Innovative Housing Showcase 2019



The Innovative Housing Showcase, held June 1-5 in Washington, DC, highlighted innovative technologies that create affordable and resilient housing to help address the nation's housing challenges. Secretary Carson, the driving force behind the showcase, delivered the opening address and was on hand throughout the event. HUD's Office of Policy Development and Research (PD&R), Office of Public Affairs, and Office of the Chief Procurement Officer organized the showcase in conjunction with the National Association of Home Builders. Exhibitors from around the country gathered on the National Mall to build prototypes of affordable homes, and thousands attended the event.

The prototype homes on display were high quality and built with exacting craftsmanship. The homes shared an abundance of space and modern amenities such as stainless- steel appliances and wall-mounted televisions. The homes' state-of-the-art technologies allowed the builders to construct them in a fraction of the time that a traditional wood-framed home would require. One innovation showcased was trenchless construction, subsurface construction that requires little to no continuous trenches and offers minimal disruption to businesses and traffic. The technology is intended for repairing or constructing new underground infrastructure, such as tunnels for utilities.

From mobile homes and manufactured homes to containers fitted for housing, the exhibitors displayed their years of experience in the field of affordable, innovative construction. Boxabl, an exhibitor and provider of post disaster housing innovations, used construction methods that included green building and cleanup as well as advanced wood-free building materials resistant to rot, water, mold, and many forms of insect damage. Ducky Johnson, another exhibitor, also specializes in disaster relief construction, elevated housing, and historic preservation. Other exhibitors included Prescient, indieDwell, Build us H.O.P.E., Cavco, and UMH Properties.

The U.S. Department of Energy's Oak Ridge National Laboratory provided the 3D-Printed Utility Vehicle (PUV), in which Secretary Carson arrived. The 3D PUV is a natural gas-powered hybrid electric vehicle that can supply power to a 210-square-foot home in the absence of <u>sunlight</u>. The printing technology is described as an additive method of construction, in which objects are built in layers, rather than a subtractive method such as turning, milling, or sawing. This technology can be used to print objects such as shoes, jewelry, and even aerospace parts.

Senior-level speakers discussed how the federal government is championing many of the innovations witnessed at the event. Some of those speakers included Acting Deputy Secretary Brian D. Montgomery, Secretary of Agriculture Sonny Purdue, General Deputy Assistant Secretary Todd Richardson, and numerous other representatives from the public and private sectors.

The Innovative Housing Showcase was a new endeavor for HUD, and the agency hopes to host another showcase next year. Coupling affordable housing with modern resiliency technology seems to be a way forward for the housing industry. Michael Blanford and Dana Bres of PD&R's Affordable Housing and Research Technology Division were the linchpins of the event, coordinating with the exhibitors and bringing a wealth of knowledge to the showcase. In addition, three exhibitors — Build us H.O.P.E., Cavco, and indieDwell — decided to donate their entry ramps to local service providers for homeless veterans.

Photo caption: HUD Secretary Ben Carson arrived to deliver the opening address for the Innovative Housing Showcase in a 3D-Printed Utility Vehicle provided by the U.S. Department of Energy's Oak Ridge National Laboratory.



What is missing from this seemingly positive plug on the HUD website for factory-building in general, and HUD Code manufactured housing specifically? The word "preemption." HUD Code manufactured homes enjoy federal preemption. When the law is plain, and its meaning is widely agreed to, why is it not fully and properly enforced?

Some examples are shown below.

More specifically, these combined changes have given HUD the legal authority to preempt local requirements or restrictions which discriminate against the siting of manufactured homes (compared to other single family housing) simply because they are HUD-code homes. We ask that HUD use this authority to develop a Policy Statement or regulation to address this issue, and we offer to work with you to ensure that it comports with Congressional intent.

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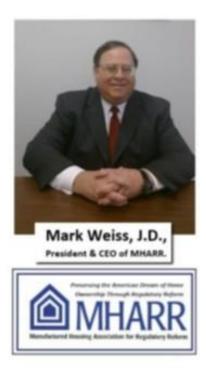
IVALA CARSON

The PDF of this 2003 letter, along with a cover letter to HUD Secretary Ben Carson that raised this same issue, is found at the link below this screen capture.

MHPRONEWS

"With respect to zoning discrimination Congress, in the 2000 reform law, strengthened and enhanced federal preemption in order allow for the invalidation of state or local "requirements," such as discriminatory zoning mandates, that have the effect of excluding mainstream manufactured homes."

 Mark Weiss, J.D.,
 President and CEO
 Manufactured Housing Association for Regulatory Reform (MHARR),
 Washington, D.C. On 2.9.2021







Notice, the photo of Santana was mirrored for the collage by MHProNews above; credits are as shown. https://www.manufacturedhomepronews.com/bombshells-former-hud-manufactured-housing-program-administrator-bill-matchneer-cavcos-manuel-santana-statements/

"THE LARGER QUESTION IS WHY THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT HAS FAILED TO EMBRACE ITS DUTY TO ENCOURAGE INCLUSIVE ZONING AND ACCEPTANCE OF A FEDERALLY-REGULATED HOUSING PRODUCT."



JD HARPER AMHA

July 18, 2019

The Honorable Ben Carson Secretary

U.S. Department of Housing and Urban Development 451 7th Street SW

Washington, D.C. 20410

MHI Letter to Dr. Carson.

RE: Notice of a Federal Advisory Committee Meeting; Manufactured Housing Consensus Committee (Docket No. FR-6141-N-04)

Dear Secretary Carson,

MONOPOLISTIC HOUSING INSTITUTE

monufacturedhomepronews.com

4.) HUD Must Implement and Enforce its Enhanced Preemption Authority

MHI Proposes that HUD shall issue a revised and updated policy statement regarding the Department's position concerning preemption and state and local auning, planning, or development restrictions that either severely limit or outright prohibit manufactured housing.

HUD neath to execute in preemption authority when local regulatory communication standards and rooming, planning, or development policies adversely affect the placement of quality, affordable manufactured histories, While HUD has praised individual cases where local principlicious have introduced construction and safety standards that are one consistent with the HUD Code or have improved acoming and planning requirements that exclude HUD-compliant manufactured homes, MH thelicres HUD must play a much greater role in this effort and has a congessional intraduct to do so. HUD has jurisdictional authority to move beyond case by case enforcement and take an official policy position opposing mate and local regulators whereight inconsistent with Congressional intent.

The satirical MHI logo is paradoxically demonstrated by this long letter to HUD Secretary Ben Carson from the Manufactured Housing Institute (MHI). On bottom of page 5 it raises the topic of enhanced preemption rather well.

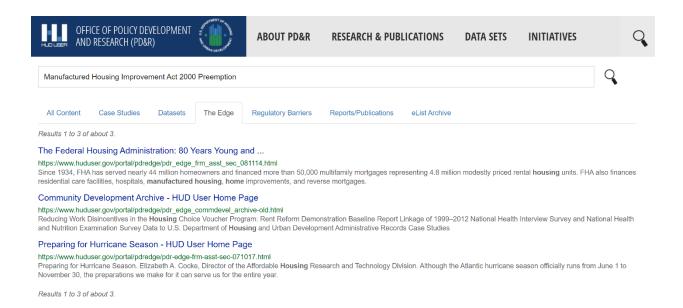
The letter was sent after months of relentless pressure by MHProNews, not to mention years of MHARR items on this key subject.

Page 6 Submission by the Manufactured Housing Institute July 18, 2019 MHPRO/IEVE

In 1997, HUD determined it has authority under the MHCSS Act to issue a "Stamment of Policy 1997-1 State and Local Zoning Determinations Involving HUD Code" (the 1997 Policy Statement) that authority in the Department's policy possition concerning preremption and certain assuing decisions being made by state or local prereminants. Following passage of the Manufactured Housing Improvement Act, which significately attempted the Transaction of 1990 (the Improvement Act), which significately statement (Transactions, HUD's promptive authority, HUD clearly has the authority in make necessary updates in its original policy patternent. Consequently, MHI recommends that HUD opdate its 1997 Policy Statement because it was insued after enactives of the MESSS Act, but before the passage of the Improvementant Act consent after languagement Act expanded HUD's authority, MHI believes it is only appropriate for the Department to update in statement. Further, updating the 1997 Policy Statement only gibranium HUD's pledge to facilitate the availability of affordable manufactural homes and its increase homesone-free for old Americans.

The letter is fine, but begs several questions. Why did it take MHI until 7. 18.2019 before MHI raised "enhanced preemption" with Secretary Carson? Why not raise it earlier and in person?

A search of the HUD PD&R website reveals three 'results' for the search below.



But upon actual examination, the word "preemption" does not appear in ANY of those 3 linked reports. See below for the evidence.

The Federal Housing Administration: 80 Years Young and Going Strong



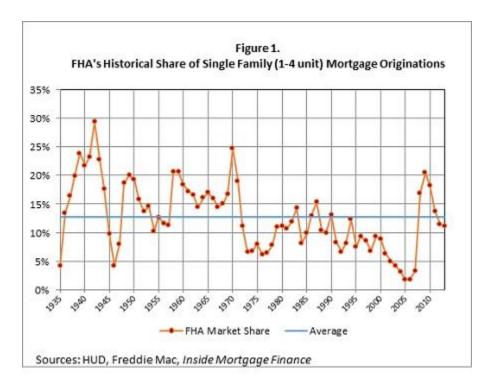
Edward Szymanoski, Associate Deputy Assistant Secretary for Economic Affairs. The Federal Housing Administration (FHA) turns 80 years old in July. This federal agency, which currently resides within the Department of Housing and Urban Development, was founded in 1934 as part of President Roosevelt's New Deal to combat the Great Depression. I should say that FHA is 80 years *young*, as the work and focus of FHA may have changed over eight decades, but FHA's core mission remains as vital to the nation today as it was at its founding. Among its many achievements, FHA modernized the American mortgage system, improved the quality of the nation's housing stock, prevented millions of Americans from losing their homes, allowed millions more to purchase their first home, and financed the construction of millions of modestly priced rental units. Although FHA has encountered some bumps in the road over the years in

its operations, it has always managed to right itself, and has by and large accomplished its mission while remaining self-supporting using revenues generated by its mortgage insurance programs rather than taxpayer <u>funds</u>. I would extend former PD&R Assistant Secretary Michael Stegman's 1996 sentiment that FHA [in 2014] remains "truly one of the Federal Government's greatest success <u>stories</u>."

In 1934, with new mortgage credit frozen, residential construction stalled, and construction employment in a serious nationwide decline, Congress created FHA's mortgage insurance programs to get the building trades and private credit back to work. In response, FHA created national lending standards and revolutionized the mortgage market by extending insurance against default to lenders who originated loans as long as they met two key criteria: they would need to offer fixed-rate, long-term, fully amortizing mortgages, and they would need to ensure that mortgages and borrowers met national underwriting and construction standards. These innovations provided borrowers with a measure of certainty about their long-term financial picture and ensured that properties were habitable and marketable.

To a large extent, today's FHA does not compete with conventional lenders. FHA focuses on homebuyers who, although still creditworthy, have lower wealth and pose moderately higher risks than do those typically served in the conventional market. Most FHA home purchase loans over the past 15 years have been made to first-time homebuyers. FHA has also long been known to serve a disproportionately larger number and share of minority homebuyers, particularly African American and Hispanic buyers.

Since 1934, FHA has served nearly 44 million homeowners and financed more than 50,000 multifamily mortgages representing 4.8 million modestly priced rental housing units. FHA also finances residential care facilities, hospitals, manufactured housing, home improvements, and reverse mortgages. Although the latter programs are a relatively small share of the market, they provide funds for certain segments that might otherwise have difficulty getting loans.



Another important component of FHA's mission has been to stabilize credit markets in times of economic disruption. In addition to its original role of stabilizing housing and construction markets during the Great Depression, FHA has added market stability on many other occasions over its 80-year history. Since World War II, there have been four instances (in 1948, 1958, 1970, and 2008) during which FHA's

national market share increased by more than 5 percentage points in a single year. According to the National Bureau of Economic Research, these four periods have been times of economic recession (including the Great Recession, which began in December 2007), when conventional mortgages were hard to come by (see figure 1). On many occasions, FHA has stabilized local or regional markets experiencing recessions and provided relief to communities hit by natural disasters.

Most recently, FHA demonstrated its vital countercyclical role during the Great Recession. While other sources of mortgage finance retreated from the market, FHA continued to originate loans. Research indicates that in the absence of FHA-insured mortgages, home prices would have declined another 25 percent, contributing to an additional \$4 trillion loss of household wealth and exacerbating the already severe impacts of the economic meltdown.

Although the Great Recession tested FHA's financial health, recent data show significant improvement, and FHA origination volumes, which rose dramatically in response to the crisis, are returning to long-term, precrisis levels.

FHA's mission is the subject of current policy debate as Congress weighs housing finance reforms, including reforms for the conventional market supported by Fannie Mae and Freddie Mac. Arguably, FHA's core mission remains the same, although it will likely need to be refined. Demographic trends indicate growing numbers of first-time minority homebuyers with limited means and a deficit of affordable multifamily properties as emerging challenges to address. Policymakers will need to consider how FHA can best fulfill its mission and continue to protect taxpayers while evolving to meet these demographic needs.

Of course, it is always helpful to remember that mortgage finance policy discussions have always had a political edge. In the archives of the Franklin D. Roosevelt Library is an amusing vignette about a dissatisfied homebuyer who could not obtain an FHA mortgage. A relative brought the matter up in a 1938 letter to the president, writing, "I hate to bother you about so small a thing as a termite — but the FHA Inspector has again demanded we jack up the nine locust posts in the cellar of my son's house at Warrenton, Virginia, and place a copper sheet underneath them." Ultimately, the problems were resolved and the mortgage was made. ##



COMMUNITY DEVELOPMENT ARCHIVE

HUD USER Home > PD&R Edge Home > Community Development Archive

• Grassroots Community Development Creating New Housing, Education, and Wellness Opportunities in Birmingham

September 2016

Reinhard Manor Offers Residents of Woodbridge an Opportunity to Age in Place

September 2016

• Southwest Border Colonias: Housing And Sustainable Development in the 21st Century

July 2016

Research Symposium on Gentrification and Neighborhood Change

July 2016

• <u>Habitat III Miami Convening on Building a Resilient South Florida: "Stop Thinking This Is Someone Else's Problem."</u>

July 2016

• Environmentally Sustainable Neighborhood Revitalization in Pittsburgh, Pennsylvania

June 2016

• Expanding Affordable Senior Housing and Building Community in Seattle, Washington

June 2016

• Aligning Housing and Education: CLPHA's 2nd Annual Affordable Housing & Education Summit

June 2016

• <u>Davis Park Residents Use Transportation Project Mitigation to Strengthen Their Neighborhood</u>

May 2016

Managing Community Change: A Dialogue on Gentrification



Message From PD&R Senior Leadership

HUD USER Home > PD&R Edge Home > Message From PD&R Senior Leadership

Preparing for Hurricane Season



Although the Atlantic hurricane season officially runs from June 1 to November 30, the preparations we make for it can serve us for the entire year. Research on extreme weather events over the years has taught us the best ways to prepare for hurricane season and other high wind events. Residents of Gulf and Atlantic Coast states should evaluate their situation and act to protect their families, their homes, and their finances. Each of these areas logically begins with assessing your current situation and then addressing the issues you identify.

Planning for the hurricane season requires anticipating the risks you face and protecting you and your family from those risks. Although some actions will reduce the risk to your home, you should always focus first on minimizing the risk to yourself and your family.

Hurricanes can damage homes and communities that are some distance from the coast. Even though you live away from the shore, you may still face risks from the high winds, heavy rains, and flooding associated with hurricanes.

Protecting Yourself

Protecting your family and yourself requires planning, including preparing plans to both stay in the home and evacuate. (In some particularly vulnerable locations, such as on barrier islands, evacuation should be the primary strategy.) Your local emergency management agency can direct you to the best local information on the potential risks in your area.

The first step to protect your family from a hurricane is to have a plan that addresses preparation, evacuation, and communications. The www.ready.gov website has great information to help you prepare.

Awareness of weather forecasts is an essential step in preparing for storms. If you wait too long to act, needed supplies may be unavailable or evacuation routes may become clogged with traffic. Understand where to get alerts and emergency notifications for your community and learn what they mean.

Part of the plan is to have an effective evacuation route. This plan starts with having a full tank of gas in your automobile; gas stations along the route will be crowded and will run out of supplies quickly. Map several routes to your destination. Assembling the personal property you plan to take when you evacuate will make the process more orderly and will help avoid leaving something behind.

If you are going to stay in your home, the Federal Emergency Management Agency (FEMA) recommends having on hand a 3-day supply of nonperishable food and water for each person in your home. For water, that amounts to 1 gallon per person, per day. A case of 24 half-liter bottles, readily available at warehouse stores, contains just over 3 gallons of water. Filling your bathtub will provide water for other purposes, such as toilet flushing. Remember to have a manual can opener available, because the storm may cause a power outage. You might want to ensure that you have foods that can be eaten without being heated. A solar- or hand-crank-powered radio will work during power outages, and some may also charge your cell phone.

Communication will likely be difficult following the storm because cellular networks may be overloaded or damaged. Relying on a distant friend or relative to relay messages through email or social media posts may be more effective than direct contact.

Protecting Your Home

As homes age, their vulnerability to storm damage may increase as their components degrade. Roof shingles and siding can deteriorate, door and window seals may become damaged, and areas near the foundation may no longer drain effectively.

Before hurricane season begins, inspect your home. Look at the building's exterior and ensure that drainage away from the house is effective. Old, loose, or deteriorated roofing, siding, and windows are often at particularly high risk of leakage or failure during extreme weather. A reputable contractor may be able to help you with the inspection. Many of the issues you identify must be repaired promptly, so addressing them before hurricane season begins makes sense.

If you live in a mobile or manufactured home, inspect the anchorage system as well as the structure. Look at the tie-downs to ensure that they are still serviceable and taut. You may want to get help from local manufactured home installers.

Home improvement activities can provide opportunities to improve the storm performance of your home. For example, when installing a new roof, you should select shingles that have greater wind resistance. When reroofing, you might also be able to reinforce the roof trusses, add nails or screws to strengthen the sheathing, and seal the sheathing joints with a special water-resistant tape. Although these actions might be prohibitively expensive at other times, they are much more affordable when your roofing project requires replacing the existing shingles. If you need to replace your garage door, selecting one designed for greater wind resistance can protect your home because garage door failures often allow water to enter the home.

In the days immediately before landfall, secure outdoor furniture and protect doors and windows. There are several ways to protect windows, such as using plywood panels or rolling shutters. Although some homeowners apply tape to their windows in an X-pattern, it doesn't work. Tape not only is ineffective at protecting your windows, but it will also be difficult to remove after the storm.

When preparing your home for hurricane season, take note of items that are valuable but will stay in the home. These include essential records and items of sentimental value. Many records can be scanned and stored offsite or taken with you when you evacuate. Consider protecting items that will stay in the home by placing them in plastic tubs with secure covers and elevating them off the floor.

Protecting Your Finances

Protecting your home also includes insuring it against storm damage. You should know what insurance you have and what it covers. Because damage from hurricanes may be caused by high winds or flooding, you should make sure that you have appropriate insurance coverage (including flood, wind, and homeowners insurance) for your home. Homeowners policies don't cover flooding, which is available through FEMA's National Flood Insurance Program. Please note that many flood insurance policies require a waiting period before the insurance is effective. More information on the National Flood Insurance Program is available at www.floodsmart.gov.

After you understand the risks your home faces, sitting down with your insurance agent to understand your coverage is a good strategy. Because standard homeowners policies cover some water damage, you should understand the differences between flood insurance and your homeowners insurance policy so you don't end up with gaps in needed coverage or buy more coverage than necessary. (This advice also applies to policies covering damage from wildfires, earthquakes, high winds, and other hazards.) You should also understand what documents your insurance company may need (such as photos or receipts) after a claim.

Although renters don't need to insure the structure, they should insure their personal property in the unit. Both personal property and flood insurance are available for renters.

Studies have shown that insured properties recover faster, so insurance is an essential part of most financial plans.

Photo caption above: Elizabeth A. Cocke, Director of the Affordable Housing Research and Technology Division.



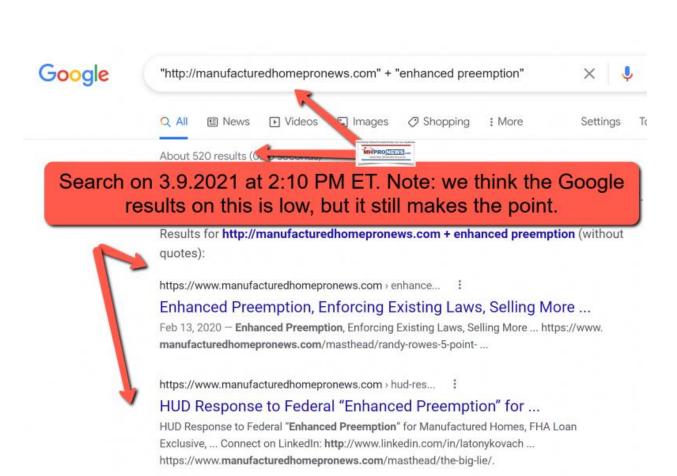
Put differently, the evidence reflects that HUD's **Policy Development and Research (PD&R)** arm has zero mentions of the law that HUD – by federal law or "policy" – is supposed to be implementing. **It** must be hard to implement a provision of a law that is not found on their **PD&R** page, right?

That mirrors what is occurring with the Manufactured Housing Institute (MHI) on their own website. While there are examples of letters – **not found on their own website** – favorably mentions "**preemption**" or "**enhanced preemption**."



Search result on 3.9.2021 at 1:23 PM ET. This begs two questions. Why did MHI send then HUD Secretary Ben Carson a letter that is not found on their own website? Does MHI have a response from former Secretary Carson to their letter?

By comparison, the MHARR website, or the MHProNews and MHLivingNews websites, have repeated examples of the use of the words "preemption" or "enhanced preemption."



https://www.manufacturedhomepronews.com > benefici... :
Beneficial Betrayal? HUD Ripped - "Sheer Sophistry ...

Jul 15, 2020 — HUD Ripped — "Sheer Sophistry" — Federal **Enhanced Preemption** of Manufactured ... https://www.manufacturedhomepronews.com/exclusive-insights-on- ... Connect on LinkedIn: http://www.linkedin.com/in/latonykovach ...

https://www.manufacturedhomepronews.com > enhance...

Enhanced Preemption for Manufactured Housing Raised on ...



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enhanced preemption 9/18/2020

MHI on this date once again has no results on this key legal search term.



Search performed on 3.30.2019 by MHProNews.

Home > Search

Enhanced preemption - search results

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Enhanced preemption

Search

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"Time to Enforce the Law on Federal Preemption"

October 31, 2017



"The Illusion of Motion Versus Real-World Challenges"

January 23, 2019



HUD Code Manufactured Home Production Decline Persists – Time For Action...

February 4, 2019



Comprehensive MHARR Comments on HUD Review Of Manufactured Housing Regulations

February 21, 2018



MHARR Calls on HUD To Remove Zoning, Placement and Consumer Financing...

October 11, 2018



"Another Missed Post-Production Opportunity?"

August 27, 2018



"MHARR Leadership Continues to Produce Results for Industry"

March 28, 2018



MHARR Officials Meet with Hud Secretary Dr. Benjamin Carson —

January 30, 2018



MHARR Washington Update, 10.10.2017

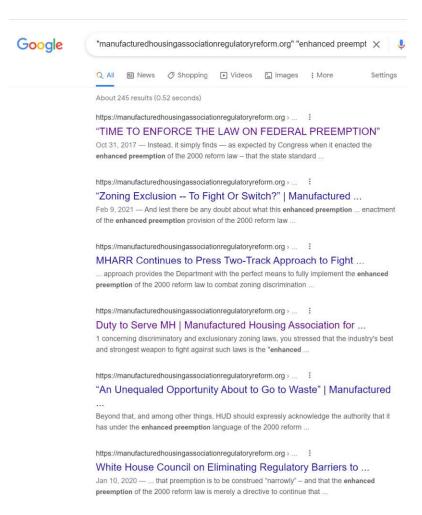
October 11, 2017



Actions and Abuses Of The Current HUD Manufactured Housing Program...

August 3, 2017

On 5.17.2021, the Google search that follows below reflected some 245 results on the Manufactured Housing Association for Regulatory Reform (MHARR website for the search "enhanced preemption."



In reality and logically, there is a keen difference between *posturing* something and actually supporting or *doing* something.



The above is part of a fact check and analysis at this page linked here.

https://www.manufacturedhomepronews.com/hud-builders-nahb-innovative-housing-showcase-operation-breakthrough-systematic-aristotle-thomism-testing-jas-schmitz-claims-of-sabotaging-monopolies-todd-m-richardson-hud-pdr/