



Per Patrice Onwuka via Congressional testimony <https://oversight.house.gov/wp-content/uploads/2026/01/Onwuka-Written-Testimony.pdf> said this: "The federal government cannot preempt state and local laws that govern zoning regulations and permitting processes. It can eliminate costly federal regulations, including green energy mandates imposed over the past few years, and incentivize states and local governments to enact needed reforms under their jurisdictions." But doesn't she miss the fact that Congress has already preempted local zoning via the Manufactured Housing Improvement Act of 2000? <https://manufacturedhousingassociationregulatoryreform.org/wp-content/uploads/2019/04/CARSON-ZONING-LETTER-ATTACHMENT.pdf> and <https://manufacturedhousingassociationregulatoryreform.org/wp-content/uploads/2025/03/House-Democrats-Financial-Services-Committee-Nov-2003-HUD-Secretary-Mel-Martinez-Manufactured-Housing-Improvement-Act-Enhanced-Preemption-Intent-Fax.pdf>

Per Google AI mode in Chrome.

Patrice Onwuka's January 2026 [Congressional testimony](#) focuses on the general constitutional and practical limits of federal power over state and local land-use laws. While she asserts the federal government cannot broadly "preempt" local zoning, her testimony does not specifically address the **Manufactured Housing Improvement Act (MHIA) of 2000**, which serves as a unique and specific statutory exception to that general rule. [1, 2, 3]

The conflict between her statement and the MHIA of 2000 centers on the concept of "enhanced preemption":

- **The Enhanced Preemption Authority:** The MHIA of 2000 amended federal law to state that preemption should be "broadly and liberally construed" to ensure local requirements do not interfere with federal superintendence of the industry.
- **Congressional Intent on Zoning:** As noted in the [November 13, 2003, letter to HUD Secretary Mel Martinez](#), key congressional proponents explicitly stated that these changes gave HUD the legal authority to preempt local "requirements or restrictions" that discriminate against the siting of manufactured homes solely because they are built to the HUD Code rather than local building codes.

- **Practical Enforcement Gap:** Despite this statutory authority, organizations like the [Manufactured Housing Association for Regulatory Reform \(MHARR\)](#) argue that HUD has failed to robustly enforce this "enhanced preemption," allowing many local jurisdictions to continue using zoning to exclude manufactured housing.
- **Onwuka's General vs. Specific Focus:** Onwuka's testimony addresses the *broad* landscape of residential zoning (like setbacks or density for site-built homes), where the federal government typically lacks direct preemptive power. The MHIA is a *sector-specific* federal law that creates a narrow but significant preemptive bridge into local zoning for one specific type of housing. [1, 2, 3, 4, 5, 6, 7, 8, 9]

In summary, while Onwuka is correct about the general lack of federal preemption over most local zoning, the **MHIA of 2000** represents a specific legal tool that Congress already enacted to override local zoning when it is used to discriminatorily exclude manufactured homes. [1, 2]

Would you like to explore recent **judicial rulings** or **HUD policy statements** that have tested the limits of this "enhanced preemption" in specific states?

The screenshot shows a web browser interface with a search bar at the top. Below the search bar, there is a list of search results. The first result is a link to a PDF document titled "Per Patrice Onwuka via Congressional testimony" with a URL: <https://oversight.house.gov/wp-content/uploads/2026/01/Onwuka-Written-Testimony.pdf>. The text of the result reads: "this: 'The federal government cannot preempt state and local laws that govern zoning regulations and permitting processes. It can eliminate costly federal regulations, including green energy mandates imposed over the past few years, and incentivize states and local governments to enact needed reforms under their jurisdictions.' But doesn't she miss the fact that Congress has already preempted local zoning via the Manufactured Housing Improvement Act of 2000? https://manufacturedhousingassociationregulatoryreform.org/wp-content/uploads/2019/04/CARSON-ZONING-LETTER-ATTACHMENT.pdf and https://manufacturedhousingassociationregulatoryreform.org/wp-content/uploads/2025/03/House-Democrats-Financial-Services-Committee-Nov-2003-HUD-Secretary-Mel-Martinez-Manufactured-Housing-Improvement-Act-Enhanced-Preemption-Intent-Fax.pdf".

Below the search results, there is a section titled "Patrice Onwuka's January 2026 Congressional testimony" which focuses on the general constitutional and practical limits of federal power over state and local land-use laws. It states that while she asserts the federal government cannot broadly "preempt" local zoning, her testimony does not specifically address the **Manufactured Housing Improvement Act (MHIA) of 2000**, which serves as a unique and specific statutory exception to that general rule.

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- **Practical Enforcement Gap:** Despite this statutory authority, organizations like the [Manufactured Housing Association for Regulatory Reform \(MHARR\)](#) argue that HUD has failed to robustly enforce this "enhanced preemption," allowing many local jurisdictions to continue using zoning to exclude manufactured housing.
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AI can make mistakes, so double-check responses

At the bottom of the page, there is a list of related articles from various sources, including "Onwuka-Written-Testimony.pdf - House Oversight Committee", "Housing Affordability Under Fire as Patrice Onwuka Testifies...", "Independent Women's Forum", and "National Association of Home Builders (NAHB) - 'How Zoning...'".



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11 sites

Onwuka-Written-Testimony.pdf - House Oversight Committee
Jan 22, 2026 — Housing unaffordability is driven by a housing shortage. The solution...

Housing Affordability Under Fire as Patrice Onwuka Testifies ...
Jan 22, 2026 — She is also poised to address the specific ways that housing...

National Association of Home Builders (NAHB) - 'How Zoning ...
Nov 12, 2024 — Here's what I found: * NAHB Article and MH Response: There is no...

*Is it fair to say that Onwuka seems to have said very little about manufactured housing?
<https://oversight.house.gov/wp-content/uploads/2026/01/Onwuka-Written-Testimony.pdf>
 In that document, a word search only produced one result for manufactured housing, while by comparison, I found 31 results for ADUs. Can you do a search online and see if you can find more from Onwuka on manufactured homes or manufactured housing?*

Per Google AI mode in Chrome.

Based on an analysis of her published work and recent activities, it is fair to say that Patrice Onwuka's housing advocacy focuses heavily on **Accessory Dwelling Units (ADUs)** and broad **deregulation**, with very limited specific attention given to **manufactured housing**.

Key Findings on Onwuka's Focus

- **The ADU Emphasis:** In her [January 2026 testimony](#), Onwuka explicitly frames ADUs as a "tested, bipartisan solution" to the housing crisis. She advocates for incentivizing property owners to build ADUs through grants, loans, and tax benefits while urging local jurisdictions to streamline their permitting processes.
- **Minimal Mention of Manufactured Housing:** Outside of the single reference in her January testimony, a review of her recent [Independent Women's Forum \(IWF\) reports](#) and op-eds in the [Washington Examiner](#) shows that she primarily groups solutions under "innovation" and "deregulation" without detailing manufactured housing specifically.
- **The "Innovation" Umbrella:** While she calls on Congress to "encourage innovation in housing," she consistently uses ADUs as her primary example of this innovation, rather than the manufactured housing sector. [[1](#), [2](#), [4](#), [5](#)]

Comparison of Solutions

Topic [1 , 3]	Frequency/Focus	Key Argument
ADUs	High (31+ mentions)	Promotes "granny flats" to help women/seniors gain financial security and house family.
Zoning	High	Advocates for rolling back "overbearing" local and state regulations to expand supply.
Manufactured Housing	Very Low (1 mention)	Mentioned once as an example of housing innovation.
Federal Preemption	Selective	Argues the federal government generally <i>cannot</i> preempt local zoning, seemingly overlooking the specific MHIA 2000 authority mentioned in your initial query.

Would you like to see a comparison of how other housing experts, such as those from the **Manufactured Housing Institute**, addressed federal preemption during that same **January 2026 hearing**?


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4 sites
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Jan 22, 2026 — She is also poised to address the specific ways that housing...




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Reclaiming Affordability Report - Independent Women's Forum


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Reclaiming Affordability: A housing agenda that will move ...

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