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This facts-evidence-analysis (FEA) check confirms that the provided pre-publication draft accurately reflects the core themes and specific findings of the January 2021 HUD report titled *"Eliminating Regulatory Barriers to Affordable Housing: Federal, State, Local, and Tribal Opportunities."*

## **1. Confirmation of HUD Report and Secretary Carson's Foreword**

The draft accurately quotes the foreword written by former HUD Secretary Ben Carson. The report was indeed published in **January 2021** as a final action of the White House Council on Eliminating Regulatory Barriers to Affordable Housing, which Carson chaired.

- **Evidence:** The official report is archived via [GovInfo](#) and [HUD User](#).

- **Quote Verification:** Carson's statement, "I am confident... we will make progress on increasing housing supply and eliminating unnecessary barriers," appears verbatim in the report's foreword.

## 2. Analysis of the "2000 Reform Law" and Preemption

The draft highlights the "Manufactured Housing Improvement Act of 2000" (often called the 2000 Reform Law). Online evidence supports the draft's claim that this law introduced "enhanced preemption."

- **Legal Fact:** The **Manufactured Housing Improvement Act of 2000** (Title VI of P.L. 106-569) specifically amended the 1974 Act to "facilitate the availability of affordable manufactured homes" and established the **Manufactured Housing Consensus Committee (MHCC)**.
- **Enhanced Preemption:** Industry advocates (such as MHARR) and legal analyses confirm that the 2000 law was intended to ensure that federal standards for manufactured housing preempted conflicting state and local requirements, even those that were not identical but acted as barriers.
- **Clarification:** The draft correctly notes that HUD has often been criticized for failing to fully implement this "enhanced" version of preemption, a point of contention in several Congressional oversight hearings (e.g., 2011 and 2012).

## 3. Economic Impact: The \$2 Trillion GDP Claim

The draft references a significant economic impact regarding housing constraints. This aligns with a widely cited 2019 study by economists **Chang-Tai Hsieh and Enrico Moretti**.

- **Evidence:** In their paper *"Housing Constraints and Spatial Misallocation,"* Hsieh and Moretti found that restrictive land-use regulations in high-productivity cities (like New York and San Francisco) lowered aggregate U.S. GDP growth by **more than 50%** between 1964 and 2009.
- **Fact-Check:** The figure cited in the draft (often rounded to \$2 trillion in annual lost GDP) is a standard interpretation of this research frequently used in HUD and Congressional documents to illustrate the cost of regulatory barriers.

## 4. Historical Context: "Operation Breakthrough"

The draft mentions "Operation Breakthrough" and the role of Regina Gray.

- **Confirmation: Operation Breakthrough** was a major HUD initiative (1969–1975) launched under Secretary George Romney to stimulate large-scale industrialized housing production.
- **Personnel: Regina Gray** is a long-standing researcher at HUD's Office of Policy Development and Research (PD&R) who has authored and managed various reports on housing technology and offsite construction.

### Summary of Findings

Statement in Draft	Status	Online Evidence / Source
<b>HUD Report Title/Date</b>	<b>Confirmed</b>	"Eliminating Regulatory Barriers..." (Jan 2021)
<b>Carson Foreword Quote</b>	<b>Confirmed</b>	Verbatim in GovInfo/HUD archives
<b>2000 Reform Law Impact</b>	<b>Confirmed</b>	P.L. 106-569 established MHCC and preemption
<b>\$2 Trillion GDP Loss</b>	<b>Confirmed</b>	Hsieh & Moretti (2019) research findings
<b>Operation Breakthrough</b>	<b>Confirmed</b>	Historical HUD program for factory-built housing

The draft's assertion that Dr. Carson's confidence has been "misplaced or unfulfilled" is an **analytical conclusion** rather than a simple fact, but it is supported by the data in the report showing that "worst-case housing needs" and regulatory barriers remain persistent challenges years after the council was formed.