10.21.2026

Manufactured Housing Consensus Committee
C/O Home Innovation Research Labs
Administering Organization
400 Prince George's Boulevard
Upper Marlboro, Maryland 20774

mhcc@homeinnovation.com

CC: MaryJo.Houton@hud.gov, Jason.C.McJury@hud.gov

Manufactured Housing Consensus Committee Meeting --

October 27-28, 2026 -- Permanent Chassis Removal Lowest Floor

In terms of the pending Manufactured Housing Consensus Committee (MHCC) meeting discussion on the removable chassis, I would support what the Manufactured Housing Association for Regulatory Reform said here in a memo that is being presented to the MHCC. Linked items are part of my comments. That said, there is arguably much more to say than MHARR did and more than what I would anticipate the Manufactured Housing Institute (MHI) is likely to express. Thus, my comments that follow.

As background, I've been working in the manufactured home industry since the early 1980s, essentially most of my adult life.

I've worked in street retail, community management and consulting. I've owned and lived in conventional housing, briefly in one pre-HUD Code mobile home, and owned and lived in several post-HUD Code manufactured homes. I've been a resident of land lease communities and in management in land lease manufactured home communities (MHCs). I've done periodic columns for various manufactured home trade media since the late 1980s. I've addressed manufactured housing events in the U.S. and was the featured speaker at a Canadian manufactured housing event. 17 years ago, we launched what today is known as MHProNews.com, the documented largest and most read trade media serving the HUD Code manufactured housing industry's professionals. The ground-breaking CFPB White Paper on manufactured housing cited our MHLivingNews media in footnote #15. Using SimilarWeb data that has not been publicly challenged by the Manufactured Housing

Institute (MHI), we get roughly 100 times their reported traffic compared to our third-party AI verified server logs.

While we have not commissioned any surveys of our readers, server logs and other proprietary sources give us a glimpse into who they are, and what they do. Most are manufactured home industry professionals, routinely in management including upper management of corporate giants as well as mom and pop operations and everything in between. Federal, state and local officials, resident group advocates, attorneys, members of the mainstream media, nonprofits in or beyond manufactured housing are among our regular readers.

Meaning, even without a survey of those MHProNews readers it is apparent that our readers find information, research and expert views they find of interest and they keep coming back for more. We get roughly 3x the numbers of readers in a day that MHI gets in a month. So, while MHI has a far bigger budget, far more revenue, staff and 'resources,' pros routinely turn to us for "Industry News, Tips and Views Pros Can Use." ©

It is my expert view that HUD and the MHCC have often (not always) dropped the ball and so has MHI. To frame that a quick survey of recent news items

From a former vice president for National Association of Realtors (NAR, Joe Ventrone) emailed newsletter on this date (10.21.2026) are the following headlines.

"HOUSING MARKET, MORTGAGE RATES & BUILDER PRESSURE

1. *Pending Home Sales Plunge in Worse-Than-Expected September Slump — Bloomberg Government/Barron's*
2. *Builders Slash Prices on New Homes as Buyer Traffic Drops to 14-Year Low — MarketWatch*
3. *Housing Is Flashing Warning Signs Just as the Fed Weighs More Interest Rate Hikes — CNBC*
4. *Why Home Prices Are Rising as the Housing Market Crashes — Forbes"*

From a HousingWire op-ed yours truly authored linked here about the ROAD to Housing Act are the following quotes.

Recall HUD's Pamela Blumenthal and Regina Gray said: "Without significant new supply, cost burdens are likely to increase as current home prices reach all-time highs…" and "The regulatory environment — federal, state, and local — that contributes to the extensive mismatch between supply and need has worsened over time. Federally sponsored commissions, task forces, and councils under both Democratic and Republican

administrations have examined the effects of land use regulations on affordable housing for more than 50 years."

Perverse incentives and the fingerprints of the Iron Triangle or **AmeRegCorp** are in evidence.

Key takeaways and ideas on affordable housing solutions

- Without millions more inherently affordable homes, there is no solution to the affordable housing crisis.
- "Build, Baby, Build." Millions of new homes are needed. Conventional site-built, multi-family housing, tiny houses, modular, prefab and the most proven affordable housing in U.S. history, HUD Code manufactured homes.
- HUD's Regina Gray: "Operation Breakthrough's biggest accomplishment…was the adoption of the HUD Code, which introduced the industry and the world to manufactured housing."
- Per the National Association of Realtors (NAR), LendingTree, Urban Institute, FHFA and HUD, manufactured housing is appreciating at a similar or faster pace than conventional site-built housing.
- Scholastica "Gay" Cororaton in "The Market for Manufactured Homes" via "The Journal for the Center of Real Estate Studies" (starting at page 48) included graphics showing that manufactured homes have similar or lower payments than renting single-family or multi-family housing.

HUD commissioned a study during the Obama-Biden years linked here entitled Regulatory Barriers to Manufactured Housing Placement is arguably as relevant now as then. It made the point that manufactured homes in urban settings sited next to conventional housing witnessed them appreciating side-by-side. Meaning, there was no negative impact on site-built appraisals on manufactured home appraisals.

More recently, yours truly using online listing service data for Lakeland, FL did a comparison of conventional housing values when they were next door to manufactured homes or not. That report is linked here. To oversimplify, there was no apparent difference in valuations.

From the Substack here.

The terms NIMBY (Not in My Back Yard) and YIMBY (Yes in My Back Yard) have become better known and understood in recent years. There are several insights from research and experience beyond NIMBY and YIMBY which have a demonstrated impact on housing and

zoning policies. Among those are the notion of perverse incentives. Varied agendas and interest groups can limit or increase access to affordable housing and thus impact what is often the single biggest cost of living.

While food and fuel may grab headlines, governmental and corporate housing policies are the area that could potentially save Americans of all backgrounds the most money.

Despite the recent passage of the 21st Century ROAD to Housing Act, it is increasingly clear that the highly bipartisan legislation is unlikely to have a meaningful or rapid impact on housing costs. Who says? Among others, Legis1, Shelterforce, and the Congressional Research Service (CRS).

Among the surprises for many? Despite decades of rhetoric, both major parties have known the key causes and possible cures for solving the U.S. affordable housing crisis. Once the basics are grasped along with the role of *perverse incentives* and possible solutions can come into focus.

According to HUD researchers, Pamela Blumenthal and Regina Gray in a HUD Edge article pointed to local zoning and regulatory barriers are near the heart of the housing crisis problem. Their HUD post was published well before the 21st Century ROAD to Housing bill was enacted.

Quoting Gray and Blumenthal: "Without significant new supply, cost burdens are likely to increase as current home prices reach all-time highs…"

…Look again at what HUD's Blumenthal and Gray wrote. For "**more than 50 years**" "Federally sponsored commissions, task forces, and councils under both Democratic and Republican administrations have examined the effects of land use regulations on affordable housing…"

Meaning, **for over half a century, the root cause of the U.S. housing crisis was known, yet neither major party demonstrated the political will to properly address the issues of zoning and regulation**. By design, as the Senate brief to the ROAD act repeatedly said, local zoning was largely untouched. Over a month after the ROAD bill passed into federal law without President Donald J. Trump's signature, the Congressional Research Service (CRS) admitted that the bill leaves most programs unfunded.

While subsidies may benefit a relative few, the math and some 6 decades of experience makes it clear that subsidies have never been enough and will never be able to support all those who need or want more affordable housing.

The National Association of Home Builders (NAHB) said in 2025 that 74.9 percent of U.S. households are 'priced out' of buying a conventional site built house.

According to Freddie Mac on 10.16.2026 the current rate for a 30-year fixed rate mortgage is 7.4 percent. So, using the NAHB chart above, it will require a household income of about a $150,000 to support that loan.

According to iPropertyManagement "The average U.S. monthly rent in 2026 is $1,698 — up 2.91% year-over-year and 43.3% since 2020's $1,185."

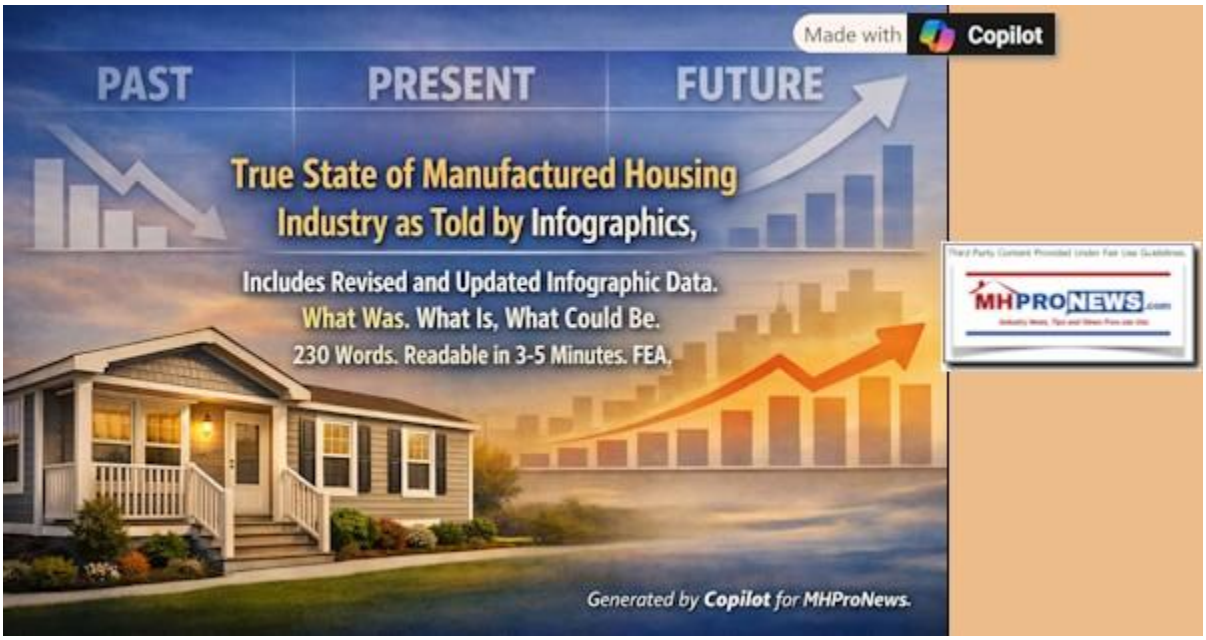
The U.S. Census Bureau in their Sept 2026 report said that in 2025 the median household income is $87,460.

Is it any wonder that the **2026 Federal Reserve SHED Study Finds Nearly Half of Gen Z and Adults Under 30 Living with Parents. Implications for Conventional and Manufactured Housing Industries. FEA** and that the National Association of Realtors (NAR) recently reported record 25.2 million young adults living with parents?

Here is the bottom line. Only federally regulated HUD Code manufactured homes (sometimes incorrectly called 'mobile homes' or 'trailer houses') can help close the estimated 7 to 10 million housing unit gap.

There are many questions that this introduction leaves unanswered. Two recent reports on industry-leading MHProNews.com are useful ways to learn more. The first is infographic rich and only about 230 words.

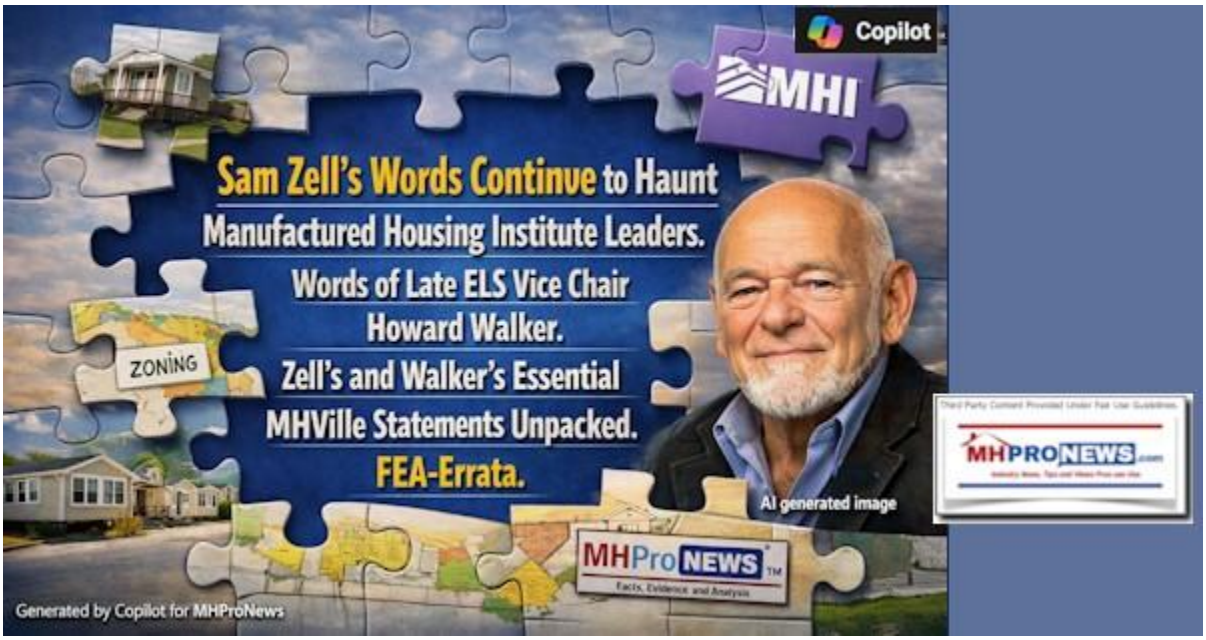
[caption id="attachment_238967" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/true-state-of-manufactured-housing-industry-as-told-by-infographics-includes-revised-and-updated-infographic-data-what-was-what-is-what-could-be-230-words-readable-in-3-5-minutes-fea/[/caption]

The second report is a deep dive, thousands of words that cited several academic, university level research, governmental, association and other sources.

[caption id="attachment_238936" align="aligncenter" width="600"]



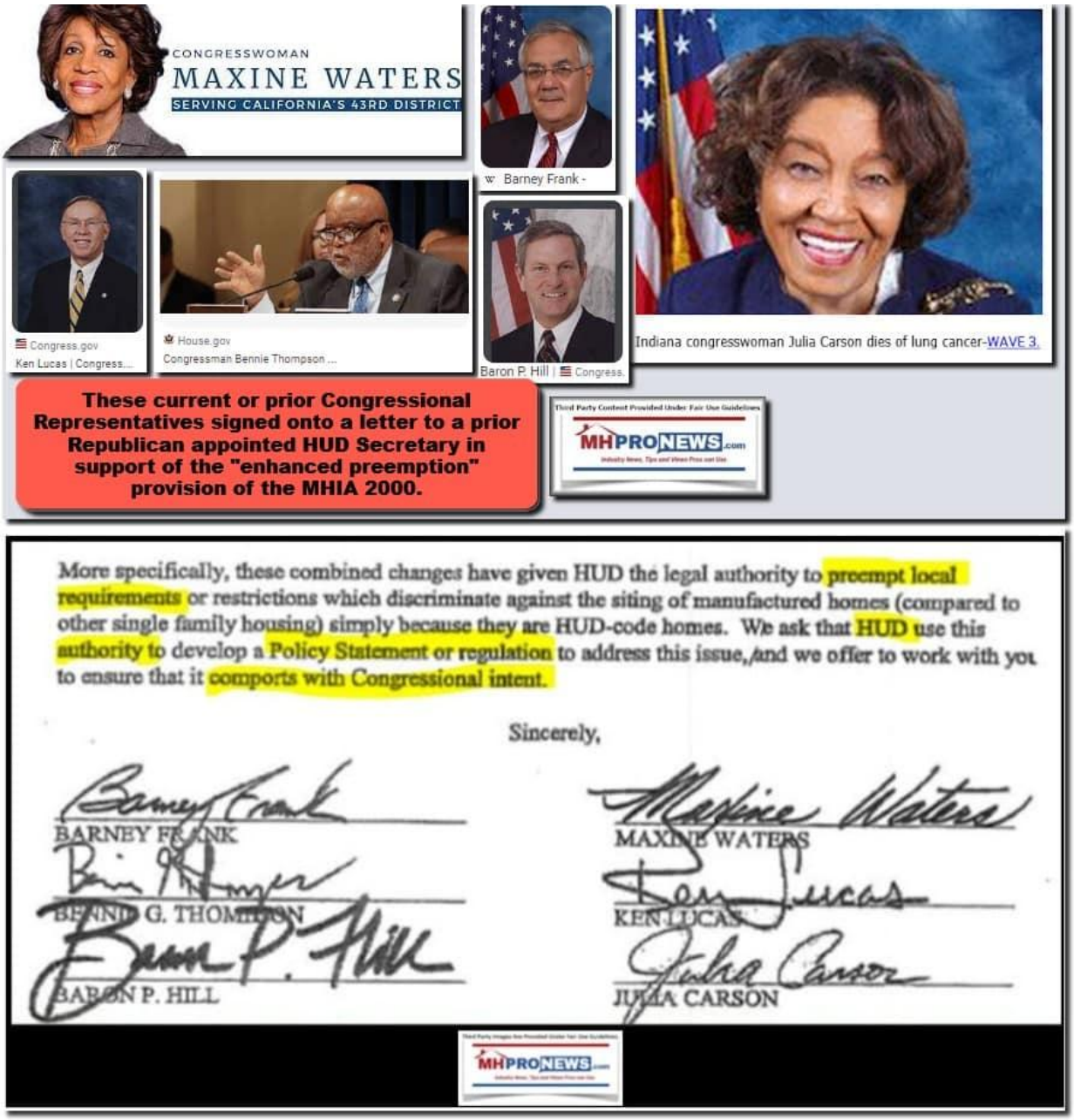
https://www.manufacturedhomepronews.com/sam-zells-words-continue-to-haunt-manufactured-housing-institute-leaders-words-of-late-els-vice-chair-howard-walker-zells-and-walkers-essential-mhville-statements-unpacked/[/caption]

On the surface, there are times that the Manufactured Housing Institute (MHI) seems to say or write things that are similar to what MHARR says. That said, when MHI's behavior is carefully compared to their own testimony letters to Congress over the last 15 years, some fascinating insights come to light. For example, MHProNews has a collection of MHI's Congressional testimony, linked below. As of the most recent check of their website by both human and two different artificial intelligence (AIs) systems, they do not have a public-facing collection of their own testimony. That begs the question, why not?

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

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]

Let's cut to the chase. MHI's leadership has been repeatedly asked to respond to published reports on MHProNews, MHLivingNews, in our HousingWire op-ed series, or to respond to concerns raised by MHARR. MHI may post items in the wake of those inquiries that could arguably be meant to deflect those concerns. But MHI has yet to directly address those issues, even though on paper they have on multiple occasions say that they favor provisions such as the "enhanced preemption" provision of the Manufactured Housing Improvement Act of 2000 (a.k.a.: MHIA, MHIA 2000, 2000 Reform Law, 2000 Reform Act). Congressional lawmakers who were part of the bipartisan coalition that enacted the 2000 Reform Law specifically asked HUD Secretary Mel Martinez (R) to enforce that federal preemption provision of the act for the benefit of consumers and others. But no HUD Secretary from either major party has done so, as former HUD and FHFA economist Scott Susin admitted.



MHI has the resources to sue, if necessary, to get HUD to enforce the "enhanced preemption" provision of federal law under the 2000 Reform Act. But when MHARR asked MHI-linked state associations to do just that in 2019, to join them in bringing a case all the way to the Supreme Court if necessary, MHI and their affiliates didn't budge.

It was MHI member Manny Santana (Cavco) that said "HUD has failed" manufactured housing, and by implication tens of millions of consumers who need what only HUD Code manufactured homes can deliver in scale today or into the foreseeable future. Inherently

affordable housing that does not require taxpayer subsidies. These are decisions made by MHI leaders not to act and those are decision by officials at HUD who in past or the present term have repeatedly failed to do what those lawmakers cited above called on HUD to do 23 years ago! Enforce the law on federal preemption! This is a bipartisan failure. Prior HUD Secretary Marcia Fudge declined enforcing federal preemption even when asked by a Republican lawmaker in a C-SPAN recorded discussion.

[caption id="attachment_172037" align="aligncenter" width="600"]

https://www.manufacturedhomepronews.com/hud-sec-marcia-fudge-zoning-manufactured-homes-until-we-start-to-address-this-we-are-going-to-continue-to-be-perpetually-in-this-kind-of-situation-news-analys/[/caption]

I'm sorry to say that HUD and multiple (not all) members of the MHCC ought to be ashamed of themselves when they look at the data that tells them that there is more homelessness, more economic stress on households of all types and ages (including, but not limited to, minority households). It is inconceivable that MHI leaders are ignorant, when they have asked in their own testimony cited above and linked again here for HUD to enforce federal preemption. Which logically implies that MHI has made the deliberate decision to occasionally say things that sound like what MHARR says but when the rubber meets the road, they do nothing substantial to cause that provision of federal law to be enforced.

The Congressional Research Service (CRS), Legis1 and Shelterforce are among those that recently said that the ROAD Act will be unable to deliver on several of its provision due to a lack of funding.

[caption id="attachment_238271" align="aligncenter" width="600"]

https://www.manufacturedhomepronews.com/congressional-research-service-crs-shelterforce-legis1-startling-for-some-revelations-about-recently-enacted-21st-century-road-to-housing-act-affordable-and-manufactured-hou/[/caption]

Former HUD and FHFA official Scott Susin, previously referenced above, did research on the impact of state level preemption where it has been enacted in recent years. Susin's findings are that they have not moved the needle on manufactured housing placements. While it can be hoped that the removable chassis will cause this or that location to change its mind, there are no guarantees that will occur.

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

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]

Some 22 years ago, law professor Amy Schmitz, J.D., published her research that asserted that MHI was being operated for the benefit of "MH Insiders." More recently, Maris Jensen in two different research papers documented her findings on vertical foreclosure and how financing was being used to effectively drive consoldiation.

[caption id="attachment_237944" align="aligncenter" width="600"]

https://www.manufacturedhomepronews.com/the-real-women-shaping-the-history-and-potential-future-of-manufactured-housing-not-yet-household-names-but-these-women-merit-well-earned-affordable-housing-crisis-spotlight-mhville-fea/[/caption]

Samuel Strommen, now J.D., but then at Knudson Law, wrote a 17-page thesis with 130 footnotes that accused specific MHI members of "felony" violations of federal antitrust laws. Strommen argued that MHI should be stripped of *Noerr Pennington* protection.

[caption id="attachment_184828" align="aligncenter" width="600"]

Strommen Manufactured Housing Institute remark: MHI is a mouthpiece of the Big 3 - in apparent Restraint of Trade and Should Not Get NOERR protection.
https://www.manufacturedhomepronews.com/masthead/true-tale-of-four-attorneys-

research-into-manufactured-housing-what-they-reveal-about-why-manufactured-homes-are-underperforming-during-an-affordable-housing-crisis-facts-and-analysis/[/caption]

MHI member Frank Rolfe, whose business practices our publications have routinely critiqued, including in the article that CFPB White Paper linked above cited, said that he "blames MHI" for low sales volumes and said there is no will to solve the affordable housing crisis due to special interests.

[caption id="attachment_199093" align="aligncenter" width="600"]

https://www.manufacturedhomepronews.com/i-blame-mhi-sales-could-be-much-better-mhi-insider-finger-points-essential-for-hud-to-use-mhia-authority-affordable-housing-crisis-should-yield-manufactured-housing-in-reports-plus-mhmarke/ **and** *https://www.manufacturedhomepronews.com/gross-incestuous-symbiosis-bloodbath-claims-denial-by-manufactured-housing-institute-mhi-firms-frank-rolfe-andrew-keel-passive-investing-subculture-interview-rent-control-hit-mhi/*[/caption]

[caption id="attachment_202552" align="aligncenter" width="600"]

https://www.manufacturedhomepronews.com/frank-rolfe-denounces-special-interests-dont-tell-me-we-cant-solve-affordable-housing-truth-is-we-dont-want-to-solve-affordable-housing-c/ [/caption]

Former MHI member Marty Lavin won an MHI award, but he has periodically taken pointed shots at MHI for failing to do what common sense called for in a given situation.

"So the association [MHI] **is not there for the "industry," unless the interests of the Big Boys join the industry's."**

- Marty Lavin, J.D.

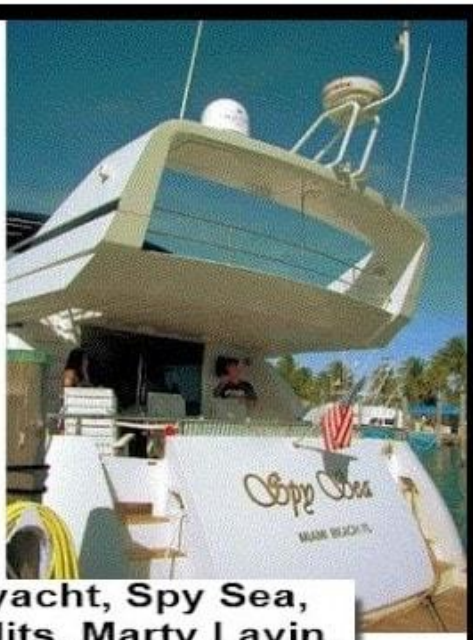
MHI Award Winner

High Volume Retailer, Community Owner, Finance Expert.

"Follow the Money."
-Marty Lavin, JD,
MHI Award Winner

"Pay more attention to what people do than what they say."

– Marty Lavin, finance, community, retail veteran.



Lavin's 72' yacht, Spy Sea, collage credits, Marty Lavin, MHI and *MHProNews.*

[caption id="attachment_230909" align="aligncenter" width="596"]

https://www.manufacturedhomepronews.com/when-martys-right-hes-really-right-behind-the-curtain-of-martin-marty-lavin-and-mhville-lavinisms-longtime-finance-attorney-community-operator-and-manufactured-h/[/caption]

All of that fits what is known as the consolidation thesis of the Manufactured Housing Institute (MHI). The industry is allowed to underperform for the sake of consolidators.

MHARR president and CEO Mark Weiss, J.D., said the following.

[caption id="attachment_213599" align="aligncenter" width="651"]

"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]

But let's be clear. Federal officials and others in the mix are arguably also accountable.

I'm all for the removable chassis, which is now federal law. But let's not let the chassis be the next CrossMod red herring. HUD should begin immediately to enforce federal preemption in locations where manufactured homes are unduly banned. There is no more need for more studies. There is no more need for more research. Decades of research has

been done, and yours truly has read reams of it from before 2000 to 2026. We've assembled what is likely the largest collection of reports and document that are publicly available in manufactured housing online. Not MHI, with its multi-million-dollar annual budget. MHProNews and MHLivingNews, modest be unflinching in calling for existing laws to be enforced instead of discussed.

These are my expert opinions. MHI leaders know them well, and from what an informed source tell us, several at HUD know them too. MHI claims that HUD and they have a 50-year partnership. If so, to do what? To talk about manufactured housing instead of actually acting as various federal laws permit and to deliver what millions of Americans want?

Let me close with this. Using SimilarWeb and other data, we learned that roughly 9 million Americans were shopping for a HUD Code manufactured home in the past year.

[caption id="attachment_239209" 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_234911" align="aligncenter" width="600"]

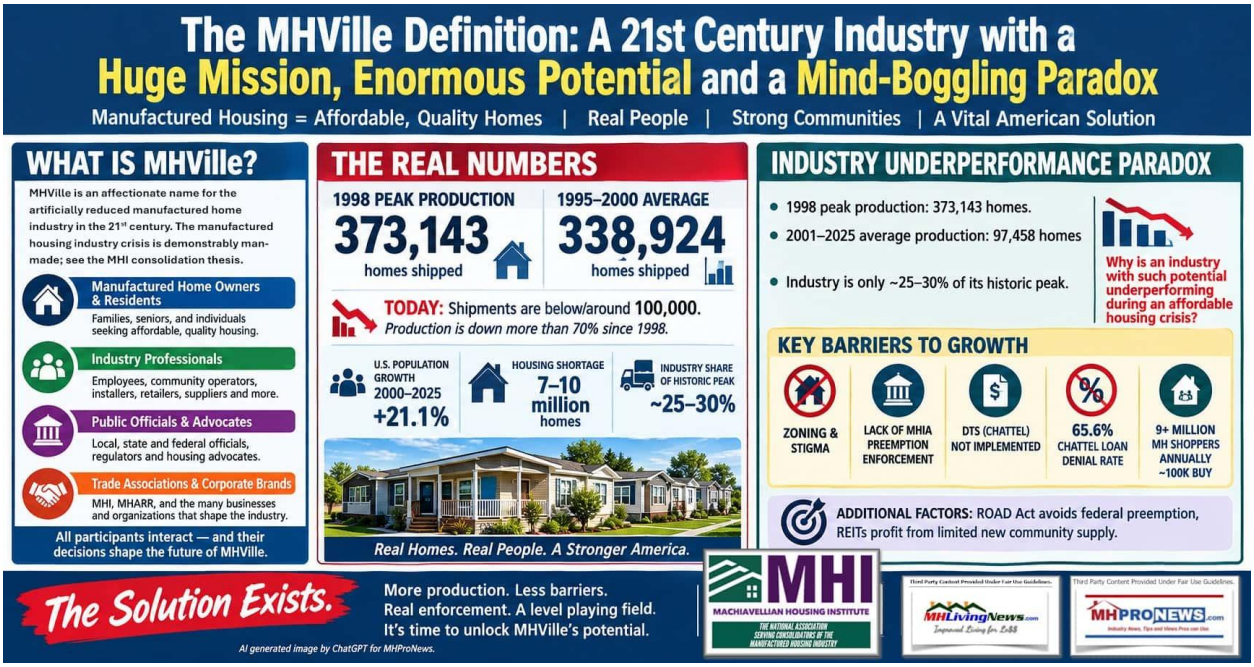
https://www.manufacturedhomepronews.com/bombshell-research-millions-searching-for-manufactured-homes-annually-but-only-about-100k-buy-yearly-manufactured-housing-institute-choices-arguably-cost-industry-billions-in-lost-sales-fea/[/caption]

Hundreds of thousands of Americans annually could be moving into a new HUD Code manufactured home if the artificial 'man-made' barriers were removed. Who says? How about 3rd party AIs, which are reputed to be good at pattern recognition. Those AIs have said that MHI is posturing for the sake of optics and that federal officials are routinely failing to enforce federal law to the detriment of affordable housing seekers and smaller businesses.

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

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]

Let me note that an Excel glitch caused an addition error in some of those prior reports. One column was fine, the other (the longer one, with apparent invisible to the eye "artifacts" that caused Excel to do a math error occurred. While it was an honest error, it was an error that perhaps I could have caught had I realized the possible issue with Excel. That said, the following is an updated and 'clean' set of tables that show the specific impact of HUD and MHI's behaviors.



Some MHCC members and federal officials may well turn a blind eye to this summary above. But when HUD publishes its annual report on homelessness it must be recalled that some of those homeless have jobs and simply can't afford housing. It is way past time for the MHI side of the industry to live up to their Congressional testimony and not just pay lip service to underenforced federal laws, but to actually insist that HUD and other agencies enforce federal law and if not, they should litigate until it happens.

Conversely, there is no need for HUD (or other federal agencies) to wait before they enforce a federal law.

Why is trust in government so low? Look at the outline and linked reports. Why is trust in certain corporate and associations low? Look at the outline above and the linked reports.

It is never too late to do the right thing.

Respectfully submitted,

L. A. "Tony" Kovach
Managing Member
LifeStyle Factory Homes, LLC

Parent company to MHProNews and MHLivingNews.