

DOE-Energy Conservation Standards for Manufactured Housing Docket number EERE-2009-BT-BC-0021

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Part I.

My name is L. A. “Tony” Kovach. I’ve been working in the HUD Code manufactured home industry in a variety of roles [most of my adult life starting in the early 1980s](#). Specifically, I’ve been selling, managing, consulting, living in manufactured homes, working in land-lease manufactured home communities (MHCs), and publishing articles about manufactured housing nearly as long as the HUD Code for manufactured housing went into effect on [June 15, 1976](#). Per multiple third-party remarks (see [link here](#)), I have been called an expert on manufactured housing. According to multiple third-party artificial intelligence platforms used as [facts-evidence-analysis](#) (FEA) checks of my published works, I may be the most published person online in manufactured housing industry related topics in the 21st century. A disclosures document we use on MHPProNews (ManufacturedHomeProNews.com or [MHPProNews.com](#)) is [linked here](#).

1) While I refer to remarks and behavior by the Manufactured Housing Institute (MHI) and the Manufactured Housing Association for Regulatory Reform (MHARR), these are my remarks and are not made on behalf of any other person, party or entity.

2) These [expert](#) comments reflect my personal views, but in Part II they are subjected to third-party artificial intelligence (AI) analysis. As a notice, I plan to publish these remarks on [MHPProNews](#) using our [facts-evidence-analysis](#) (FEA) model of journalism. As noted, the FEA model utilizes third-party AI systems to correct, confirm, or clarify statements as warranted by evidence found online.



3) Briefly, I believe the DOE should reject the premise or use in any manner the DOE energy standards for manufactured housing in any form or fashion. Reasons for that will follow.

4) MHARR's remarks, found further below in Part III cite legal reasons for rejecting the DOE energy standards, per their president and CEO, Mark Weiss, who is an attorney and is a subject matter expert too.

5) But let me go beyond MHARR's remarks, because I am a former [MHI Suppliers Division board member](#) and was a member of the Manufactured Housing Institute (MHI) for some 7 years before we parted company. A close look at the kind remarks previously linked are linked again here: <https://www.manufacturedhomepronews.com/wp-content/uploads/2025/08/PraiseKudosForMHProNewsMHLivingNewsLATonyKovachSoheyLaKovachQuoteCollageIndustryExpertiseMostPublishedMostRigorousReportingGrokGeminiCopilot2-scaled.png> includes praise by multiple MHI linked corporate and other leaders.

I've seen the MHI organization from the inside and they have seen me.



"To rephrase, Tony's publications and MHI are both correct on this issue. There is no daylight, just a difference in delivery.

I'm happy to commend Tony and his team members for the important work they do to advocate for our MH industry.

Perhaps one of the more useful points that can be made about their value is that others in the mainstream media and in government have cited Tony, MHPRONews.com and MHLivingNews.com, and/or have shared his pro-industry take on a wide range of MH related subjects. They've done positive and profitable work promoting the MH industry, events, products and services.

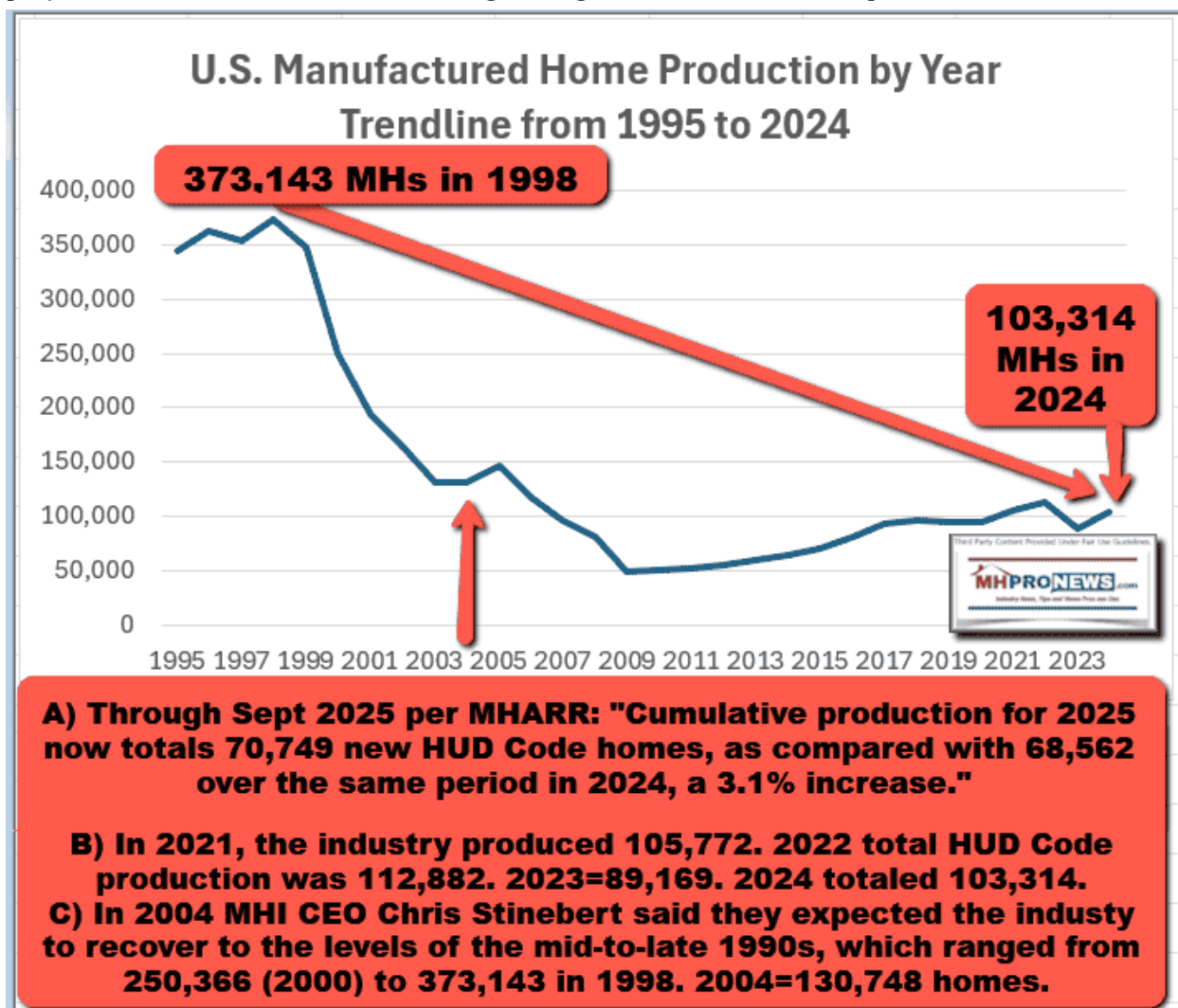
We hope his team continues their years of efforts to provide a balanced and useful source of info on MH. Their growth and success are good news for our MH Industry."

- Tim Williams, President and CEO of 21st Mortgage Corp, and then MHI Chairman, in an "Industry Voices" guest letter for publication to *MHPRONews*.



6) In my [expert](#) view, backed by over a decade of publicly unchallenged reporting and/or op-eds using third-party platforms including this: <https://www.housingwire.com/articles/a-thunderclap-unpacking-umh-ceo-sam-landys-statements-defines-the-failure-metric-in-road-to-housing-act-via-op-ed/> and scores of articles on the Patch.com: <https://patch.com/users/tony-kovach/articles> - specifically: <https://patch.com/florida/lakeland/cato-institute-paving-over-debate-road-housing-act-s-empty-promises-fix-or-flush-it-nodx> the Manufactured Housing Institute (MHI or manufacturedhousing.org) is apparently involved in scheme posturing efforts on behalf of the industry but when closely examined reveals they routinely do things that seem to benefit [self-declared consolidators](#) of manufactured housing who are apparently fine with the status quo, which includes regulatory barriers that arguably limit manufactured home production.

[caption id="attachment_224903" align="aligncenter" width="625"]



<https://www.manufacturedhomepronews.com/manufactured-housing-production-and-shipment-data-for-all-50-states-plus-washington-d-c-facts-key-performance-indicators-kpis-more-facts-road-act-backers-must-consider-others-missed-fea/>

[caption id="attachment_189334" align="aligncenter" width="619"]



"We like the oligopoly nature of our business."

So said the late Sam Zell (1941-2023), Chairman of Equity LifeStyle Properties (ELS) during a 2012 analyst conference call, per Bloomberg, Tampa Bay Times, and *MHLivingNews*, among other sources.

Note that ELS has long held a seat on the Manufactured Housing Institute (MHI) board of directors and the "MHI Executive Committee."

<https://www.manufacturedhomelivingnews.com/reflections-on-death-of-sam-zell-and-late-equity-lifestyle-properties-els-chairman-zells-impact-on-manufactured-home-living-and-the-affordable-manufactured-home-profession/>[/caption]

7) See what MS Bing's Copilot, Google's Gemini, xAI's Grok, and ChatGPT's AI systems have previously said in response to evidence in a summary document linked here:

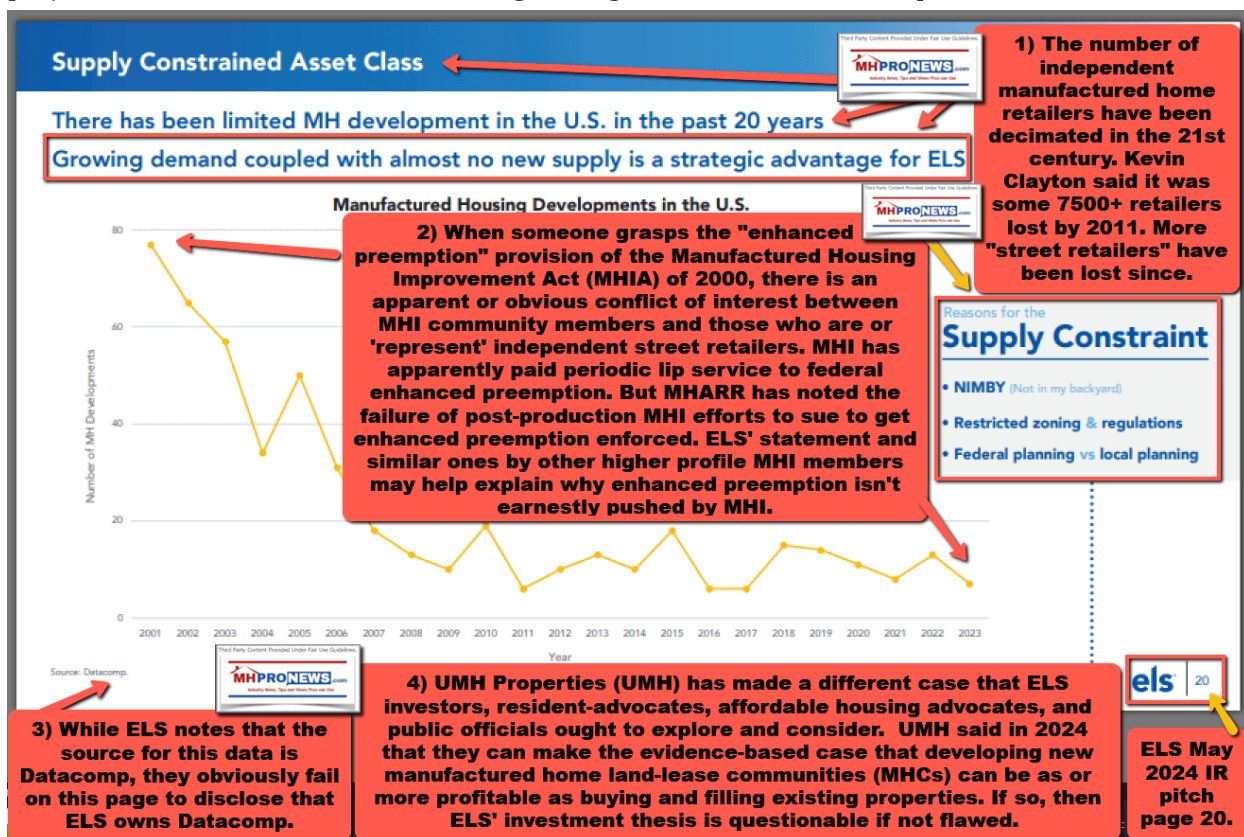
<https://www.manufacturedhomelivingnews.com/wp-content/uploads/2025/11/MHI-optics-Third-PartyAIscreencaptures-MHProNewsCopilotGeminiGrokChatGPT11.5.2025-min.png>

8) I've personally emailed MHI leaders (see examples linked as follows) seeking their response to concerns raised by MHProNews research and reporting in this statement:

<https://www.manufacturedhomepronews.com/wp-content/uploads/2025/10/PatrickWaiteMHILeaderEmail10.14.2025MHProNews.png> and <https://www.manufacturedhomepronews.com/wp-content/uploads/2025/09/xAIGrokEmailWmBillBoorPatrickWaiteMarkBowersoxTomHodgeManufacturedHousingInstituteBoardDirectorsMHVillageMHInsiderKurtKelleyManufacturedHomes.comMHProNews.png> and <https://www.manufacturedhomepronews.com/wp-content/uploads/2025/04/MHProNewsEmailedInquiryCavcoCEO-WilliamBillBoor-MHI-ChairmanMHI-CEO-LesliGooch-MHARR-PresCEO-MarkWeiss-DannyGhorbani-MHI-LinkedBloggerGeorgeF.Allen-MHLivingNewsFactCheckAnalysis.png> asking them, their public relations people, or their attorneys to respond to our reports.

9) [MHI's board](#) and senior staff leaders have routinely failed to respond, which Gemini and other AIs have said appear to be a strategy of 'strategic avoidance' because direct and open debate would only further expose the weakness and arguable corrupt relationship between MHI-consolidators of manufactured housing and problematic 'advocacy' on the part of MHI that benefits the status quo in favor of what benefits [consolidation](#). This isn't speculation - it is straight from earnings calls or investor relations documents. MHI's current chair is Equity LifeStyle Properties (ELS) COO Patrick Waite. This example is from an ELS IR pitch, with other [consolidators](#) often saying similar things.

[caption id="attachment_213154" align="aligncenter" width="622"]



"Improve the overall operating environment for the manufactured housing industry and expand the demand for manufactured homes by seeking fair and equitable treatment in the marketplace and the regulatory and legislative arenas." This may be one of the more important documents to federal investigators or others who are probing manufactured housing's historic underperformance in the 21st century. For context and details see: <https://www.manufacturedhomepronews.com/over-1-million-manufactured-housing-institute-doc-drop-top-mhi-staff-pay-revealed-additionally-unpacking-evidence-of-perjury-fraud-other-possible-federal-crimes-plus-mhville-stocks-update/> Note too that

should this be determined to be part of purported collusion or conspiracy to manipulate the market, and per federal law, the statutes of limitations do not begin to run in such matters until the final act is performed. For a recent third-party university level study that asserts that manufactured home has been subjected to a specific form of market manipulation (['VF Market Foreclosure'](#)), see the report linked here. Note: to see the above image in a larger size, in several devices or browsers, click the image and follow the prompts. To see an article detailing the ELS stance, click here:

<https://www.manufacturedhomeprnews.com/equity-lifestyle-properties-second-quarter-results-claims-of-strong-performance-examined-via-lens-of-potentially-mounting-legal-reg-concerns-as-els-double-down-on-ir-statement/> To see another article that reflects other MHI member stances on constraining supply, click here.

<https://www.manufacturedhomeprnews.com/pulling-back-the-veil-on-mhi-mhv-connected-nathan-smith-kurt-keeney-and-flagship-communities-reit-fact-check-and-analysis-of-flagships-ir-pitch-tsx-mhc-u-plus-mhville-markets-u/>

[/caption]

10) A few months ago, MHPProNews published an “acid test” of the behavioral pattern of MHI’s insiders. Before the Innovative Housing Showcase (IHS) 2025, MHPProNews posted this: <https://www.manufacturedhomeprnews.com/acid-test-pending-innovative-housing-showcase-2025-as-manufactured-housing-institute-mhi-behavioral-case-study-will-mhi-use-ihs-2025-to-try-prove-their-industry-critics-wrong-mhville-fe> and contacted MHI insiders and attorneys directly by email. Outreaches to [MHI have occurred via fax](#). The challenge was simple. Do what common sense would require MHI do at IHS if their [advocacy for growth](#) is sincere.

That test was subjected to third-party artificial intelligence (AI) review before and after the acid test, as were MHI’s and the event's reported outcomes. The results? MHPProNews’ acid test proved accurate.

[caption id="attachment_220613" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/ready-for-more-affordable-housing-in-usa-innovative-housing-showcase-2025-reveal-proven-options-but-post-event-facts-evidence-analysis-exposes-political-and-corporate-intrigue-as-bottlenecks/>[/caption]

11) Meaning, MHI hyped IHS 2025 but failed to properly promote it before, during, or after the event. MHI failed to get regulators on the record on key topics when they had public officials on camera.

[caption id="attachment_221907" align="aligncenter" width="618"]

Manufactured Housing Institute (MHI) Fails 'Acid Test' Promoting Own Video



MHPProNews asks: Why spend time, money, and effort on a high profile video from the National Mall, then fail to promote?

MHPProNews finds: MHI falls short on YouTube, press engagement, and public critique

Triangulating MHI's Optics

Video Visibility

Did not post video featuring HUD Secretary and 9 Members of Congress to YouTube or social media as of 10.5. 2025

YouTube Metrics

Channel shows double-digit views on videos featuring Cabinet officials negligible public impact despite high-profile content

Third-Party Feedback

Avoided comment, like/dislike, and exposure of MHI's paltering by not posting to the world's #2 search engine

Press Engagement Strategy

No trace of *stand alone* press release found promoting the video limits mass-market awareness and media **coverage**

Is MHI Preaching vs Practicing Enhanced Preemption

Regulatory Capture Concerns

 Teresa Payne joined MHI after 20+ yrs at HUD with reportedly lackluster enforcement, MHARR requested FOIA on her

Hypocrisy in Hiring Logic

MHI routed Payne's "policy expertise" and HUD tenure. Critics warn she represents "continuity of non enforcement"

Fed Officials Used for Internal

 **PR?** Federal officials in video risk reputational damage legitimizing MHI organization

Outcome: Paltering and Posturing

A high-interest but low-impact pitch on MHI's "innovative housing" with

Copilot offered to make an infographic during a Q&A and MHPProNews accepted. This is the infographic Copilot produced. MHPProNews manually edited a few typos/glitches. The context is found here. <https://www.manufacturedhomepronews.com/hud-sec-scott-turner-congressional-reps-federal-officials-manufactured-housing-institute-mhi-innovative-housing-showcase-2025-video-apparently-documents-mhi-affordable-housing-miscues-fea>[/caption]

12) Before [MHPProNews](#) began to adopt third-party AI systems for [facts-evidence-analysis](#) (FEA) checks, this writer for MHPProNews addressed the March 2021 Listening Session which was also addressed by MHI and MHARR. My 'A Pimple on an elephant's ass' [FHFA submissions document is linked here](#) and below.

<https://www.manufacturedhomepronews.com/wp-content/uploads/2022/02/EnterpriseHousingGoalsListeningSession3.25.2021ByLATonyKovachAPimpleOnAnElephantsAss-MHPProNews.pdf>

That linked item and all other linked items from this document should be considered as part of this writer's regulatory comments.

13) Every word in [those Biden-Harris \(D\) era listening comments submission are sadly as valid now in 2021](#). In fairness, that might be because the Trump Administration (R) has not yet cleared out Biden-Harris (D) era holdovers. **But it may be because Trump 2.0 is similarly suffering from regulatory capture.** Time will tell. Either way, [MHPProNews](#) is monitoring and will report accordingly.

14) Back to MHI posturing regulatory mitigation while slyly failing to take the commonsense steps needed to actually mitigate regulatory overreach.

MHI CEO Lesli Gooch addressed that same [Listening Session](#). Per [MHI attorney David Goch](#), it is difficult to imagine Gooch was unaware that this writer was on the agenda and my [published comments post-session](#).

Furthermore, MHI leaders and/or their attorneys and spokespeople have repeatedly been asked to address those remarks. They have declined to do so. They are a [multi-million dollar a year budget organization](#) backed by multiple multi-billion-dollar corporate brands that in turn have several [trillion-dollar asset managers/conglomerates](#) invested in their 'leading' member firms. Are we to believe MHI and its backers can't mount an effective response? Clearly, they could respond if they wished to do so. But instead, they are apparently practicing 'strategic avoidance.'

Another example occurring in real time is warranted.

15) The [ROAD to Housing Act 2025](#) passed the Senate as part of the National Defense Authorization Act (NDAA). The Cato Institute, largely correctly in this writer's view, recently remarked that the ROAD to Housing Act is an effort to 'pave over debate' by forcing the House to consider the bill without the normal debate process.

[caption id="attachment_224766" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/cato-on-paving-over-debate-of-road-act-eviction-story-mhi-member-community-by-resident-whistleblower-trump-pushes-affordability-sen-warren-pitches-road-sam-landy-umh-legacy-housing-fea/>[/caption]

16) MHI has been asked to directly support the [MHARR amendments](#) to the [ROAD to Housing Act](#). A new MHI board member, following his election, had an op-ed published on [HousingWire](#). Sam Landy, J.D., president and CEO of UMH Properties (UMH) has been a loyal MHI member. His op-ed doesn't mention either MHI or MHARR. But by accident or design, [Landy's HousingWire op-ed](#) de facto takes a stance that seems to support MHARR's proposed amendments.

[caption id="attachment_224412" align="aligncenter" width="563"]



'A thunderclap unpacking UMH CEO Sam Landy's statements defines the failure metric' in ROAD to Housing Act

HW HousingWire

UMH CEO Sam Landy should be thanked for sharing via HousingWire his recent op-ed which weaves together what is arguably a subtle call for the Manufactured Housing

<https://www.housingwire.com/articles/a-thunderclap-unpacking-umh-ceo-sam-landys-statements-defines-the-failure-metric-in-road-to-housing-act-via-op-ed/>

[caption id="attachment_224410" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/a-thunderclap-unpacking-umh-ceo-sam-landy-statement-defines-manufactured-home-failure-metric-in-road-to-housing-act-via-housingwire-will-manufactured-housing-institute-publicly-respond-fea/>[/caption]

17) MHI postures opposition to the DOE energy mandates, as has MHARR. But that paltering-posturing-head fake-spin requires that someone forget or overlook the fact that MHI entered into negotiated rule making with DOE first.

<https://manufacturedhousingassociationregulatoryreform.org/mhpronews-qa-with-danny-ghorbani/duty-to-serve-mh/#fifth>

That's not mere speculation or a tin foil hat conspiracy theory. There are documents that prove MHI's efforts to support the energy rule.

[caption id="attachment_174507" align="aligncenter" width="621"]



Manufactured Housing Institute

Transmitted via email and U.S. Mail

March 14, 2014

Ms. Kathleen B. Hogan
Deputy Assistant Secretary for Energy Efficiency
U.S. Department of Energy
Room 6A-067, Mail Stop EE-1
100 Independence Avenue, S.W.
Washington, D.C. 20585

Dear Ms. Hogan:

On behalf of the Manufactured Housing Institute (MHI), the national trade association representing all sectors of the manufactured housing industry, including manufacturers representing almost eighty percent of the production, retailers, suppliers, lenders and community owners, I am writing to respectfully request that Department of Energy (DOE) consider negotiated rulemaking for the establishment of energy efficiency standards for manufactured housing. As you know, a draft Notice of

Thank you in advance for your consideration of this request, and we look forward to hearing from you at your earliest convenience.

Sincerely,

Lois Starkey, Vice President
Regulatory Affairs

The entire document will be published in a follow up report planned in the near term. It will be produced along with another document that MHI and their VP Lois Starkey endorsed. There is no known evidence that MHI provided these documents to their own members, much less the public at large.

Note: documents like this would have typically been authorized by MHI leadership. Odds are near zero that Starkey would not have acted unilaterally.

CC: Roland J. Risser, Office of Building Technologies Program

Illustrations shown in this report can be opened in many browsers to reveal a larger size. To open this picture, click the image once. When the window opens, click it again to reveal the larger size photo. Use your browsers back key to return to the article.

[caption][caption id="attachment_216831" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/politico-pros-energywire-on-doe-mobile-home-energy-rule-their-claims-plus-mhi-mharr-doe-fedregister-gemini-on-manufactured-housing-energy-rule-provided-unpacked-comprehensive-mhville-fea/> [caption]

18) MHI failed to accept MHARR's offer to litigate the DOE energy rule and only sued DOE months after the gas industry did on a parallel front.

[caption id="attachment_195893" align="aligncenter" width="600"]

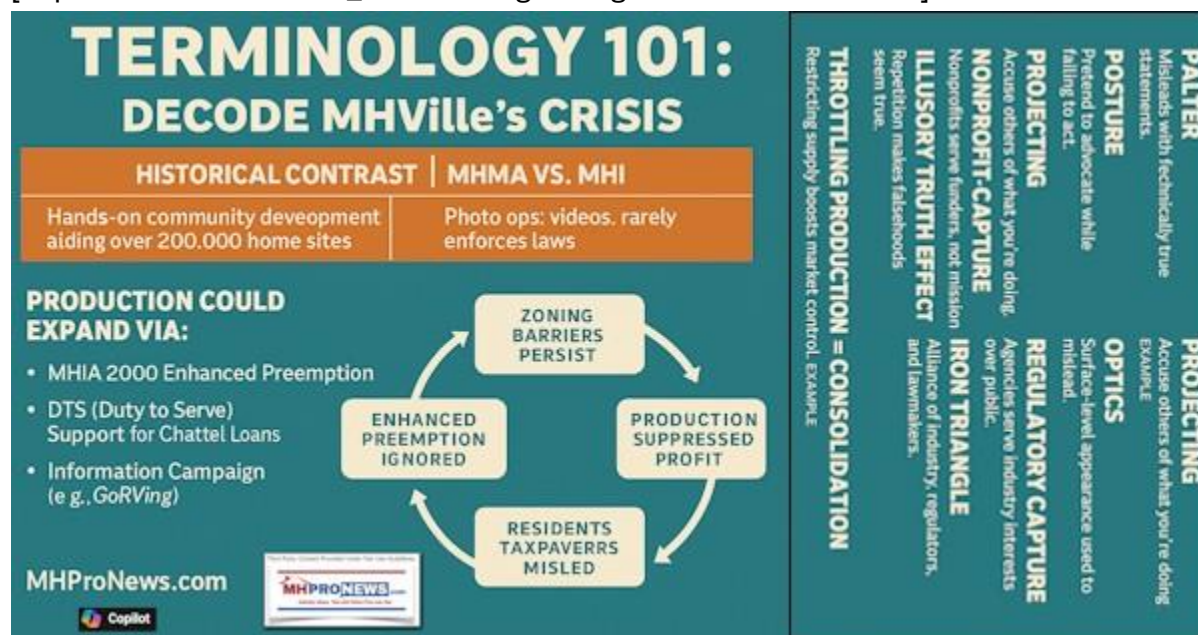


<https://www.manufacturedhomepronews.com/eye-opening-gas-industry-vs-doe-compared-to-manufactured-housing-institute-vs-doe-compared-fed-register-facts-reveals-manufactured-housing-industry-woes-and-mhi-behavior-plus-mhville-markets/> [/caption]

19) Put differently, the MHI patterns of behavior must be understood and exposed in order to reveal how either feckless and inept they are in advocating for ‘their’ industry, OR how duplicitous in posturing efforts while allowing regulatory challenges to be de facto causes for more industry consolidation.

<https://www.manufacturedhomepronews.com/narrative-or-news-mhi-on-doe-energy-rule-complete-mharr-comments-on-repeal-and-withdrawal-of-destructive-and-costly-doe-manufactured-housing-energy-standards-mh/>

[caption id="attachment_222368" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/masthead/terminology-101-understand-key-words-palter-posture-projecting-optics-regulatory-capture-iron-triangle-nonprofit-capture-illusory-truth-how-throttling-productionconsolidation-moat/> [/caption]

20) While [MHProNews](#) generally supports MHARR and vice versa, we are each independent of the other. In the article above, the point is made by MHProNews that MHI could have added the proposed change to the 2007 EISA to the ROAD to Housing Act. There are issues

such as image and education that MHARR often does not weigh in on that MHPProNews reports on; MHARR typically remains focused on regulatory matters.

MHI's so-called advocacy is about theatrics or what Copilot and other AI systems called MHI's behavior for the sake of "optics." See what 4 different AI systems said in the consolidated image shown below.

That next,

21) What do these background facts and patterns have to do with the current DOE request for information (RIF)? Much. Per a source at MHARR deemed reliable, as of the morning of 12.1.2025, there had been no regulatory submissions by MHI, nor by [MHI affiliated state associations](#).

xAI's [Grok confirmed that finding](#).

Why would MHI and/or its state association affiliates hold off on filing comments until the last possible minute?

Could it be that they do not want to be publicly fact-checked by *MHProNews* and the various third-party AI systems that we deploy to reveal their years of patterns of behavior? Again, see the more detailed report linked below.

<https://www.manufacturedhomepronews.com/narrative-or-news-mhi-on-doe-energy-rule-complete-mharr-comments-on-repeal-and-withdrawal-of-destructive-and-costly-doe-manufactured-housing-energy-standards-mh/>

22) We have been publishing [MHProNews for over 16 years](#). MHI and several of their leading brands used to be advertisers and sponsors, and they used to respond readily to our requests for information. [MHI leaders publicly and repeatedly praised MHProNews](#). We have always published what we thought at the time was correct and supported by known evidence.

Needless to say, no one can publish what they don't know.

That said, when a tipster in the MHI orbit told us nearly a decade ago that MHI had apparently intentionally left out key information about a Senate hearing involving the CFPB and topics on the then pending [Preserving Access to Manufactured Housing Act](#), the entire underlying CSPAN video of that hearing was viewed by *MHProNews*. The tipster proved to be correct. MHI accurately described the parts of the meeting that benefited their narrative. But [MHI left out the parts of that hearing that undermined their narrative](#).



23) When that tip about MHI's email to the industry was learned, the proverbial light bulb began to go off. There was long a concern why MHI had not taken more aggressive steps to mitigate regulatory challenges. Steps that should have included litigation. It had long been concerned that MHI was not properly promoting the industry, even though from time-to-time MHI and/or key industry players like Kevin Clayton claimed to be 'ready' to do so.

[caption id="attachment_183944" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/manufactured-housing-institute-mhis-roper-report-aarp-marty-lavin-strike-again-plus-manufactured-housing-stock-updates/>

[/caption][caption id="attachment_178072" align="aligncenter" width="608"]

Robert Miles:

"I was gonna ask you what you've done with the image. There's many jokes about trailers and hillbillies. Is there anything that Clayton homes is doing in terms of the image?"

Kevin Clayton:

"As an industry, we're ready to launch a national campaign to dispel those myths. As I mentioned, hurricanes, that's not an issue anymore. Now every home has to be inspected by a licensed installer, an inspection process. The tie down systems and all that are very adequate as evidenced by the hurricane issues. JD Power, CSI, all those things now give us a great message to go public with. There's plans for that underway now."



Kevin Clayton quote (2011): "As an industry, we're ready to launch a national campaign to dispel those myths." <https://www.manufacturedhomelivingnews.com/warren-buffetts-moat-per-kevin-clayton-ceo-clayton-homes-interview-transcript-video-affordable-housing-and-manufactured-homes/>[/caption]

24) Rather than confront the corporate powers behind the senior staff at MHI directly, MHProNews first made the obvious, direct, and simple public call for MHI's senior staffers to resign or be terminated. The facts were described. When the MHI board meet, a vote was held and then President-CEO Richard "Dick" Jennison and then EVP Lesli Gooch were publicly supported by the board.

That board vote in support of Jennison and Gooch effectively put it on the record that MHI was posturing and paltering and was weaving a propaganda style narrative by using an echo chamber effect. Such behavior are academically studied phenomena, not tin foil hat conspiracy theories. See examples linked here from [Harvard](#), [Stanford](#), from the [American Psychological Association](#) or here from [academic Tom Stafford writing via the BBC](#). As or more important, years of carefully documented facts-evidence-analysis (FEA) of [MHI and their leading brands have produced a body of evidence that apparently MHI's](#)

[insiders can't or won't attempt to debunk](#). Third-party AI has been asked to fact check such claims. Third-party AI will be asked to fact check these HI claims too, see that further below.

25) It will not be a surprise if MHI in some degree seems to argue similarly to MHARR without referring to MHARR. But an acid tests remain. CEO [Lesli Gooch has a Ph.D. in political science](#). She wrote her doctoral thesis on finding champions for legislation. Why didn't MHI on its own - without any suggestions from MHARR, MHPProNews/MHLivingNews or others - provide amendments to the ROAD to Housing Act that did what MHARR suggested PLUS did what MHPProNews observed at the [link here](#) and as shown above about adding amendments to the ROAD to Housing Act that eliminated this threat that MHI's own attorneys said would cause "[irreparable harm](#)" to the industry? Pardon me, but no one with that level of education could miss the obvious so badly. Additionally, MHI now has a former federal official on staff. How could [ex-HUD attorney Teresa Payne - now an MHI VP](#) - miss such an obvious move as amending the ROAD to Housing Act as MHARR has requested?

[caption id="" align="aligncenter" width="600"]



<https://manufacturedhousingassociationregulatoryreform.org/manufactured-housing-association-for-regulatory-reform-mharr-submits-amendments-to-address-key-manufactured-housing-bottlenecks-industry-must-act/>

[caption id="attachment_221355" align="aligncenter" width="566"]



<https://manufacturedhousingassociationregulatoryreform.org/mharr-communication-to-president-trump-seeks-elimination-of-industry-bottlenecks-as-part-of-cure-for-affordable-housing-crisis/>[/caption]

26) The Occam's Razor answer to that question is arguably clear. Regulations are a tool for MHI – which has consolidators as their key members - to batter smaller brands until they sell out or close down under regulatory pressures. Who do those smaller brands sell out to when they do sell? Routinely, to one of MHI's [consolidators](#). This too is a matter of years of academic and other researchers well documented observations.

At this point in my initial draft of this submission, I was under 2000 words. In perhaps 10 to 15 minutes of reading, someone with a reasonable attention to detail could get an initial feel for the evidence-based musings of this writer. But when those musing-linked items are considered, and the related facts are studied, and then they are subjected to the critique by third-party AI, something almost inescapable emerges.

That could be viewed through the lens of another MHI member, who appears sadly to be correct.

[caption id="attachment_199093" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/i-blame-mhi-sales-could-be-much-better-mhi-insider-finger-points-essential-for-hud-to-use-mhia-authority-affordable-housing-crisis-should-yield-manufactured-housing-in-reports-plus-mhmarke/> and <https://www.manufacturedhomepronews.com/gross-incestuous-symbiosis-bloodbath-claims-denial-by-manufactured-housing-institute-mhi-firms-frank-rolfe-andrew-keel-passive-investing-subculture-interview-rent-control-hit-mhi/>

[caption id="attachment_202552" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/frank-rolfe-denounces-special-interests->

[dont-tell-me-we-cant-solve-affordable-housing-truth-is-we-dont-want-to-solve-affordable-housing-c/](#)[/caption]

27) The facts and evidence are clear. Manufactured housing is underperforming for essentially all of the 21st century when considered by historic standards.

[caption id="attachment_224933" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/manufactured-housing-production-and-shipment-data-for-all-50-states-plus-washington-d-c-facts-key-performance-indicators-kpis-more-facts-road-act-backers-must-consider-others-missed-fea/>[/caption]

As the article above detailed, the lack of affordable housing in the U.S. is strongly correlated to the difference between the production of HUD Code manufactured housing in the mid-to-late 1990s through 2000 vs. the dramatically lower production levels from 2001 to 2025.

[caption id="attachment_223397" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/census-bureau-shipments-by-year-1959-2019-13-3-million-mobile-and-manufactured-homes-produced-population-trends-and-manufactured-housing-production-mhville-reality-check-fea/> [/caption]

28) An array of manufactured housing industry focused third-party research - and litigation - exists that points to antitrust and other concerns that dovetail with years of MHPProNews/MHLivingNews reporting.

[caption id="attachment_217422" align="aligncenter" width="600"]



HAUSFELD

FOR THE CHALLENGE

DICELLO LEVITT



**DiCello Levitt and Hausfeld Co-Counsel
in Antitrust Price-Fixing Scheme
to Inflate Housing Costs in
Manufactured Home Communities;**

**'CORPORATE DEATH
PENALTY'
CRIMINAL LIABILITY FOR
DEFENDANTS-FEA**

<https://www.manufacturedhomepronews.com/dicello-levitt-and-hausfeld-co-counsel-in-antitrust-price-fixing-scheme-to-inflate-housing-costs-in-manufactured-home-communities-corporate-death-penalty-criminal-liability-for-defendants-fea/>

[caption id="attachment_223168" align="aligncenter" width="600"]



**'AFFORDABLE
HOUSING
UNAFFORDABLE CREDIT?**

CONCENTRATION
HIGH-COST
LENDING FOR
MANUFACTURED HOMES'

SEBASTIAN DOERR
ANDREAS FUSTER
BIS.ORG

**'EXPLOIT
MARKET
POWER-
MANUFACTURED
HOUSING
BORROWERS-
FEA**



<https://www.manufacturedhomepronews.com/affordable-housing-unaffordable-credit-concentration-high-cost-lending-for-manufactured-homes-sebastian-doerr-andreas-fuster-bis-exploit-market-power-manufactured-housing-borrowers/>

Is it any surprise that the vast majority of these research or litigation items are not mentioned on the MHI website? Nor are they often mentioned by MHI affiliated trade media?

[caption id="attachment_212150" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/minneapolis-fed-economic-writer-jeff-horwich-learning-from-first-and-only-manufactured-housing-boom-spotlights-elena-falcettonimark-wrightjames-schmitz-jr-research-where/>[/caption]

[caption id="attachment_204289" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/ibisworld-2024-traditional-house-prices->

[soared-making-affordable-manufactured-homes-more-attractive-proposition-but-more-new-manufactured-home-data-sunday-weekly-mhville-headlines-recap/](#)



Federal Reserve Bank of Minneapolis
James A. Schmitz, Jr. | Federal Reserve Bank of Minneapolis



“This [pattern of obscured sabotaging monopoly tactics] leads to whole new set of monopolies, those in [the] manufactured housing industry itself.” ~

James A. “Jim” Schmitz Jr., in an presentation to university students. See that full presentation and these

comments in context at the link below.

Schmitz in a separate but related research report on the topic of sabotage monopoly and its impact on manufactured housing said: "This [pattern of obscured sabotage monopoly tactics] leads to whole new set of monopolies, those in [the] manufactured housing industry itself." <https://www.manufacturedhomepronews.com/affordable-homes-for-low-income-must-produce-in-factory-years-to-unravel-sabotage-grad-students-interest-in-manufactured-housing-factory-home-solutions-plus-sun/>



Elena Falcettoni

Senior Economist

Ph.D., Economics,
Univ of Minnesota



James A. Schmitz, Jr.
Federal Reserve Bank of Minneapolis



Federal Reserve Bank of St. Louis
Mark L. J. Wright | St. Louis Fed

Mass Production of Houses in Factories in the United States:
The First and Only "Experiment" Was a Tremendous Success*

Mass Production of Homes in U.S. Factories 'First and Only Experiment Was Tremendous Success' by Elena Falcettoni-James A. Schmitz Jr-Mark L. J. Wright;

PLUS
SUNDAY
WEEKLY
MHVILLE
HEADLINES RECAP

<https://www.manufacturedhomepronews.com/mass-production-of-homes-in-u-s-factories-first-and-only-experiment-was-tremendous-success-by-elena-falcettoni-james-a-schmitz-jr-mark-l-j-wright-plus-sunday-weekly-mhville-head/>[/caption][caption id="attachment_189603" align="aligncenter" width="600"]

<https://www.manufacturedhomepronews.com/masthead/true-tale-of-four-attorneys-research-into-manufactured-housing-what-they-reveal-about-why-manufactured-homes-are-underperforming-during-an-affordable-housing-crisis-facts-and->

[analysis/](#)[/caption](#)[\[caption id="attachment_187216" align="aligncenter" width="600"\]](#)

**PRO-MANUFACTURED HOME
LAW PROF. DANIEL R.
MANDELKER SAYS**

**ORGANIZATION
NEEDED FOR
MANUFACTURED
HOUSING ADVOCATES
LITIGATION AND
LEGISLATIVE SUPPORT**

plus MHVille's Sunday Weekly Headlines Recap

Washington University in St. Louis
SCHOOL OF LAW

Daniel R. Mandelker
Howard A. Stamper Professor of Law Emeritus

MHPRONews.com

<https://www.manufacturedhomepronews.com/pro-manufactured-home-law-prof-daniel-r-mandelker-says-organization-needed-for-manufactured-housing-advocates-litigation-and-legislative-support-plus-mhvilles-sunday-wee/>[/caption](#)[\[caption id="attachment_224866" align="aligncenter" width="600"\]](#)

**LOYAL MANUFACTURED
HOUSING INSTITUTE
MEMBER ASKS -**

**'WHAT THE HELL IS
GOING ON WITH
MHI?' WILL SAM
LANDY CHALLENGE
MHI LEADERS TO
FIX OR FLUSH ROAD
TO HOUSING ACT?**

**FEAR AND
HOBBS
ACT. FEA**

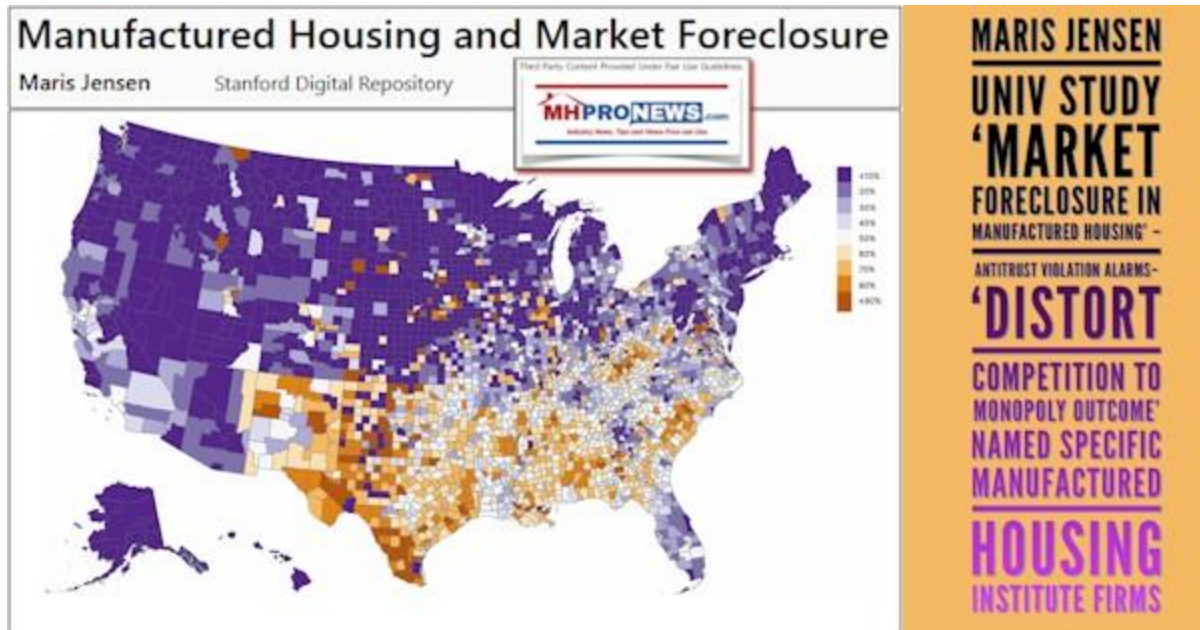
MHARR Amendments
Duty to Serve
Site Fees
Hobbs Act
Economic Fear
Anti/beat/WICO

MHI 50
THE NATIONAL ASSOCIATION
SERVING THE
CONSOLIDATORS OF THE
MANUFACTURED HOUSING INDUSTRY

MHARR
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MHPRONews.com

<https://www.manufacturedhomepronews.com/loyal-manufactured-housing-institute-member-asks-what-the-hell-is-going-on-with-mhi-will-sam-landy-challenge-mhi-leaders-to-fix-or-flush-road-to-housing-act-fear-and-hobbs-act-f/>[/caption](#)[\[caption id="attachment_213474" align="aligncenter" width="600"\]](#)



<https://www.manufacturedhomepronews.com/maris-jensen-univ-study-market-foreclosure-in-manufactured-housing-antitrust-violation-alarms-distort-competition-to-monopoly-outcome-named-specif/>[/caption][caption id="attachment_217873" align="aligncenter" width="600"]

The figure is a composite image. On the left are logos for the American Bar Association (ABA), JSTOR, and MHPRONEWS. In the center is a portrait of Amy Schmitz, B.A., J.D., with her affiliation at Moritz College of Law. On the right is a large blue banner with white text that reads "LAW PROF AMY J. SCHMITZ J.D.". To the right of this banner is a vertical yellow banner with black text that reads: "'Promoting the Promise Manufactured Homes Provide for Affordable Housing' - Potent Historic Flashback Reveals Still Relevant 'MH Insider' Insights and More; MHVile FEA".

<https://www.manufacturedhomepronews.com/prof-amy-j-schmitz-j-d-promoting-the-promise-manufactured-homes-provide-for-affordable-housing-potent-historic-flashback-reveals-still-relevant-mh-insider-insights-and-more-mhville-fea/>[/caption]

29) IMHO, a decade of reporting and examination of evidence reveals the following. MHI leaders appear to be either massively corrupt and duplicitous or massively inept, take your pick. That leaves MHARR as the only authentic advocates among trade groups for the industry's interests.

[caption id="attachment_211004" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/revisiting-pamela-blumenthal-and-regina-gray-hud-edge-report-opportunities-to-increase-housing-production-and-preservation-plus-star-parker-hud-sec-turner-with-facts-and-mhville-analysis/>

30) Without millions of more HUD Code manufactured homes, the math is clear. The affordable housing crisis can't be solved without modern HUD Code manufactured homes. Other forms of housing are useful, necessary and obviously can be good. But to solve affordable housing, there is no widely demonstrated method of construction that is more proven than HUD Code manufactured housing.

[caption id="attachment_218433" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/tanstaaf-socialism-big-government-thomas-sowell-affordable-housing-crisis-protections-against-special-interests-how-to-move-to-solutions-crucial-safeguard-against-future-distortions-mhville-fea/>[/caption]

31) Regardless of if I'm the most published person in manufactured housing in the 21st century, or simply among the most published, either way, **I do not want to put my name to an article or document that I believe to be factually inaccurate.** When we discovered that MHI was misleading the industry on the [Preserving Access to Manufactured Housing Act](#), this writer spoke up publicly. That may have been perceived by some as going against the [consolidation](#)-focused interests of sponsors and advertisers. At multiple FHFA listening sessions, in multiple such regulatory comments letters, I've raised the evidence about MHI and the [consolidators](#) who apparently run the trade group for their own benefit rather than for the broader industry's interests. Which brings us to yet another former MHI member, an MHI award winner, who said the following to *MHProNews*.

Marty Lavin, J.D., Manufactured Housing Institute (MHI)
Award Winner Becomes an "Unperson" – Perhaps for Remarks
Like These.



**"So the association [MHI] is not there
for the "industry," unless the interests
of the Big Boys join the industry's."**

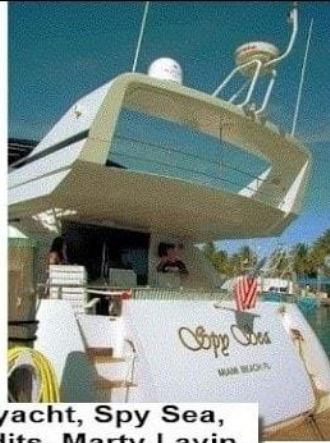
- Marty Lavin, J.D.
MHI Award Winner
High Volume Retailer, Community
Owner, Finance Expert.



"Follow the Money."
-Marty Lavin, JD,
MHI Award Winner

**"Pay more attention to what
people do than what they say."**

- Marty Lavin, finance, community,
retail veteran.



**Lavin's 72' yacht, Spy Sea,
collage credits, Marty Lavin,
MHI and MHPProNews.**



MEMBERS ABOUT MHI PROGRAMS CONSUMERS RESEARCH ADVOCACY & ISSUES

LAVIN

12:21 PM
11/17/2022



No Results Found

The page you requested could not be found. Try refining your search, or use the navigation above to locate the post



Lavin is an MHI award-winner.
But after several critiques of MHI by
Lavin, no mention of his name is found
on the MHI website. Coincidence?



**MHI award winner Marty Lavin's name can't
be found on the MHI website on 6.26.2024.
Lavin was apparently viewed as a stealthy
critic of the trade group and became an
"unperson" in Orwellian fashion.**

Search Results Marty Lavin



Sorry, we couldn't find any posts. Please try a different search.

Marty Lavin

Note that Lavin's name was culled from the MHI website, even though he was 'honored' with a lifetime achievement award.

32) There is an old saying that history is written by the winners. MHI's consolidators have per their own statements been 'winning.' This chapter of American history in my view is in several respects a dark one. Musing as a multiple award winner in history, it also has numerous points of light. It is in the darkest of nights – far from the white light of cities and towns – that 'the stars come out at night.' I've witnessed that firsthand driving down a rural road, pulling over, killing the vehicle's lights and gazing up at the myriads of stars.

Truth is like that dark-night, stars shine bright image. Eventually, in a nominally free society, truth shines despite the darkness. Telling the truth transparently with third-party facts-evidence-analysis (FEA) has appeal, which explains why MHPProNews has achieved 1 million average visitors monthly in an industry of an estimated 85,000 souls.

[caption id="attachment_224969" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/industrial-scale-lies-nar-ranks-50-states-on-housing-affordability-mh-missing-the-boat-celebrating-free-will-spiritual-new-year-salvation-nearer-now-than-first-believed-sunda/>

[caption id="attachment_225009" align="aligncenter" width="600"]





 LinkedIn
 Marcin Frackiewicz - Pres...

References

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4. www.gutenberg.org, 5. www.honolulu.com, 6. www.manufacturedhomepronews.com,
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EYE-OPENER!

TS2

'CAVCO

INDUSTRIES

ROLLERCOASTER

RECORD HIGHS

BIG ACQUISITION

HOUSING MARKET

HEADWINDS

OCT 2025 UPDATE.'

Marcin Frackiewicz Cite

ManufacturedHomeProNews.com

MHVille Reveal-FEA

Third Party Content Provided Under Fair Use Guidelines.

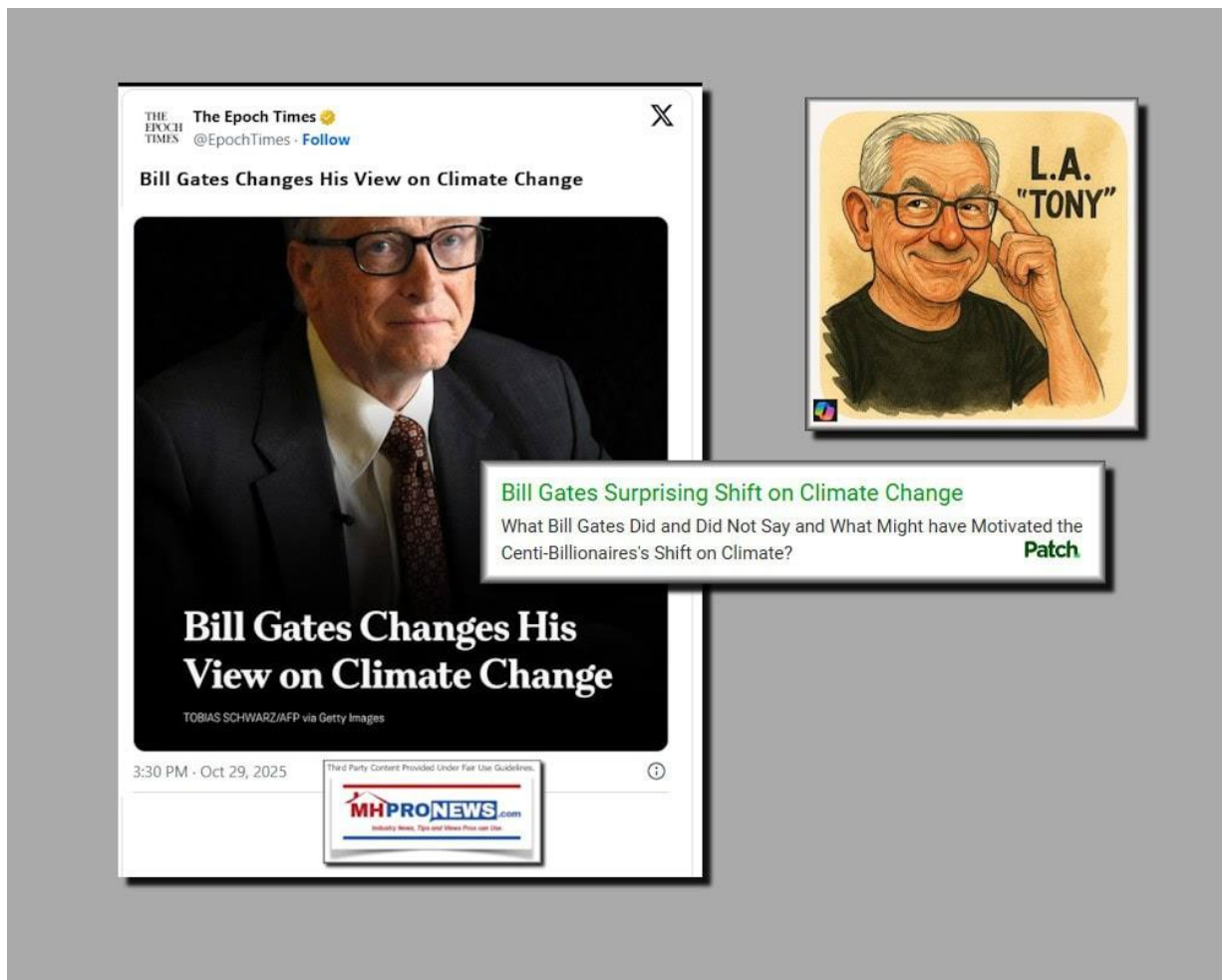


Industry News, Tips and Views From our Site

<https://www.manufacturedhomepronews.com/eye-opener-ts2-cavco-industries-rollercoaster-record-highs-big-acquisition-housing-market-headwinds-oct-2025-update-marcin-frackiewicz-cite-manufacturedhomepronews-com-mhville-reveal-fea/>[/caption]

33) William “Bill” Gates III recently amended his public stance about climate change. It was always a farce to those who understood the difference between actual science and astro-turf science bought and paid for by special interests.

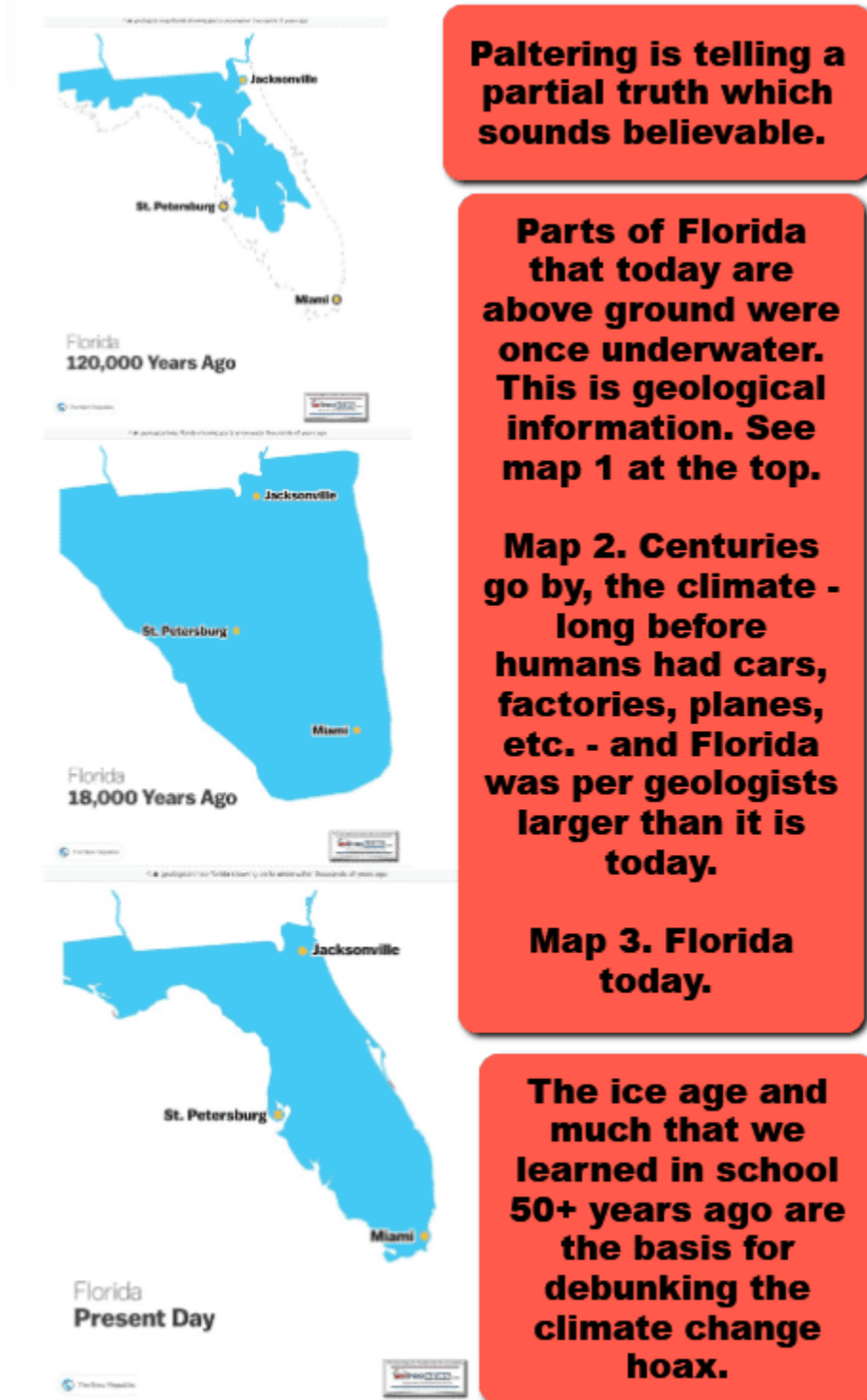
[caption id="attachment_223677" align="aligncenter" width="613"]



<https://patch.com/florida/lakeland/bill-gates-surprising-shift-climate-change>[/caption]

It is further true that a recent chart by scientists have revealed that for hundreds of thousands of years the earth has been warming and cooling.

[caption id="attachment_188853" align="aligncenter" width="460"]



<https://www.manufacturedhomeprnews.com/masthead/dr-william-happer-explains-science-on-co2-and-climate-happer-other-experts-on-motivation-agenda-psychology-and-sociology-behind-agenda-driven-big-lies-why-it-matters-to-usa-world-mhville/>

[/caption][caption id="attachment_152925" align="aligncenter" width="600"]



Energy & Environment Institute – Big Donors & Conflicts - Warren Buffett, Mike Bloomberg Undermine Manufactured Housing via Sierra Club Lawsuit

This image above was posted on 2.20.2020. Over three years later, the report linked below is still obviously relevant as factual evidence that helps industry stakeholders understand how the industry arrived at this moment in time.

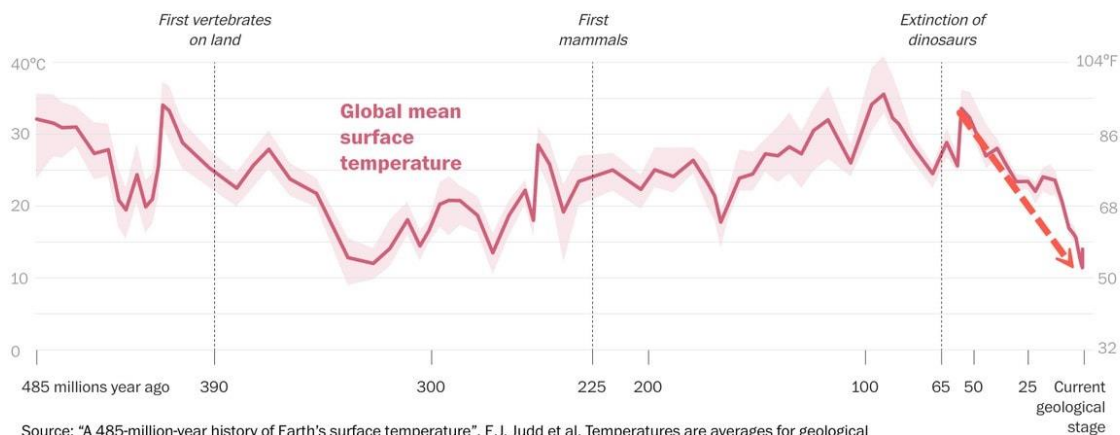
<https://www.manufacturedhomepronews.com/masthead/energy-environment-institute-big-donors-conflicts-warren-buffett-mike-bloomberg-undermine-manufactured-housing-via-sierra-club-lawsuit/>

[/caption][caption id="attachment_225032" align="aligncenter" width="622"]

Scientists have captured Earth's climate over the last 485 million years. Here's the surprising place we stand now.

An effort to understand Earth's past climates uncovered a history of wild temperature shifts and offered a warning on the consequences of human-caused warming.

10 min



By [Sarah Kaplan](#) and [Simon Ducroquet](#)
September 19, 2024 at 2:01 p.m. EDT

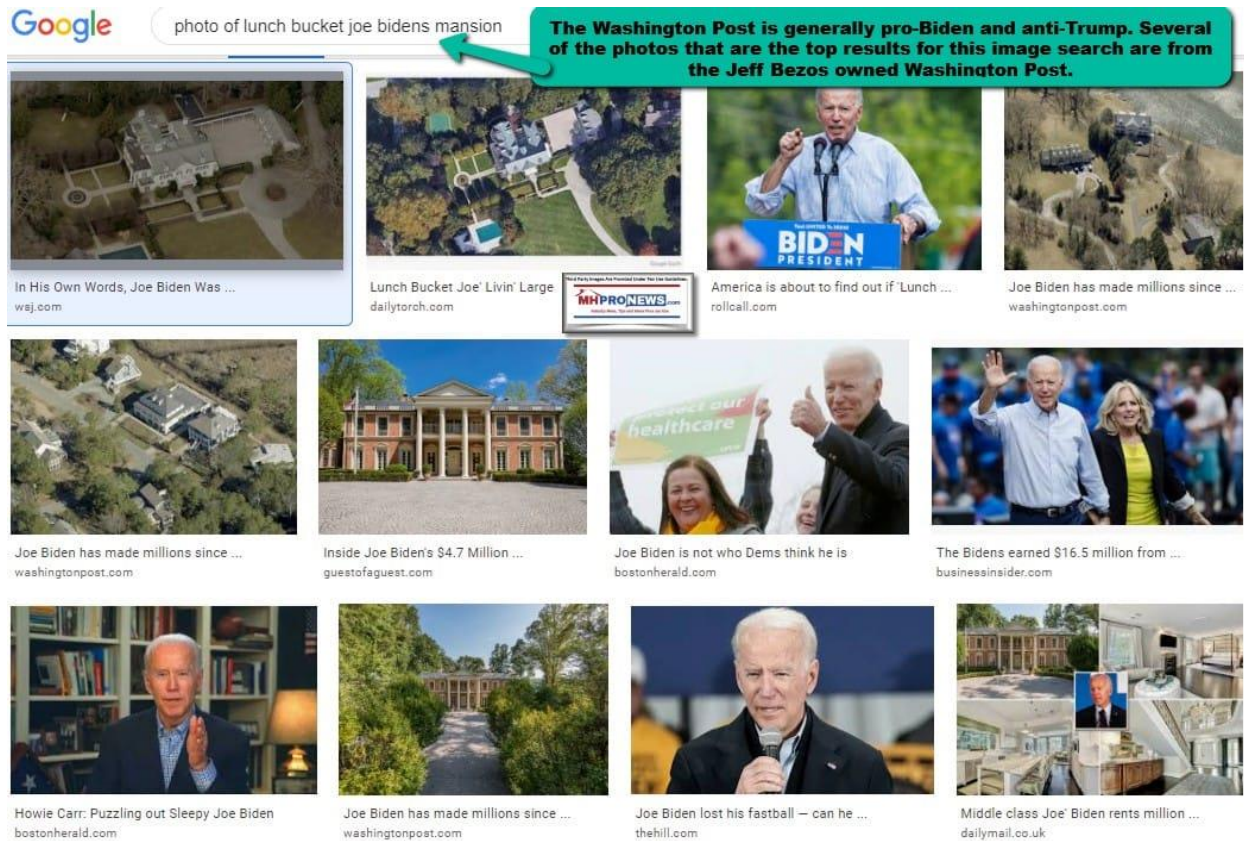


This is from the left-leaning Washington Post. It isn't the commentary that speaks volumes as much as the graphic itself. It is yet another data point that goes to MHProNews long argued point that while clean air, water, and soil are naturally to be sought, the evidence of geology and history is that human or 'man made climate change' is too insignificant to cause the kind of climate crisis thinking that has captured the minds of millions in the U.S. and beyond. Repeating a falsehood or partial truth may make believing the falsehood easier. But repeating something untrue doesn't make it true. If the rising of the oceans is a valid concern, then why do Joe Biden (D) and the Obamas (D) have ocean front properties?

[/caption]



[caption id="attachment_161252" align="aligncenter" width="625"]



The Washington Post is a left-leaning media source, clearly in the Biden camp. Which makes their spotlighting of Biden's real estate holdings all the more telling. [/caption]

34) The National Association of Home Builders (NAHB) publishes an annual “priced out” report. Per their research nearly 75 percent of the nation can’t afford a new site-built house.

[caption id="attachment_213273" align="aligncenter" width="600"]

Affordable Homeownership

Manufactured Homes:

- Appreciate – median value increased 39% compared with 33% for site-built homes.*

Manufactured Homes[†]
\$108,100 Avg. Cost
\$72.21 per sq. ft.
Single Section: \$72,600
Multi-Section: \$132,000

Site-Built Homes[†]
\$365,904 Avg. Cost
\$143.83 per sq. ft.
[†]Without Land

NAHB National Association of Home Builders

MHARR Manufactured Housing Association for Regulatory Reform
Preserving the American Dream of Home Ownership Through Regulatory Reform

MHI MANUFACTURED HOUSING INSTITUTE
THE NATIONAL ASSOCIATION SERVING CONSOLIDATORS OF THE MANUFACTURED HOUSING INDUSTRY

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NAHB PRICED OUT STUDY EXPOSED.
NEARLY 75% OF U.S. HOUSEHOLDS CANNOT AFFORD NEW MEDIAN-PRICED HOME IN 2025- WHAT ABOUT MANUFACTURED HOMES?
EYE-OPENING MHI-MHARR-MHVILLE FACTS-EVIDENCE-ANALYSIS (FEA)

<https://www.manufacturedhomeproneews.com/nahb-priced-out-study-expose-nearly-75-of-u-s-households-cannot-afford-new-median-priced-home-in-2025-what-about-manufactured-homes-eye-opening-mhi-mharr-mhville-facts-evidence-analysis-fea/>

[/caption][caption id="attachment_216353" align="aligncenter" width="600"]

FROM SUBSIDIES TO SOLUTIONS

WHY ENFORCING EXISTING LAWS MATTERS

EXISTING LAWS

SUBSIDIES

NAHB National Association of Home Builders

MHI MANUFACTURED HOUSING INSTITUTE
THE NATIONAL ASSOCIATION SERVING CONSOLIDATORS OF THE MANUFACTURED HOUSING INDUSTRY

NAHB LETTER-HUD SEC SCOTT TURNER CONFIRMS CONV BUILDERS WANT (NEED) SUBSIDIES TO VIE WITH MANUFACTURED HOMES; WHY THIS MATTERS TO PUBLIC OFFICIALS-TAXPAYERS-AFFORDABLE HOUSING SEEKERS-MHVILLE FEA

MHPRONEWS.com
Industry News, Tips and Views From our Site

PROUD MEMBER OF

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Copilot

<https://www.manufacturedhomeproneews.com/nahb-letter-hud-sec-scott-turner-confirms-conv-builders-want-need-subsidies-to-vie-with-manufactured-homes-why-this-matters-to-public-officials-taxpayers-affordable-housing-seekers-mhville-fea/>

35) **Without millions of HUD Code manufactured homes, the affordable housing crisis can't be solved.** The current DOE regulations and President Trump's executive order as referenced by MHARR make it clear that the DOE rules for manufactured housing act to effectively limit potentially hundreds of thousands from becoming homeowners if they are put into effect.

MHARR is correct. Kill it.

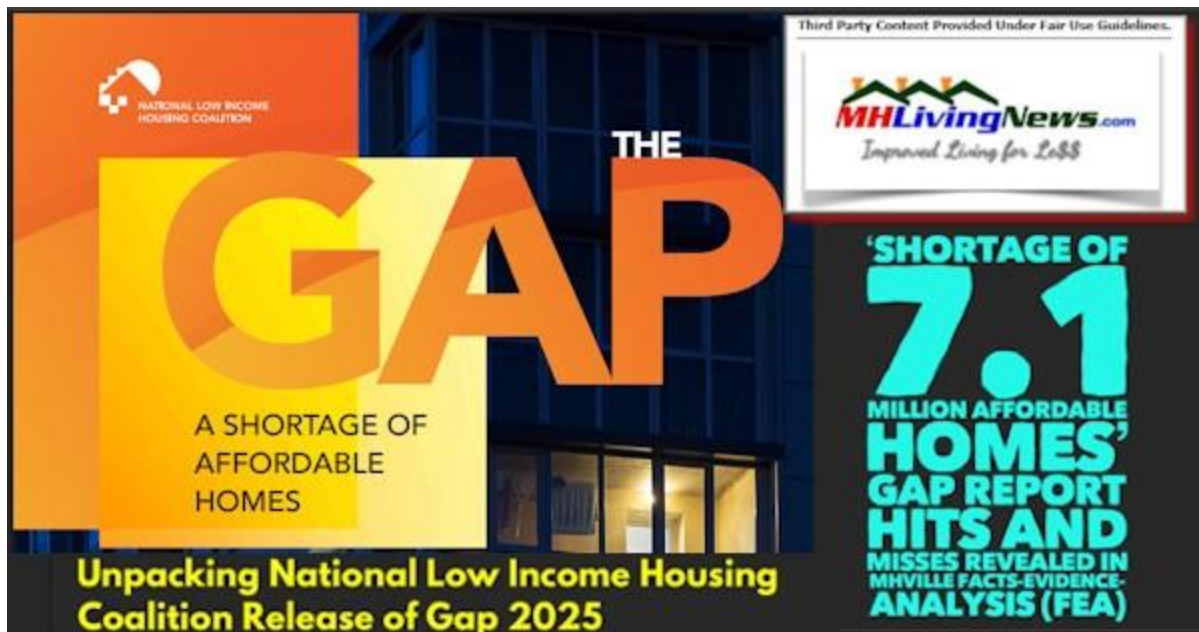
My reasoning as to why MHARR is correct may seem circuitous to some, but now, let's submit this thesis to third-party AI and see what it has to say about the facts-evidence-analysis (FEA) being provided to you.

[caption id="attachment_224040" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/why-is-manufactured-housing-underperforming-during-a-documented-affordable-housing-crisis-what-sources-including-3rd-party-artificial-intelligence-ai-said-facts-evidence-analysis-fea/>

[caption id="attachment_221123" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/unpacking-national-low-income-housing-coalition-release-of-gap-2025-shortage-of-7-1-million-affordable-homes-gap-report-hits-and-misses-revealed-in-mhville-facts-evidence-analysis-f/> [caption] [caption id="attachment_218954" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/if-not-amended-does-road-to-housing-act-risk-less-affordable-housing-new-mharr-white-paper-critical-analysis-of-renewing-opportunity-in-the-american-dream-road-to-housing-act-2025-m/> [caption] [caption id="attachment_223153" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/was-vox-rachel-cohen-booth-misled-by-mhi-ceo-lesli-gooch-removable-chassis-road-to-housing-act-2025-unpacking-evidence-of-deception-and-misdirection-by-manufactured-housing-institute-fea/>[/caption][caption id="attachment_219399" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/satirical-consumer-alert-hypocrisy-housing-hijinks-in-mhville-yes-communities-ceo-steve-schaub-honored-by-rv-mh-hall-of-fame-despite-100s-of-resident-complaints-price-rigging-antitrust-suit/>[/caption]

Thank you for your consideration of these manufactured housing industry expert observations and comments.

Part II. Third-party artificial intelligence checks of this developing submissions and report.

1)

2)

Part III. From MHI and MHARR, as shown.

1) Per a [PDF document obtained from MHARR](#) and posted at that link are MHARR supplemental comments. This document has reportedly not yet been posted on the MHARR website.

2) Per the [MHARR press release linked here](#).

Washington, D.C.





NOVEMBER 24, 2025

IMPORTANT

TO: HUD CODE MANUFACTURED HOUSING INDUSTRY MEMBERS

FROM: MHARR

RE: MHARR COMMENTS CALL FOR THE REPEAL AND WITHDRAWAL OF
DESTRUCTIVE AND COSTLY DOE MANUFACTURED HOUSING "ENERGY"
STANDARDS

Attached for your review, information and follow-up is a copy of MHARR's comments in response to the U.S. Department of Energy's (DOE) September 3, 2025 Request for Information (RFI) concerning manufactured housing "energy conservation" standards. These comments call on DOE to fully repeal and withdraw the pending costly and destructive DOE manufactured housing energy standards rule, as well as the related December 26, 2023 DOE enforcement procedures proposed rule pertaining to those standards. Simply put, in a nation with an affordable housing shortage measuring in millions of homes, the inherent affordability of manufactured homes should not be needlessly undermined with baseless "climate change" mandates.

As always, MHARR urges all industry members to comment on this matter. Comments in response to the pending RFI are due on or before December 2, 2025. Industry members are free to cite MHARR's comments in whole or in part, or alternatively to write DOE at the address shown in the MHARR comments (with a specific reference to "Request for Information – Manufactured Housing Energy Conservation Standards – Docket No. EERE-2009-BT-BC-0021") and state their support for the Manufactured Housing Association for Regulatory Reform's November 24, 2025 comments.

Thank you.

Attachments

Manufactured Housing Association for Regulatory Reform (MHARR)

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Gemini, make a featured image for MHARR on this topic. ^

"MHARR Comments

Call for the Repeal and Withdrawal of Destructive and Costly DOE Manufactured

Housing "Energy" Standards" Show lighting bolts or electricity flowing from DOE building towards a manufactured home, but MHARR logo standing in the way of the destructive charges. No text needed, other than DOE logo and MHARR logo.



MHARR this report is available for re-publication in full (i.e., without alteration or substantive modification) without further permission and with proper attribution and/or linkback to MHARR.

Attachment

November 24, 2025

VIA FEDERAL EXPRESS AND ELECTRONIC SUBMISSION

Appliance and Equipment Standards Program
U.S. Department of Energy
Building Technologies Office
Mailstop EE-5B
1000 Independence Avenue, S.W.
Washington, D.C. 20585-0121

Re: Request for Information -- Manufactured Housing Energy

Conservation Standards – Docket No. EERE-2009-BT-BC-0021

-

Dear Sir or Madam:

The following comments are submitted on behalf of the Manufactured Housing Association for Regulatory Reform (MHARR). MHARR is a Washington, D.C.-based national trade association representing the views and interests of producers of manufactured housing regulated 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.) (1974 Act) as amended by the Manufactured Housing Improvement Act of 2000 (2000 Reform Law) and subject to potential energy-related regulation by the U.S. Department of Energy (DOE) pursuant to section 413 of the Energy Independence and Security Act of 2007 (EISA) (42 U.S.C. 17071). MHARR was founded in 1985. Its members include independent manufactured housing producers from all regions of the United States.^[1]

I. INTRODUCTION

On September 3, 2025, DOE published a Request for Information (RFI) seeking “public input regarding certain aspects of its energy conservation standards for manufactured housing.”^[2] (Emphasis added). DOE initially published a final rule adopting manufactured housing “energy conservation” standards on May 31, 2022,^[3] although the enforcement compliance date for those standards has been successively delayed by DOE via regulatory action.^[4] DOE subsequently published a proposed rule to establish regulations for testing, compliance and enforcement of those standards on December 26, 2023.^[5] No final rule pertaining to the enforcement of the May 31, 2022 manufactured housing energy conservation standards has ever been issued or published by DOE.^[6]

As is explained by the September 3, 2025 RFI, the RFI seeks “public input ... to help guide DOE’s further refinement of certain aspects of its standards for manufactured housing, as well as supporting technical analysis, including anticipated costs and benefits.”^[7] (Emphasis added). The RFI then poses 14 specific issues, questions and inquiries concerning the pending standards on which DOE seeks additional input. Significantly, however, the RFI states that “DOE is also revisiting the 2022 Final Rule in light of [Executive Order] 14192, ‘Unleashing Prosperity Through Deregulation,’ and ... seeks stakeholder input on reducing [the] regulatory burden of these regulations.”^[8]

On behalf of the smaller, independent, *entrepreneurial* manufactured housing producers that it represents in Washington, D.C., MHARR, which has strenuously, consistently and inalterably opposed the baseless, destructive “climate change” ideology-driven DOE manufactured housing “energy” standards in both concept and substance since day-one of their fraudulent development and imposition,^[9] has only one comment to offer. As is explained in greater detail below, these unnecessary, excessive, extreme and unduly costly standards, in a country with an affordable housing shortage numbering in the millions of units,^[10] and in the context of a presidential administration with a stated fundamental commitment to the elimination of needless and destructive regulation,^[11] should not be the subject of “fine-tuning,” tinkering around the edges, or “refinement” of any kind. Instead – and in accordance with the fundamental regulatory principles set forth by the President -- these standards, including their alleged “enforcement” component, should be jettisoned – withdrawn, repealed and permanently consigned to oblivion in their entirety. In addition, the Administration should fully support and seek the repeal of any conceivable legislative authority underlying this abusive overreach that would needlessly deny Americans the affordable mainstream homeownership that they so desperately need.^[12]

II. COMMENTS

The May 31, 2022 DOE manufactured housing “energy conservation” standards must be withdrawn and repealed. The reasons for that conclusion are beyond debate and are factually (and legally) unassailable.

A. The DOE Standards Are Required by Law to be Cost-Justified

First, it is beyond debate that any manufactured housing energy conservation standards adopted by DOE were (and are) affirmatively required by federal law to be cost-justified including, but not limited to, the initial purchase price of the home. Specifically, section 413 of the Energy Independence and Security Act of 2007 – the authorizing legislation for the DOE standards – states, in relevant part:

“The energy conservation standards established under this section shall be based on the most recent version of the International Energy Conservation Code (including supplements), except in cases in which the Secretary finds that the code is not cost-effective, or a more stringent standard would be more cost-effective, based on the impact of the code on the purchase price of manufactured housing and on total life-cycle construction and operating costs.”[\[13\]](#)

(Emphasis added).

An affirmative cost-benefit impact is also mandated by Executive Order 12866, “Regulatory Planning and Review,” (September 30, 1993) which provides, in relevant part:

“Each agency shall assess both the costs and the benefits of the intended regulation and, recognizing that some costs and benefits are difficult to quantify, propose or adopt a regulation only upon a reasoned determination that the benefits of the intended regulation justify its costs.”[\[14\]](#)

Section 413’s statutory mandate, in turn, is specifically enforceable against DOE pursuant to the Administrative Procedure Act (APA), which directs federal courts to “hold unlawful and set aside agency action ... found to be arbitrary, capricious and an abuse of discretion, or otherwise not in accordance with law.”[\[15\]](#)

B. The Pending Standards Were Deemed Cost-Justified

by DOE Based on the “Social Cost of Carbon” Metric

Second, it is beyond debate that the May 31, 2022 DOE manufactured housing energy conservation standards published by DOE (with respect to both standard tiers) were affirmatively determined and found by DOE to be cost-justified[\[16\]](#) and “beneficial” based on a purported cost analysis that included substantive and substantial inputs and values derived directly from the Social Cost of Greenhouse Gasses (SCC) metric developed by the federal Interagency Working Group on the Social Cost of Greenhouse Gasses (IWG), including, without limitation, inputs, values and analyses contained in the IWG’s February 2021 “Technical Support Document: Social Cost of Carbon, Methane and Nitrous Oxide.”[\[17\]](#) Accordingly, the May 31, 2022 final rule as published in the Federal Register states:

“DOE estimates the value of climate benefits from a reduction in greenhouse gasses using four different estimates of the social cost of CO₂.... Together these represent the social cost of greenhouse gasses (SC-GHG). DOE used interim SC-GHG values developed by an Interagency Working Group on the Social Cost of Greenhouse Gasses....”

The May 31, 2022 notice then specifically cites, as the source of these “values,” the February 2021 IWG Technical Support Document.^[18] These so-called “values” are then netted (together with other illusory alleged “benefits”) against the extreme costs of the DOE standards – as demonstrated by MHARR in its previous comments on the DOE standards – to produce a warped and fraudulent alleged net “benefit” for consumers, while totally ignoring the massive individual and collective impacts of the exclusion of millions of Americans from homeownership due to the standards’ extreme impact on the purchase price of manufactured housing (measuring in the thousands of dollars per home -- and even more now, due to subsequent inflation -- notwithstanding contrary baseless assertions by DOE).

Ultimately, however, the DOE standards were deemed cost-justified and lawful based in substantial (and unavoidable) part on the SCC metric and its related “values.”

C. Any Regulatory Reliance on the SCC Metric and Related

Materials is Affirmatively Prohibited by Executive Order 14154

Third, there is absolutely no current basis for the utilization of – and DOE reliance on – the SCC metric and related materials and/or documents in connection with the cost-benefit evaluation and analysis of the May 31, 2022 DOE standards, and any previous utilization or reliance on such metrics and materials is no longer valid or permissible, insofar as all of those metrics, analyses, studies and so-called support documents, have been eliminated and specifically repudiated as of January 20, 2025, through Executive Order (EO) 14154, “Unleashing American Energy.” In relevant part, that EO states:

“The calculation of the ‘social cost of carbon’ is marked by logical deficiencies, a poor basis in empirical science, politicization, and the absence of a foundation in legislation.”

In accordance with this determination, the EO further states:

“In all federal permitting adjudications or regulatory processes, all agencies shall adhere only to the relevant legislated requirements for environmental considerations and any considerations beyond these requirements are eliminated.”

(Emphasis added). Based on these conclusions, EO 14154, among other things, disbands the IWG and further states:

“any guidance, instruction, recommendation or document issued by the IWG is hereby withdrawn as no longer representative of government policy, including: [(b)(iii)] the Technical Support Document of February 2021 (Social Cost of Carbon, Methane, and

Nitrous Oxide Interim Estimates under Executive Order 13990); and [(b)(iv) estimates of the social cost of greenhouse gasses, including the estimates for the social cost of carbon, the social cost of methane and the social cost of nitrous oxide based, in whole or in part, on the IWG’s work or guidance.”

(Emphasis added).

Accordingly, and based upon current law and policy, DOE’s May 31, 2022 final standards’ cost-benefit analysis relies and is based upon invalid, repudiated and withdrawn inputs that have no – and had no – indicia of scientific or policy validity when developed and relied upon by DOE. Therefore, the May 31, 2022 final DOE standards are inherently and irretrievably “arbitrary, capricious and an abuse of discretion” in their total failure to legitimately quantify and consider cost impacts as directed by statute.

As a result, and pursuant to the DOE administrative review referenced by the RFI, the May 31, 2022 final standards should be withdrawn and not merely, modified, amended, or “updated.”

D. DOE has Already Acknowledged that the SCC Metric is Inherently Flawed

The analysis and conclusions set forth above, moreover, are buttressed and supported by DOE’s own research and analysis of the SCC metric. In a July 23, 2025 report, DOE’s Climate Working Group characterized the SCC metric and approach as “flawed,” stating:

“This report supports a more nuanced and evidence-based approach for informing climate policy that explicitly acknowledges uncertainties. The risks and benefits of a climate changing under both natural and human influences must be weighed against the costs, efficacy and collateral impacts of any ‘climate action’ An approach that acknowledges both the potential risks and benefits of CO₂, rather than relying on flawed models and extreme scenarios, is essential for informed and effective decision-making.”

(Emphasis added).

Up until this point in the DOE manufactured housing energy rulemaking, all that there *has been* is reliance on “flawed models” and hyper-ventilation over “extreme scenarios.” There is no way to correct this inalterably flawed and corrupted rulemaking on the present regulatory record.

Accordingly, the entire May 31, 2022 final standards rule, the December 26, 2023 proposed enforcement rule, and all components and aspects of each, should be withdrawn,

repealed and repudiated. Both of those rules are fundamentally, fatally and irretrievably flawed and cannot be rescued by tinkering around the edges.[\[19\]](#)

III. CONCLUSION

For all of the foregoing reasons, MHARR seeks and supports the repeal and withdrawal of the May 31, 2022 DOE manufactured housing “energy conservation” standards and the proposed December 26, 2023 DOE manufactured housing energy conservation enforcement and compliance regulations. Further, MHARR supports pending congressional consideration and approval of the repeal of section 413 of the Energy Independence and Security Act of 2007. MHARR, therefore, urges DOE and the U.S. Department of Housing and Urban Development to take no further action regarding any such standards or related mandates.

Sincerely,

Mark Weiss

President and CEO

cc: Hon. Donald J. Trump

Hon. Susan Wiles

Hon. Chris Wright

Hon. Tim Scott

Hon. French Hill

Hon. Erin Houchin

Hon. Russell Vought

HUD Code Manufactured Housing Industry Members

[1] MHARR's members are all "small businesses" as defined by the U.S. Small Business Administration (SBA) and are "small entities" for purposes of the Regulatory Flexibility Act (5 U.S.C. 601, et seq.).

[2] See, 90 Federal Register, No. 168 (September 3, 2025) "Public Input on Energy Conservation Standards for Manufactured Housing" at P. 42544.

[3] See, 87 Federal Register, No. 104 (May 31, 2022) "Energy Conservation Standards for Manufactured Housing" at p. 32728, et seq.

[4] See, 90 Federal Register, supra at pp. 42545-42546 for a summary of DOE regulatory actions regarding the compliance date for the subject standards.

[5] See, 88 Federal Register, No. 246 (December 26, 2023) "Energy Conservation Standards for Manufactured Housing; Enforcement" at p. 88844, et seq.

[6] DOE acknowledges in the RFI that it is "still reviewing" comments on the enforcement Notice of Proposed Rulemaking. See, 90 Federal Register, supra at p. 42546, col. 1.

[7] See, 90 Federal Register, supra at p. 42544, col. 1.

[8] Id. At p. 42545, col. 2-3.

[9] The fraudulent initiation and development of the DOE manufactured housing "energy conservation" standards, through a corrupted "negotiated rulemaking" process, the results and products of which were carried forward through the entire DOE rulemaking in this matter, notwithstanding facile and gratuitous assertions to the contrary by DOE – as well as DOE's utter failure to substantively consult with HUD and with the statutory Manufactured Housing Consensus Committee, as directed by EISA section 413 -- is described in detail by MHARR in its August 8, 2016 comments and attachments in this docket, which MHARR hereby incorporates and included in these comments as if restated in full. These issues are further addressed and detailed in subsequent comments filed by MHARR in this matter, which it also incorporates by reference herein including, without limitation, the following: (1) MHARR's October 25, 2021 comments and attachments on Energy Conservation Standards for Manufactured Housing; (2) MHARR's November 22, 2021 comments and attachments on Energy Conservation Standards for Manufactured Housing; (3) MHARR's May 4, 2022 comments and attachments on Energy Conservation Standards for Manufactured Housing; (4) MHARR's April 13, 2023 comments and attachments on Energy Conservation Standards for Manufactured Housing; (5) MHARR's January 24, 2024 comments and attachments on enforcement regulations regarding Energy Conservation Standards for Manufactured Housing; (6) MHARR's May 31, 2025 comments and attachment on Energy Conservation Standards for Manufactured Housing.

[10] In a March 2025 report, the National Low Income Housing Coalition concluded that the United States faces a national shortage of 7.1 million affordable housing units.

[11] See, e.g., Executive Order 14192, “Unleashing Prosperity Through Deregulation,” January 31, 2025.

[12] See, e.g., H.R. 5184, the “Affordable Housing Over Mandating Energy Efficiency Standards Act of 2025, introduced by Rep. Erin Houchin

[13] See, 42 U.S.C. 17071 (b)(1).

[14] See, Executive Order 12866, “Regulatory Planning and Review” (September 30, 1993, Section 1(b)(6).

[15] See, 5 U.S.C. 706 (2)(A).

[16] See, 87 Federal Register, supra, at p. 32735, col. 1: “DOE has determined that the conservation standards in this final rule are cost-effective when evaluating the impact of the standards on the purchase price of the home and on the total life-cycle and operating costs.”

[17] Id. at p. 32733, col. 1 and footnote 5 therein specifically referencing “Interagency Working Group on Social Cost of Greenhouse Gasses, Technical Support Document: Social Cost of Carbon, Methane and Nitrous Oxide. Interim Estimates under Executive Order 13990.”

[18] See, 87 Federal Register, supra at p. 32733, n. 5.

[19] An additional independent grounds for withdrawing the May 31, 2022 standards is illustrated by the Executive Order, “Directing the Repeal of Unlawful Regulations” issued on April 6, 2025. That EO directs federal agencies to “identify ... unlawful and potentially unlawful regulations ... and begin plans to repeal them.” Among other things, the EO directs the repeal of regulations that are (or have become) unlawful under ten recent Supreme Court decisions, including Loper Bright Enterprises v. Raimondo, 603 U.S. 369 (2024). That decision ended the concept of Chevron deference to the interpretation of ambiguous statutes by federal regulatory agencies. MHARR maintains that the May 31, 2022 final rule and final standards violate EISA section 413 insofar as the May 31, 2022 final rule is based upon multiple, compounded, cumulative, baseless “interpretations” of section 413 and its alleged intent by DOE. Those baseless interpretations, as fully explained in prior MHARR comments within the administrative record, include but are not limited to, distortions, manipulation and de facto re-writing of certain aspects of the International Energy Conservation Code (IECC) in a futile effort to conform that Code – which was not developed for manufactured housing – to the unique construction of manufactured

housing as mandated by federal law. For this reason as well, the May 31, 2022 standards cannot be salvaged or legitimized under any theory.

3) From the MHI website on 12.2.2025 at about 9:18 AM ET. There are NO public facing article on the DOE rule making process. How can MHI claim to be advocating for the entire industry when their remarks are not available publicly in advance as are those published or provided by MHARR?

manufacturedhousing.org/?s=DOE+Energy+rule+

On 12.2.2025 at about 9:18 AM ET. There are NO public facing article on the DOE rule making process, per this common sense search term. How can MHI claim to be advocating for the entire industry when their remarks are not available publicly in advance as are those published or provided by MHARR?

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