



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

September 15, 2025

VIA FEDERAL EXPRESS

Hon. Donald J. Trump
President of the United States
The White House
1600 Pennsylvania Avenue, N.W.
Washington, D.C. 20500

Re: The Affordable Housing Crisis and Federally-Regulated Manufactured Homes

Dear President Trump:

As both you and U.S. Department of Housing and Urban Development (HUD) Secretary, Scott Turner, have recognized, the United States, in 2025, faces an unprecedented shortage of truly affordable housing, leading many Americans – and especially younger people and retirees – to lose hope and faith in the “American Dream” of homeownership.

This is an emerging policy catastrophe that we at the Manufactured Housing Association for Regulatory Reform (MHARR) have been grappling with for decades. MHARR is a Washington, D.C.-based national trade organization representing the views and interests of independent producers of inherently affordable manufactured housing comprehensively regulated by the federal government itself, pursuant to the National Manufactured Housing Construction and Safety Standards Act of 1974, as amended by the Manufactured Housing Improvement Act of 2000 (42 U.S.C. 5401, et seq.). MHARR’s members are smaller and mid-sized businesses representing the traditional entrepreneurial core of the industry (in contrast, for example, to the industry’s largest corporate conglomerate, Clayton Homes, Inc., a subsidiary of Warren Buffet’s Berkshire Hathaway, Inc.).

If the United States is to have an affordable homeownership revival, affordable, mainstream manufactured homes must be part of the solution – and a bigger part than it is now. Mainstream, factory-built manufactured homes cost a fraction of the price of a typical site-built single-family home and are quality-built in accordance with a robust (yet price sensitive) federal building code, administered by HUD. Manufactured homes, therefore, are affordable for all Americans. Yet, despite this -- and despite the uncontroverted and unprecedented need for affordable housing choices -- the production of mainstream HUD Code manufactured homes has lagged far below historical norms for more than two decades.

www.manufacturedhousingassociation.org

Preserving the American Dream of Home Ownership Through Regulatory Reform

The reason is rooted in two policy-based bottlenecks that have artificially suppressed the manufactured housing market, i.e.:

- (1) The discriminatory zoning exclusion of federally-regulated manufactured homes in large areas of the country; and
- (2) The lack of federal support for the vast bulk of manufactured home consumer financing loans (i.e., personal property loans representing nearly 80% of the industry's production) through Fannie Mae and Freddie Mac.

The result is that manufactured home purchasers face crippling discrimination in two key metrics – their ability to finance the purchase of a home and their ability to site and place that home on private land and/or in new manufactured home developments and communities. Together, these baseless restrictions are excluding Americans from the most affordable type of homeownership available today.

Fortunately, federal law already provides remedies for both of these illegitimate limitations. The federal administrative state, for decades, has refused to implement these statutory remedies. You, however, as President, can bring an end to this groundless refusal to implement federal law and take two specific steps to halt this illegitimate and baseless discrimination.

First, federal law, as amended in 2000, provides that HUD can federally preempt the zoning exclusion of federally-regulated manufactured homes. Second, federal law already directs Fannie Mae and Freddie Mac to serve the HUD Code manufactured housing market with securitization and secondary market support for all types of manufactured housing loans (i.e., mortgage loans and personal property loans). You, as President, should instruct both HUD and the Federal Housing Finance Agency (FHFA) – as the federal regulator of Fannie Mae and Freddie Mac – to fully implement both of these existing laws.

Beyond that, however, and to ensure that these mandates are robustly enforced, we also ask that you support and encourage action by both houses of Congress to adopt the enclosed amendments (please see copies attached), which would make certain, beyond any possible future argument, that these mandates are fully implemented.

In short, Mr. President, solutions are in plain sight and are within the control of both the Administration and Congress. All that has been missing, until now, is the will to fully implement the law. You, Secretary Turner and FHFA Director Pulte, in conjunction with Congress, can do this. We ask for your leadership to help resolve this fundamental problem.

Thank you and we look forward to working with you, your appointees and both houses of Congress to make affordable homeownership available for all Americans.

Sincerely,

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

Mark Weiss
President and CEO

cc: Hon. Scott Turner
Hon. Scott Bessent
Hon. Bill Pulte
Hon. Tim Scott
Hon. Elizabeth Warren
Hon. French Hill
Hon. Maxine Waters
Hon. Mike Flood
Hon. Emanuel Cleaver
Hon. Susie Wiles
Federally-Regulated Manufactured Housing Industry Members



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MHARR-SUGGESTED AMENDMENT FOR CONSIDERATION BY PRESIDENT TRUMP AND CONGRESS IN CONNECTION WITH ANY HOUSING OR HOME FINANCE LEGISLATION ADVANCED IN THE 119TH CONGRESS –

STRENGTHENING ENHANCED FEDERAL PREEMPTION WITH REGARD TO EXCLUSIONARY STATE AND/OR LOCAL ZONING REQUIREMENTS

Discriminatory state and local zoning and placement restrictions and/or exclusions, prohibit modern, inherently affordable mainstream manufactured homes from many areas of the United States, including areas of concentrated poverty or housing poverty, where affordable homeownership is particularly needed. This includes, but is not limited to, many urban and suburban areas, where HUD-regulated manufactured housing could be a private-sector source of affordable homeownership, or a component of public-sector affordable housing initiatives, but has been – and continues to be -- excluded either as a result of de jure zoning/placement exclusions or de facto reluctance and hesitancy related to zoning and placement restrictions. Thus, while manufactured housing is nominally included in any number of existing federal affordable housing programs, its actual deployment and utilization in many areas is effectively prohibited by such zoning and placement exclusions. Those exclusions, in turn, could be overridden by HUD pursuant to the enhanced federal preemption authority provided by the Manufactured Housing Improvement Act of 2000 (2000 Reform Law), but HUD has refused to use that power in support of American consumers of affordable housing.

Accordingly, MHARR seeks the following amendment to reiterate HUD's authority to override such exclusionary state or local mandates. In order to address and ensure the remediation of state and/or local zoning restriction or exclusion of manufactured homes, the following language should be added at the conclusion of current section 42 U.S.C. 5403(d):

PREEMPTION – “The Secretary shall fully implement federal preemption under this section to prevent, prohibit and remedy the zoning exclusion or discriminatory restrictions on the placement of manufactured homes in any state or local jurisdiction thereof.”

**MHARR-SUGGESTED AMENDMENT FOR CONSIDERATION BY PRESIDENT
TRUMP AND CONGRESS IN CONNECTION WITH ANY HOUSING OR HOME
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**CONFIRMING THE MANDATORY APPLICABILITY OF THE “DUTY TO SERVE”
DIRECTIVE TO MANUFACTURED HOME PERSONAL PROPERTY LOANS**

The utilization of mainstream HUD Code manufactured housing has been undermined by the unavailability of market-competitive consumer financing for such homes as a result of the persistent refusal of Fannie Mae and Freddie Mac to provide support for manufactured housing personal property loans (comprising nearly 80% of the entire HUD Code market) pursuant to the statutory Duty to Serve Underserved Markets (DTS) directive. The failure to fully implement DTS within the manufactured housing market for nearly two decades after its enactment, effectively forces manufactured homebuyers to pay unnecessarily high interest rates on manufactured home purchase loans, to a small group of portfolio lenders which effectively dominate the HUD Code consumer financing market. This, in turn, excludes qualified but marginal borrowers who would qualify for financing in a market with legitimately competitive – and, therefore, lower -- borrowing rates, as was intended by Congress in 2008.

This fundamental deficiency within the manufactured housing market, which needlessly impairs the industry’s ability to compete with other types of homes on a level playing field – despite the inherent affordability of mainstream manufactured homes – has suppressed both the growth of the industry and its ability to serve a larger segment of Americans in need of affordable homeownership. In order to make it clear that the Duty to Serve mandate fully extends to and encompasses the personal property loans which comprise nearly 80% of the HUD Code manufactured housing market, current law (12 U.S.C. 4565 (a)(1)(A)) should be amended as follows:

“The enterprise shall develop loan products and flexible underwriting guidelines to facilitate a secondary market for mortgages and loans on manufactured homes for very low-, low-, and moderate-income families. These shall include loans secured by manufactured homes titled as real property and by manufactured homes titled as personal property.”

In addition, amend 12 U.S.C. 4565(d)(3) as follows:

“(3) Manufactured housing market -- In determining whether an enterprise has complied with the duty under subparagraph (A) of subsection (a)(1), the Director shall consider loans secured by both real and personal property.”

(Underlining denotes new language).