

Manufactured Home Industry Members and Advocates Must Demand DOE Withdraw its Harmful DOE MH Energy Rule

Manufactured Housing Association for Regulatory Reform (MHARR) Submits Regulatory Remarks-Urges Industry Members and Manufactured Home Advocates to Get Redo.

WASHINGTON , D.C., UNITED STATES, April 20, 2023 /EINPresswire.com/ -- The Manufactured Housing Association for Regulatory Reform (MHARR) has issued the following statement to the media, certain public officials, and members of the manufactured housing industry.

TO: HUD CODE
MANUFACTURED HOUSING INDUSTRY
MEMBERS

FROM: MHARR

RE: WHY MANUFACTURED HOME INDUSTRY MEMBERS MUST COMMENT ON THE DOE
MANUFACTURED HOUSING ENERGY RULE TO DEMAND
ITS DELAY AND WITHDRAWAL

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Key Issues holding the manufactured home industry at low ebb during an affordable housing crisis include the failure to fully and properly implement existing federal laws.”

MHARR



Why Manufactured Home Industry Members Must Comment on the DOE Manufactured Housing Energy Rule to Demand its Delay and Withdrawal
Manufactured Housing Assoc Regulatory Reform
MHARR.

As promised in its March 28, 2023 memorandum, entitled “DOE Delays Energy Rule – Industry Must Now Demand Total Revocation of Destructive Regulation,” attached for your information and use, in whole or in part, if you so wish, is a copy of MHARR comments to the U.S.

Department of Energy (DOE) supporting not only a delay in the enforcement of its May 31, 2022 “final” manufactured housing “energy conservation” standards, but, more

importantly, seeking once again, the complete withdrawal of those standards and DOE’s return

“to the drawing board” to completely re-start its standards development process in full compliance with the requirements of both the Energy Independence and Security Act of 2007 (EISA) and relevant parts of the Manufactured Housing Improvement Act of 2000 (2000 Reform Law).

As MHARR has asserted and stated from the outset of the DOE rulemaking process, 15 years ago, DOE’s development of manufactured housing energy standards has been and continues to be in complete defiance of the most important provisions of EISA – i.e., its cost-benefit mandate and, even more importantly, its requirement for the development of manufactured housing energy standards in full cooperation, coordination and consultation with both HUD and the statutory Manufactured Housing Consensus Committee (MHCC).

...

MHARR...strongly encourages all industry members to submit comments (due by April 24, 2023) to DOE addressing both the delay of the implementation/enforcement date of the DOE manufactured housing energy standards, as well as the full withdrawal of these inappropriate and unlawful standards combined with a return to the “drawing board” for a complete and total “re-do” of the standards in full cooperation, coordination and consultation with both HUD and the MHCC as required by EISA and federal manufactured housing law. In doing so, please feel free to cite or reference MHARR’s attached comments.

MHARR will continue to closely monitor this rulemaking which has extremely serious



MHARR is Protecting The American Dream of Home Ownership. MHARR Brings Consumers, Industry Professionals, Public Officials and Media Common Sense Solutions Others May Miss.



Manufactured Housing Association for Regulatory Reform (MHARR) Thoreau Quote - Photo Collage of Modern HUD Code Manufactured Homes Infographic Compares Cost Per Square Foot of New Conventional Site Built Housing vs New Manufactured Homes. (Click Image to Expand.)

implications for the industry and its consumers.

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The full MHARR press release is found on their website at this link here. It includes the MHARR comments letter to the U.S. Department of Energy (DOE) at the link below.

<https://manufacturedhousingassociationregulatoryreform.org/wp-content/uploads/2023/04/mharr.doeenergyextensioncomments-MHARR-Download-Version.pdf>

Prior MHARR reports and remarks on the DOE Energy Rule issue are found at the links below.

<https://manufacturedhousingassociationregulatoryreform.org/more-department-of-energy-doe-energy-outrages-coming-for-the-manufactured-home-industry-and-consumers/>

<https://manufacturedhousingassociationregulatoryreform.org/legal-action-filed-on-does-manufactured-housing-energy-rule/>

<https://manufacturedhousingassociationregulatoryreform.org/august-2022-mharr-issues-and-perspectives-why-the-doe-energy-rule-should-be-doa/>

As MHARR has advised industry readers and interested parties, the Manufactured Housing Institute (MHI) and the Texas Manufactured Housing Association (TMHA) filed suit against the DOE and other named parties to halt the progress of the implementation of the DOE's pending rule. That case number is Case No. 23-cv-00174 was filed on 02/14/23 in the United States District Court for the Western District of Texas.

MHARR has also warned affordable housing advocates that current policies have resulted in the 5th straight month of manufactured housing production declines. The largest known collection of years of monthly [manufactured housing industry production/shipment records are found here.](#)

About MHARR

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.

Latest Manufactured Housing Industry News from MHARR

The largest known collection online of manufactured housing industry focused news provided by a manufactured home industry nonprofit focused on independent producers' facts and views are found at this link below.

<https://manufacturedhousingassociationregulatoryreform.org/mharr-news/>

MHARR Issues and Perspectives

MHARR Issues and Perspectives are insider-insights and fact-packed articles authored by MHARR President and CEO, Mark Weiss, J.D. Years of "Issues and Perspectives" are found at the link below. They routinely provide insights not found from other sources.

<https://manufacturedhousingassociationregulatoryreform.org/category/mharr-issues-and-perspectives/>

Collection of MHPProNews Q&As with Founding MHARR President and Current Senior Advisor Danny Ghorbani

Danny Ghorbani was a vice president for the Manufactured Housing Institute (MHI) before leaving and becoming the founding president and CEO of MHARR. Ghorbani's career spans some 5 decades and was recognized by the RV MH Hall of Fame. He was an engineer and played a key role in developing some 200,000 home sites for factory built mobile home homes prior to the HUD Code manufactured housing era. Those Q&A style interviews with Ghorbani are found at this link below.

<https://manufacturedhousingassociationregulatoryreform.org/mhpronews-qa-with-danny-ghorbani/duty-to-serve-mh/>

Brief History and Objectives of the Manufactured Housing Association for Regulatory Reform (MHARR)

<https://manufacturedhousingassociationregulatoryreform.org/brief-history-and-objectives-of-the-manufactured-housing-association-for-regulatory-reform-mharr/>

Major and Continuing MHARR Accomplishments for the HUD Code Manufactured Housing Industry and Consumers of Affordable Housing

<https://manufacturedhousingassociationregulatoryreform.org/major-and-continuing-mharr-accomplishments-for-the-hud-code-manufactured-housing-industry-and-consumers-of->

[affordable-housing/](#)

Key Issues holding the manufactured home industry at low ebb during an affordable housing crisis include the failure to fully and properly implement existing federal laws." The Manufactured Housing Improvement Act of 2000 and its 'enhanced preemption' provision is widely seen by industry professionals as not being properly enforced by the U.S. Department of Housing and Urban Development (HUD). Similarly, more cost-effective manufactured home lending has been provided for by federal law, but those laws - in MHARR's expert view - are not being properly enforced. See the [MHARR website for articles on enhanced preemption](#).

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