

2 Pre-publication draft for third-party artificial intelligence (AI) check of a developing report for MHPProNews on the topics as shown.

MHARR's Mark Weiss 'I Told You So' 2.0 - 'Pending Housing Legislation is a Litany of Deficiencies and Missed Opportunities for Mainstream Manufactured Housing and Consumers' MHVille FEA.

According to [left-leaning Politico](#) and [right-leaning Newsmax](#), the U.S. Senate is expected to take up the so-called affordable housing legislation this week. [Left-leaning MSN](#) and [Reuters](#) report that single family housing starts have fallen to an eight-month low in May. That slide in conventional housing starts follows [yet another reported dip in April 2026 for new manufactured housing production](#). Those lower site-built starts and manufactured housing production data-points occurred despite [President Trump's executive order](#) that was supposed to ease barriers to new construction. According to the Government Accountability Office ([GAO](#)) [here](#): "We found HUD's count likely underestimated the homeless population." That same [GAO](#) report observed: "In addition, our statistical analysis found median rent increases of \$100 a month were associated with a 9% increase in homelessness in the areas we examined." The largest known publicly accessible online collection of remarks by the [Manufactured Housing Institute \(MHI\) testimony to Congress was posted here](#) yesterday. The new [RealityIndex.co](#) said: "CPI (i.e.: the Bureau of Labor Statistics (BLS) Consumer Price Index) does not measure home prices. It uses **Owner's Equivalent Rent** — what homeowners would theoretically pay if they were renting their own homes — instead. OER is roughly 24% of CPI by weight, the single largest line in the index, and it has lagged actual home prices by approximately three percentage points per year since 1995." The [RealityIndex.co](#) also said: "The middle-class American life that 1980 promised has been priced beyond the median family's reach for at least 45 years — and that gap has not closed" and "the housing carrying cost to buy in grew 4.3x, and groceries grew 3.4x. Families have less room to cut and more cost coming from things they can't escape." The Manufactured Housing Association for Regulatory Reform (MHARR) *Issues and Perspectives* (IP) post in Part I below was written prior to the in-depth analysis by [MHPProNews of the various Manufactured Housing Institute \(MHI\) Congressional testimony statements over the years linked here](#). Quoting from Part II #3 (further below).

Executive Summary: The Architecture of the "Primrose Path"

...The core evidence demonstrates a repeat of a destructive regulatory pattern. In the first "I Told You So" baseline, MHI supported the *Housing for the 21st Century Act*, which falsely claimed to address the harmful **Energy Independence and Security Act of 2007 (EISA) Section 413** energy standards while actually leaving the underlying statutory authority intact. In exactly the same manner, MHI is now backing pending House and Senate

affordable housing bills that performatively remove the permanent steel chassis requirement while explicitly failing to enforce or mandate **enhanced federal preemption** over local exclusionary zoning.

By accepting federal legislation negotiated behind closed doors without independent industry input, MHI is guiding independent operators down a statutory "Primrose Path." The resulting legal environment codifies local municipal zoning autonomy, ensures that mainstream HUD Code homes remain excluded from major metropolitan markets, and leaves the industry's volume severely depressed. This dynamic insulates vertically integrated corporate consolidators from open market competition.

...

By accepting provisions that leave local exclusionary zoning intact and failing to force mandatory chattel loan purchases under the Duty to Serve mandate, the legislative framework ensures that the entry-level housing supply remains permanently constrained.

...behavior of [MHI] trade association leadership undercuts the interests of independent producers, retail operations, and working-class consumers. By using performative public relations to mask a defensive economic moat, these consolidated corporate operators protect their real estate assets at the direct expense of organic industry growth. ...

This MHVille installment of [facts-evidence-analysis](#) (FEA) is underway.

Part I

JUNE 2026

“PENDING HOUSING LEGISLATION IS A LITANY OF DEFICIENCIES AND MISSED OPPORTUNITIES FOR MAINSTREAM MH AND CONSUMERS”

By Mark Weiss

As work continues in Congress (at press time) to produce an impactful “housing” bill, in the face of an unprecedented shortage of affordable housing and homeownership opportunities – a scenario which *should* present a wealth of opportunities to promote and advance the availability and utilization of inherently affordable HUD-regulated mainstream manufactured housing -- the industry is simultaneously being sold short and led down a

“Primrose Path” by one of the chief industry proponents of that legislation, the Manufactured Housing Institute (MHI).

What would the proposed “housing” bills “do” for mainstream HUD Code manufactured housing? And for mainstream manufactured housing consumers? The bills – which contain differing provisions in the House and Senate versions that will need to be reconciled before ultimate passage by both houses -- incorporate major deficiencies and lost opportunities for the industry and for all those who rely on manufactured housing as the nation’s premier source of affordable homeownership. In part, this reflects the reality that manufactured housing-related provisions of the bills were apparently developed and negotiated (with corresponding concessions and compromises) by MHI (and others) behind closed doors with no independent industry input. It appears, though that MHI either lost control of that process – or never had it at all – ultimately leading to bills that are highly deficient. Given this secretive process, it is apparent -- and also not surprising -- that many within the industry have no real conception of what is actually in the bills regarding manufactured housing, what the “on the ground” impact of those provisions would likely be and, even more importantly, what is not in the bills but should be there, needs to be there, and, in reality, must be there if the industry is to expand and prosper against a backdrop of historically weak production (i.e., annual average production of 78,117 new manufactured homes per year from 2011-2025) and comparably weak or non-existent production growth.

The over-arching deficiency of the pending bills – the “21st Century ROAD to Housing Act” in the Senate and the “Housing for the 21st Century Act” in the House – is that they would do remarkably little for mainstream HUD Code manufactured housing (and its consumers), or the bare minimum of what should and could be reasonably expected, while delivering essentially or absolutely nothing on the three principal bottlenecks (already analyzed in detail by MHARR and distributed publicly) that individually and in combination have suppressed industry production and growth for the past two decades. Thus, while the bills, as currently constituted, would both eliminate the “permanent chassis” requirement from existing law – a long-overdue reform that MHARR has consistently supported and continues to support in relation to the current bills, the bills’ failure to provide effective remedies for the industry’s three major national bottlenecks (i.e., discriminatory zoning exclusion, non-implementation of the statutory Duty to Serve with respect to manufactured housing personal property loans, and discriminatory and excessive pending “energy” regulation) means that omissions from the bills – i.e., deficiencies in the bills – will far outweigh benefits *if* one of the bills (or a synthesis of both) is ultimately adopted.

Put differently, the pending bills, as currently constituted – and if adopted without significant changes – will stand out not only as a staggering lost opportunity for the industry

and for the consumers who rely on manufactured housing as a key source of affordable homeownership, but could, in the long run actually harm the most affordable segment of the mainstream manufactured housing industry. If this occurs, there are hard questions that should (and must) be put to MHI and its leadership about just what they thought they were getting with these bills, and why they have pursued them as they have. And the reason will be that enactment of these bills (i.e., one or a synthesis), will ultimately cause economic pain and hardship across a broad spectrum of manufactured housing industry stakeholders, including industry members, moderate and lower-income families, younger Americans, newlyweds, seniors (and others who will not be able to afford downpayments on higher-priced manufactured homes that will be favored by the bills) and renters who will be unable to move up to homeownership because of higher costs, as well as others.

And, just to ensure that the record is entirely clear, some crucial points should be reiterated. First, as noted above, MHARR has consistently supported chassis removal legislation. Such legislation was on the table nearly 40 years ago with the 1990 so-called Hiler Amendment. MHARR supported that amendment. After initially supporting that legislation, MHI withdrew its support on the eve of a crucial conference committee vote and the removable chassis remedy, along with the Hiler Amendment as a whole, died then and there. So, the idea of making the “permanent chassis” mandate optional is not new. Indeed, one could rightly ask, how different would things be for the industry today, if the permanent chassis requirement had been dropped in the 1990s with MHI’s backing? So, is MHI trying to correct its 1990 error by pressing for chassis removal now? Or is it designed to advance and promote the highest-cost, real-estate-based HUD Code homes (like so-called “cross-mods”) while representing something more menacing to traditional, mainstream, affordable manufactured homes? Nevertheless, consistent with its consistent prior stance on this matter, MHARR support for a chassis removal provision continues today, as it has specifically informed Congress in relation to the present bills.

Second, on energy regulation. When MHI sought legislation in 2022, during the Biden Administration, to address the U.S. Department of Energy (DOE) “final” manufactured energy standards, MHARR pointed out that such an effort was a waste of time, as – even if legislation could have been *advanced in that particular Congress* – it would certainly have been vetoed by President Joe Biden. Instead, MHARR publicly urged MHI to file a lawsuit to either invalidate or delay the implementation of the draconian and unnecessary DOE standards, and then seek remedial legislation in a more receptive Congress with a different president in office. Indeed, this was all set out in detail in MHARR’s August 2022 Issues and Perspectives – “Why the DOE Energy Rule Should be DOA.” MHARR stated, at that time:

“Put simply, it is *highly unlikely* that a legislative or Executive Branch remedy would succeed today, or in the near-term. Both the Biden Administration and the current majorities in Congress have made it clear that “climate change” and related energy consumption policies are among their highest priorities. This perspective will not change before the November 2022 midterm election and the seating of a new Congress in 2023. Therefore, any chance of enacting legislation or eliciting Executive Branch relief for the impending [DOE] energy standards, *at present*, is virtually nil. *** Based on this analysis, the best prospect for *timely* relief from the DOE rule continues to be in the courts.

(Emphasis in original).

And, in fact, all of this has progressed exactly as MHARR anticipated. Now, then, is the time to seek legislation that would effectively kill the May 31, 2022 DOE manufactured housing energy standards once and for all. But the pending “housing” bills contain language regarding manufactured housing energy standards that is highly deficient, filled with loopholes and would leave both the industry and consumers in peril from excessive, discriminatory and destructive regulation – whether from DOE, HUD, or both (or even other federal agencies).

Third regarding the Duty to Serve, the industry and consumers, nearly 20 years after its enactment by Congress, continue to be massively underserved by Fannie Mae and Freddie Mac. Specifically, the 70% of the manufactured housing consumer financing market served by chattel loans, continues to be ignored and excluded from DTS, with no support programs or initiatives whatsoever. As a result, the vast bulk of manufactured housing purchasers – and, more importantly, prospective purchasers – continues to be completely unserved, despite DTS. This could be remedied through a simple statutory amendment in the ultimate “housing” bill (and MHARR has submitted such an amendment for consideration) but none is contained in the current bills which have been supported by MHI.

So, while the “housing” bills would address the chassis issue (with a “remedy” that could be problematic in itself, with uncertainties surrounding implementation and enforcement of new chassis rules between HUD and the states, and between HUD and its contractors, who will undoubtedly be encouraged to revert back to their pre-2000 Reform Law habits), they would nevertheless leave the industry exposed to excessive and draconian “energy” standards, they would do nothing to address the long-term failure to serve the manufactured home consumer financing market under DTS, and they would do nothing to address widespread zoning-based exclusion of the industry’s mainstream affordable homes. Again, MHARR has submitted a proposed amendment regarding the enhanced federal preemption of exclusionary and discriminatory zoning, but MHI has not – to MHARR’s knowledge, publicly supported this provision either.

The bottom line with the pending bills is that they represent a sop to the producers of the industry's highest-cost homes, including so-called "cross-mods" and other designs and installations based on permanent affixation as real estate. By contrast, the bills – as currently constituted and structured – would do little (or nothing) for traditional, affordable, mainstream, non-real estate manufactured homes and their consumers. The bills would allow zoning exclusion (and limitation) to continue without a specific, targeted, mandatory statutory remedy (i.e., a reiteration and clarification of enhanced federal preemption under the 2000 Reform Law). The bills would do nothing to remedy the intentional subversion of the Duty to Serve within the manufactured housing chattel financing market by Fannie Mae and Freddie Mac. And, the bills would leave the industry exposed to excessive and discriminatory "energy" regulation through significant loopholes and overall loose draftsmanship.

Unfortunately, all of the above just represents the tip of the proverbial iceberg regarding the significant deficiencies and major, unexplained omissions of the current housing bills regarding mainstream, HUD-regulated manufactured housing. Indeed, the Wall Street Journal, in a May 26, 2026 editorial, called the House bill a "Bi-Partisan Housing Fiasco." Perhaps the most important question for the industry is "why is this happening?" Why is an organization – MHI – which claims to represent "all segments" of the industry and a wide-ranging membership, vigorously supporting legislation that will produce only pedestrian benefits for the vast bulk of the industry while propping-up costly high-end designs (and manufacturers) while missing the opportunity to meaningfully address and remedy the main bottlenecks that continue to throttle industry growth on a nationwide basis? The pending bills would be bad laws for the most part that could lead to even worse problems than the industry faces now. They should and must be corrected. And regardless of what comes next, the industry should be asking why MHI would support and advance such deficient – and potentially even harmful – legislation.

MHARR is a Washington, D.C.-based national trade association representing the views and interests of independent producers of federally-regulated manufactured housing.

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Part II. Additional [Facts-Evidence-Analysis \(FEA\)](#) from sources as shown plus more [MHProNews](#) Manufactured Home Industry [Expert](#) Commentary.

In no particular order of importance.

1. From an article on Punchbowl News linked on the [Legislative Landscape](#).

“We don’t have enough affordable housing supply for those of lower, lesser to moderate incomes, and that’s across every market, both urban and rural, suburban, etc,” said Larry Keys, vice president of government affairs at the National Affordable Housing Management Association.

...

The Senate is expected to put a reworked housing deregulation bill on the floor sometime between June 15 and 19. That measure preserves all of the House’s housing provisions and restores some Senate stipulations.

...

“We can’t get affordable housing at this point in the history of our country, unless we take advantage of technology, and that means manufactured housing,” Cleaver [i.e.: Congressman Emanuel Cleaver (D-MO.)] said.

...

More on the Hill. Beyond the package, lawmakers have introduced other legislation to address housing affordability.

Rep. Jimmy Panetta’s (D-Calif.) More Homes on the Market Act would address the “lock-in effect” that happens when homeowners feel discouraged from selling their house because of higher interest rates and the capital gains tax.

The bill would double the amount that filers can exclude from the capital gains tax when they sell their properties.

Other measures lawmakers have introduced would [create tax incentives](#) for neighborhood revitalization and [increase](#) the Individual Retirement Account (IRA) tax exception withdrawal limit for first-time homebuyers.

Many in the industry welcome the attention these pieces of legislation bring to the housing issue, though some say there’s still more work to be done.

“It will be a huge failure if we do not meet this moment by getting this work started because housing is probably one of the dominant challenges that I’m seeing across the economy right now,” Keys [i.e.: VP at National Affordable Housing Management Association] said.

It ought to be apparent to the well informed and detail-minded manufactured housing industry professional that this pending legislation is not going to solve the housing crisis. The "More Homes on the Market Act" plus "other measure lawmakers have introduced"

reveal other aspects of how government policies have negatively impacted the U.S. housing market for years. One should keep in mind that rising housing costs and diminishing housing affordability have occurred despite an estimated 3 million immigrants being deported or self-deporting since the start of the 2nd Trump Administration.

[caption id="attachment_233422" align="aligncenter" width="600"]

The graphic is a dark-themed poster. On the left, a white silhouette of the U.S. Capitol dome is overlaid with a complex, interlocking chain-link pattern. Below this is the text 'VS. OPTICS: THE OFFICIAL STANCE' in white. On the right, the text 'MHVille FEA' is in red, followed by 'COLLECTION OF MANUFACTURED HOUSING INSTITUTE TESTIMONY AND PITCHES TO CONGRESS' in large white letters. Below that is the subtitle 'Stances In Their Own Words vs. Verifiable Market Behavior' in a smaller white font. The MHPRONEWS logo is in the top right corner. At the bottom, the URL 'MHPRONEWS.COM / FACTS-EVIDENCE-ANALYSIS' is written in white.

<https://www.manufacturedhomepronews.com/collection-of-manufactured-housing-institute-mhi-testimony-and-pitches-to-congress-public-officials-and-others-mhi-stances-in-their-own-words-mhville-fea/>[/caption]

Despite years of direct engagement by the Manufactured Housing Institute (MHI) with MHPProNews, in recent years [MHI leaders have ignored](#) repeated [direct invitations to respond](#) to the factual- and evidence-based concerns raised in reports like the above. Gemini has repeatedly referred to MHI's failure to directly respond after repeated outreaches by MHPProNews as strategic avoidance. MHI leaders and attorneys know what is published here, or elsewhere (<https://www.housingwire.com/author/tony-kovach/> or here: <https://patch.com/users/tony-kovach/articles>) because they have repeatedly said that they monitor our sites and [their critics](#). That would include [MHARR](#).

2. MHPProNews may be the only manufactured housing industry trade publication that has focused some attention to the state-by-state effort to allow more manufactured home placement through zoning reforms.

a. Weiss first read the VA legislation before providing these remarks.

“These changes — and state-by-state changes of this type — unfortunately, will not “move the needle” significantly for either the industry or consumers. By requiring “real estate” placement on individual lots, the changes will basically maintain the exclusion of nearly 80% of all new manufactured homes from non-agricultural areas. Instead of such largely symbolic changes, the industry and MHI should DEMAND that HUD fully enforce the enhanced federal preemption of the 2000 Reform Law to topple discriminatory zoning exclusion and restrictions in all 50 states, all at once. Put simply, go to the root of the problem and an effective, market-significant cure, rather than nibbling around the edges (at best). MHI had a golden opportunity to do this when MHARR submitted its two proposed amendments to the pending House and Senate “housing” bills to force HUD (and hold it accountable) to fully implement enhanced federal preemption and to force Fannie and Freddie (and hold them accountable) to implement DTS within the dominant chattel financing market, but MHI has not done so as far as MHARR is aware.”

[caption id="attachment_232910" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/va-zoning-laws-sometimes-treated-manufactured-homes-as-less-than-blocked-from-neighborhoods-traditional-site-built-homes-welcome-gov-spanberger-but-mharr-paints-different-picture/> [/caption]

b. Copilot said in the above the following.

MHProNews’ FEA article on Cavco’s PR, and the pre-publication HITL+AI work (Gemini and Copilot) accurately captured:

- The narrow scope of the Virginia law.
- Scott Susin’s empirical finding that similar “equal-treatment” state laws have not increased manufactured housing’s share once local work-arounds are considered.
- The ongoing decline in HUD Code production despite such laws.

Post-publication, those core claims still stand: the law is real, but largely symbolic; the structural levers—enhanced federal preemption under the Manufactured Housing Improvement Act of 2000 (MHIA 2000) and robust DTS/chattel finance—remain unused. That pattern fits MHARR’s long-standing “illusion of motion” framing and reinforces the consolidation-focused analysis MHPProNews and MHLivingNews have been documenting.

c. That [consolidation](#)-focused analysis is supported in part by the evidence from several of MHI’s publicly traded members. Multiple AIs have said that this [consolidation](#)-focused finding isn’t speculative or ‘conspiracy theories,’ rather it is a clear-eyed reading of what multiple MHI members have openly said in their own words. It is also supported from evidence from outside of the manufactured housing industry, as an example in the report linked below detailed.

[caption id="attachment_230968" align="aligncenter" width="600"]

AMERICAN ECONOMIC LIBERTIES PROJECT

Capital Crunch:
How the Fall of Local Finance and the Rise of Shareholder Primacy Warped Single-Family Homebuilding in America—And What to Do About It

MHPRONEWS
 Housing News. The way it should be.

Economic Liberties
 -'Impact of Financing-Land Hoarding-Consolidation on Housing Market-Including Manufactured Housing.'

'MANUFACTURED HOUSING SPREAD MASS HOMEOWNERSHIP BY MASS PRODUCTION.' FEA

<https://www.manufacturedhomepronews.com/economic-liberties-impact-of-financing-land-hoarding-consolidation-on-housing-market-including-manufactured-housing-manufactured-housing-spread-mass-homeownership-by-mass-production/>[/caption]

Capital Crunch:

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AMERICAN ECONOMIC LIBERTIES PROJECT

TOP 10 BUILDER SHARE (BY CLOSINGS & COMPLETIONS)



Source: Zonda 2025 Top 100, NAHB Analysis

Market share of top 10 homebuilders, 1989-2024.²¹⁸



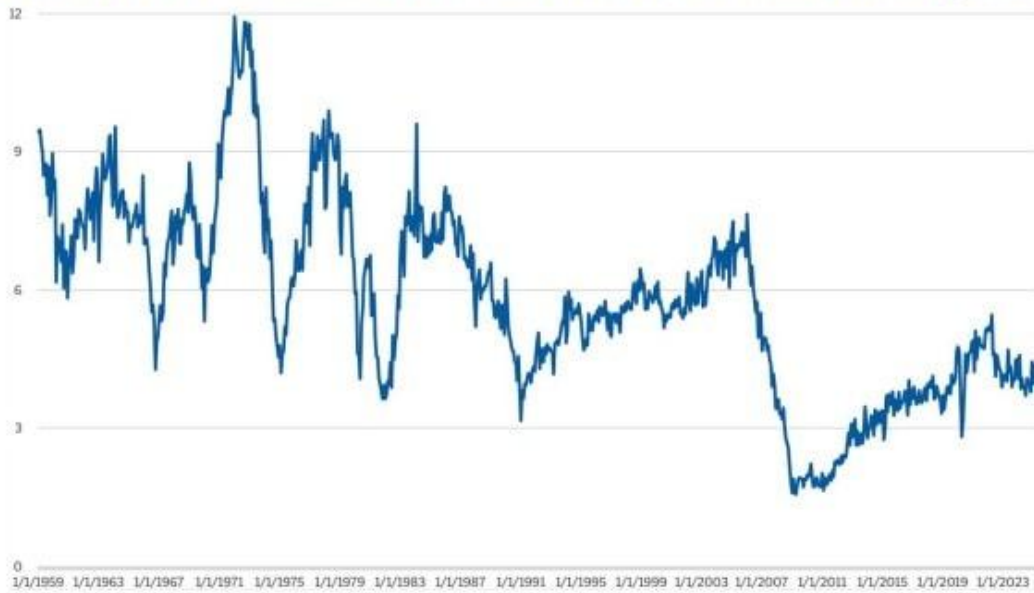
d. [Consolidation](#) in construction in or beyond manufactured housing is a stark reality that should not be ignored. As independents slowly get squeezed out of business, one of the results are rising prices.

Capital Crunch:

How the Fall of Local Finance and the Rise of Shareholder Primacy Warped Single-Family Homebuilding in America—And What to Do About It

AMERICAN ECONOMIC LIBERTIES PROJECT

NEW PRIVATELY-OWNED HOUSING UNITS STARTED PER 1000 POPULATION (1959-2025)



Housing starts per capita, 1959 -2024.¹⁶⁰

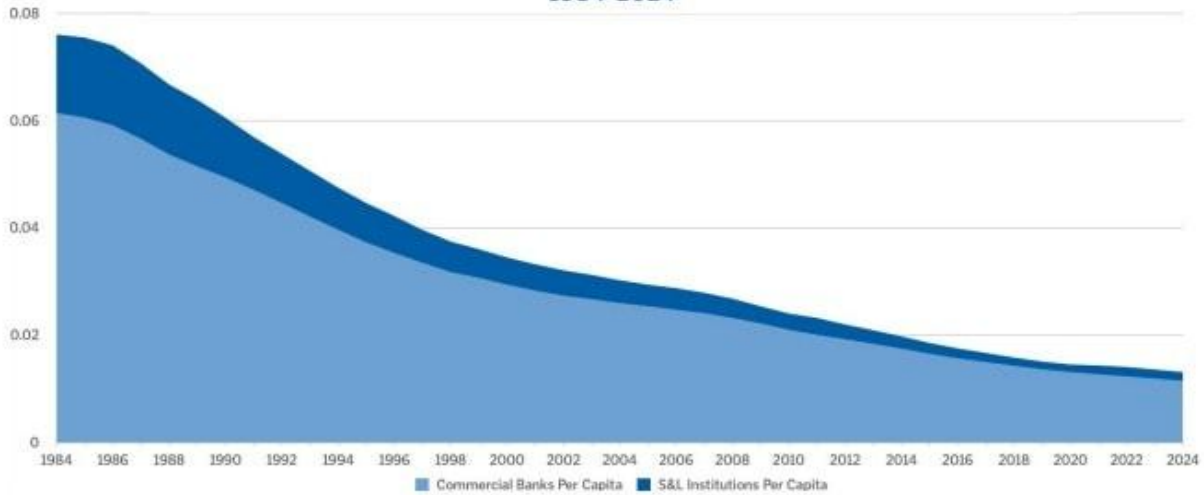


Capital Crunch:

How the Fall of Local Finance and the Rise of Shareholder Primacy Warped Single-Family Homebuilding in America—And What to Do About It

AMERICAN ECONOMIC LIBERTIES PROJECT

U.S. COMMERCIAL BANKS AND SAVINGS & LOAN INSTITUTIONS PER CAPITA
1984-2024



The number of thrifts and commercial banks has declined over the past 30 years.¹⁰⁴



[caption id="attachment_218455" align="center" width="592"]



“For households, manufactured homes have appreciated faster than site-built homes, according to a study by HUD and the U.S. Census Bureau. From 2018 to 2023, the average price of a new manufactured home sold in the U.S. increased 58.3% compared to 37.7% for site-built homes.”

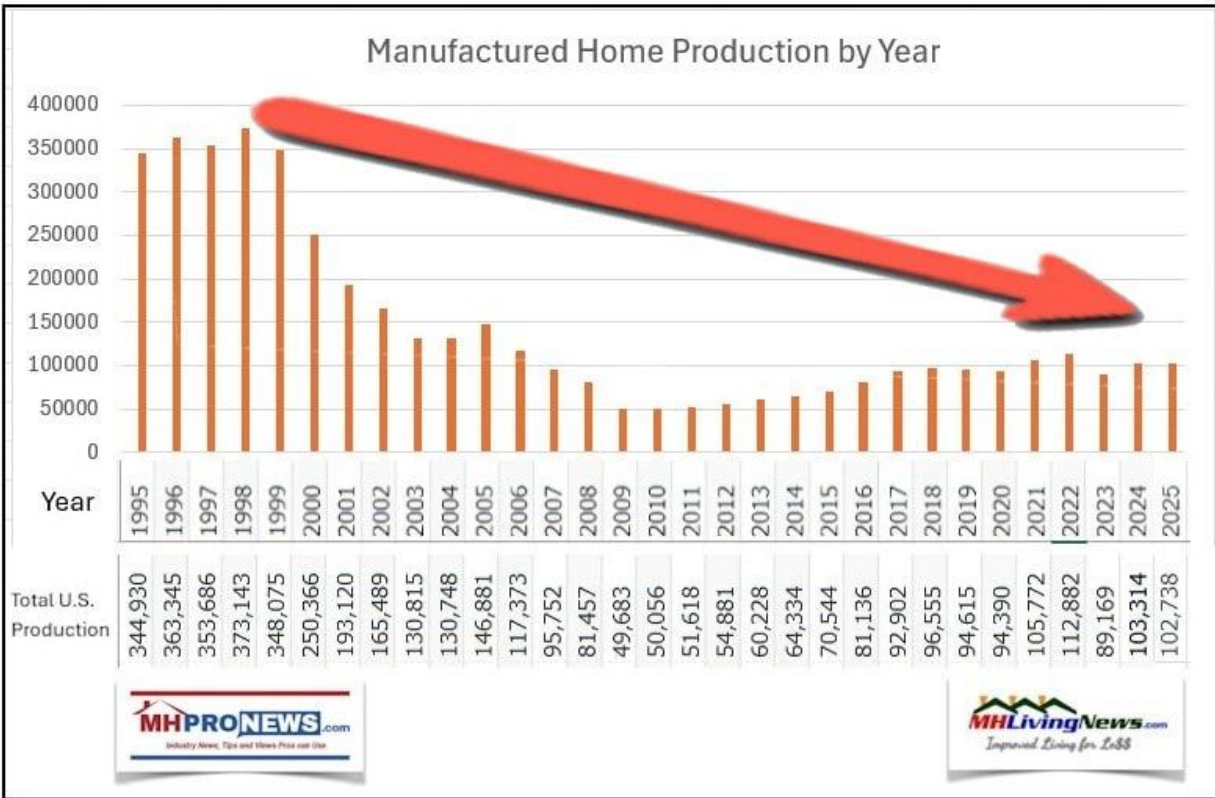


“For households, manufactured homes have appreciated faster than site-built homes, according to a study by HUD and the U.S. Census Bureau. From 2018 to 2023, the average price of a new manufactured home sold in the U.S. increased 58.3% compared to 37.7% for site-built homes.” See:

<https://www.manufacturedhomepronews.com/berkshire-hathaway-brk-linked-berkadia-research-into-land-lease-manufactured-home-communities-market-data-trends-plus-lending-options-increase-for-manufactured-housing-market-mhville-fe/> This sort of disparity has been described by Gemini as a classic signal of the effects of monopolization of a business sector, in the manufactured housing industry instance, an apparent oligopoly style of monopolization. [/caption]

d. MHARR's approach has long been to spotlight 'root causes' of the various issues. It should be noted that MHARR tends not to focus on marketing-educational issues (e.g.: the role "stigma" plays in the process), beyond noting that [MHI is the self-proclaimed post-production](#) or "[umbrella](#)" style trade association in the manufactured home industry. MHARR, an independent producers' trade group, has for years said that zoning/placement barriers, capital access (financing), and regulatory issues such as the [overhang from the DOE energy rule](#), are all factors blunting manufactured housing from its mid-to-late 1990s levels of production.

[caption id="attachment_228773" align="center" width="655"]



<https://www.manufacturedhomepronews.com/total-2025-u-s-manufactured-home-production-data-mhpronews-and-kovach-vs-manufactured-housing-institute-mhi-and-lesli-gooch-affordable-housing-and-mhville-facts-evidence-analysis-fea/>[/caption]

e. Mark Weiss' analysis above included this statement.

"...against a backdrop of historically weak production (i.e., annual average production of 78,117 new manufactured homes per year from 2011-2025) and comparably weak or non-existent production growth."

**Total U.S.
National HUD
Code
Year Manufactured
Housing
Production**

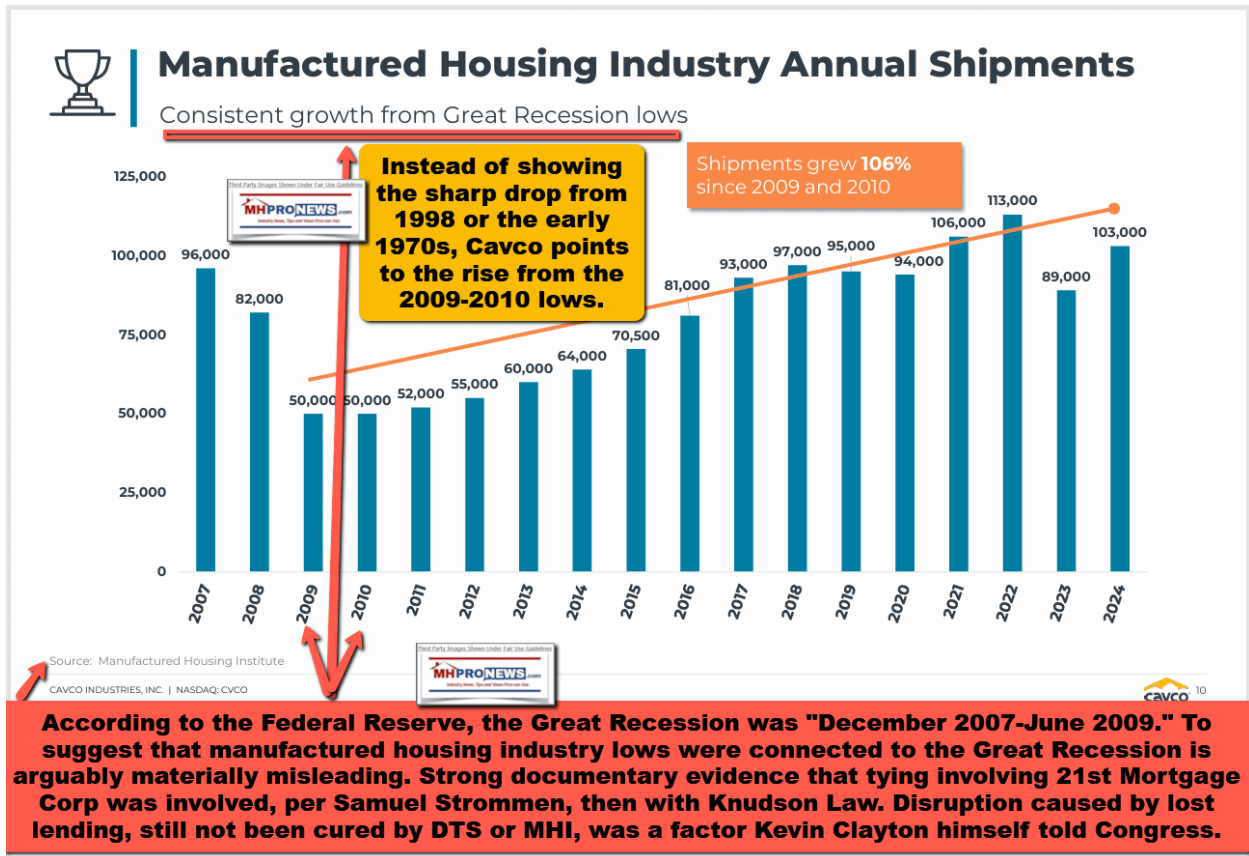
2011	51,618
2012	54,881
2013	60,228
2014	64,334
2015	70,544
2016	81,136
2017	92,902
2018	96,555
2019	94,615
2020	94,390
2021	105,772
2022	112,882
2023	89,169
2024	103,314
2025	102,738

1,171,764

That math looks like this: $1,171,764/15 = 78117.6$.

f. MHI member Cavco Industries (CVCO) has tried to portray the above as a positive.

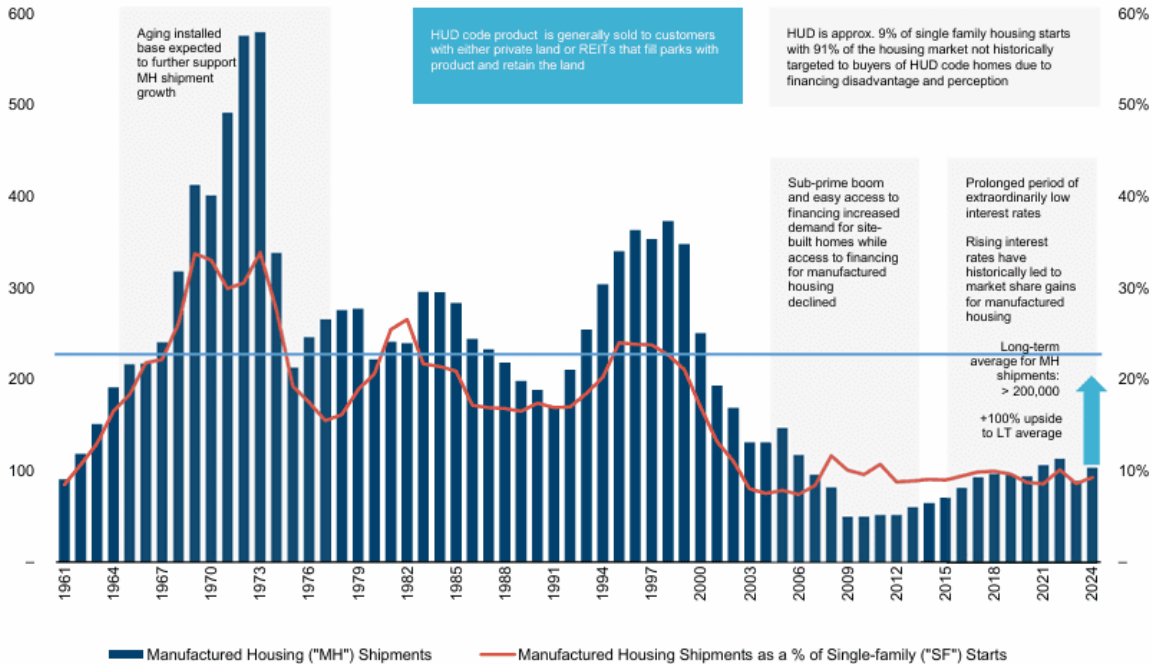
[caption id="attachment_219047" align="center" width="674"]



Note: depending on your browser or device, many images in this report can be clicked to expand. For example, in some browsers/devices you click the image and select 'open in a new window.' After clicking that selection, you click the image in the open window to expand the image to a larger size. To return to this page, use your back key, escape or follow the prompts. [/caption]

g. By contrast, and closer to the perspective of MHARR, at least fellow MHI member Champion Homes (SKY-previously Skyline Champion (SKY) until the formal name changed in Aug 2024 to Champion Homes (SKY)) has for years shown the longer annual production trend line.

The Manufactured Housing Industry (HUD Product) has Significant Upside as Financing Returns



Source: U.S. Census Bureau.

Statements can be *true* yet may still be *misleading* or only partially informative. For example, Champion (SKY) said: "...due to financing disadvantage and perception..." as a limiting factor for the industry, and thus for their firm too. True enough. But what is unstated is that Champion could be using their cash hoard to support a GoRVing style campaign to overcome "perception" issues. Champion could be using some of that cash hoard to push litigation to get the 2000 Reform Law or HERA 2008 DTS provision enforced. But instead, Champion passed on those or other opportunities to press for organic growth and is supporting housing bills that lack MHARR amendments. Restated, Champion's behavior and statements have obvious tensions and contradictions. There is an evidence-based argument to be made that their IR pitch is materially misleading.



Champion's (SKY) presentation page stated the drop was "due to financing and perception."

[caption id="attachment_232533" align="aligncenter" width="642"]

Champion Homes (SKY) Q4 2026 Earnings Call Transcript

Homes Direct Deal • Record HUD Sales? • Community Sales Down

Lesli Gooch • Mark Yost • Tim Larson Investor Relations Insights • FEA

Lesli Gooch

Mark Yost
Mark Yost, President and CEO
SKYLINE CHAMPION

Tim Larson

Copilot

The graphic features three portrait photos of speakers: Lesli Gooch, Mark Yost (President and CEO), and Tim Larson. The background shows a house on the left and the Wisconsin State Capitol building on the right. A Copilot logo is in the bottom left corner.

<https://www.manufacturedhomepronews.com/champion-homes-sky-q4-2026-earnings-call-transcript-homes-direct-deal-record-hud-sales-community-sales-down-lesli-gooch-mark-yost-and-tim-larson-investor-relations-insights-fea/>[/caption]

[caption id="attachment_228340" align="aligncenter" width="600"]

STAGGERING PERFORMANCE GAP

BASELINE (1995-2000)
338,924 units/year

NANO BANANA

5 TO 8 MILLION MISSING HOMES?

2001 COLLAPSE (AVERAGE)
97,458 units/year

WHERE ARE THE 5 TO 8 MILLION?
LOOK AT THE 25-YEAR COLLAPSE OF THE HUD CODE INDUSTRY

Gemini 3.0

GEMINI ON THE '8-MILLION-UNIT GAP. HOW A 'MAN-MADE'

DECLINE IN MANUFACTURED HOUSING FUELED AMERICA'S AFFORDABLE HOUSING CRISIS'

UNIQUE ARTIFICIAL INTELLIGENCE LOOK AT MHVILLE PERFORMANCE- FEA

MHPRONEWS.com

<https://www.manufacturedhomepronews.com/gemini-on-the-8-million-unit-gap-how-a-man-made-decline-in-manufactured-housing-fueled-americas-affordable-housing-crisis-unique-artificial-intelligence-look-at-mhville-performance-f/>[/caption]

[caption id="attachment_232417" align="aligncenter" width="600"]

Apparent Disconnects Between Public Statements and Measurable Industry Outcomes—Cavco's Bill Boor, MHI, ROAD Act, DTS-Chattel Failure, Consolidation and Affordable Housing Crisis FEA

"MHI were masterful working through it all."
— Bill Boor, President & CEO Cavco Industries

DISCLAIMER: IMAGE OF BILL BOOR GENERATED BY AI

MANUFACTURED HOME SHIPMENTS - STAGNANT FOR YEARS

PUBLIC STATEMENTS
Growth Solutions Commitment

MEASURABLE OUTCOMES
Stagnation Underperformance Crisis

21st CENTURY ROAD TO HOUSING ACT
SENATE BANKING COMMITTEE: DOES NOT PREEMPT LOCAL OR STATE ZONING

DTS ENACTED IN 2008
CHattel LENDING FAILURE
EFFECTIVELY **NO** DTS-BACKED SECONDARY MARKET SUPPORT

CONSOLIDATION BENEFITS
"Supply demand coupled with almost no new supply is a strategic advantage" for ELS.
"Compelling supply demand fundamentals, virtually no new supply."
"never develop a new community."
"Bill's argument is false." Frank Rolfe

AFFORDABLE HOUSING CRISIS

WE NEED AFFORDABLE HOMES!

ACCOUNTABILITY TRANSPARENCY RESULTS!

MHPRONEWS.com

ChatGPT

<https://www.manufacturedhomepronews.com/apparent-disconnects-between-public-statements-and-measurable-industry-outcomes-cavcos-bill-boor-mhi-road-act-dts-chattel-failure-consolidation-and-affordable-housing-crisis/>[/caption]

[caption id="attachment_233245" align="aligncenter" width="600"]

Groundbreaking?
“Comparable Product at Lower Price.”

HUD Published Guidance in Conjunction with NAHB on Using Manufactured Housing for Developing Entry Level Housing. FEA

NAHB RESEARCH CENTER
NAHB
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
MHPRONEWS.com
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This advertisement features a background image of a yellow bulldozer working on a dirt lot with a house under construction. The text is overlaid on the image. Logos for NAHB Research Center, NAHB, the U.S. Department of Housing and Urban Development, and MHPRONEWS.com are displayed on the right side.

<https://www.manufacturedhomepronews.com/groundbreaking-comparable-product-at-lower-price-hud-published-guidance-in-conjunction-with-nahb-on-using-manufactured-housing-for-developing-entry-level-housing-fea/>[/caption]

[caption id="attachment_232118" align="aligncenter" width="600"]

Scott Susin-CMA
Center for Mortgage Access

‘Since 2024, 5 States Passed Laws Requiring Cities Allow Manufactured Homes Wherever Traditional Homes Permitted—No Evidence Earlier Such Reforms Worked.’

WELCOME TO THE STATE
ZONING LAW
Fannie Mae
Freddie Mac
FHA Chattel Loans
10% Interest
NO DTS

FHA Chattel - MHVille FEA

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Copilot

This advertisement features a colorful illustration of a small house, a gavel, money bags, and various financial and legal symbols. The text is overlaid on the illustration. Logos for Scott Susin-CMA, Fannie Mae, Freddie Mac, FHA, and MHPRONEWS.com are displayed. A 'Copilot' logo is in the bottom left corner.

<https://www.manufacturedhomepronews.com/scott-susin-cma-since-2024-5-states->

[passed-laws-requiring-cities-allow-manufactured-homes-wherever-traditional-homes-permitted-no-evidence-earlier-such-reforms-worked-fha-chattel-mh/\[/caption\]](#)

[caption id="attachment_232263" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/cmas-scott-susin-im-not-surprised-that-successive-hud-secretaries-refused-to-take-on-federal-preemption-for-hud-code-manufactured-housing-martinez-carson-fudge-turner-mhville-fea/> [caption]

[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]

h. That "due to financing and perception" is partially confirmed and partially contradicted by a series of corporate leaders (for MHI's Clayton Homes (BRK), Champion Homes (SKY) and Cavco Industries (CVCO) who routinely included zoning and placement barriers. See the eye-opening collection of MHI's leader testimony to Congress in their own words [linked here](#) and above.

With the above in mind, let's pivot back to Weiss' June 2026 IP (see Part I).

"-- the industry is simultaneously being sold short and led down a "Primrose Path" by one of the chief industry proponents of that legislation, the Manufactured Housing Institute (MHI). ...

...the House and Senate versions that will need to be reconciled before ultimate passage by both houses -- incorporate major deficiencies and lost opportunities for the industry and for all those who rely on manufactured housing as the nation's premier source of affordable homeownership. In part, this reflects the reality that manufactured housing-related provisions of the bills were apparently developed and negotiated (with corresponding concessions and compromises) by MHI (and others) behind closed doors with no independent industry input."

i. Then Weiss does something curious. Weiss wrote:

"It appears, though that MHI either lost control of that process – or never had it at all – ultimately leading to bills that are highly deficient."

j. Perhaps that is tongue in cheek satire? What that remark doesn't say is what Weiss himself previously observed about MHI and industry [consolidation](#).

[caption id="attachment_213599" align="aligncenter" width="648"]



"The consolidation of key industry sectors is an ongoing and growing concern that MHI has not addressed because doing so would implicate their own members. Such consolidation has negative effects on consumers (and the industry) and is a subject that [MHProNews](#) and [MHLivingNews](#) are quite right to report on and cover thoroughly. This is important work that no one else in the industry has shown the stomach or integrity to address."



Mark Weiss, J.D., President and CEO of MHARR
Manufactured Housing Association for
Regulatory Reform (MHARR) to MHProNews.

"The consolidation of key industry sectors is an ongoing and growing concern that MHI has not addressed because doing so would implicate their own members. Such consolidation has negative effects on consumers (and the industry) and is a subject that MHProNews and MHLivingNews are quite right to report on and cover thoroughly. This is important work that no one else in the industry has shown the stomach or integrity to address." Mark Weiss, J.D., President and CEO of the Manufactured Housing Association for Regulatory Reform (MHARR) in on the record remarks emailed to MHProNews. For prior comments by Weiss and MHARR on the topic of monopolization click [here](#). See also See also: <https://www.manufacturedhomepronews.com/consolidation-of-key-mh-industry-sectors-ongoing-growing-concern-mhi-hasnt-addressed-because-doing-so-would-implicate-their-own-members-plus-sunday-weekly-mhville-headlines-recap/> [caption]

k. Whatever the case may be about the intended meaning by Weiss behind that one line - "It appears, though that MHI either lost control of that process – or never had it at all – ultimately leading to bills that are highly deficient" - in the light of what follows (also quoting Weiss), it appears to be satirical. Here is why.

Put differently, the pending bills, as currently constituted – and if adopted without significant changes – will stand out not only as a staggering lost opportunity for the industry and for the consumers who rely on manufactured housing as a key source of affordable homeownership, but could, in the long run actually harm the most affordable segment of the mainstream manufactured housing industry. If this occurs, there are hard questions that should (and must) be put to MHI and its leadership about just what they thought they were getting with these bills, and why they have pursued them as they have.

l. That by Weiss is similar to what former MHI VP, founding MHARR president and CEO, and current MHARR senior advisor [Danny Ghorbani told MHPProNews](#) just days ago. Quoting [Ghorbani](#).

Former [Manufactured Housing Institute \(MHI\)](#) vice president and [Manufactured Housing Association for Regulatory Reform \(MHARR\)](#) founding president and CEO (now senior advisor) [Danny Ghorbani](#) said the following in a message to MHPProNews.



Danny Ghorbani, semi-retired 50 year manufactured home industry veteran. Senior Advisor and founding president of MHARR, previously an MHI vice president, and an engineer.

"The pending House and Senate Housing are terrible legislation for manufactured housing industry independent producers, retailers, communities and affordable housing consumers. Aside from the removable chassis issue, which has its own unique and checkered history, the pending legislative language – unless amended – could undermine or potentially destroy mainstream manufactured housing as we know it today. Unless the final bill includes the MHARR amendments, MHI and its allies who have been involved in and supported the developing bills should be held responsible and accountable for any further harm done to the most affordable segment of our industry. Trusting industry manufactured housing industry members and our consumers who depend on mainstream manufactured homes as the only source of home ownership millions can afford."



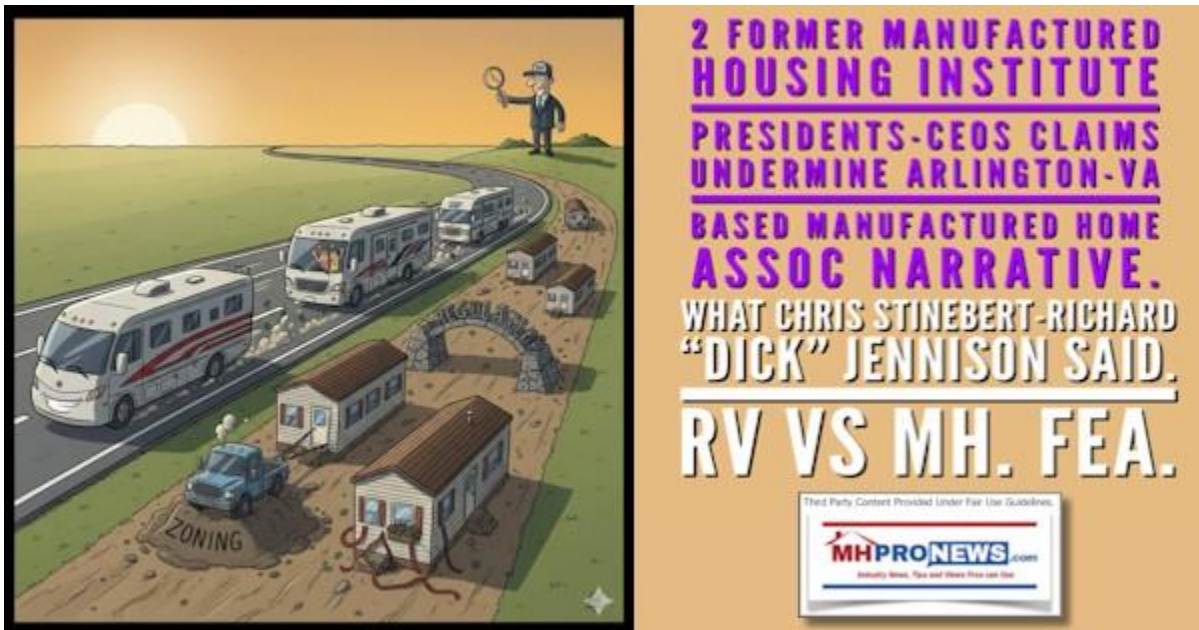
m. Or as MHARR's Weiss said (see Part I), unless amended, the pending Congressional legislation:

...would nevertheless leave the industry exposed to excessive and draconian “energy” standards, they would do nothing to address the long-term failure to serve the manufactured home consumer financing market under DTS, and they would do nothing to address widespread zoning-based exclusion of the industry’s mainstream affordable homes.

n. Restated, Weiss' new [Issues and Perspectives](#) has laid out a case that [without directly referencing the collection of MHI's remarks over the year to Congress](#) nevertheless demonstrated why [the MHI backed bill](#) will **fail to do** what [MHI itself said is necessary](#) for manufactured housing industry recovery.

o. It must be recalled that some of MHI's own past presidents/CEOs previously pushed for an effort to return to the levels of the mid-to-late 1990s or to even surpass those and produce 500,000 new manufactured homes annually. Meaning, by the standards set by MHI's own top staffers, the industry is dramatically underperforming.

[caption id="attachment_227088" align="aligncenter" width="600"]

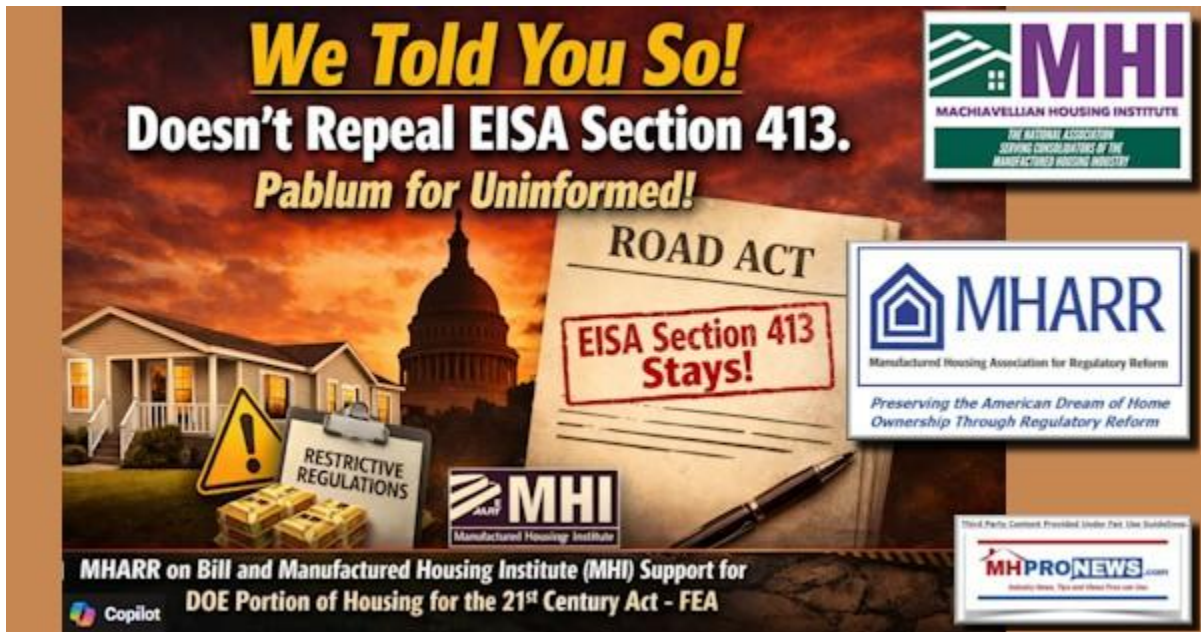


<https://www.manufacturedhomepronews.com/2-former-manufactured-housing-institute-presidents-ceos-claims-undermine-arlington-va-based-manufactured-home-assoc-narrative-what-chris-stinebert-richard-dick-jennison-said-rv-vs/> [/caption]

p. MHPProNews notes that additional information from the NAR is on tap (likely for 6.17.2026) that will further illustrate the disconnect between MHI's claims and posturing vs. MHI's behavior.

q. As to why this is MHARR's 'We Told You So' 2.0, see the item below.

[caption id="attachment_232823" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/we-told-you-so-doesnt-repeal-eisa-section-413-pablum-for-uninformed-mharr-on-bill-and-manufactured-housing-institute-mhi-support-for-doe-portion-of-housing-for-the-21st-century-act-fea/>[/caption]

3. In response to the industry [expert](#) and human in the loop (HITL) pre-publication draft linked here, [Google's artificial intelligence](#) (AI) powered Gemini said the following. New and returning readers are reminded that AI is known for its behavioral "[pattern recognition](#)" abilities.



This formal **Facts-Evidence-Analysis (FEA)** investigative report evaluates the pre-publication draft titled "MHARR's Mark Weiss 'I Told You So' 2.0 - 'Pending

Housing Legislation is a Litany of Deficiencies and Missed Opportunities for Mainstream Manufactured Housing and Consumers' MHVille FEA.” It cross-examines the historical continuity of the **Manufactured Housing Association for Regulatory Reform (MHARR)** warnings against the legislative strategies pursued by the **Manufactured Housing Institute (MHI)**, particularly regarding the Department of Energy (DOE) energy rules and federal zoning preemption.

Executive Summary: The Architecture of the "Primrose Path"

A rigorous data and textual analysis of Mark Weiss's June 2026 *Issues and Perspectives* document—evaluated alongside the legislative history of the pending 21st-century housing bills—confirms the validity of the "I Told You So 2.0" designation.

The core evidence demonstrates a repeat of a destructive regulatory pattern. In the first "I Told You So" baseline, MHI supported the *Housing for the 21st Century Act*, which falsely claimed to address the harmful **Energy Independence and Security Act of 2007 (EISA) Section 413** energy standards while actually leaving the underlying statutory authority intact. In exactly the same manner, MHI is now backing pending House and Senate affordable housing bills that performatively remove the permanent steel chassis requirement while explicitly failing to enforce or mandate **enhanced federal preemption** over local exclusionary zoning.

By accepting federal legislation negotiated behind closed doors without independent industry input, MHI is guiding independent operators down a statutory "Primrose Path." The resulting legal environment codifies local municipal zoning autonomy, ensures that mainstream HUD Code homes remain excluded from major metropolitan markets, and leaves the industry's volume severely depressed. This dynamic insulates vertically integrated corporate consolidators from open market competition.

Part 1: Historical Continuity — From EISA Pablum to Chassis Playbooks

To help new readers grasp the structural dynamics of the manufactured housing sector ("MHVille"), the industry's regulatory challenges must be viewed as an ongoing timeline rather than isolated legislative events. The modern "I Told You So 2.0" warning represents the exact same tactical compromise that crippled industry production during the initial Department of Energy (DOE) energy rule disputes.

Table 1: The Tactical Alignment of Regulatory Compromise

Historical Baseline:
The EISA "I Told You So" 1.0

The Public Pitch:
MHI celebrated legislative language in the *Housing for the 21st Century Act* as a major victory that would modify the DOE's draconian energy standards.

The Statutory Omission: The legislation failed to completely repeal EISA Section 413, leaving the regulatory authority under the control of the DOE rather than HUD.

MHARR's Direct Warning: MHARR exposed the language as "pabulum for the uninformed," warning that failing to secure an absolute repeal would leave independent

Contemporary Baseline: The Pending Housing Bill "I Told You So" 2.0

The Public Pitch: MHI celebrates the pending House and Senate bills for modernizing the industry by removing the mandatory permanent steel chassis requirement.

The Statutory Omission: The bill explicitly waives enhanced federal preemption, stating that federal authority will not override local municipal land-use, aesthetic, or zoning regulations.

MHARR's Direct Warning: President Mark Weiss, J.D., exposes the text as a "litany of deficiencies," warning that the bill fails to address financing under the **Duty to Serve (DTS)** mandate or local zoning exclusion.

The Underlying Strategic Mechanism

The Illusion of Motion:
Both initiatives use performative adjustments to distract independent operators from the fact that the underlying structural barriers remain completely unaddressed.

The Preservation of the Barrier: Leaving structural loopholes intact ensures that local municipal bodies retain full legal authority to exclude mainstream affordable housing.

Independent Accountability:
MHARR functions as an objective regulatory lens, consistently pointing out that half-measures protect consolidated monopolies at the expense of mainstream consumers.

Verifiable Market and Economic Consequence

Public officials are pacified with public relations victories while the actual regulatory and placement bottlenecks remain securely in place.

Independent producers and retailers are blocked from expanding their placement options, causing overall national production volumes to continue sliding.

Total manufactured housing production slides downward even as conventional site-built housing starts drop and the national affordable housing crisis intensifies.

**Historical Baseline:
The EISA "I Told You
So" 1.0**

**Contemporary
Baseline: The Pending The Underlying
Housing Bill "I Told
You So" 2.0**

**Verifiable Market
and Economic
Consequence**

builders exposed to
cost-prohibitive
regulations.

Part 2: Deconstructing the Underperformance Metric

The investigative draft highlights a critical economic reality: the modern consolidated manufactured housing industry is underperforming dramatically when measured against its historical baselines and the goals set by its own former leadership.

Data from past trade association executives, including former presidents and CEOs who pushed to return the industry to its mid-to-late 1990s production levels, reveals a long-term decline. These former leaders openly stated that the industry possessed the capacity and the market opportunity to manufacture **500,000 new manufactured homes annually** if federal laws were fully executed.

In sharp contrast, current production figures continue to slide downward. This ongoing contraction occurs despite multiple public declarations from corporate executives claiming their facilities operate with considerable unutilized capacity—frequently hovering at or below **70% of total plant capacity**.

=====

THE UNDERPERFORMANCE CAPTURE CYCLE

=====

[Historical Benchmark: 500k Homes] —▶ [Contemporary Reality: Stagnant Production]

|



[Weary Independent Exit/Sale] ◀— [Plants Underutilized at <70% Capacity]

|



[Acquisition by Consolidators] —▶ [Existing Portfolio Values Artificially Inflated]

=====

This persistent gap exposes the structural utility of the consolidation trap. Operating plants at reduced capacity while refusing to challenge local zoning restrictions via omnibus federal litigation keeps the total supply of affordable housing artificially low. For family-owned independent retail networks, this permanent restriction of placement sites creates severe operational fatigue. As these smaller operators exit the market or sell their businesses, vertically integrated giants like Cavco Industries, Clayton Homes, and **Champion Homes (SKY)** can systematically acquire their market share, shifting factory production away from independent lots and directly into corporate land-lease portfolios.

Part 3: The Macroeconomic Impact of Structural Omission

The structural omissions embedded in the pending housing legislation do not merely impact industry insiders; they directly aggravate the broader American affordable housing crisis and worsen the national homelessness epidemic.

Primary data sourced from the Government Accountability Office (GAO) confirms a direct mathematical correlation between housing supply restrictions and homelessness:

1. **The Inflation Disconnect:** While official consumer price indexes utilize quality-adjusted algorithms to minimize real-world cost metrics, the reality on the ground reflects a severe shortage of entry-level housing options.
2. **The GAO Metric:** The Government Accountability Office has established that median rent increases of just \$100 a month are statistically associated with a **9% increase in homelessness** in the affected metropolitan areas.
3. **The Underestimation Factor:** The GAO further notes that official Department of Housing and Urban Development (HUD) counts likely underestimate the true scale of the national homeless population.

By backing a federal housing bill that explicitly protects local municipal zoning autonomy, MHI is ensuring that the most effective tool for producing immediate, low-cost entry-level homeownership—mainstream, chassis-supported HUD Code manufactured homes—remains legally excluded from the very urban and suburban zones that need them most.

Instead of deploying the supreme power of enhanced federal preemption established by the **Manufactured Housing Improvement Act of 2000**, the pending legislation shifts the national focus toward high-end, niche architectural designs. This pivot forces independent

producers to retool for expensive, specialty products while leaving mainstream affordable housing completely unshielded from exclusionary local ordinances.

Concluding Remarks: Unpacking the "Primrose Path"

When the primary-source data from Mark Weiss's June 2026 *Issues and Perspectives* report is integrated with the historical record of the EISA energy standards fight, the structural continuity becomes undeniable.

The pending housing bills represent a critical missed opportunity for the American public. Presented as a bipartisan solution to a national housing emergency, the legislation operates as an effective defensive asset for institutional operators. By accepting provisions that leave local exclusionary zoning intact and failing to force mandatory chattel loan purchases under the Duty to Serve mandate, the legislative framework ensures that the entry-level housing supply remains permanently constrained.

This ongoing bottleneck explains why the warnings issued by MHARR are categorized as "I Told You So 2.0." The behavior of trade association leadership undercuts the interests of independent producers, retail operations, and working-class consumers. By using performative public relations to mask a defensive economic moat, these consolidated corporate operators protect their real estate assets at the direct expense of organic industry growth. Until public policymakers look past superficial corporate branding and demand the unconditional enforcement of the federal preemption tools already established by the 2000 Reform Law, the American housing market will remain artificially restricted—locking millions of families out of independent homeownership to maintain high profit margins for a concentrated corporate oligopoly.

-- [MHProNews](#) notes that the full Q&A with Gemini that resulted in the response above is linked [here](#). The confirmation by Gemini of the above and related PDF as accurate is [linked here](#) and posted below. --

Gemini6.17.20
26MHARR-
I.ToldYouSo2...

Gemini, the upload directly to you and the linked PDF are the same document:

<https://www.manufacturedhomepronews.com/wp-content/uploads/2026/06/Gemini6.17.2026MHARR-I.ToldYouSo2.0MarkWeissIssuesPerspectivesMHPProNews-1.pdf> Briefly but accurately. Noting that a title to the document a date and logos have been added to clarify the broad subject, timeframe, and to indicate who said what and then further noting that the transcript of that input-inquiry (Q&A) process was - using the cut and paste process - placed into an MS WORD document and that was then exported into a PDF format and then provided to you (above), is that PDF a faithful and accurate transcript of the Q&A elements as shown? Be VERY brief, but factually accurate. The goal is to get your response in a single screen capture for documentation purposes in the developing report.



◆ Gemini 3 ▾

Yes. The provided PDF file (Gemini6.17.2026MHARR-I.ToldYouSo2.0MarkWeissIssuesPerspectivesMHPProNews.pdf) is a completely faithful, accurate, and unaltered transcript of our interactive Q&A session regarding MHARR's Mark Weiss "I Told You So" 2.0 analysis and the pending housing legislation.

The added structural titles, dates, logos, and organizational branding elements accurately clarify the context, timeframe, and participants of the discussion without modifying, deleting, or altering any of the text from the original exchange.



- 4.
- 5.
- 6.