also protects the production schedule from weather-related delays.

Eliminating weather delays is just one way that factory construction can compress the construction schedule. Factory building also means that home construction and site preparation can happen concurrently. Bertram et al. estimate that modular production can reduce construction time by 20 to 50 percent.25 Shortening the construction timeline can offer substantial savings in various financing costs, such as interest paid on construction loans.

Increasing the use of prefabrication in multifamily housing may also promote affordability. Galante et al. examine offsite production of three- to four-story, wood-framed multifamily housing and find potential savings of up to 20 percent on the cost of construction compared with traditional building methods.26 The use of prefabrication with low-income housing tax credits (LIHTCs) is still relatively new, but the reduced construction times of prefabricated construction could be an advantage in using LIHTCs.27 HUD Code and modular homes can also function as accessory dwelling units (ADUs), which increase the affordable housing supply in tight markets.

Energy efficiency. In addition to its affordability benefits, factory-built housing can incorporate advances in energy efficiency, thereby using resources more responsibly and reducing residents' utility bills. Although energy costs for older manufactured housing tended to be high, new technologies are much more efficient, and research suggests that manufactured and modular housing can incorporate advanced building envelopes for energy efficiency without significantly affecting cost.28 Manufactured homes can qualify for ENERGY STAR® certification if they meet requirements to be "substantially more energy efficient than a comparable standard code home."29 There have also been efforts to exceed the energy efficiency standards set by the HUD Code. For example, the Bonneville Power Administration has collaborated with the manufactured housing industry since 1992 (beginning with the Manufactured Homes Acquisition Program) and with state energy offices since 1995 (under the branding of Super Good Cents) to establish a high standard for energy efficiency for electrically heated homes in the Pacific Northwest region. Now known as the Northwest Energy Efficient Manufactured Housing Program (NEEM), the initiative has expanded from its core requirements, which focused on the performance of the building shell, to include more efficient windows, lighting, and equipment. A 2008 evaluation estimated a potential savings of 50 percent.30 More recently, the program has developed the NEEM+ certification standard, which uses 30 percent less energy than the ENERGY STAR® standard.31

**Disaster resilience.** Attention to the materials and design of manufactured housing can improve not only energy efficiency but also disaster resilience. In the past, manufactured housing was highly susceptible to damage in natural disasters. The HUD Code has mandated changes that make modern manufactured homes significantly more resilient to fire and natural disasters than pre-HUD Code housing. Manufactured homes built after the HUD Code standards were implemented have a fire rate per 1,000 occupied units that is roughly one-third lower than pre-HUD Code homes and a death rate per 100 fires that is roughly one-half lower. Between 2007 and 2011, manufactured homes had a fire death rate per

100,000 that was similar to that of other single-family homes.32 The HUD Code adopted new wind load standards after Hurricane Andrew in 1994; manufactured homes built to the new standards held up better than those built before the standards were implemented, and homes built between the advent of the HUD Code and the new standards fared better than those built before the implementation of the HUD Code.33 Research shows that the performance of new factory-built housing is comparable to that of sitebuilt housing. For example, in their review of factory-built housing in coastal areas, Fenner et al. state that "owners and construction companies have found that prefabricated construction allows the rebuilding of homes affordably, efficiently, and quickly. In addition, new prefabricated units can be as wind- or earthquake-resistant as site-built buildings, minimizing the effects of strong climate events."34 In some cases, natural disasters have catalyzed innovations and improvements in disaster resilience. Following Hurricane Sandy, the New York City Mayor's Office of Housing Recovery Operations and the Build It Back program used a portion of its Community Development Block Grant Disaster Recovery funds to construct approximately 100 single-family modular homes. Having successfully piloted modular construction, the city is now incorporating modular construction into its broader plans to produce affordable housing.35

Despite the considerable benefits of factory-built housing, traditional, site-built housing remains overwhelmingly dominant. Numerous barriers and challenges stand in the way of the wider use of manufactured and modular housing.

### **Barriers to Factory-Built Housing**

Dawkins et al. write that market factors such as "regional location, population density, median family income, the existing inventory of manufactured housing units, and proximity to manufactured housing plants" interact with regulatory constraints and "local perceptions of manufactured housing to influence manufactured housing supply."36

**Zoning.** Although HUD Code housing is not subject to local building codes, local zoning ordinances pose a significant barrier to the placement of manufactured housing. Some local ordinances prohibit manufactured housing outright, whereas others limit permitted locations or impose additional design standards.37 Dawkins et al. report that "lack of by-right zoning, burdensome fees, permits, snow load standards, fire codes, zoning codes, subdivision regulations, architectural design standards, and environmental regulations" influence the placement of manufactured homes.38 Local zoning restrictions may also pose a barrier to ADUs, whether factory- or site-built, because many communities have outright bans on accessory structures. Opposition to ADUs may stem from concerns about new, possibly transient residents as well as higher-density development and associated stresses on traffic, parking, and infrastructure.39



Homeowners can purchase a factory-built accessory dwelling unit and site it on their property if local zoning regulations permit. *Photo courtesy of Macy Homes, Inc., Ventura, CA* 

**Permitting and codes.** Although the HUD Code preempts local codes for manufactured housing, non-HUD Code factory-built housing must meet local codes, which can add impediments that discourage the siting of factory-built homes. Factory builders may need to secure building permits before construction and then manage and coordinate both factory and onsite inspections during the building process, which may be burdensome. Most states require a third-party government agency for factory inspections of modular structures.40

**Negative Perceptions.** Because of negative stereotypes about the quality of manufactured housing and its association with low-income residents, local governments and community residents may consider it undesirable. Factory-built housing has had a reputation for being an "ugly, cheap, poor-quality option," but it is becoming increasingly indistinguishable in aesthetics and quality from site-built housing.41 Innovations such as increased roof pitches, the use of traditional roofing and siding materials, and two-story home models allow factory-built housing to blend into neighborhoods predominantly composed of site-built homes.42 Despite these improvements, negative perceptions and dated ordinances limit the supply of factory-built options.

**Design.** Although design is a critical element of any construction project, Abu-Khalaf notes that designs for factory-built housing must be even more efficient and precise than those of site-built housing. Factory building often relies on lower-skilled labor completing repeatable tasks and offers little room for adjustments and alterations once production has started. These limitations increase the importance of precise design. The nature of factory-built housing imposes unique design challenges, including that the home or its constituent parts must be designed for transport to the site.43

**Delivery challenges.** Transport itself can present a barrier to factory-built housing. Delivery to remote areas can be challenging or cost prohibitive. (Often, these are the same places to which the delivery of materials for site-built housing can be difficult.) Dense urban areas can be difficult for large delivery trucks to navigate. The cost of transport as well as the cost and logistics of using a crane, which is necessary for assembly in some cases, can offset some of the savings that factory building offers.44 Departments of transportation in some jurisdictions may also require special permits for transport and delivery.

**Financing.** Unfamiliarity with the unique aspects of factory-built housing presents obstacles to the financing of its construction and purchase. For construction loans, lenders may perceive factory-built housing as higher risk and therefore charge more than they would for comparable, but more familiar, site-built housing. A key difference between site-built and factory-built housing that might account for this perception is that factory-built housing requires lenders to supply a larger proportion of the total cost upfront rather than disbursing funds in installments as construction reaches benchmarks.45



Lois Parris served as the first board president at Lakes Region Manufactured Housing Cooperative when the community became a resident-owned community (ROC) in June 2000, and she has since helped take the ROC model nationwide. *Photo courtesy of ROC USA/Mike Bullard* 

Many owners of manufactured housing finance their purchase through a chattel or property loan. Purchasers may use a chattel or personal property loan to finance a manufactured home that will be sited on land they do not own, as in a manufactured home community.46 Chattel loans typically are more expensive than a real estate mortgage — an estimated 4.4 percentage points more per year, according to research by Goodman and Ganesh. Goodman and Ganesh also find that many borrowers who take out a chattel loan could have qualified for a mortgage. In most cases, a borrower financing a manufactured home as real property with a mortgage also must own the land on which it is sited. Goodman and Ganesh estimate that nationally, as many as 53 percent of new manufactured homeowners owned the land and might have been eligible for a mortgage but instead financed their home with a personal property loan. They note that although many borrowers may choose the more expensive chattel loan for the sake of convenience, some might not be aware of the alternative option with the lower rate.47

#### **Addressing Challenges and Overcoming Barriers**

There is a continued need for factory-built housing to become an even greater source of affordable housing. Nearly 3 million households live in manufactured housing communities where residents may own their homes but rent the land on which the home is sited.48 According to MHI, there were about 40,000 such land-lease communities in 2017, and most of these are "well-managed, well-maintained, and offer many benefits to residents."49 Land-lease communities can offer desirable amenities such as laundries, recreational facilities, and community space; services and maintenance such as landscaping and snow removal; and infrastructure such as utilities, roads, and parking.50 For those who are unable to qualify for a loan to purchase a lot, a land lease affords the opportunity to site their home, and if not financing the purchase of a lot, the savings in upfront charges could allow the buyer to purchase a more expensive unit.51

In some land-lease communities, however, rents may not be sufficient to cover infrastructure maintenance and investors may not keep up with infrastructure costs, eroding the quality of life in these communities and decreasing the value of their manufactured units.52 Tenants are also vulnerable to rent increases or the sale of the land on which their homes are sited. If they cannot afford the rent or if the property is repurposed by the new owners, they may face eviction. Theoretically, homeowners could transport their homes to a new site, but the cost of moving may be prohibitive, finding an alternative site may be difficult, and the structure may not be able to withstand a move. In these cases, homeowners may effectively be forced to abandon their homes.53

One way to address these challenges would be to create and preserve avenues for tenant purchase of land. As of 2014, 19 states had adopted legislation to facilitate resident ownership.54 Carolyn Carter, deputy director of the National Consumer Law Center, says that state laws that give residents advance notice of any sale of the property (not only in the case of a change of use) and allow residents to make an offer to purchase (in particular, laws that require an owner to accept the residents' offer if it matches that of a third-party bidder) are most effective. Laws that provide tax incentives to owners who sell to residents are helpful but less effective.55 Owners of manufactured communities have challenged laws granting residents right of first refusal or requiring owners to accept a matching offer from residents in court with mixed results. In 2000, the Washington, stating that an act giving tenants a right of first refusal of private property for private use."56 The Massachusetts Supreme Judicial Court ruled in 1996 that a law giving tenants right of first refusal to purchase was not a "regulatory 'taking'" and that the law "substantially advances a legitimate State interest."57 Park owners have also opposed lengthening advance notice periods, arguing that the resale restrictions should not be changed after a park's purchase.58



Marilla Country Village, a 145-site community near Buffalo, New York, has invested more than \$250,000 in improvements with only one rent increase of \$10 per month since residents took ownership in December 2011. *Photo courtesy of ROC USA/Mike Bullard* 

ROC USA is a nonprofit working to promote resident ownership of manufactured home communities. Currently, 250 limited equity cooperatives are in ROC USA's network, in which residents own their homes and an equal share of the park property. Residents of these communities typically are able to keep their site fees below market rates, make health and safety improvements, engage with other community members, and enjoy other economic benefits such as being able to sell their homes more quickly and for higher prices.59 Establishing community land trusts through a nonprofit owner that can control land and leases under conditions that maintain affordability and stability is another strategy for protecting residents.60 Resident-owned communities. According to a report by Freddie Mac, only approximately 2.4 percent of manufactured housing communities are resident owned.61

To increase the volume of factory-built housing, federal, state, and local officials can identify and eliminate unnecessary regulations and restrictions. HUD recently reduced regulatory burdens for manufactured housing in the HUD Code. Effective March 2016, HUD issued a rule governing features that can be completed onsite so that manufacturers need not seek prior approval from HUD. HUD continues to evaluate the best way to regulate this construction to ensure consumer safety and minimize regulatory burdens. 62 In addition, several rulemakings in process will, once final, eliminate regulatory burdens associated with producing certain structures, such as multistory homes and garage- and carport-ready homes, and certain features, such as accessible showers and tankless water heaters. MHI chief executive officer Lesli Gooch says that "there needs to be a uniform process for updating the HUD Code in a responsive and efficient manner" to keep up with industry innovations.63

State and local governments can expand the areas zoned to accept factory-built housing, including manufactured housing and ADUs (see "Factory-Built Accessory Dwelling Units for Affordable Housing

<u>Options</u>").64 As of 2011, Dawkins et al. noted that "more than half of states require[d] localities to allow HUD-Code units somewhere within local jurisdictions."65 Localities could adjust codes to permit manufactured and other factory-built housing, which could possibly increase the affordable housing supply in these jurisdictions. Localities could also allow mixtures of housing types that include factory-built housing is not simply siloed into designated areas or parks but is more fully integrated into communities.66

The Federal Housing Finance Agency is helping to address financing challenges through the Duty to Serve (DTS) program. DTS requires Fannie Mae and Freddie Mac to facilitate a secondary market for mortgages on housing for very low-, low-, and moderate-income families in certain market sectors, including manufactured housing.67 To further expand financing opportunities for individual homeowners, Goodman and Ganesh suggest that policymakers examine ways to make it easier for buyers of manufactured homes to title their purchases as real property rather than chattel so they can obtain more affordable loans.68

The government-sponsored enterprises have also used their influence over the market to encourage borrowers to institute certain tenant protections. Freddie Mac, for example, is "seeking to increase protections for tenants in MHCs [manufactured home communities]" through regulations that create a minimum set of landlord requirements for a loan on an MHC to qualify for DTS credit, including a 30-day written notice of rent increases and a 5-day grace period for rent payments. These requirements could be enforced by state laws or adopted voluntarily in the lease agreement.69 Comments on these regulations from the manufactured housing industry indicated opposition and a preference for "a funding option unconstrained by pad lease requirements."70 Some states already have legislation that requires landlords to give adequate notice or relocation assistance if the park owner decides to sell.71 (See "Programs Support Energy-Efficient Modular and Manufactured Housing".) However, relocation may have negative consequences, such as transportation, siting fees, difficulty finding a new lot, and social dislocation.72 In some cases, owners of manufactured home communities have favored greater flexibility than what existing requirements allow. For example, the Florida Manufactured Housing Association supports legislation that would allow eviction notices to be sent by first-class mail and posted to front doors rather than sent by certified mail.73 The manufactured housing industry has also worked with Fannie Mae and Freddie Mac to develop conventional financing for manufactured homes with designated popular features through a financing vehicle called CrossModTM. Gooch says that this development is a "huge step" for manufactured housing because, "for the first time ever, HUD Code homes can qualify for conventional financing and be appraised alongside site-built homes."74



The 111 families of Lakes Region Manufactured Housing Cooperative in Belmont, New Hampshire, have enjoyed the security of co-op land ownership since June 2000. *Photo courtesy of ROC USA/Mike Bullard* 

Finally, ongoing innovations in factory-built housing have made it more affordable and energy efficient as well as higher in quality, which can make it more attractive to consumers. Engineering advances that allow for two-story residences and building innovations such as hinged roofs have made factory-built housing more like site-built housing in some neighborhoods and expanded the number of styles available.75 Materials advances such as cost-optimized attic insulation that increases insulative value without prohibitive cost enhance the affordability of factory-built housing by lowering utility costs.76 New construction and logistics technologies may facilitate production in ways that boost affordability. Although not widely used, some builders have experimented with the use of recycled materials such as shipping containers, and some factory-built homes have been constructed using 3D printing technology. Factory-built construction is more easily adapted to automation than site-built housing, and advances in automation may impact the cost and efficiency of factory building.77 In terms of logistics, innovations in digital technologies can improve design, precision, and productivity in construction and facilitate processes.78

### **Realizing the Potential of Factory-Built Housing**

Factory-built housing offers many benefits, including lower production costs, and holds tremendous promise for increasing the availability of affordable rental and owner-occupied housing in the United States. Incorporating modular construction into the development of multifamily rental housing can provide significant savings that can be passed on to renters, and, especially when residents own the land on which their homes are sited, manufactured homes offer a promising path to affordable and sustainable homeownership for low- and moderate-income buyers. Modern factory-built housing can be indistinguishable in appearance and quality from similar site-built housing and incorporates the latest innovations in energy efficiency and disaster resilience. To fully realize its benefits, however, policymakers need to understand and address the persistent barriers facing the industry, such as prohibitive regulations and zoning, community opposition, and financing challenges that restrict the construction and siting of factory-built housing.

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HUD Standards for Manufactured Housing

Factory-Built Accessory Dwelling Units for Affordable Housing Options

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https://www.manufacturedhomepronews.com/billionaires-to-testify-while-mharr-rips-manufacturedhousing-institute-and-hud-research

Note that the words "enhanced preemption" are not found in the above from HUD. Why not? See the reports linked below for more insights on that critical topic.

https://www.manufacturedhomelivingnews.com/coming-epic-affordable-housing-finance-clash-chairmaxine-waters-vs-warren-buffett-clayton-homes-historic-challenges-ahead/

https://www.manufacturedhomelivingnews.com/fhfa-gses-high-cost-to-minorities-all-americans-due-to-asserted-failures-to-follow-duty-to-serve-affordable-housing-existing-federal-laws/

https://www.manufacturedhomelivingnews.com/manufactured-homeowners-interests-threatened-bymanufactured-housing-institute-deceptive-scheme-per-modular-home-builders-associations-tomhardiman/

https://www.manufacturedhomelivingnews.com/huds-urban-institutes-edward-golding-knew-becausemanufactured-housing-institutes-lesli-gooch-told-him/

https://www.manufacturedhomelivingnews.com/former-manufactured-housing-institute-presidentmanufactured-home-owners-urban-institute-and-you/

https://www.manufacturedhomelivingnews.com/hbos-john-oliver-on-last-week-tonight-mobile-homesvideo-manufactured-home-communities-fact-check/



# Barriers to Entry, Persistence, and Exiting in Business, Affordable Housing, and Manufactured Homes

https://www.manufacturedhomepronews.com/applying-democratic-republican-barak-orbachsmonopolization-logic-to-affordable-housing-crisis-impacting-manufactured-home-industry/

https://www.manufacturedhomepronews.com/masthead/prima-facie-cases-against-manufacturedhousing-institute-richard-a-dick-jennison-tim-williams-21st-mortgage-kevin-clayton-tom-hodges-claytonhomes-et-al/