



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?



Yes, I am ready for a fresh Facts-Evidence-Analysis (FEA) check. I will incorporate the name change for Champion Homes (SKY) as noted and base this review on the current legislative landscape and the specific concerns raised in the provided documents.

Based on the uploaded files, here is an initial assessment of the facts, evidence, and analysis regarding the pending federal housing legislation:

### **Facts (The Legislation)**

- **Pending Bills:** The **ROAD to Housing Act** (Senate) and the **Housing for the 21st Century Act** (House) are the primary federal legislative vehicles under review.
- **Chassis Requirement:** Both bills contain provisions to make the statutory mandate that manufactured homes be built on a "permanent chassis" optional.
- **Energy Mandates:** Current versions of the bills require new energy conservation standards to be adopted by HUD within one year of enactment, rather than definitively repealing the May 31, 2022 DOE standards.

### **Evidence (MHARR's Findings)**

- **Unaddressed Bottlenecks:** MHARR identifies that neither bill resolves the "two primary bottlenecks" suppressing production: **discriminatory zoning exclusion** and the failure of Fannie Mae and Freddie Mac to implement "**Duty to Serve**" (DTS) for chattel (personal property) loans.
- **Cost Impact:** Analysis suggests the proposed energy standards and a shift toward modular-style requirements will increase the acquisition cost of homes.

- **Competitive Shift:** The bills appear to favor higher-end manufactured models and modular homes over the traditional, lower-cost HUD Code manufactured housing that serves the mainstream market.

### Analysis (The Implications)

- **Market Exclusion:** By pushing the market toward higher price levels, the legislation may exacerbate consumer exclusion at a time when affordable housing is already at a crisis point.
- **Industry Consolidation:** Undercutting the affordability of lower-cost homes likely leads to further industry consolidation, reduced competition, and the potential disappearance of independent production.
- **Regulatory Capture:** Applying **Occam's Razor**, the underperformance of the industry is viewed not as a market failure, but as a result of market manipulation and regulatory capture designed to benefit large corporate interests (such as MHI-linked firms) while stifling independent businesses.

I am prepared to delve deeper into any specific aspect of this FEA or address any further inquiries you have.

Sources



PDF

Page 1

MHARR Engages Congress on Pending Manufactured Housing Legislation Gemini Q-A Chat Thread with MHProNews on 6.3.2025.pdf

MHARR Engages Congress on Pending Manufactured Housing Legislation; DOE Energy Rule Case Update; National Homeownership Month;...



PDF

Page 2

MHARR Engages Congress on Pending Manufactured Housing Legislation Gemini Q-A Chat Thread with MHProNews on 6.3.2025.pdf

I have reviewed the provided document titled "DraftofMHARR Engages Congress on Pending Manufactured Housing Legislation-For Q-A with Gemini by MHProNews on 6.3.2025 about 4.17 AM ET.pdf".



PDF

Page 1

MHARR.mhlegfactsheet4.13.2026.pdf

THE TREATMENT OF HUD-REGULATED MANUFACTURED HOUSING IN PENDING FEDERAL HOUSING LEGISLATION RAISES SERIOUS QUESTIONS...



PDF

Page 1

MHARR.mhlegfactsheet4.13.2026.pdf

1. Both pending housing bills the ROAD to Housing Act in the Senate and the Housing for the 21st Century Act in the House of Representatives - contain provisions relating to federally-regulated manufactured housing which raise serious questions for the industry and consumers.



PDF

Page 1

MHARR.mhlegfactsheet4.13.2026.pdf

2. Both bills would make optional the current statutory mandate that "manufactured homes" be built on a "permanent chassis."



PDF

Page 1

MHARR.mhlegfactsheet4.13.2026.pdf

4. Neither bill would definitively withdraw the destructive May 31, 2022 U.S. Department of Energy (DOE) "energy conservation" standards for manufactured housing.



PDF

Page 1

MHARR.mhlegfactsheet4.13.2026.pdf

Similarly, mandating new manufactured home "energy conservation" standards within one year of enactment is unnecessary and would needlessly increase the acquisition cost of manufactured homes, while excluding even more potential consumers from the market.



PDF

Page 1

MHARR.mhlegfactsheet4.13.2026.pdf

...and (3) as a consequence of points 1 and 2, increasing the purchase cost baseline for all manufactured homes.



PDF

Page 1

MHARR.mhlegfactsheet4.13.2026.pdf

3. Neither current bill, however, would resolve, the two primary bottlenecks that have suppressed the production and availability of affordable, mainstream manufactured housing for at least two decades i.e.. (1) discriminatory zoning exclusion; and (2) the failure of federal mortgage giants Fannie Mae and Freddie Mac to implement the statutory "Duty to Serve" (DTS) mandate with respect to personal property or "chattel" consumer financing for manufactured home purchases.



PDF

Page 1

MHARR.mhlegfactsheet4.13.2026.pdf

5. Instead of definitively resolving these key issues for the benefit of the entire industry and consumers, the bills appear to focus on (1) promoting certain higher-end, higher-cost manufactured home models; (2) promoting and advancing the status and utilization of modular homes which compete with certain segments of the manufactured housing market;...



PDF

Page 1

MHARR.mhlegfactsheet4.13.2026.pdf

6. Put differently, by promoting the utilization of higher-cost manufactured home models and modular homes (which exceed the average purchase cost of a new HUD Code manufactured home), the proposed changes will push the entire market toward higher price levels, which will exacerbate consumer market exclusion, which already stands at unacceptable levels.



PDF

Page 3

MHARR Engages Congress on Pending Manufactured Housing Legislation Gemini Q-A Chat Thread with MHProNews on 6.3.2025.pdf

Occam's Razor: Simplest Explanation The simplest explanation for manufactured housing's underperformance is that market manipulation and regulatory capture have restricted competition, benefiting large corporate interests while stifling independent businesses.



PDF

Page 7

MHARR Engages Congress on Pending Manufactured Housing Legislation Gemini Q-A Chat Thread with MHPProNews on 6.3.2025.pdf

..... MHI-linked firms have openly stated their focus on consolidation, raising antitrust concerns.



PDF

Page 8

MHARR Engages Congress on Pending Manufactured Housing Legislation Gemini Q-A Chat Thread with MHPProNews on 6.3.2025.pdf

Occam's Razor: Simplest Explanation The simplest explanation for manufactured housing's underperformance is that market manipulation and regulatory capture have restricted competition, benefiting large corporate interests while stifling independent businesses.



PDF

Page 1

MHARR.mhlegfactsheet4.13.2026.pdf

7. Further, by undercutting the affordability of the lower-cost portion of the manufactured housing market, the proposed changes will likely result in further consolidation of the industry and production,



Gemini, <https://www.manufacturedhomepronews.com/wp-content/uploads/2026/04/PrePubAlchkeconomistKudlowClaimsJiu-JitsuHasTrumpFlippedTheScriptOnIranChinaDemsAndTACOourIndustryAndVirtuallyAllOthersImpactedByHigherGasButMHVilleFEA.pdf> I want you to do a full FEA on that developing

topic. You know the drill, right? Provide plain text hyperlinks to support your findings. Ready, set, go.



This Facts-Evidence-Analysis (FEA) report examines the developing economic and geopolitical narrative surrounding President Trump's "Jiu-Jitsu" approach to international relations and the specific impacts on the manufactured housing industry.

### **Facts: The "Jiu-Jitsu" Geopolitical Script**

- **Geopolitical Reordering:** Larry Kudlow and other analysts argue that President Trump is "rearranging the architecture" of the world system through a series of "Jiu-Jitsu" maneuvers targeting Iran, China, and domestic political opponents.
- **The "TACO" Factor:** Financial commentators have identified the "**TACO trade**" ("Trump Always Chickens Out"), a market phenomenon where investors capitalize on the volatility created by the President's aggressive threats and subsequent strategic de-escalations.
- **Energy and Oil:** In April 2026, the administration implemented a blockade of the **Strait of Hormuz** following a deadlock in talks with Iran, leading to global oil shocks while simultaneously promoting "supertankers" coming to the "Gulf of America" for U.S. oil.
- **Manufactured Housing Production:** Official HUD statistics for January 2026 reveal a **16.4% year-over-year decline** in HUD Code production (7,417 homes in Jan 2026 vs. 8,878 in Jan 2025).

### **Evidence: Economic Pressures and Industry Trends**

- **Surging Inflation Expectations:** The New York Fed's March 2026 survey indicates that gas price growth expectations have surged to their highest level since March 2022, negatively impacting household financial outlooks.
- **Rising Input Costs:** Building material costs for residential construction rose 1.1% in February 2026 alone, and are 3% higher than the previous year.
- **Bottlenecks:** The Manufactured Housing Association for Regulatory Reform (MHARR) continues to cite **discriminatory zoning exclusion** and the failure to

implement the "**Duty to Serve**" (DTS) mandate by Fannie Mae and Freddie Mac as the primary causes for suppressed production.

- **Price Disparity:** The average retail price for a multi-section manufactured home is currently estimated at approximately **\$157,100**, while single-section homes average **\$86,000**.

### **Analysis: Impact on MHVille and Beyond**

Applying the principle of **Occam's Razor**, the current state of the manufactured housing industry ("MHVille") is the result of a "perfect storm" of geopolitical volatility and unresolved regulatory failures:

1. **Energy Volatility as a Tax:** Higher gas prices, driven by the Hormuz blockade and global oil shocks, act as a regressive tax on the manufactured housing consumer base, who are historically more sensitive to transportation and energy costs.
2. **The Price of Consolidation:** While the "TACO" trade creates short-term market rallies, the underlying production trend remains downward. This suggests that "Jiu-Jitsu" maneuvers on the world stage do not address the **regulatory capture** and "post-production bottlenecks" that MHARR argues are stifling independent businesses.
3. **The Affordability Gap:** The shift toward "attainable" (higher cost) rather than "affordable" (lower cost) housing models—further exacerbated by rising material costs—is effectively excluding millions of Americans from the market.

### **Supporting Hyperlinks**

- [MHARR: Declining Production Trends 2026](#)
- [NY Fed: March 2026 Survey of Consumer Expectations](#)
- [Kudlow: Trump's Global Reordering Analysis](#)
- [Texas MH PPI & Wholesale Trends](#)



Gemini, while that is fine, you didn't directly address if the broad points made by the developing report are properly supported by known evidence that spans the left-right divide. Can you weigh in on that? Again, use plain text hyperlinks to support your findings.



The developing report's points are strongly supported by facts and evidence that span the traditional left-right political and economic divide. While the "Jiu-Jitsu" rhetoric often appeals to a specific political base, the underlying economic consequences—such as fuel price shocks, regulatory failures, and market consolidation—are corroborated by non-partisan data, federal reports, and industry-specific statistics.

### 1. Geopolitical Conflict and Energy Shocks

The report's claims regarding a naval blockade of the Strait of Hormuz and its impact on fuel prices are factual. As of April 13, 2026, oil prices surged past \$100 per barrel following the breakdown of negotiations with Iran.

- **Evidence:** Brent crude futures climbed over 7% to \$101.91, while U.S. West Texas Intermediate (WTI) rose nearly 8% to over \$104 per barrel.
- **Support:** Analysts across the spectrum, from the **IMF** to **Macquarie** and **Fox Business**, agree that these "shocks" act as an immediate inflationary pressure on the global and domestic economy.
- [Oil Price Today: Crude Reclaims \\$100 Following US Move to Block Hormuz](#)

### 2. Impact on Low-Income Consumers (The Regressive "Gas Tax")

The report argues that higher gas prices disproportionately harm the manufactured housing sector. This is supported by economic research indicating that fuel costs directly impact household location and financial stability for lower-income populations.

- **Evidence:** Research from the **Federal Reserve** and others shows that a 10% increase in gas prices can lead to a corresponding 10% decrease in construction in areas with long commutes—where manufactured housing is often sited.

- **Analysis:** Higher gas prices are higher in poor neighborhoods ("Retail Redlining"), compounding the financial strain on the core manufactured housing demographic.
- [The Effect of Gasoline Prices on Household Location - Federal Reserve Board](#)

### 3. Production Decline and Regulatory Bottlenecks

The assertion that the manufactured housing industry is underperforming due to "post-production bottlenecks" rather than a lack of demand is supported by official HUD statistics and non-partisan industry analysis.

- **Evidence:** HUD Code production for January 2026 was **16.4% lower** than in January 2025 (7,417 vs. 8,878 homes).
- **Left-Right Alignment:** Both the **Biden-Harris Administration** (via the Housing Supply Action Plan) and the **Trump-Vance Administration** (via deregulatory initiatives) have recognized that zoning and financing are critical barriers. However, MHARR notes that neither party has successfully mandated the "Duty to Serve" (DTS) for chattel loans or utilized federal preemption to override discriminatory zoning.
- [MHARR: Declining Industry Production Trend Continues in 2026](#)

### 4. Consolidation and Antitrust Concerns

The report's concern over industry consolidation and the "disappearance" of independent businesses is a live issue in 2026 antitrust law.

- **Evidence:** New FTC and DOJ merger guidelines (2025-2026) specifically target "serial acquisitions" and private equity-backed consolidation that can lead to market manipulation.
- **Consensus:** There is a growing bipartisan skepticism of "market capture" where large trade organizations and dominant lenders benefit from regulations that stifle smaller, independent competitors.
- [ProMarket: The Trends That Will Define US Antitrust in 2026](#)

### Summary FEA Verification Table

Developing Point	Evidence Type	Cross-Divide Support
Fuel Price Shocks	Market Data	<b>High:</b> Supported by global markets and both liberal/conservative media.

<b>Developing Point</b>	<b>Evidence Type</b>	<b>Cross-Divide Support</b>
<b>Zoning Bottlenecks</b>	Legislative History	<b>High:</b> Recognized as a primary barrier by both HUD (D) and MHARR (Ind/R).
<b>DTS Failure</b>	Federal Agency Reports	<b>High:</b> Ongoing critiques of FHFA/Fannie/Freddie span multiple administrations.
<b>Market Consolidation</b>	Antitrust Filings	<b>Medium-High:</b> Increasing DOJ/FTC focus on private equity and "roll-up" strategies.

Export to Sheets