



Dear Texas General Land Office - Community Development and Revitalization:

The Texas Manufactured Housing Association (TMHA) is a state based trade organization representing all aspects of the Texas manufactured housing industry. TMHA is comprised of approximately 600-member companies with over 1,000 individual affiliate members.

We welcome this opportunity to provide public comments that will assist the General Land Office (GLO) with its State Action Plan detailing the distribution and eligible uses of \$5.024 billion in Community Development Block Grants for Disaster Recovery (CDBG-DR) to assist Texas communities with long-term recovery following Hurricane Harvey.

TMHA's comments are narrowly focused on the Single-Family Homeowner Assistance program within the Action Plan. More specifically, TMHA is providing comments related to the Eligible Activities of: 1) the reconstruction and/or new construction of owner-occupied single-family homes, and 2) replacement of manufactured housing units.

#### Replacement of Manufactured Housing:

First, we applaud the GLO for including manufactured home replacement as an eligible activity within the Action Plan. Many of the areas most severely impacted by Hurricane Harvey contain manufactured homeowners. TMHA supports providing homeowners facing "Major-High" and "Severe" damage to their manufactured homes with the choice to replace their home with a new manufactured home.

#### Inclusion of Manufactured Housing in Permanent Housing Choices:

TMHA requests that the GLO preserve recipients of new home construction awards a complete range of new housing choices, including manufactured homes. Manufactured homes should be permissible for replacement and new constructions choices throughout the recovery programs. We ask that manufactured housing is included in both the state level programs, down through the local government levels as eligible for not only replacing damaged manufactured homes, but also new manufactured home construction replacing damaged site-built homes.

### Modern Manufactured Homes and Changing Perceptions:

We understand that manufactured housing can be associated with negative perceptions. Too often mentioning “manufactured housing” creates thoughts of “mobile homes” or “trailer homes” and congers up images of old, dilapidated, bread-box shaped “single-wides.” While we certainly serve the critical niche within the overall housing market by supplying safe, unsubsidized, affordable housing, the nature of the modern manufactured home is vastly different than the negative images that can come to mind.

Modern manufactured homes can be built to look indistinguishable from our site-built counterparts. Higher roof pitches, integrated porches and decks, attached garages, and exterior elevation components are now common place in the construction of modern manufactured homes.

Our range in construction spans the entry level, lower cost single-section homes, all the way to high-end modern homes that match or exceed other single-family home construction options.

### Regulation, Safety and Resiliency:

Manufactured homes are built to a federally mandated and regulated building code - the “HUD-code.” The U.S. Department of Housing and Urban Development which administers CDBG-DR to the GLO is also responsible for the construction standards for manufactured homes. Federal law requires HUD to, “establish federal standards for the design and construction of manufactured homes to assure quality, durability, safety, and affordability.”

In addition to federal regulation, the state of Texas regulates manufactured housing through the Manufactured Housing Division of the Texas Department of Housing and Community Affairs. From the entire factory construction process, to transportation, selling, and installation, every aspect of today’s manufactured home is regulated. State installation inspectors ensure proper installation of homes, and manufactured homes are the only form of housing in Texas that come with statutory construction warranties.

Manufactured homes also satisfy the Action Plans call for reconstruction that is more “resilient” than what was destroyed. Any resiliency standards contemplated by the GLO can also be adopted in the construction of manufactured homes. Manufactured homes are more suited for increased elevation requirements compared to other single-family housing options because of their construction methods on large steel I-beams and the ability to crane set homes on engineered elevation systems.

### Local Control:

TMHA appreciates the importance of local control. We agree with the GLO that local decision makers should be empowered to direct the best manner to rebuild their communities.

However, we are concerned some local jurisdictions could include blanket prohibitions against all manufactured homes when adopting their local programs under the GLO and HUD guidelines. TMHA has witnessed such prohibitions at local levels in previous programs, and we feel that our modern homes are unfairly excluded based on out-of-date stereotypes.

If local jurisdictions and programs want specific home aesthetics, elevations, amenities, sizes, etc., TMHA appreciates and stands ready to build our homes to meet the required federal, state, and local standards. We ask that we are allowed to compete equally, and with pricing parity to all forms of single-family home reconstruction.

The manufactured housing industry knows that if given the opportunity to participate we can highlight the modern homes we can build, and play an integral role helping Texans recover from one of the state's worst disasters.

We ask for the GLO's consideration to require in its final Action Plan and Housing Guidelines that manufactured homes are included, and specifically cannot be excluded, subject to the local jurisdictions' requirements applying so long as the requirements apply equally for all single-family home reconstruction options.

TMHA appreciates the GLO's consideration of our comments.

Sincerely,

DJ Pendleton, J.D.

Executive Director,

Texas Manufactured Housing Association