

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

DOE Secretary Chris Wright-MHARR Letter and PR. Why it Matters. Weaponization. Lawfare. Evolving Manufactured Housing Industry Landscape. Plus, the Sunday Weekly MHVille Headlines Recap. FEA

Every headline topic will be addressed in this article: the latest from MHARR as provided in Part I below and their letter to Sec. Chris Wright. What (if anything) MHI has done on the same issue. The notions of lawfare and weaponization and how that plays into the manufactured housing industry landscape, and the headlines for the week in review. Periodically stating the obvious can be clarifying. [MHPProNews](#) notes that this and our [MHLivingNews](#) sister site are not trade groups. We are trade publishers focused on HUD Code manufactured housing, and to a lesser extent, report on other forms of factory or production center building (modular, prefabs, etc.). MHPProNews dips on a regular basis into insights from the National Association of Home Builders (NAHB), the National Association of Realtors (NAR), because they are major U.S. housing associations that routinely produce research and reporting on their industry, and at times they also report on HUD Code manufactured housing. There are times when those manufactured home reports by NAHB or NAR are arguably better than what the Manufactured Housing Institute (MHI) produces, at least in terms of public-facing information. Curiously, as one of the headlines for the week will explore, despite the fact that MHI calls itself an "institute." Per Dictionary.com: an "institute is an organization or association designed to study or promote something." MHI claims the represent "[all segments](#)" of the manufactured housing and factory-built housing industries. What is likely a better description (see the articles for the week in review for details) is that [MHI has members](#) that are *involved* in "[all segments](#)" of the factory-built home industry, including the apparent focus of many of those members and MHI on HUD Code manufactured housing. The [Modular Home Building Association \(MHBA\) executive director Thomas Hardiman has admitted](#) to MHPProNews that [modular construction is widely outpaced by HUD Code home construction](#). Then there is the [Manufactured Housing Association for Regulatory Reform \(MHARR\)](#) which [clearly states that they represent the views of independent producers of HUD Code manufactured housing](#). There are dual member-producers of both MHARR and MHI. That reality has at times arguably been misunderstood by some. MHPProNews acts as an observer, reporter and analyst of housing more broadly and manufactured housing industry more specifically developments. In our [industry expert/professional](#) and [editorial view](#), [MHPProNews](#) would be remiss in our research/reporting if we *failed to point out the apparent disconnects between what MHI says and what MHI has done* and continues to do in their various lobbying, educational, advocacy, marketing and other activities - or the apparent lack thereof. After repeated outreaches to MHI leadership, they have routinely failed to respond to reports like those that follow. While that does not mean that MHI agrees, it does arguably imply that they are unwilling to publicly push-back or debate our decade of reporting that MHI's own leaders have previously praised for their objectivity.



"[MHProNews.com](#) and [MHLivingNews.com](#) are both good communications resources for the Manufactured Housing Industry. I and many others at 21st Mortgage and at MHI logon to see the latest news, interviews, debates, videos, opinions and reports they publish. Having a trade publisher that presents thoughtful, respectful commentary independent of any association's perspective – as important as an association's view can be – can be a big asset to advancing the MH Industry's cause. Let me explain why..." - Tim Williams, 21st Mortgage Corp, then MHI Chairman.



"The emergence of Tony Kovach's group of publications has brought a new standard of professionalism to the industry. The thorough and unbiased reporting fills the vacuum that has existed for too long. It's been refreshing to have these communications serving the manufactured housing industry, and here's to their continued success."

- Howard Walker, JD,
Vice-Chairman of Equity LifeStyle Properties (ELS)
Manufactured Housing Institute Executive Committee Member

Kind thoughts from the late Howard Walker, the long-time right-hand man to ELS Chairman, billionaire Sam Zell. To this day, readers from firms of all sizes, ranging from the industry's giants, to mom-and-pops, make this most-read, runaway #1 trade media in the manufactured housing industry.

"Tony "gets it" when it comes to manufactured housing. He has worked or been involved in almost all phases of the business."

- **Al Cole**
Senior Vice President
Oxford Bank and Trust
via LinkedIn.



"I enjoy receiving *MHProNews* and as I have told you before – everyone I know in MH reads your pub. Continue on forever with this great news worthy service."

- [Barry Cole](#)
past Chairman of the RV/MH Hall of Fame
RV MH Hall of Fame inductee



Bob Thieman, CAE
Executive Director at
January 18, 2012. Bob worked
with L. A. Tony but at different
companies

Tony and his company are leading the way for manufactured housing to enter the 21st century. He and his staff have put together remarkable educational programs and marketing that are ahead of the time and benefit the industry greatly.



Tim Williams
Executive Director at Ohio
Manufactured Homes
Association
February 3, 2011. Tim was a client
of L. A. Tony's

Tony was utilized as the primary means to promote the 2011 Louisville Manufactured Home Show. As a member of the Show Committee and parent body presenting the Show, I can say we received tremendous value for the monies spent with Tony's firm. He was enthusiastic and very creative with the promotional aspects and follow up after the Show. I would recommend consideration of his services to MH professionals.



These are a sampling of some of the written, audio, and video recorded praise of *MHProNews* as an evidenced based publication that is produced by a genuine hands-on manufactured home industry expert.



"Hollywood Tony - I never thought you would last this long. Congratulations on...years of informative, up to the minute, short readings and boastful industry views. I enjoy receiving *MHProNews* and as I have told you before - everyone I know in MH reads your pub. Continue on forever with this great news worthy service."

- Barry Cole
Prior Chairman
RV MH Hall of Fame

These examples are from individuals who are members of MHI and/or are connected to an MHI state affiliate. Others from people of various backgrounds from inside and outside of manufactured housing are also available.

[caption id="attachment_185538" align="aligncenter" width="596"]

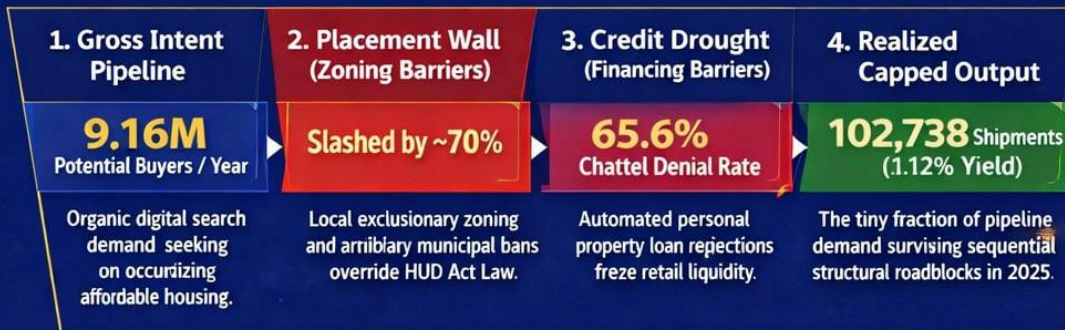
No one connects the dots in MHVille like MHProNews and MHLivingNews. Who says? Individuals like those cited above, MHARR, and others. [/caption]

The following Copilot generated infographic is in relation to two reports found in the headlines for the week in review further below. To see that image below in a larger size, in many browsers/devices, [click here](#) and follow the prompts.

Bombshell Research! Millions Searching for Manufactured Homes Annually. But Only About 100K Buy Yearly?

Manufactured Housing Institute Choices Arguably Cost Industry **BILLIONS** in Lost Sales-**FEA**

Millions of Shoppers, Thousands of Buyers: **A Choke Funnel**



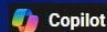
California ADU Surge vs. HUD Preemption **Lost Potential**



Jennison's Model: **Feasible 500K Units Annually**

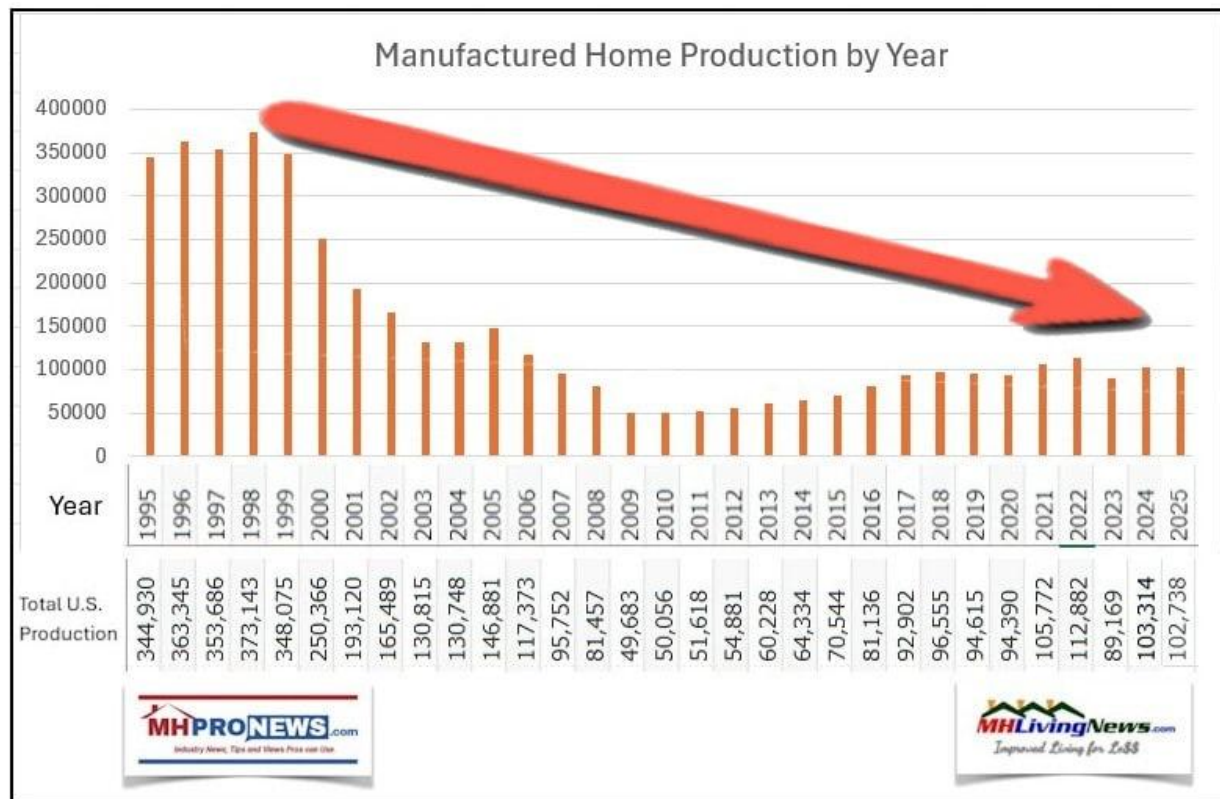


AI-Generated by Microsoft Bing's Copilot for MHPRONews – Facts • Evidence • Analysis 2026.



It is an arguably serious matter if MHI is posturing efforts on behalf of all segments of the industry and they are rather - slyly or boldly - working for the interests of the [consolidators](#) of the manufactured home industry. MHI could, perhaps, mount a potential argument about how great they are and why [MHIProNews](#) is mistaken in our [facts-evidence-analysis](#) (FEA) model of reporting save for a serious problem. There is a growing array of evidence, including the remarks of MHI and MHI corporate leaders, that routinely supports our reading of the facts and evidence in our various analyses. This isn't about taking MHI or their corporate leaders' words out of context. That's one reason why over 3 years ago, MHIProNews began a steady pivot in our reports by including third-party artificial intelligence as a FEA checking tool. Since MHI won't debate us directly, the AIs are a reasonable stand-in for such an association effectiveness and reporting accuracy debate. But there are more than just third-party AIs, or remarks by MHARR, or even recent remarks (see the headlines below) by the Tiny House Alliance USA that support MHIProNews' thesis. There are also those pesky key performance indicators (KPI). If MHI were doing its job properly, then there would be several times the current level of manufactured home production. But that is not the case. Looking at historic behavior is another factor. The predecessor of MHI, the Mobile Home Manufacturers Association (MHMA) once helped the industry develop hundreds of thousands of new home sites in order to support the industry at the time to continue to increase production. Why is there no similar effort by MHI today? Anyone can hold a class or a seminar. Anyone can publish a PDF of this or that topic and hope that someone reads it and think that it is an accurate reflection of reality. But the KPIs of production, the KPIs of site developments are all objective reasons why MHI is arguably failing by those metrics to do for manufactured housing what NAR or the NAHB are doing for their industry. From the perspective of the MHBA/MBI, the modular industry may have some wins in the recently enacted 21st Century ROAD to Housing Act. But manufactured housing? Perhaps not so much.

[caption id="attachment_228773" align="aligncenter" width="653"]



<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][caption id="attachment_223397" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/census-bureau-shipments-by-year-1959-2019-13-3-million-mobile-and-manufactured-homes-produced-population-trends-and-manufactured-housing-production->

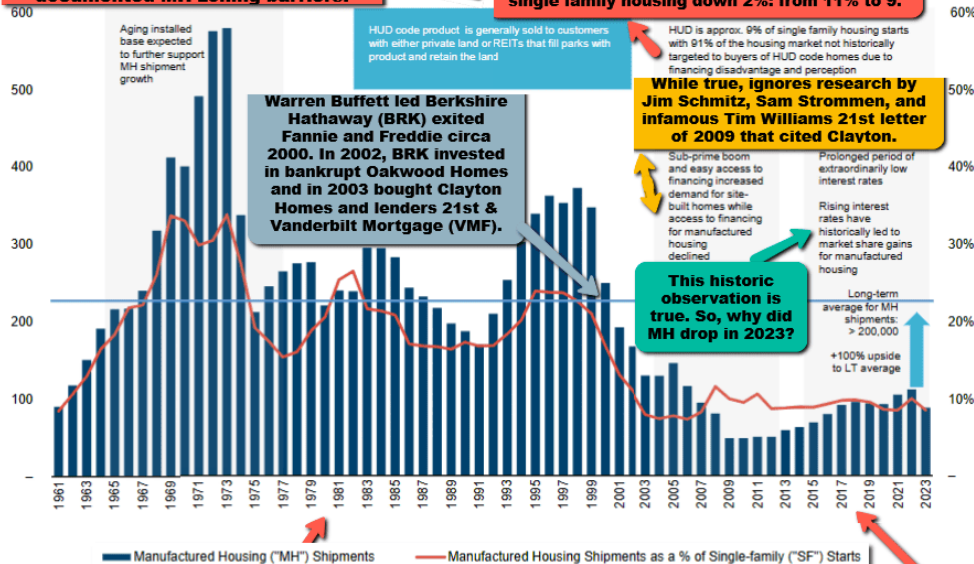
[mhville-reality-check-fea/](#)[/caption][caption id="attachment_209244" align="aligncenter" width="653"]

HUD Industry Overview

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

While true, this remark ignores well documented MH zoning barriers.

Based on May 2023 SKY IR pitch, MH share of single family housing down 2%: from 11% to 9.



Source: (1) U.S. Census Bureau

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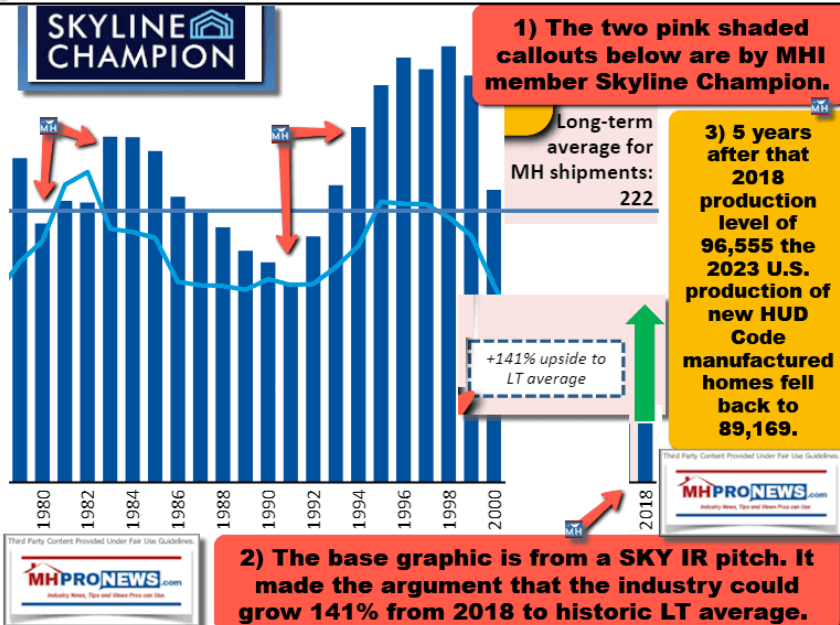


Per fellow MHI member Cavco Industries (CVC) 12.2023 IR pitch deck: "188K Average annual home shipments since HUD Code adoption in [6.15] 1976"

The lack of reference by SKY to the Manufactured Housing Improvement Act (a.k.a.: MHIA, 2000 Reform Law, 2000 Reform Act) raises concerns about Champion's corporate and similarly MHI's fiduciary responsibilities due to apparently missing material facts.

Champion reportedly has over '\$500 million in free cash.' They have multiple idled plants. They claim they want to grow organically and via acquisitions.

Why aren't they using their legal and financial resources to sue to get the 2000 Reform Law enforced? Especially post Loper Bright decision, the odds for success and increased opportunities for sales are per MHARR better.



2) The base graphic is from a SKY IR pitch. It made the argument that the industry could grow 141% from 2018 to historic LT average.

ADU production in CA soared after statewide preemption kicked in. Similarly, if federal preemption under the 2000 Reform Law were enforced by HUD routinely manufactured housing production could soar nationally. That would ease affordable housing crisis. Enforcement could save tax dollars over time.

MHProNews 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]

**Manufactured Home Community Closures vs.
New Manufactured Home Communities Developed**

Year Built	Communities Constructed Nationally
2016	3
2015	12
2014	7
2013	10
2012	7
2011	3
2010	14
2009	8
2008	13
2007	20
2006	24
2005	46
2004	31
2003	52
2002	60
Total	310

- Datacomp USA

New Development Data



If such facts are merely 'market forces' then there is no antitrust violation to be inferred from such data.

But if this is part of a scheme to deliberately limit the supply of land-lease manufactured home communities, that could be an antitrust violation. In that case, it may also be reasonable to think that RICO violations are also at play.

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Circa 2000, some estimated that there were as many as 55,000 land lease manufactured home communities in the U.S. The Lincoln Institute reported that a FEMA study puts that number at about 50,000 today. While estimates on the number of closures varies, it appears that there are more closures than new communities being opened.

COMPELLING SUPPLY-DEMAND FUNDAMENTALS



Source: Company information, Wall Street Research and Zillow. Refer to Sun Communities, Inc. Form 10-Q and Supplemental information. Refer to information regarding non-GAAP financial measures in the attached Appendix.
(1) MH sites in North America only January 2021 - June 2023.

Once these facts are understood, this is arguably antitrust violating market manipulation hiding in plain sight.

Facts and statements can be true yet may still not clearly reveal the full dynamic of a situation.

The MHMA in the late 1960s and early 1970s actively worked to help develop new sites and new land lease 'mobile home' communities. By contrast, since the 2000 Reform Law, the Manufactured Housing Institute (MHI) has an opportunity to get federal law enforced that would make developing and sitting manufactured homes easier. But what MHARR calls the 2000 Reform Law is not enforced. MHI has not attempted in the 21st century to litigate that non-enforcement of the 2000 Reform Law.

[caption id="attachment_216400" align="aligncenter" width="530"]



Mobile Home

Manufacturers Association (MHMA) and the 21st Century Manufactured Housing Institute (MHI)
<https://www.manufacturedhomepronews.com/historic-revealing-production-retailers-dealers-data-mobile-home-parks-and-finance-facts-from-mobile-home-history-when-mobile-homes-were-30-vs-10-of-all-single-family-housing-units-fea/>



<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/>

For a variety of reasons, MHProNews waited until today to publish the following MHARR press release, which the [original is found at this link here on the MHARR website](#). A manual check of the MHI website

on this date does not reveal anything similar to MHARR's report that follows. A [GAIO cross-check of the MHI website also confirmed that there is no similar report by MHI on this date akin to what follows from MHARR](#). A screen shot of the [MHI website that reveals no similar topic is linked here](#). That same screen shot is [annotated with GAIO and MHProNews FEA model analysis](#).

So, there is [no similar public-facing post or similar claim \(or counterclaim\) by MHI on this topic as of the time and dates shown](#).

The graphic is a yellow rounded rectangle with a dark blue border. At the top left, the letters 'FEA' are in large, bold, dark blue font. Below them, the words 'FACTS-EVIDENCE-ANALYSIS' are in a smaller, bold, dark blue font. To the right of this, a quote in dark blue text reads: "Analytical journalism is the highest style of journalism." - Diana Dutsyk. Below the quote, a paragraph of text in dark blue reads: "... the personal courage of the journalist is important, he should not be afraid to go against the bosses, should not call white black. He [the analytical journalist] cannot distort the truth." Below the text, there are three orange circles. The first circle contains a white icon of a document with lines of text. Below it, the word 'FACTS' is written in bold, dark blue capital letters. The second circle contains a white magnifying glass icon. Below it, the word 'EVIDENCE' is written in bold, dark blue capital letters. The third circle contains a white bar chart icon with an upward-pointing arrow. Below it, the word 'ANALYSIS' is written in bold, dark blue capital letters. A horizontal line is drawn below the words 'FACTS', 'EVIDENCE', and 'ANALYSIS'. To the right of the circles is a dark blue silhouette of a person's head and shoulders. On the person's chest is a white shield with a dark blue checkmark inside. At the bottom left of the graphic is the Microsoft Copilot logo, which consists of a colorful square icon and the word 'Copilot' in white text on a black background. At the bottom right is a screenshot of a computer screen showing the MHProNews.com website. Above the screenshot, the text 'Third Party Images Shown Under Fair Use Guidelines' is written in a small, light gray font. The website logo 'MHProNews.com' is prominently displayed in red and blue, with the tagline 'Industry News, Tips and More Pros can Use' below it.

FEA
FACTS-EVIDENCE-ANALYSIS

"Analytical journalism is the highest style of journalism." - Diana Dutsyk

... the personal courage of the journalist is important, he should not be afraid to go against the bosses, should not call white black. He [the analytical journalist] cannot distort the truth.

FACTS **EVIDENCE** **ANALYSIS**

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Part I

FOR IMMEDIATE RELEASE

Contact: MHARR

(202) 783-4087



MHARR REITERATES CALL FOR REPEAL OF DOE “ENERGY” RULE

Washington, D.C., July 9, 2026 – The Manufactured Housing Association for Regulatory Reform (MHARR) has reiterated and reinforced its long-standing call for the U.S. Department of Energy (DOE) to repeal and repudiate its currently-deferred May 31, 2022 “final” manufactured housing “energy conservation” standards.

In a July 8, 2026 communication to DOE Secretary, Chris Wright (see, copy attached), MHARR asserts that DOE’s June 26, 2026 repudiation of the 2024 International Energy Conservation Code (IECC) – a closely-related iteration of the 2021 IECC version which forms the basis for the May 31, 2022 DOE manufactured housing standards – is a further independent, valid and sufficient basis for a parallel DOE repudiation of the manufactured housing standards. Furthermore, in repudiating the 2024 IECC, DOE cites Executive Order 14394 “Removing Regulatory Barriers to Affordable Home Construction” (EO). MHARR cited the same EO, in a March 25, 2026 communication to DOE likewise calling for the elimination of the May 31, 2022 Biden-era manufactured housing energy standards based on section 2 (c) of the EO, which states, in relevant part:

“The Secretary of HUD and the Secretary of Energy shall ... take appropriate action to reform and where appropriate, eliminate unduly burdensome or costly energy-efficiency ... requirements regarding housing ... include[ing] ...revising the Energy Conservation Program’s Energy Conservation Standards for Manufactured Housing.”

In addition, and as a further independent and sufficient basis for the repeal of the May 31, 2022 manufactured housing standards, MHARR cites DOE’s July 2, 2026 proposed rule to “permanently end” certain DOE home appliance and equipment energy mandates that have “restricted consumer choice and dr[iven] up costs,”

MHARR’s communication asserts that there is no valid or legitimate legal or practical distinction between the energy mandates that the aforesaid actions would eliminate and the May 31, 2022

manufactured housing energy standards. MHARR thus calls upon DOE to repudiate and repeal those standards.

Such action, moreover, is essential, because the pending housing bill – the 21st Century ROAD to Housing Act – would not automatically or necessarily eliminate the May 31, 2022 DOE “final” standards. A previous bill filed by Rep. Erin Houchin (R-IN) would have done that, but was “compromised” into irrelevance and ineffectiveness for reasons that have never been fully – or even partially – explained. Instead, the ROAD Act would do nothing to repeal the mandate for manufactured housing energy standards set forth in the Energy Independence and Security Act of 2007 (EISA) and would specifically allow the DOE standards to go into effect if they were approved and adopted by HUD (a virtual certainty under a Post-Trump administration).

In order to avoid such a scenario – and a major loophole incorporated within the ROAD Act – it is essential that DOE, under the current administration, take concrete action to eliminate the lingering existential threat posed by those baseless and needlessly costly regulations.

MHARR, therefore, will continue to pursue the full repeal of the May 31, 2022 DOE standards through all available means.

In addition, MHARR will continue to aggressively oppose any HUD manufactured housing energy standards that are in any way, based upon, derived from, related to, or based on the same statutory authority or external code provisions as the pending DOE standards. This further point is particularly important insofar as HUD has now published notice of a Manufactured Housing Consensus Committee (MHCC) meeting on July 23, 2026 specifically to “review *the* energy conservation standards for manufactured housing.” (Emphasis added).

In Washington, D.C., MHARR President and CEO Mark Weiss stated: “While Secretary Wright at DOE is actively implementing President Trump’s agenda (as set forth in Executive Order 14394) to reduce unnecessary, baseless and costly regulatory burdens on American homebuyers, including extremist-driven “energy” mandates, HUD is showing its utter contempt for both the HUD Code industry and hard-pressed lower and moderate-income consumers who would be priced out of the manufactured housing market – and the housing market altogether – by pursuing unneeded and unnecessary high-cost “energy” mandates. Even worse, it is clearly trying to railroad these standards into effect through absolutely minimal notice of the July 23, 2026 MHCC meeting and virtually no time for stakeholders to submit substantive comments. The Trump Administration can – and must – do better.”

The Manufactured Housing Association for Regulatory Reform is a Washington, D.C.- based national trade association representing the views and interests of independent producers of federally-regulated manufactured housing.

[Attachments](#)

-- 30 --

Manufactured Housing Association for Regulatory Reform (MHARR)
1331 Pennsylvania Ave N.W., Suite 512
Washington D.C. 20004
Phone: 202/783-4087
Fax: 202/783-4075

Email: MHARRDG@AOL.COM

Website: www.manufacturedhousingassociation.org

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July 8, 2026

VIA FEDERAL EXPRESS

Hon. Chris Wright
Secretary
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: Manufactured Housing Energy Conservation Standards

DOE Docket No. EERE-2009-BT-BC-0021

Dear Secretary Wright:

I write once again to ask that the U.S. Department of Energy (DOE) formally withdraw its "energy conservation" standards for manufactured homes final rule, published May 31, 2022, [\[1\]](#) but not yet implemented. [\[2\]](#)

As MHARR has demonstrated in multiple rounds of written comments submitted during the DOE rulemaking process, the DOE standards – contrary to baseless assertions set forth by disingenuous DOE staff in support of the "final" rule – would needlessly add thousands of dollars to the purchase price of a new manufactured home, with minimal or no corresponding benefits or, *at most*, benefits that would take years or decades to be realized. According to price sensitivity metrics provided by MHARR, such purchase price increases would exclude millions of Americans from homeownership and all of the benefits of homeownership, at a time of unprecedented demand and need for affordable housing.

Further, as you are aware, the DOE manufactured housing energy standards are based on – and were developed in accordance with – the International Energy Conservation Code (IECC) maintained and sponsored by the International Code Council (ICC). [\[3\]](#) It is thus highly relevant that, as in a News Release issued on June 26, 2026, [\[4\]](#) DOE, in accordance with Executive Order 14394, "Removing Regulatory Barriers to Affordable Home Construction," [\[5\]](#) specifically repudiated the 2024 IECC Code and the ICC development process for the IECC, stating:

"[T]he 2024 IECC would increase residential housing costs by more than \$9.2 billion annually compared to 2006 code levels, adding more than \$127 billion in cumulative costs nationwide."

Pursuant to these findings, you concluded and stated:

"American families should not be forced to pay more for a home because nonsensical energy-related mandates. *** For too long, climate activists have pushed regulations that increase housing costs, reduce consumer choice, and make it harder for Americans to build and own a home. Thankfully President Trump will continue fighting for the American people so they can enjoy affordable energy access and the ability to buy the home they desire with the features they choose."

(Emphasis added).

The exact same reasoning and rationale applies with equal – if not greater force – to the May 31, 2022 “final” DOE manufactured housing “energy conservation” standards. Those IECC-derived standards, as MHARR and other commenters have consistently demonstrated, would needlessly undermine the inherent affordability of manufactured homes, contrary to the express mandate of federal manufactured housing law and would deny safe, decent and affordable housing and homeownership to millions of lower and moderate-income American families that have historically relied on the unparalleled affordability of manufactured housing to become homeowners. Indeed, DOE’s reliance on the IECC as the basis for manufactured housing energy standards is even more egregious and unfounded than the example cited in the above-referenced News Release, insofar as the IECC was never developed for, or specifically adapted to, manufactured housing, and is totally inconsistent with the unique engineering, designs and construction of HUD Code manufactured homes.

Furthermore, the manufactured housing energy mandate and May 31, 2022 DOE standards are legally, economically and practically indistinguishable from the DOE home appliance and equipment energy conservation mandates that DOE announced, on July 2, 2026, would be “permanently end[ed].” In that News Release, you again stated that:

“For too long, the American people [have] paid a price for [energy] mandates that restricted consumer choice and drove up costs. President Trump promised to end this nonsense and that is exactly what we are doing. The proposed rule will preserve the American people’s ability to choose home appliances and equipment that actually work – at prices they can afford. It’s called common sense.”

And once again, the same logic and rationale support – and demand – that DOE formally and finally withdraw its overblown, overdone, industry and home affordability-killing “energy conservation” standards for manufactured housing in order to eliminate and repudiate such unnecessary and destructive mandates pushed by the same cadre of “climate” radicals. The time has come to remove this extreme threat against the nation’s most affordable type of housing and the American consumers who rely on its purchase-price and operational affordability.

We thank you – and President Trump – for your affordability agenda, and again ask that you act to repeal the egregious May 31, 2022 DOE manufactured home “energy conservation” regulations and their underlying basis.

Sincerely,

Mark Weiss
President and CEO

cc: Hon. Donald J. Trump
Hon. Scott Bessent
Hon. Scott Turner
Hon. Russell Vought
HUD Code Manufactured Housing Industry Members

[1] See, 87 Federal Register, No. 104, (May 31, 2022) “Energy Conservation Program: Energy Conservation Standards for Manufactured Homes,” at p. 32728, et seq.

[2] See, 90 Federal Register, No. 168 (September 3, 2025) "Public Input on Energy Conservation Standards for Manufactured Housing," at pp. 42545-425546 for a summary of DOE regulatory actions regarding the compliance date for the subject standards.

[3] The May 31, 2022 DOE "final" manufactured housing standards were based on the 2021 iteration of the IECC. While the 2021 IECC is not *identical* to the 2024 IECC addressed by DOE's June 26, 2026 News Release and supporting materials, it is very similar and is characterized by the same type of high-cost/zero (or minimal) benefit mandates that are contained in the 2024 IECC.

[4] See, copy attached.

[5] In a prior March 25, 2026 communication to you, MHARR *specifically* called for the withdrawal and repudiation of the May 31, 2022 DOE manufactured housing energy standards pursuant to section 2(c) of EO 14394, which states, in relevant part: " The Secretary of [HUD] [and] the Secretary of Energy shall, within their respective authorities, take appropriate action to reform and where appropriate, eliminate unduly burdensome or costly energy-efficiency ... requirements regarding housing, to the maximum extent practicable.... Such action shall include reviewing and revising ... (i) the Energy Conservation Program's Energy Conservation Standards for Manufactured Housing." See, copy attached.

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MHARR's press releases are available for re-publication in full (i.e.: without alteration or substantive modification) without further permission and with proper attribution and/or linkback to MHARR.

MHARR notes that the featured image was generated by artificial intelligence (AI) powered ChatGPT. This MHARR report was written using industry-expert human intelligence.

Part II. The Sunday Weekly MHVille Headlines in Review

Don't miss today's postscript, further below. Weaponization, lawfare and the evolving manufactured housing industry landscape will be considered and unpacked there. A few teasers from the postscript, the first the 3rd party AI check from #1 and table 1.

"MHARR's warning is well-founded: ROAD is structurally compatible with future HUD adoption of DOE's rule; without DOE repeal now, a later administration could weaponize the dormant standards."

Note that use of the term "weaponize." It is a term Google's AI powered Gemini has also used recently.

From the postscript Part I table 2.

"MHARR is leveraging the best available legal tool; MHI's non-use of the same tool is a material omission that supports the "Machiavellian Housing Institute" critique."

and

"Pattern: MHARR uses law to de-weaponize regulation; MHI's inaction allows law and regulation to be weaponized against independents and consumers, while benefiting well-capitalized consolidators who can absorb higher costs and tighter supply."

and

"The lawfare narrative is coherent: when one trade group fights weaponized rules and another tolerates or quietly leverages them, the net effect is regulatory capture and structural suppression of affordable MH output."

There is much, much more from third-party AI findings in the postscript. So, again, don't miss it.

With no further adieu, here is the from 7.12 to 7.19.2026.

What's New, Recent and Select from [MHLivingNews](#)

[caption id="attachment_234930" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/why-are-literally-millions-shopping-for-hud-code-manufactured-housing-are-they-smart-or-deluded-3rd-party-and-industry-research-on-modern-manufactured-homes-2026-facts-evidence-analysis-fea/>[/caption][caption id="attachment_234567" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/trump-admin-called-to-expose-manufactured-housing-industry-corruption-and-beat-corp-establishment-politicos-at-their-own-game-root-causes-and-cures-to-housing-crisis-examined-mhville-fea/>[caption]

[caption id="attachment_234250" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/then-and-now-construction-and-housing-in-america-at-250-practical-lessons-for-all-in-usa-how-choices-not-scarcity-drive-unaffordability-understanding-how-to-revive-the-american-dre/>[caption][caption id="attachment_233974" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/celebrating-50-years-of-hud-code-manufactured-housing-huds-office-of-manufactured-housing-programs-omhp-provides-history-of-trailers-to-mobile-homes-to-manufactured-homes-fea-to-know/>

[caption id="attachment_232931" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/2026-u-s-manufactured-housing-industry-production-slide-continues-as-affordable-housing-crisis-grows-unpacking-manufactured-housing-association-report-with-fea-method/>

[caption id="attachment_231584" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/dirty-secrets-in-housing-crisis-lessons-from-purple-haze-and-the-first-transcontinental-railroad-for-the-puzzled-concerned-or-angry-about-u-s-affordable-housing-crisis-mhville-fea/> [/caption]

[caption id="attachment_228803" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/affordability-and-the-manufactured-housing-census-bureau-evidence-what-most-politicos-and-special-interests-arent-telling-affordable-housing-hungry-americans-mhville-fea/> [caption id="attachment_227343" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/when-manufactured-housing-institute-ceo-lesli-gooch-publicly-opposed-resident-owned-communities-as-risky-scheme-in-right-of-first-refusal-legislation-part-of-claimed-monopolization-scheme-fea/>

[caption id="attachment_227007" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/consumers-sincere-affordable-housing-advocates-and-independent-businesses-attorney-mark-weiss-interview-insights-into-causes-and-possible-cures-to-affordable-housing-crisis-mhville-fea/>

[caption id="attachment_224040" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/why-is-manufactured-housing-underperforming-during-a-documented-affordable-housing-crisis-what-sources-including-3rd-party-artificial-intelligence-ai-said-facts-evidence-analysis-fea/>[caption]

[caption id="attachment_220373" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/manufactured-homeowner-rhp-properties-community-resident-fred-neil-dover-city-council-president-exclusive-on-new-state-law-possible-example-to-protect-residents-and-stop-fraud-by-states-fea/>[caption]

[caption id="attachment_219399" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/satirical-consumer-alert-hypocrisy-housing-hijinks-in-mhville-yes-communities-ceo-steve-schaub-honored-by-rv-mh-hall-of-fame-despite-100s-of-resident-complaints-price-rigging-antitrust-suit/>[/caption]

What's New, Recent, and Select from Washington, D.C. based [MHARR](#)

[caption id="attachment_234931" align="aligncenter" width="600"]

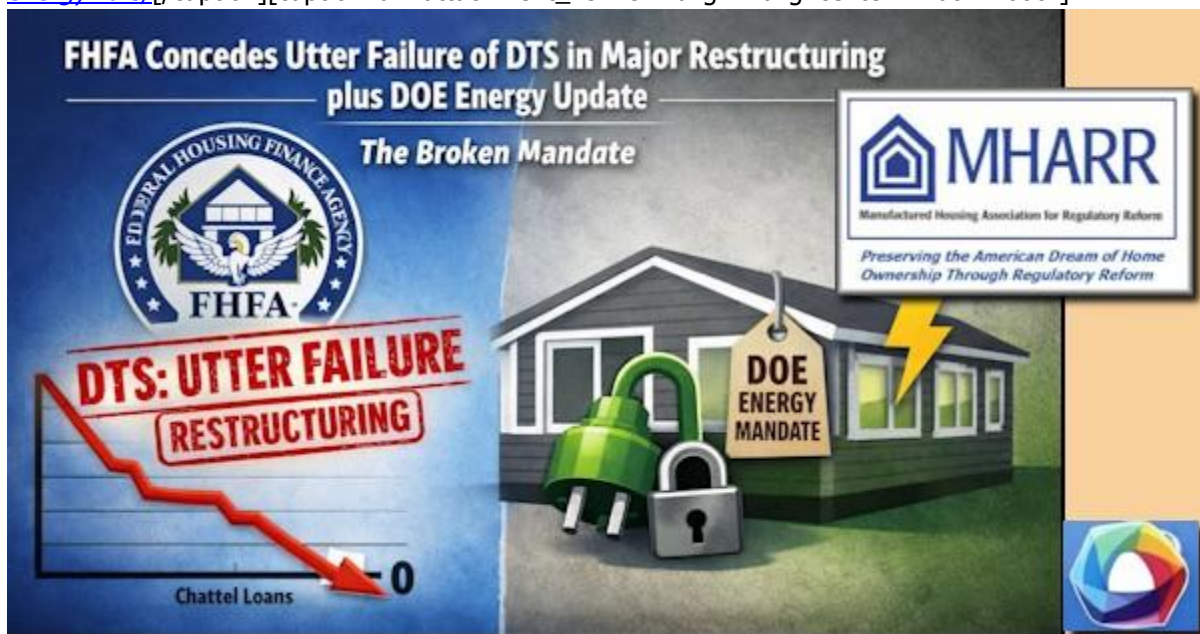


<https://manufacturedhousingassociationregulatoryreform.org/mharr-calls-on-manufactured-housing-consensus-committee-mhcc-to-shelve-any-new-or-further-manufactured-housing-energy->

[standards/](#)[caption][caption id="attachment_234569" align="aligncenter" width="600"]



<https://manufacturedhousingassociationregulatoryreform.org/mharr-reiterates-call-for-repeal-of-doe-energy-rule/>[caption][caption id="attachment_234251" align="aligncenter" width="600"]



<https://manufacturedhousingassociationregulatoryreform.org/fhfa-concedes-utter-failure-of-dts-in-major-restructuring-plus-doe-energy-update/>[caption][caption id="attachment_234570" align="aligncenter" width="600"]



MHARR HOUSINGWIRE OP-ED –

“Congress has a Chance to Expand Affordable Homeownership – It Shouldn’t Waste It”



Expanding manufactured housing opportunities to help more Americans achieve the dream of homeownership.

HOUSINGWIRE

OP-ED

Congress has a Chance to Expand Affordable Homeownership – It Shouldn’t Waste It

<https://manufacturedhousingassociationregulatoryreform.org/mharr-housingwire-op-ed-congress-has-a-chance-to-expand-affordable-homeownership-it-shouldnt-waste-it/>[caption][caption

id="attachment_234571" align="aligncenter" width="600"]

HUD CODE MANUFACTURED HOME INDUSTRY PRODUCTION DECLINES AGAIN IN MAY 2026



8,385 HOMES
PRODUCED IN MAY 2026

↓ 9.6%
Y-O-Y DECLINE

CUMULATIVE 2026 PRODUCTION:
41,433 HOMES ↓ 7.7%
VS. 2025



FHFA CONCEDES DUTY TO SERVE (DTS) FAILURES

Fannie Mae and Freddie Mac have failed to serve the chattel lending market.



HIGHER RATES. LESS COMPETITION.

Lenders cannot access secondary markets, sustaining higher rates for consumers.



REGULATORY REFORM NEEDED

Remove barriers. Enforce DTS. Expand financing choices.



SUPPORT INDEPENDENT PRODUCERS AND AFFORDABLE HOMEOWNERSHIP

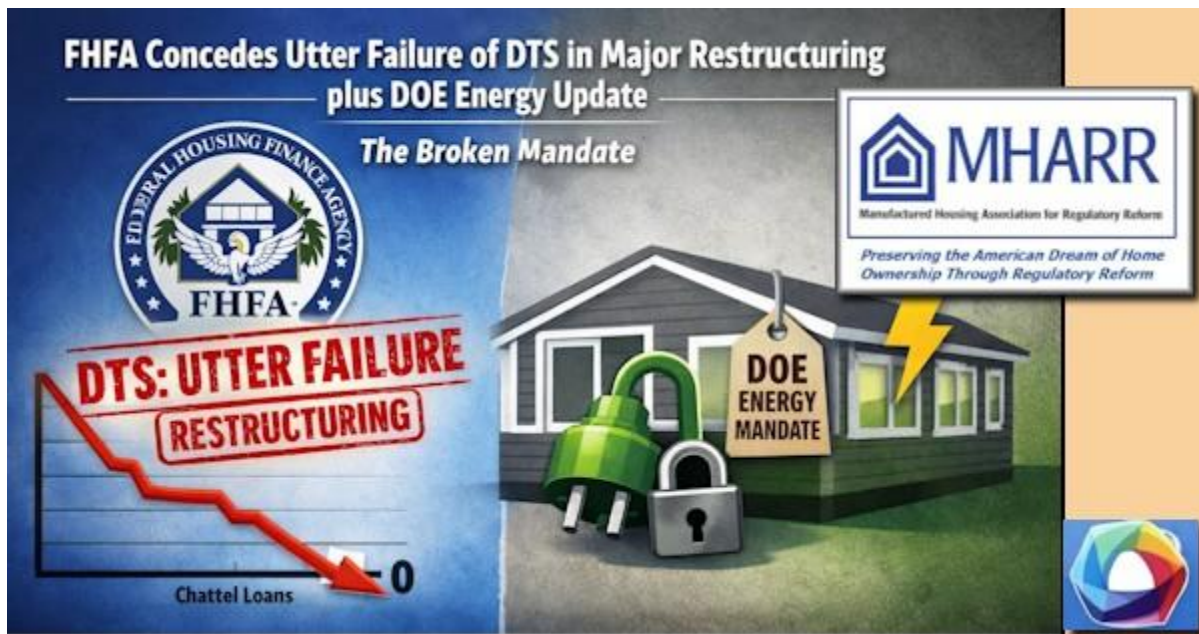
A vibrant HUD Code industry strengthens communities and expands affordable housing.

MHARR: WORKING FOR A FAIR, COMPETITIVE AND AFFORDABLE MANUFACTURED HOUSING MARKET



ChatGPT

<https://manufacturedhousingassociationregulatoryreform.org/hud-code-manufactured-home-industry-production-declines-again-in-may-2026/>[caption][caption id="attachment_234251" align="aligncenter" width="600"]

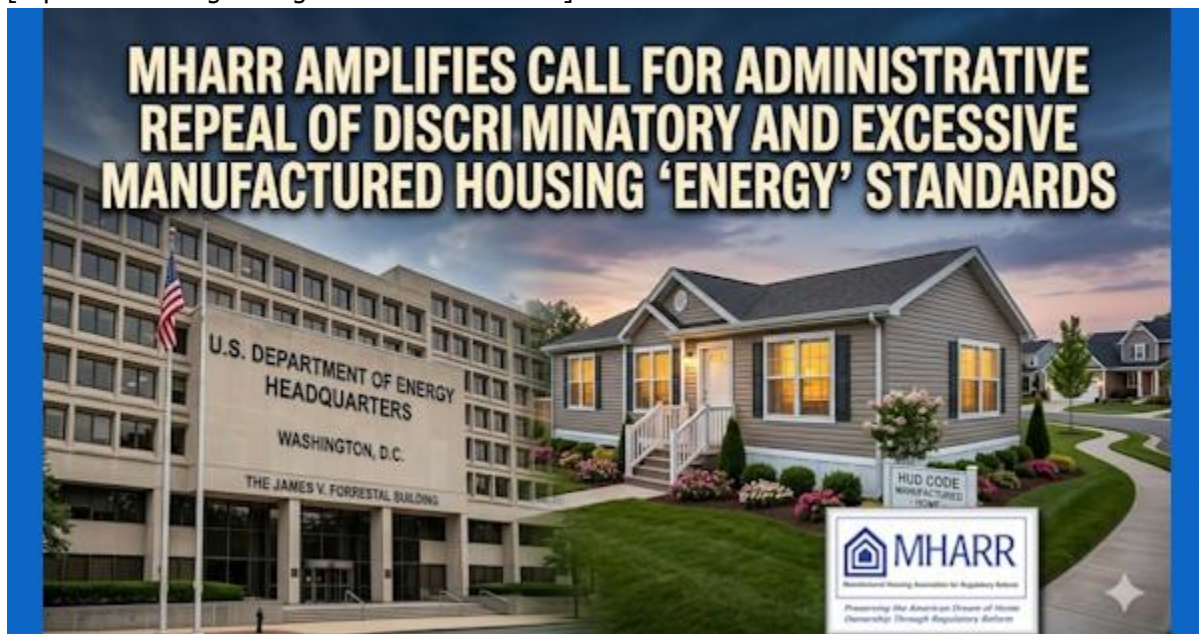


<https://manufacturedhousingassociationregulatoryreform.org/fhfa-concedes-utter-failure-of-dts-in-major-restructuring-plus-doe-energy-update/>[/caption][caption id="attachment_233768" align="aligncenter" width="600"]



<https://manufacturedhousingassociationregulatoryreform.org/pending-housing-legislation-is-a-litany-of-deficiencies-and-missed-opportunities-for-mainstream-manufactured-housing-and-consumers-mharr-issues-and-perspectives/>[/caption]

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



<https://manufacturedhousingassociationregulatoryreform.org/mharr-amplifies-call-for-administrative-repeal-of-discriminatory-and-excessive-manufactured-housing-energy-standards/>

[caption id="attachment_228804" align="aligncenter" width="600"]



<https://manufacturedhousingassociationregulatoryreform.org/why-manufactured-housing-production-remains-suppressed-and-what-could-change-it-manufactured-housing-association-for-regulatory-reform-mharr-issues-and-perspect/>

[caption id="attachment_220730" align="aligncenter" width="600"]



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



<https://manufacturedhousingassociationregulatoryreform.org/manufactured-housing-association-for-regulatory-reform-mharr-leaders-call-on-hud-secretary-to-address-and-remedy-federal-manufactured-housing-program-mismanagement/>

[caption id="attachment_142511" align="aligncenter" width="606"]



<https://manufacturedhousingassociationregulatoryreform.org/mharr-releases-study-recommending-independent-collective-representation-for-post-production-sector/>[/caption]

What's New, Recent and Select from the [Masthead](#)

[caption id="attachment_234252" align="aligncenter" width="600"]



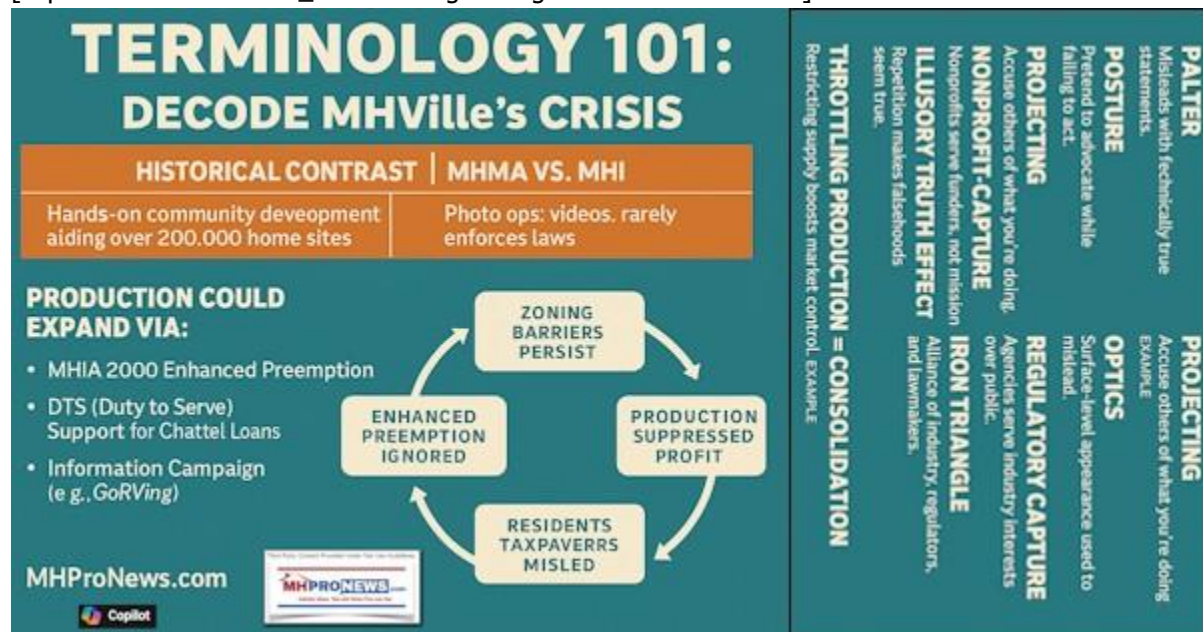
<https://www.manufacturedhomepronews.com/masthead/american-250th-the-u-s-housing-crisis-and-the-manufactured-home-pro-news-david-vs-goliath-distinctions-facts-evidence-analysis-fea-including-human-intelligence-4-ais-findings/>[/caption]

[caption id="attachment_222350" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/masthead/taxpayers-single-or-multi-family-housing-owners-renters-honest-vs-uninformed-or-corrupt-public-officials-should-demand-changes-to-the-road-to-housing-act-2025-or-strip-it-from-ndaa-fea/>[/caption]

[caption id="attachment_216781" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/masthead/terminology-101-understand-key-words-palter-posture-projecting-optics-regulatory-capture-iron-triangle-nonprofit-capture-illusory-truth-how-throttling-productionconsolidation-moat/> [caption] [caption id="attachment_214092" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/masthead/manufactured-housing-institute-email-ceo-lesli-gooch-via-linkedin-teresa-payne-joined-mhi-tip-paynes-policies-favored-largest-manufacturers-for-years-now-she-joined-mhi-co/> [caption]

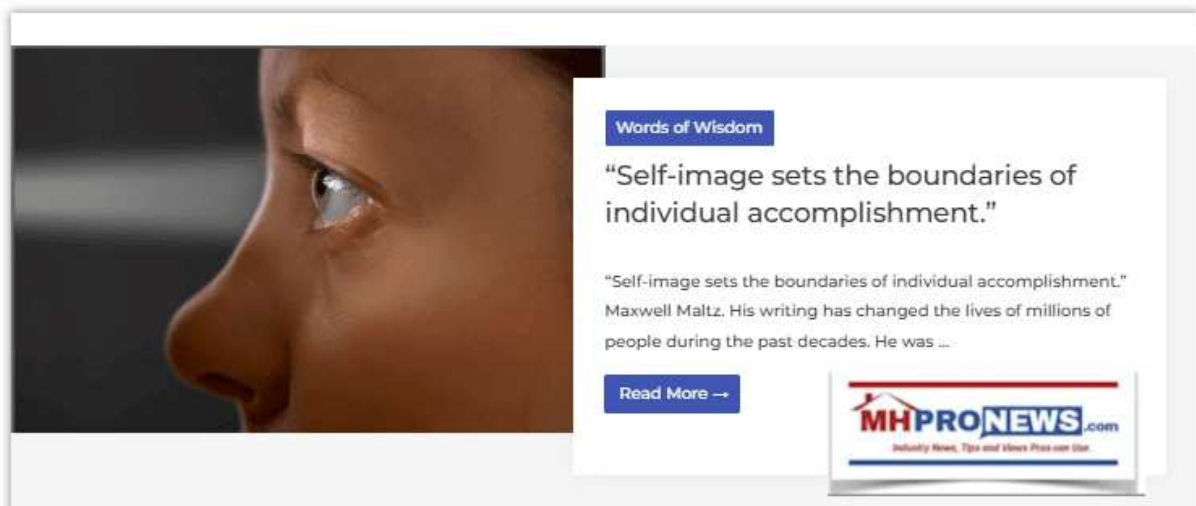
[caption id="attachment_203966" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/masthead/loper-brights-light-on-fhfa-fannie-mae-freddie-mac-duty-to-serve-manufactured-housing-and-a-pimple-on-an-elephants-ass-eye-opening-warren-buffett-dts-for-manufactured-homes-wit/>[/caption]

From Tim Connors, CSP and his [Words of Wisdom](#)

[caption id="attachment_210789" align="aligncenter" width="606"]



<https://www.manufacturedhomepronews.com/wordsofwisdom/self-image-sets-the-boundaries-of-individual-accomplishment/>[/caption]

[caption id="attachment_210790" align="aligncenter" width="606"]



Uncategorized

All Work Is As The Seed Was Sown; It Grows And Spreads And Sows Itself Anew.

"All work is as the seed was sown; it grows and spreads and sows itself anew." Carlyle. Again, your definition of work matters here. If ...

[Read More →](#)



<https://www.manufacturedhomepronews.com/wordsofwisdom/all-work-is-as-the-seed-was-sown-it-grows-and-spreads-and-sows-itself-anew/>[/caption][caption id="attachment_178888" align="aligncenter" width="573"]



Success Tips

Never Give Up

"Never give up, no matter what is going on...no matter what is happening, no matter what is going on around you, never give up." Dalai ...

April 11, 2023

[Read More →](#)

<https://www.manufacturedhomepronews.com/wordsofwisdom/never-give-up/>[/caption][caption id="attachment_178591" align="aligncenter" width="600"]



“Find a need and fill it.”

Words of Wisdom / By Tim Connor

<https://www.manufacturedhomepronews.com/wordsofwisdom/find-a-need-and-fill-it-r/>[/caption]

MHProNews Programming Notice. As a result of the [contributor relationship developed with HousingWire](#), MHProNews has made a pivot from [The Patch](#) previously announced in December 2025. That said, MHProNews can still contribute to [The Patch](#) as desired (a new op-ed installment is linked below). The latest post on [HousingWire](#) is immediately below.

[caption id="attachment_233160" align="aligncenter" width="652"]

HOUSINGWIRE

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Contributors | Housing Market | Opinion ⌚ 6 minute read

Opinion: Congress, don't mock homeownership month: Fix or flush 21st Century ROAD to Housing Act

Congress can't solve housing affordability without stronger manufactured housing reforms, zoning preemption and financing access for inherently affordable homes.

June 11, 2026, 3:20am by *Tony Kovach*

News > Opinion



<https://www.housingwire.com/articles/road-act-demand-subsidies-opinion/>[/caption]

[caption id="attachment_231815" align="aligncenter" width="489"]

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Industry News, Tips and Views Price can Use.

– Posts By Tony



Opinion: 'This time it's different.' U.S. of AmeRegCorp. AARP. UMMC. MHI. MHARR. Congress and manufactured homes

May 15, 2026

<https://www.housingwire.com/articles/road-act-manufactured-housing/>[caption][caption id="" align="aligncenter" width="662"]

Contributors | Legislation | Opinion ⌚ 8 minute read

Manufactured housing is the homeownership solve we keep ignoring

Will Maxine Waters, Congress or the Trump administration fix the Affordable Housing Bill?

April 2, 2026, 3:34am by [Tony Kovach](#)

News > Contributors



<https://www.housingwire.com/articles/manufactured-housing-is-the-homeownership-solve-we-keep-ignoring/> [/caption]

[caption id="attachment_229322" align="aligncenter" width="494"]



housingwire.com/author/tony-kovach/

HOUSINGWIRE

News ▾

– Posts By Tony



**Sorry, don't buy Senate brief: "The facts:
The 21st Century ROAD to Housing Act"
won't work unless amended**

Mar 10, 2026

<https://www.housingwire.com/articles/sorry-dont-buy-senate-brief-the-facts-the-21st-century-road-to-housing-act-wont-work-unless-amended/>

[caption id="attachment_229417" align="aligncenter"]



WND EXCLUSIVE

L.A. 'Tony' Kovach: 1 simple legislative fix needed to solve America's housing crisis

'21st Century ROAD to Housing Act' will
fail without this obvious remedy



width="438"]

<https://www.wnd.com/2026/03/1-simple-legislative-fix-needed-solve-americas-housing/>

[/caption][caption id="attachment_233971" align="aligncenter" width="717"]

Lakeland | Neighbor News | 5d

Epic Failure of the Manufactured Housing Institute in Pending Congressional Legislation, per Experts & AI

Cavco Industries CEO William "Bill" Boor Called MHI's Handling of 21st
Century ROAD to Housing Act "Masterful." Masterful for Consolidators?



L. A. "Tony" Kovach, Neighbor



<https://patch.com/florida/lakeland/epic-failure-manufactured-housing-institute-pending-congressional-legislation-nodx> and <https://patch.com/users/tony-kovach/articles>

[/caption][caption id="attachment_227836" align="aligncenter" width="649"]

Comparing RV and manufactured housing data sheds critical light on U.S. affordable housing crisis

RV shipments surged while HUD Code output stalled



February 2, 2026, 3:28am by *Tony Kovach*



<https://www.housingwire.com/articles/comparing-rv-and-manufactured-housing-data-sheds-critical-light-on-u-s-affordable-housing-crisis/> [/caption]

[caption id="attachment_226499" align="aligncenter" width="602"]

housingwire.com/articles/judge-valderramas-roadmap-for-successful-antitrust-litigation-in-affordable-housing-crisis/

HOUSINGWIRE

News ▾Events

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Industry News, Tips and Views Pros can Use.

Contributors | Housing Market | Opinion ⌚ 6 minute read

Judge Valderrama's 'roadmap' for successful antitrust litigation in affordable housing crisis

How Judge Valderrama's ruling outlines what antitrust plaintiffs must prove in manufactured housing

January 2, 2026, 3:50am by [Tony Kovach](#)

News > Contributors



<https://www.housingwire.com/articles/judge-valderramas-roadmap-for-successful-antitrust-litigation-in-affordable-housing-crisis/>

[caption id="attachment_224412" align="aligncenter" width="563"]



'A thunderclap unpacking UMH CEO Sam Landy's statements defines the failure metric' in ROAD to Housing Act

HW HousingWire

UMH CEO Sam Landy should be thanked for sharing via HousingWire his recent op-ed which weaves together what is arguably a subtle call for the Manufactured Housing

<https://www.housingwire.com/articles/a-thunderclap-unpacking-umh-ceo-sam-landys-statements-defines-the-failure-metric-in-road-to-housing-act-via-op-ed/>[/caption]

What's New on the Daily Business News on MHProNews

Saturday 7.18.2026

[caption id="attachment_234911" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/bombshell-research-millions-searching-for-manufactured-homes-annually-but-only-about-100k-buy-yearly-manufactured-housing-institute-choices-arguably-cost-industry-billions-in-lost-sales-fea/>[/caption]

Friday 7.17.2026

[caption id="attachment_234873" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/fr-6537-p-01-revising-the-definition-of-manufactured-home-to-lower-housing-costs-exploring-a-detailed-introduction-to-a-rube-goldberg-machine-of-human-suffering/>[/caption]

Thursday 7.16.2026

[caption id="attachment_234822" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/political-theater-barrons-aei-housing-center-cascade-policy-center-mharr-pushback-cheerleader-claims-21st-century-road-to-housing-act-will-law-help-adults-buy-a-home-fea/>

Wednesday 7.15.2026

[caption id="attachment_234741" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/what-are-we-going-to-do-about-it-ladies-tiny-house-alliance-sounds-alarm-mhi-paid-by-hud-in-purported-conflict-plus-takeover-of-hud-mh-code-paid-by-hud-tax-dollar/>[/caption]

Tuesday 7.14.2026

[caption id="attachment_234662" align="aligncenter" width="600"]

From the Desk of L. A. “Tony” Kovach

HUD REGULATORY COMMENTS FOR MANUFACTURED HOUSING

CONSENSUS COMMITTEE (MHCC) MEETING

 **Energy Conservation Standards
for Manufactured Housing**

 **JULY 23, 2026**

 **mhcc@homeinnovation.com**

HUD
U.S. Department of
Housing and
Urban Development

**OFFICIAL COMMENTS
TO THE MHCC**
ENERGY CONSERVATION STANDARDS
FOR MANUFACTURED HOUSING

**TRUTH.
EVIDENCE.
SOLUTIONS.**

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 **FACTS
MATTER** |  **EVIDENCE
COUNTS** |  **AFFORDABLE HOUSING
FOR ALL** |  **RESPONSIBLE
REGULATION** |  **REAL SOLUTIONS
REAL IMPACT**

<https://www.manufacturedhomepronews.com/hud-regulatory-comments-for-manufactured-housing-consensus-committee-mhcc-meeting-july-23-2026-energy-conservation-standards-for-manufactured-housing-fea-mhcchomeinnovation-com/>[/caption]

Monday 7.13.2026

[caption id="attachment_234615" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/per-steve-mclean-via-renx-manufactured-housing-investments-pay-off-for-flagship-communities-reit-unpacking-claimed-hits-misses-in-kurt-keeney-quoted-report-behind-mhi-flagship-curtain-fea/>[caption]

Sunday 7.12.2026

[caption id="attachment_234583" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/lindsey-graham-dead-mitch-mcconnell-sec-rubio-calls-60-nation-antifa-meet-chris-nicely-road-housing-bill-becomes-law-without-trump-signing-plus-sunday-weekly-mhville-headlines-recap-fea/>[caption]

Postscript

1. In response to the [pre-publication draft version of this article linked here](#) Microsoft Bing's [artificial intelligence](#) (AI) powered [Copilot said the following in response to this input-inquiry](#).

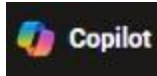


Table 1 – DOE manufactured housing energy rule vs. Trump EO 14394 and ROAD Act

Item	Key facts	Alignment / conflict
DOE May 31, 2022 MH energy standards (10 CFR Part 460)	Final rule published May 31, 2022; standards explicitly “adapted from...2021 IECC” and apply to HUD Code manufactured homes once enforcement procedures are finalized.	Directly tied to IECC framework that DOE has now repudiated for site-built homes, which MHARR argues is a logical basis to repudiate the MH rule as well.
DOE repudiation of 2024 IECC	DOE has announced rejection of 2024 IECC as unduly burdensome for affordable housing; MHARR’s July 9, 2026 release treats this as “a further independent, valid and sufficient basis for a parallel DOE repudiation of the manufactured housing standards.”	Strong policy signal that IECC-based mandates are inconsistent with Trump’s affordability agenda; supports MHARR’s call to withdraw MH standards built on 2021 IECC.
Executive Order 14394 (Removing Regulatory Barriers to Affordable Home Construction)	EO 14394 directs HUD and DOE to “reform and where appropriate, eliminate unduly burdensome or costly energy-efficiency...requirements regarding housing... includ[ing]...revising the Energy Conservation Program’s Energy Conservation Standards for Manufactured Housing.”	MHARR’s letter correctly anchors its repeal demand in explicit EO language; the EO is a clear legal/policy hook for DOE to withdraw the MH rule without waiting for Congress.
ROAD Act (21st Century ROAD to Housing)	As described in the draft, ROAD does not repeal the 2007 EISA mandate for MH energy standards and “would specifically allow the DOE standards to go into effect if they were approved and adopted by HUD (a virtual certainty under a Post-Trump administration).”	MHARR’s warning is well-founded: ROAD is structurally compatible with future HUD adoption of DOE’s rule; without DOE repeal now, a later administration could weaponize the dormant standards.
Houchin bill vs. compromised ROAD language	The draft notes that “A previous bill filed by Rep. Erin Houchin (R-IN) would have done that, but was ‘compromised’ into irrelevance and	FEA: this is a credible concern—legislative dilution left the EISA mandate intact, so the safest path for MH

Item	Key facts	Alignment / conflict
	ineffectiveness for reasons that have never been fully – or even partially – explained.”	producers is administrative repeal at DOE plus vigilant opposition to any HUD energy rule derived from IECC/EISA authority.

“MHARR asserts that DOE’s June 26, 2026 repudiation of the 2024 International Energy Conservation Code (IECC)...is a further independent, valid and sufficient basis for a parallel DOE repudiation of the manufactured housing standards.” “Such action, moreover, is essential, because the pending housing bill – the 21st Century ROAD to Housing Act – would not automatically or necessarily eliminate the May 31, 2022 DOE ‘final’ standards.”

Table 2 – MHARR vs. MHI: actions, omissions, and lawfare/weaponization implications

Dimension	MHARR posture (per draft)	MHI posture / behavior (per draft & prior FEA)	FEA takeaway
DOE MH energy rule	MHARR “has reiterated and reinforced its long-standing call” for full repeal; directly writes to Secretary Wright, tying EO 14394, DOE IECC repudiation, and appliance-rule rollback together as grounds to scrap the MH rule.	Draft notes “a manual check of the MHI website...does not reveal anything similar to MHARR’s report...GAIO cross-check...confirmed that there is no similar report by MHI on this date akin to what follows from MHARR.”	Clear asymmetry: MHARR is proactively litigating the policy battlefield; MHI is publicly silent on a rule that could add “thousands of dollars to the purchase price of a new manufactured home” and shrink the market. That silence is consistent with a consolidation-friendly posture.
Use of Trump EO 14394	MHARR explicitly cites section 2(c) directing revision of MH energy standards; frames repeal as aligned with Trump’s affordability agenda.	No evidence in the draft or MHI’s site (per GAIO check) that MHI is invoking EO 14394 to demand relief for HUD Code producers or buyers.	MHARR is leveraging the best available legal tool; MHI’s non-use of the same tool is a material omission that supports the “Machiavellian Housing Institute” critique.
Litigation / lawfare strategy	MHARR signals willingness to “continue to pursue the full repeal...through all available means” and to “aggressively oppose any HUD...energy	Draft points out that “MHI has not attempted in the 21st century to litigate that non-enforcement of the 2000 Reform Law” and has similarly avoided litigation to enforce	Pattern: MHARR uses law to de-weaponize regulation; MHI’s inaction allows law and regulation to be weaponized against independents and consumers, while benefiting well-capitalized consolidators

Dimension	MHARR posture (per draft)	MHI posture / behavior (per draft & prior FEA)	FEA takeaway
	standards...based upon... the pending DOE standards."	preemption or to block DOE energy mandates.	who can absorb higher costs and tighter supply.
Transparency and public-facing advocacy	MHARR publishes detailed releases, letters, and calls to action; explicitly warns of ROAD Act loopholes and HUD MHCC energy agenda.	Draft documents repeated MHProNews outreach to MHI with "routinely failed to respond" and notes the absence of comparable public-facing analysis or warnings from MHI.	FEA: the contrast supports the thesis that MHARR is acting as a regulatory reform watchdog, while MHI functions more as a quiet facilitator of the status quo that advantages large consolidators.
Weaponization / lawfare framing	MHARR's actions implicitly resist weaponized regulation by seeking repeal and exposing procedural shortcuts (e.g., "absolutely minimal notice" for MHCC energy meeting).	The draft's "MACHIABELLIAN HOUSING INSTITUTE" framing and antitrust/RICO discussion around community closures and constrained new development suggest MHI-aligned actors may be using law and zoning as tools of market control.	The lawfare narrative is coherent: when one trade group fights weaponized rules and another tolerates or quietly leverages them, the net effect is regulatory capture and structural suppression of affordable MH output.

"In Washington, D.C., MHARR President and CEO Mark Weiss stated: '...HUD is showing its utter contempt for both the HUD Code industry and hard-pressed lower and moderate-income consumers...by pursuing unneeded and unnecessary high-cost 'energy' mandates.'" "If such facts are merely 'market forces' then there is no antitrust violation...But if this is part of a scheme to deliberately limit the supply of land-lease manufactured home communities, that could be an antitrust violation. In that case, it may also be reasonable to think that RICO violations are also at play."

Table 3 – Industry impact: risks, opportunities, and strategic moves for HUD Code stakeholders

Category	Risk / opportunity	Evidence base	Strategic implication (FEA)
Cost and demand impact of DOE MH energy rule	Risk: "needlessly add thousands of dollars to the purchase price of a new manufactured home," pricing out lower-income buyers and shrinking shipments.	MHARR letter explicitly states the added-cost risk; DOE's own EIS acknowledges incremental purchase price increases tied to IECC-based envelope requirements.	Immediate priority for independents and consumer advocates is to support MHARR's repeal push and to oppose any HUD MHCC energy standard that mirrors DOE's framework.

Category	Risk / opportunity	Evidence base	Strategic implication (FEA)
ROAD Act loophole	Risk: If DOE rule remains on the books, ROAD's structure allows a future HUD to adopt it, turning a currently deferred rule into a powerful post-Trump weapon against MH affordability.	Draft: "would specifically allow the DOE standards to go into effect if they were approved and adopted by HUD (a virtual certainty under a Post-Trump administration)."	FEA: repeal now is safer than relying on future congressional fixes; industry should treat ROAD as incomplete and press for explicit EISA-mandate repeal or carve-outs for HUD Code MH.
Preemption and siting (MHIA 2000 vs. zoning barriers)	Opportunity: Enforced federal preemption could replicate California's ADU surge nationally, unlocking hundreds of thousands of HUD Code placements and billions in revenue.	Infographic and draft note CA ADUs adding "+60,000 Units/Year...after stripping local vetoes," contrasted with MH's "1.12%" market yield and Jennison's "Feasible 500K Units Annually" model.	Strategic move: pair MHARR's anti-DOE campaign with a pro-preemption litigation/advocacy push—using EO 14394 and MHIA 2000—to attack exclusionary zoning and weaponized local vetoes.
Community supply, closures, and antitrust exposure	Risk: Net loss of land-lease communities plus near-zero new development creates a choke-point that supports higher rents and consolidation, with potential antitrust/RICO exposure.	Draft's Datacomp table shows only 310 new communities 2002–2016; Lincoln Institute/FEMA estimates ~50,000 communities now vs. ~55,000 circa 2000, with more closures than openings.	FEA: regulators and litigators could frame this as coordinated supply restriction; independents and residents have grounds to push for investigations while advocating for pro-preemption, pro-development reforms.
Trade association credibility and representation	Risk: MHI's silence on DOE repeal and MHIA enforcement undermines its claim to represent "all segments" and strengthens the "serving consolidators" critique.	Draft: "MACHIAVELLIAN HOUSING INSTITUTE – THE NATIONAL ASSOCIATION SERVING CONSOLIDATORS OF THE MANUFACTURED HOUSING INDUSTRY" and detailed KPI charts showing long-term underperformance vs. historic norms.	Strategic implication: independents, retailers, and consumer advocates should recalibrate expectations of MHI, lean more heavily on MHARR and independent media for FEA, and consider alternative or reformed representation structures.

"As MHARR has demonstrated... the DOE standards...would needlessly add thousands of dollars to the purchase price of a new manufactured home..." "If federal preemption under the 2000 Reform Law were

enforced by HUD routinely manufactured housing production could soar nationally. That would ease affordable housing crisis. Enforcement could save tax dollars over time.”

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