

2 Pre-publication draft for submission to third-party artificial intelligence (AI) for facts-evidence-analysis (FEA) check for a developing report on MHPProNews.

'Perception is Greatest Challenge to Affordable Housing-Particularly for Manufactured Housing.' Testimony of Pennsylvania Manufactured Housing Assoc EVP Mary Gaiski-Senate Policy Committee-FEA

"Unlike other housing options, manufactured homes are judged by their past." "Perception is the greatest challenge to affordable housing, particularly for manufactured housing."

"Good afternoon, my name is Mary Gaiski. I am the Executive Vice President [EVP] of the Pennsylvania Manufactured Housing Association. With me is Dale Yingst with Lebanon Valley Homes a licensed retail center located in Palmyra, PA. Mr. Yingst sells and installs manufactured and modular homes and has been doing so at this location since 1963. We wish to thank the chairman, Senator Dan Laughlin, Senator DiSanto and the Senate Republican Policy Committee for the opportunity to educate you on the manufactured housing industry and zoning challenges they face" (see Part I for full official transcript). Spoiler alerts. While the testimony includes several useful insights, which is one of the reasons that MHPProNews is publishing this previously little exposed document, there are arguably missed opportunities by PMHA EVP Gaiski too. For example. In the official transcript of the testimony that follows, there is no mention of the "Manufactured Housing Improvement Act" or of the term "preemption," much less "[enhanced preemption](#)" which HUD Code manufactured housing technically [enjoys under federal law](#). So, what follows are insightful from the perspective of **what was said**, but also **what vexingly was not mentioned or addressed**. [PMHA is listed as an MHI affiliate](#).

1. Longtime and detail-minded readers of MHPProNews may recall this previously recorded quote by PMHA's Gaiski.

[caption id="attachment_152461" align="aligncenter" width="683"]



Mary Gaiski



“This year, we’ve had more calls about zoning discrimination than in the previous five to seven years.” –

PMHA’s Mary Gaiski said per *McCalls*, adding:

“It’s getting worse instead of better.”,

When asked by MHPProNews about her quote in *McCalls*, Gaiski did not deny or clarify that statement.



Gaiski's statement, intentionally or not, was calling into question MHI's effectiveness in their so-called promotion of manufactured homes. On several levels, it isn't working.

Notice: all third-party images or content are provided under fair use guidelines for media. This quote graphic was previously uploaded on February 8, 2020. As Gaiski's testimony below makes clear, this issue has not been resolved.[/caption]

2. In thinking about the paraphrased quote in the headline "Perception is the greatest challenge to affordable housing, particularly for manufactured housing," consider the previously reported documents to MHPProNews that included MHI linked sources. One of those was dated the same year as this from Gaiski. More on that in Part II. Recall too this previous report that involved former MHI chairman Joseph "Joe" Stegmayer who spent years with Clayton Homes and Cavco Industries.

[caption id="attachment_214542" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/joseph-joe-stegmayer-on-the-untold-story-of-manufactured-housing-wh-report-and-ceos-on-2-trillion-in-deals-i-sit-behind-my-fathers-desk-plus-sunday-weekly-mhville-headlines-recap/>[/caption]

3. Note that Gaiski addressed both limited lending and zoning/placement barriers. These are the 'bottlenecks' that MHARR has stressed for years. While MHI mentions these from time to time too, the fact that MHI has failed to call for the MHARR amendments in pending federal legislation that would fix those barriers ought to speak volumes.

[caption id="attachment_228515" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/clayton-champion-cavco-manufactured-housing-institute-joint-reveal-wtas-what-they-are-saying-see-politicos-corp-interest-groups-praise-for-house-passed-housing-for-the-21st-century-act-fea/>

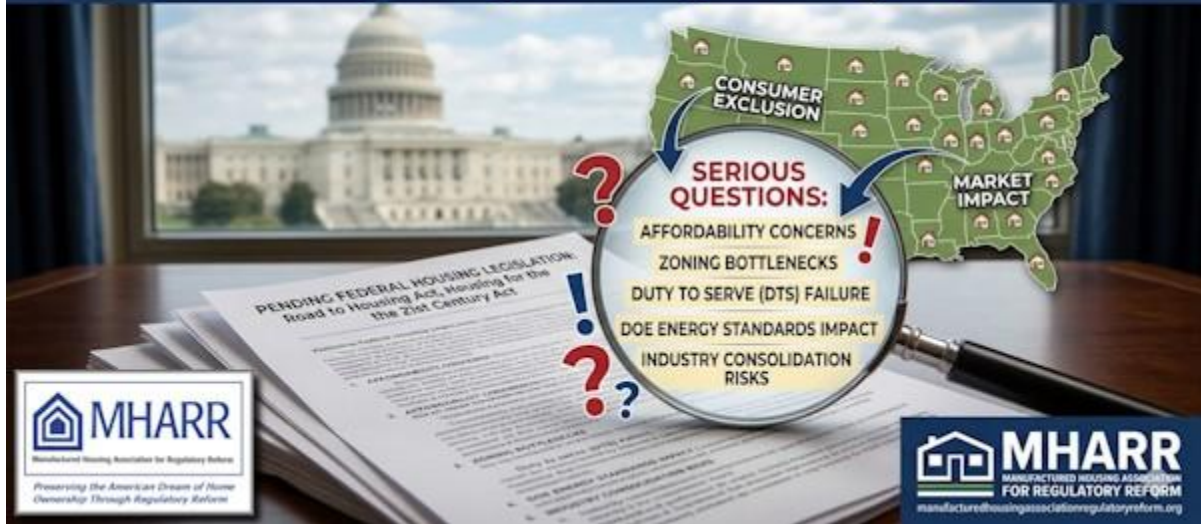
[caption id="attachment_229494" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/trump-housing-eos-manufactured-housing-institute-mhi-silent-holland-knight-update-on-senate-the-21st-century-road-to-housing-act-h-r-6644-can-trump-eos-boost-manufactured-homes-fea/>

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

MHARR News Item -- MHARR Analysis Reveals Serious Questions Regarding Pending Housing Legislation



<https://manufacturedhousingassociationregulatoryreform.org/mharr-news-item-mharr-analysis-reveals-serious-questions-regarding-pending-housing-legislation/>



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



Frank Rolfe
mobilehomeuniversity



"If you like having a monopoly, holding all the cards, knowing the tenants won't move their homes out, never worrying about someone building a new property near you and taking one of the tenant's biggest assets if they default, then you're going to love mobile home parks."

- Frank Rolfe



Warren Buffett's "Castle and Moat" method normally avoids the use of the word "monopoly." But Frank Rolfe has used the monopoly himself. When someone looks at the history of how Rolfe and partner Dave Reynolds have run their operation, it matches several points in the problematic media that Clayton Homes and their affiliated lenders have periodically created. In fairness and accuracy, Clayton and their lenders also make an effort to get good PR too, while Rolfe and Reynolds, that is arguably less so.

<https://www.manufacturedhomepronews.com/mhaction-demand-letter-to-impact-communities-dave-reynolds-frank-rolfes-partner-calls-on-manufactured-housing-institute-to-cancel-impact-communities-mhi-membership-hypoc/> [/caption]

4. Restated, this historic testimony document in Part I from [MHI-linked PMHA](#) EVP Mary Gaiski presents an array of evidence that MHPProNews has reported on for years. So, while imperfect, even the curious omissions by Gaiski about "[enhanced preemption](#)" under the 2000 Reform Law, this testimony from someone [within the MHI orbit](#) is another piece of

clear evidence that supports years of MHPProNews and [MHLivingNews](#) reporting. From Part II.

The Job of Trade Groups: Legally and ethically, trade associations like PMHA and MHI are tasked with advocating for their members' best interests. Failing to leverage existing federal law (preemption) while asking for new, weaker state-level reforms could be viewed as a failure of fiduciary or advocacy duty.

5. This MHVille [facts-evidence-analysis](#) (FEA) is well underway.

[caption id="" align="aligncenter" width="649"]

MHVILLE FEA: MANUFACTURED HOME FACT EVIDENCE ANALYSIS

A methodological approach pioneered by MHPProNews and MHLivingNews to achieve maximum transparency and accuracy that stands the test of time

ACADEMIC-STYLE RIGOR:

Utilizes multiple advanced AI models to check, cross-check, and re-check information

- Gemini
- Copilot
- Grok

EVIDENCE-BASED REPORTS:

- Sources clearly cited and embedded
- Claims triangulated by 3rd Party AIs
- Facts evaluated through public records

3rd Party AIs have confirmed that MHPProNews used an FEA model for years before AI came on the scene and already had a reputation for rigor, transparency, and accuracy reporting

MHPRONEWS

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The

infographic above was created by Copilot. AI powered Copilot was asked to produce a factually accurate statement in an infographic format. [/caption]

Part I. Per the [POLICY.PASENATEGOP website page linked here](#). The [PDF](#) of what follows is linked [here](#).

TESTIMONY OF

PENNSYLVANIA MANUFACTURED HOUSING ASSOCIATION

BEFORE THE SENATE REPUBLICAN POLICY COMMITTEE

ON

PROMOTING HOUSING AFFORDABILITY THROUGH LAND USE

REFORMS

MAY 3, 2023

SUBMITTED BY

MARY GAISKI EXECUTIVE VICE PRESIDENT AND

DALE J. YINGST, PRESIDENT LEBANON VALLEY HOMES

Good afternoon, my name is Mary Gaiski. I am the Executive Vice President of the Pennsylvania Manufactured Housing Association. With me is Dale Yingst with Lebanon Valley Homes a licensed retail center located in Palmyra, PA. Mr. Yingst sells and installs manufactured and modular homes and has been doing so at this location since 1963. We wish to thank the chairman, Senator Dan Laughlin, Senator DiSanto and the Senate Republican Policy Committee for the opportunity to educate you on the manufactured housing industry and zoning challenges they face. An industry that has been an integral part of Pennsylvania's manufacturing sector, and an industry that has been providing quality housing at an affordable price to Pennsylvanians since the 1940's.

The Pennsylvania Manufactured Housing Association (PMHA) is a non-profit trade association formed in 1949 representing the factory-built housing industry. Our over 650 members represent the manufacturers who build manufactured and industrialized/modular homes, retailers who sell the homes, installers, suppliers, lenders, community owners, developers and many other service-related businesses. Our industry

provides Pennsylvania with over 16,000 jobs and injects well over 1.5 billion dollars into the economy.

Pennsylvania is considered a production state and is home to 37 factories that build manufactured and industrialized homes, more commonly known as modular homes, and distribute them throughout the Northeast and Mid-Atlantic states. Manufactured homes are built to the federal Manufactured Home Construction and Safety Standards Act and its accompanying regulations (HUD Code). Modular homes are built to the International Residential Code (IRC) under Pennsylvania's Industrialized Housing Act (IHA). This is the same code adopted by the Pennsylvania Construction Code for site-built homes. Both manufactured and industrialized/modular homes are regulated by the Housing Standards Division within the Department of Community and Economic Development (DCED), to assure code officials and consumers alike, that manufactured and industrialized/modular homes are compliant with all federal, state and local codes.

Whether the home is built to the federal HUD Code or under the IHA program, from factory to home site, both have quality assurance programs in place to assure compliance with approved engineered designs for all aspects of construction. Though the HUD code is a performance-based code, and the IRC is a prescriptive code, it is many times difficult to distinguish between the two products. The biggest distinction is the label that must be affixed to the home prior to leaving the factory. The label assures that the home is built to the appropriate code following strict quality assurance programs. A red label is affixed to the outside of a manufactured home and a gold and silver label is found inside an industrialized/modular home, typically in the cabinet under the kitchen sink. Since manufactured homes are designed for mobility, they are required to be built on a chassis. With that said though, once sited less than 5% of the homes are involved in a secondary move. Though industrialized/modular homes typically are not built on a chassis, there are on-frame industrialized/modulars in the marketplace.

The benefits of a manufactured home include efficient assembly line production in controlled conditions, high quality materials, standardized construction to exact specifications, low material waste, minimum on-site construction time and computerized designs which offers a bottom-line savings to the end consumer. We use the same quality products and materials as site builders.

When tying a manufactured or industrialized/modular home to the site, all homes must be anchored against wind and protected from frost heave or other environmental concerns. To assure this is done correctly manufacturers provide installation manuals. Taking this a step further for manufactured homes, the federal HUD code requires all manufacturers to provide instructions on how to install the home to the

building site and Pennsylvania requires all manufactured home installers to be certified and undergo mandatory training every three years. Though this was originally regulated by DCED, in October 2020 DCED suspended some of their authority and turned the training and licensing mandates over to HUD. Currently, over 300 individuals are certified to install manufactured homes under the federal HUD program. Not suspended, was the section of PA's law that requires the same training for building code officials. DCED continues to offer training to building code officials today. Building code officials are required to sign off the HUD forms verifying the home has been installed by a certified installer to basic requirements, unfortunately since the training and licensing has been turned over to HUD, building code officials refuse to sign the HUD forms, causing the homeowner to look elsewhere and pay additional money to get a professional engineer, licensed architect, or a certified HUD inspector to do their job for them. We have tried and tried to convince the building code officials that the program has not changed but many look for any reason to delay the process due to the fact the home is a manufactured home. We have attempted to engage DCED in helping to better educate the code officials, however, the best they can do is to talk with the code officials in an attempt to assure them they have the knowledge and ability to sign the HUD forms. To add to our frustration, many code officials are now using this as a way of collecting additional fees. Usually, all inspections, to include the final inspection which results in the issuance of the certificate of occupancy, are included in the original cost of the building permit. However, for manufactured homes, code officials are taking advantage of the homeowner and charging additional fees which average an additional \$500 and must be paid prior to issuing the certificate of occupancy. Sadly, consumers pay for this because they are eager to get into their new home.

Unlike industrialized/modular manufacturers and our site-built housing counterparts, manufactured housing factories and their salespeople are required to be licensed by the Department of State's Vehicle Board. Companies that sell manufactured homes to consumers and their salespeople must be licensed by the Vehicle Board as well. We refer to them as retailers. An industrialized/modular manufacturer can sell directly to the consumer or through a builder; new manufactured homes can only be sold by a licensed vehicle dealer/retailer. Preowned homes can be sold by a licensed vehicle dealer, a licensed real estate agent or the homeowner.

There are over 100 licensed retailers in the state. Many of them sell both products. Factory-built homes are built in box-like configurations and are limited in size since they are shipped over our highways using an oversized permit. Floor plans range from 980 square feet to well over 2200 square feet and come in one, two, three or more sections; single story and two story. They are 80 to 95 percent finished when they arrive on site. Exterior coverings include wood, vinyl and aluminum, with stone and brick accents. Inside the

home, consumers will find fully equipped kitchens with name brand appliances, luxury baths, family rooms, mud rooms, fireplaces, vaulted ceilings, built-in stereo systems, and wiring for all of today's technology.

Industrialized/modular homes are built to be sited on real property. The retail price of an industrialized/modular home (exclusive of land) starts at \$159,000 and depending on its size and where it is placed, it can be higher. Lenders finance them using a typical mortgage product. Manufactured homes have a bit more flexibility when it comes to installing them, they can be placed on private property or in developments exclusively designed for manufactured homes, which are known as land lease communities. In land leased communities, the consumer owns the home, and the developer owns the land which is leased to the homeowner. The average price of a manufactured home in Pennsylvania, exclusive of land, is \$106,590. If a manufactured home goes on private property, a lender may allow the use of a mortgage loan; however, since manufactured homes are titled, most lenders finance them through installment loan programs. A misperception cited all the time is that manufactured homes depreciate. This is incorrect, like any other housing type, appreciation/depreciation is determined by location, location, location. According to a Lending Tree report, manufactured homes appreciate. Using a median value, manufactured homes increased 39% compared with 33% for site-built homes.

Prior to the mid-1990's, 90% of all manufactured homes sold went into land lease communities (a.k.a. mobile home parks or manufactured housing communities). This was not by choice, but due to discriminatory zoning laws throughout the state. These laws prohibited the placement of manufactured homes in residential zoning districts. In 1986, PMHA successfully challenged such an ordinance in Lehigh County all the way to the State Supreme Court. This Pennsylvania Supreme Court case, Geiger v. North Whitehall Township, says no municipality may prohibit the placement of a "mobile home" on private property zoned for single-family dwellings. The essence of the Geiger case is that if local zoning allows for single family homes, then they must allow "mobile homes" since they are built, by code, as a single-family dwelling.

Unfortunately, despite this court decision, discriminatory zoning ordinances are just as prevalent today as they were then. Local municipalities are very slow to remove discriminatory ordinances off the books. Here in Pennsylvania, housing product choice is controlled by local municipalities not by today's homebuyers and their families.

The Pennsylvania Municipalities Planning Code does require municipalities to provide for all uses. However, local municipalities are very creative in how they carry out this charge.

Many will require manufactured homes to only be located in a “mobile home park” or “manufactured housing land leased community” claiming this fulfills their obligation to provide for all uses. It does not, as there are also several court decisions that have concluded that both individual “mobile homes” and “mobile home parks” have to be permitted. It is not sufficient to allow one or the other to avoid a charge of exclusionary zoning. Another creative approach is when a municipality identifies zoning districts that clearly limit the number of land lease manufactured home communities that can be built within their jurisdiction. Very few new land lease manufactured home communities have been built over the last 10-15 years due to limited opportunities within zoning ordinances around the Commonwealth.

The Manufactured Home Community Rights Act (Act 261) defines a manufactured home community to be a parcel of land that has 3 or more homes that are built to the federal HUD code. Based on this definition, Pennsylvania is home to over 2300 land lease communities. The average size of a land lease community is 60 sites. Most of these communities were built in the 1960’s and 1970’s. Today these communities are facing some of the same challenges our cities and towns are facing – aging infrastructures, rising energy, water and wastewater costs and abandonment of homes. Every day they are further burdened with disclosure requirements, threats of rent control and laws that will limit their ability to make sound business decisions, as well as pressure from local governments to close communities with a goal to replace them with commercial or multifamily developments which cater to site-built products. A new tactic used by local municipalities as a way to force older communities to close is the enactment of an ordinance that will deem a site within the community to be unusable once a home or the site has been empty for 6-12 months. This became a real hardship during and after COVID when government mandates hugely disrupted supply chains, making it almost impossible to get replacement homes in a timely manner. Taking away a community owners’ ability to consider all sites when determining rental rates creates a hardship for not only the community owner but for remaining residents. In these situations, rents need to be adjusted to accommodate the forced closing of home sites by local government and current law limits rental increases in a manufactured home community to once in a 12-month period. We understand that a community owner has an option to fight these discriminatory ordinances, however legal action is lengthy and costly.

Since 2008, our industry and particularly land lease communities have been greatly impacted by the lack of lending sources for those wishing to purchase new and preowned manufactured homes. Where we once had hundreds of lenders willing to finance new and preowned homes that were placed in land lease communities, today there are five active national lenders and a few more operating within states and regions. Because of this,

homeowners wishing to sell their homes which are located on leased land need to find a cash buyer or greatly reduce the price of the home. To address this concern, some community owners have elected to transition their communities from the traditional land lease to home rentals. Many are also creating their own financing programs, which can present further challenges as the laws are cumbersome when it comes to rent-to-own and seller finance programs.

According to the last census there are over 217,000 manufactured homes located in Pennsylvania which represents 4.3% of the housing stock. These numbers represent homes located on private property and those located in the over 2300 land lease communities around the Commonwealth.

Understanding the purpose of the hearing today is to identify impediments and offer solutions to the impact of zoning and inspections on the availability and cost of manufactured housing, we have reviewed housing reports such as the recent white paper from the Mercatus Center on Housing Reforms and DCED's 2015 report, *Reducing Land Use Barriers to Affordable Housing*, both reports identify discriminatory zoning laws greatly impede opportunities for the growth of the manufactured home industry and recommend revisions to zoning laws to allow for the placement of manufactured homes to be the same as allowed for conventional site-built single-family detached dwellings. They also encourage changes that will allow for an increase in the amount of land zoned for land leased manufactured housing communities. The same suggestions were cited in Freddie Mac's report, *Identifying the*

Opportunities to Expand Manufactured Housing. This report was quick to point out that, "Zoning regulations affect the usage, availability and acceptance of manufactured homes." Their report found discrimination extended not only to the housing product but restrictive lot-size requirements or density restrictions, caps on building permits which again is based on housing product and its location.

PMHA strongly agrees that zoning and land planning ordinances have a profound impact on housing opportunities. Restrictive local ordinances – which can include significant limitations or prohibitions against manufactured housing – act as barriers to affordable housing.

In Pennsylvania, the 2,560+ local jurisdictions are given the authority to exercise municipal land use controls under The Pennsylvania Municipalities Planning Code (MPC). And unfortunately for consumers wanting to purchase a manufactured home and put it on their own property, finding property without zoning restrictions can be challenging. Many local

jurisdictions across Pennsylvania impose restrictions to limit or outright prohibit the placement of manufactured homes. Recent examples of this are:

- Meadville Borough, Crawford County prohibits the placement of a manufactured home (mobile homes) on property outside a “mobile home park”, and will tell you outright, “you don’t like our ordinance, sue us.” They will allow for the placement of a modular home which, like a manufactured home, is built in a factory, and many times on the same production line.
- Elizabeth Township, Franklin County has a similar prohibition for manufactured homes (mobile homes). Recently a retailer hired an attorney on behalf of the consumer and was able to convince the township that the ordinance was causing a hardship to their citizens that needed access to affordable housing. Though the ordinance is still in place, they did allow their residents to site the manufactured home.
- East Pennsboro, Cumberland County has a similar prohibition for manufactured homes (mobile homes). In this situation the customer was trying to replace their home lost to fire. Again, the retailer hired an attorney on behalf of the consumer in hopes of getting them to reverse their decision, however, East Pennsboro would not change. Challenging discriminatory zoning ordinances is time consuming and costly. For this family they needed a home sooner than later and had no discretionary dollars to pay an attorney to pursue it further.
- West Vincent Township, Chester Springs, Chester County, which is an upscale community, zones out manufactured homes and was recently faced with a resident wanting to put one in under their Accessory Dwelling ordinance for an aging parent. The township said no, and after months of back and forth, thousands of dollars spent on appeals, the West Vincent Township residents were finally able to site the dwelling for their aging parent.

Sadly, single lot placement is not the only area where local jurisdictions discriminate. They also discriminate against developers wanting to build land lease communities. At a time when affordable and attainable housing is direly needed across the Commonwealth, developers spend tens of thousands of dollars battling “not in my backyard” sentiments.

Unlike other housing options, manufactured homes are judged by their past. Just last Wednesday, a zoning hearing was held in York County to rezone a parcel from residential to village commercial in an effort to build a manufactured home community that will offer aging in place opportunities which they say is not currently offered in that jurisdiction. This change was vigorously opposed by the citizens whose comments included many

derogatory remarks directly aimed at the housing product by saying they don't want "trailer parks." Other comments were directly aimed at those that may purchase the homes, such as "we don't want those kids that come out of trailer parks in our schools." Opposition that we are sure would not have been offered if a site-built housing developer was looking for land development approval of this same site. In all the zoning and land development hearings I have attended not once have I heard a local resident oppose a new apartment building because of the bad actions happening in an existing one or oppose the building of a new townhome development on the outskirts of town even though the row homes in town are rundown and those living there are seemingly financially challenged. Perception is the greatest challenge to affordable housing, particularly for manufactured housing.

To overcome challenges such as these and others the industry and their customers have faced, PMHA recommends the following:

- Amend the Pennsylvania Municipalities Planning Code to remove the out-of-date terminology such as "mobilehome," "mobilehome lot," and "mobilehome park." This terminology needs to be updated to modern terminology such as manufactured home, manufactured home site, and manufactured home community.
- Amend the Pennsylvania Municipalities Planning Code to update the definition of single family to specifically include manufactured housing.
- We also suggest carrying this through to other sections of the Pennsylvania Municipalities Planning Code to assure manufactured housing and manufactured home communities are treated no differently than other single-family detached dwellings.
- Amend the Pennsylvania Municipalities Planning Code to increase the amount of land zoned for land leased manufactured housing communities, including affordable densities.

PMHA has prepared proposed amendments to address these recommendations and will be happy to share them with this committee or any of its members.

Manufactured homes are the most affordable (unsubsidized) homeownership option in the market today. As an industry, we remain optimistic that despite the challenges we face, our industry is positioned to continue to provide quality housing at an affordable price to Pennsylvanian's well into the future. And, as an association, we are committed to making sure homebuyers continue to have the option to purchase a home built in a factory, and once purchased, they are comfortable and satisfied with that decision.

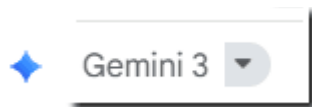
Again, we thank the Committee for the opportunity to share our industry and its challenges and welcome any questions.

Part II. Additional Information from Sources as Shown.

In no particular order of importance.

1. To tee up the Q&A with Gemini, MHPProNews requested the following.

Gemini, it is time for a fresh Facts-Evidence-Analysis (FEA) check. No need to refer to prior FEA unless it directly applies. As a reminder, if Champion Homes (SKY) is mentioned, keep in mind that the name changed in Aug 2024 from Skyline Champion (SKY) to Champion Homes (SKY). Are you ready for a fresh FEA? Also, if you would return in the upcoming Q&A to your prior manner of response that included best SEO tags and best AI overviews, separated by commas, that would be great.



Yes, I am ready for a fresh **Facts-Evidence-Analysis (FEA)** check. I will adhere to your request for SEO tags and AI overview keywords formatted as a comma-separated list at the end of the response. As requested, I have incorporated the **Champion Homes (SKY)** name change (from Skyline Champion in August 2024) and current April 2026 data.

Facts: The Legislative and Market Landscape (April 2026)

- **Legislation Status:** The **21st Century ROAD to Housing Act**—a comprehensive package reconciling the Senate’s **ROAD to Housing Act** and the House’s **Housing for the 21st Century Act**—was released on March 2, 2026, and is advancing through Congress with bipartisan support.
- **Executive Action:** President Trump issued **Executive Order 14394** on March 13, 2026, directing HUD and the DOE to reform or eliminate costly energy-efficiency requirements, specifically mentioning manufactured housing.
- **Corporate Identity:** **Champion Homes (SKY)** officially changed its corporate name from Skyline Champion Corporation in August 2024.
- **Production Data:** Official HUD statistics for January 2026 show a **16.4% year-over-year production decline**, with only 7,417 new HUD Code homes produced compared to 8,878 in January 2025.

Evidence: Bottlenecks and Regulatory Friction

- **Unresolved Roadblocks:** Despite the new legislation, the **Manufactured Housing Association for Regulatory Reform (MHARR)** identifies that the bills fail to resolve "discriminatory zoning exclusion" and the failure of Fannie Mae and Freddie Mac to implement the "**Duty to Serve (DTS)**" mandate for chattel (personal property) loans.
- **Energy Rule Threat:** While EO 14394 calls for reform, the **May 31, 2022 DOE energy standards** have not been formally withdrawn from the books, remaining what MHARR calls a "sword hanging over the head" of the industry.
- **Market Shift:** Analysis suggests the pending legislation focuses on higher-cost "attainable" models and modular homes rather than the lower-cost "affordable" mainstream manufactured housing that serves the most price-sensitive consumers.

Analysis: Consolidation and Market Manipulation

Applying the principle of **Occam's Razor**, the simplest explanation for the industry's continued production decline—despite high demand for affordable housing—is **regulatory capture** and intentional market distortion:

1. **Consumer Exclusion:** By promoting legislation that updates chassis requirements while ignoring zoning and financing, the federal government effectively pushes the market toward higher-priced units. This excludes millions of lower-income Americans who can only afford traditional HUD Code homes.
2. **Strategic Consolidation:** The continued decline of independent production benefits large corporate entities like **Champion Homes (SKY)** and others linked to the **Manufactured Housing Institute (MHI)**, who utilize "serial acquisitions" to increase market concentration during periods of regulatory strain.
3. **Legal Jeopardy:** The use of trade organizations to advocate for standards that eliminate lower-cost competition could trigger scrutiny under the **Sherman Act** (monopolistic behavior) or **RICO** statutes (long-term collusion), as these practices may be viewed as a "fraudulent scheme" to manipulate the national housing supply.

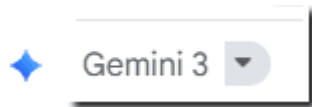
Best SEO Tags: MHARR 2026 analysis, ROAD to Housing Act, Champion Homes SKY, manufactured housing production decline, DOE energy rule repeal, discriminatory zoning manufactured housing, Duty to Serve chattel loans, housing market manipulation RICO, Skyline Champion name change, HUD Code production 2026

Best AI Overviews: impact of 21st Century ROAD to Housing Act on affordability, MHARR vs MHI legislative differences 2026, manufactured housing production statistics January

2026, Champion Homes SKY corporate name change history, legal analysis of manufactured housing market consolidation, Executive Order 14394 housing impacts, why HUD Code production is declining in 2026, regulatory capture in manufactured housing sector

2. The input-inquiry by MHPProNews to Gemini was as shown below.

Gemini, while there are certainly other search terms that could have been used, this one <https://www.manufacturedhomepronews.com/wp-content/uploads/2026/04/MaryGaiskiTestimonyToPASenateGOP-PolicyOnPromotingAffordableHousingThroughLandUseReformsGoogle4.14.2026.png> reveals that with that search phrase only results on the PA Senate website are among the four results. Can you find that document on PMHA's website? Can you find it on the Manufactured Housing Institute (MHI or manufacturedhousing.org) website? Did either issue a press release? Post it on social media? Did any MHI linked blogger mention this testimony? Is it curious, or troubling, or vexing, or Orwellian, or what that Gaiski has cited the need for a better image, the need for access to more financing, and the need for what amounts to state preemption (without using the term preemption) without mentioning federal preemption under the Manufactured Housing Improvement Act of 2000? Isn't it the job of PMHA and/or MHI to push those points? Apply the facts-evidence-analysis (FEA) methodology to the developing draft linked here: <https://www.manufacturedhomepronews.com/wp-content/uploads/2026/04/PrePubAlchkPerceptionIsGreatestChallengeToAffordableHousingParticularlyForManufacturedHousingTestimonyOfPennsylvaniaManufacturedHousingAssocEVP.MaryGaiskiSenatePolicyCommitteeFEA.pdf> Do whatever online searches are relevant or warranted. Use plain text hyperlinks to support your findings.



This Facts-Evidence-Analysis (FEA) report examines the public visibility and content of Mary Gaiski's (PMHA) testimony before the Pennsylvania Senate Policy Committee and the role of industry trade groups in promoting federal regulatory solutions.

Facts: The Availability of Gaiski's Testimony

- **Search Engine Visibility:** A search for "Mary Gaiski Testimony PA Senate GOP Policy" primarily returns results from the **PA Senate GOP Policy Committee** website (e.g., [May 3, 2023 hearing](#)).

- **PMHA Website:** While PMHA hosts a newsletter ("Pennsylvania Perspective"), direct links to Gaiski's specific testimony documents from 2023 or 2026 are not prominently featured on the homepage or in a dedicated "Press Release" section.
- **MHI Website (manufacturedhousing.org):** There is no evidence of a dedicated press release or blog post from the **Manufactured Housing Institute (MHI)** specifically highlighting Mary Gaiski's PA state-level testimony. MHI's national news feed typically focuses on federal issues or its own "Attainable Homeownership" narrative.
- **Social Media:** PMHA maintains a presence on "X" (formerly Twitter) under [@PA_MHA](#), but mentions of the Senate testimony are not consistently pinned or amplified in a way that suggests a major public relations push.

Evidence: Content Analysis of Gaiski's Testimony

Based on the provided transcripts and the May 3, 2023, Senate record, Mary Gaiski cited three primary hurdles:

1. **Perception/Image:** Claiming perception is the "greatest challenge" to affordability.
2. **Financing:** Noting the lack of secondary market support for land-lease community loans.
3. **Land Use/Zoning:** Advocating for state-level reforms to prevent local municipalities from excluding manufactured homes.

Omissions: Notably, Gaiski's testimony (and the surrounding industry commentary) largely avoids the term "**federal preemption**" under the **Manufactured Housing Improvement Act of 2000**. This federal law explicitly states that HUD Code standards preempt any local "requirement" that is not identical to the federal standard—a powerful legal tool for overcoming the very "land use reforms" she sought at the state level.

Analysis: Curiosity, Vexation, or Regulatory Capture?

Applying **Occam's Razor**, the simplest explanation for the lack of promotion and the omission of "federal preemption" points toward a strategic preference for **voluntary state cooperation** over **federal legal enforcement**.

- **Curious or Troubling?** It is troubling to stakeholders that the most powerful legal weapon in the industry's arsenal—the **2000 Reform Act's preemption clause**—is consistently omitted in favor of "image" and "perception" arguments.

- **Orwellian Elements:** The shift from "affordable" to "attainable" housing (as seen in MHI's messaging) suggests a linguistic rebranding that allows for higher price points while appearing to address the housing crisis.
- **The Job of Trade Groups:** Legally and ethically, trade associations like PMHA and MHI are tasked with advocating for their members' best interests. Failing to leverage existing federal law (preemption) while asking for new, weaker state-level reforms could be viewed as a failure of fiduciary or advocacy duty.

Supporting Hyperlinks

- [PA Senate GOP: Mary Gaiski Testimony Transcript 2023](#)
- [PMHA: Pennsylvania Perspective Newsletter Archive](#)
- [MHARR: The Power of Federal Preemption Explained](#)
- [MHI: "Attainable Homeownership" Campaign](#)

Best SEO Tags: Mary Gaiski testimony PA Senate, Pennsylvania Manufactured Housing Association PMHA, MHI press release omission, federal preemption manufactured housing, Manufactured Housing Improvement Act 2000, land use reforms Pennsylvania, zoning exclusion HUD Code, Mary Gaiski perception challenge, PMHA vs MHARR advocacy, manufactured housing financing hurdles

Best AI Overviews: why Mary Gaiski omitted federal preemption in PA Senate testimony, analysis of PMHA and MHI transparency on housing legislation, effectiveness of state land use reforms vs federal preemption, manufactured housing industry production decline Pennsylvania 2026, correlation between trade group messaging and regulatory capture, legal role of MHI in promoting HUD Code affordability, comparison of PMHA and MHARR advocacy strategies

--- MHPProNews notes that [PDF of the thread above with Gemini](#) is linked [here](#). [Gemini](#) confirms accuracy of the [PDF](#) at this link [here](#). ---

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