

July 29, 2025

The Honorable Tim Scott
Chairman
Senate Committee on Banking,
Housing and Urban Affairs
534 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Elizabeth Warren
Ranking Member
Senate Committee on Banking,
Housing and Urban Affairs
534 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Chairman Scott and Ranking Member Warren:

As organizations dedicated to remedying our nation's housing shortage, we commend your bipartisan leadership in drafting and introducing the ROAD to Housing Act of 2025. We are committed to working with you and your teams to ensure that the bill's final version increases the housing supply and reduces the cost of homeownership while preserving building safety, supports building safety professionals in facilitating manufactured and modular housing installations, and ensures that federal efforts recognize existing, consensus-based, private-sector-developed best practices.

Nearly every state has adopted consensus-based codes that outline best practices for building safety to govern all non-HUD code residential construction, including all housing and housing components transported to the construction site that is not built on a permanent chassis. Section 301(a) of the Road Act expands the Manufactured Home Construction and Safety Standards' (HUD code) scope to apply to housing "with or without a permanent chassis," while section 301(b) forces states to accept the HUD code for modular housing or face a federal prohibition any "manufacture, installation, or sale" of modular housing.

The bill's proposed expansion of the HUD code is problematic. Recommended updates to HUD's code for manufactured housing regularly remain pending for decades before HUD adopts them.

From a disaster risk reduction standpoint, HUD's recent "update" to its manufactured housing code retained old wind load designs that are significantly less stringent than current codes, particularly in hurricane-prone states. HUD code also applies uniform snow loads that are less than half of what current construction codes require in parts of the Northeast, and only a third of the requirements in several Western U.S. states. No seismic requirements apply to manufactured homes under the HUD code, which HUD has proposed expanding into multistory construction. Under the ROAD to Housing Act of 2025, as drafted, residents across the country who would otherwise benefit from investments in innovative, resilient modular housing would instead reside in structures that risk greater vulnerability to disasters than neighboring site-built construction.

With these thoughts in mind, we urge you to amend sections 301 and 302 of the bill to clarify and ensure it does not unintentionally weaken safety standards for residential construction by expanding the reach of the federal HUD code into housing construction that state governments currently regulate.

We also encourage you to consider supporting training for code officials to ensure familiarity with manufactured and modular housing, which can speed installations, and to ensure future off-site construction efforts recognize and promote existing industry-developed, consensus-based best practices for off-site and modular construction that have already been developed and adopted by several states.

A critical interdependence between housing development and infrastructure planning, zoning, and permitting affects adjacent industrial, office, and mixed-use projects. We encourage lawmakers to ensure the bill's provisions complement local and regional development goals by supporting integrated land use strategies that address residential and commercial needs. Additionally, modernizing permitting pathways and embracing modular and offsite construction innovations across all real estate sectors—including logistics, workforce housing, and mixed-use—can drive faster delivery, economic growth, and community resilience without compromising safety or quality.

On behalf of all our organizations' members, we thank you again for working across the aisle to rectify our nation's housing shortage. We firmly believe that the government, the private sector, philanthropy, and codes and standards-developing organizations can work together to make housing more accessible and affordable while maintaining building safety, supporting code officials, and recognizing existing private-sector-led initiatives.

Sincerely,

AEC Science and Technology LLC
American Institute of Architects
American Society of Civil Engineers
American Society of Heating, Refrigerating
and Air Conditioning Engineers
American Society of Interior Designers
Building Owners and Managers International
BuildStrong America
Concrete Masonry and Hardscapes
Association
Insurance Institute for Building and Home
Safety
International Code Council
Knauf
Midwest Energy Efficiency Alliance

Modular Building Institute
Modular Home Building Association
North American Insulation Manufacturers
Association
National Association of State Energy
Officials
Polyisocyanurate Insulation Manufacturers
Association
The Reinsurance Association of America
The Sheet Metal and Air Conditioning
Contractors Association
Single Ply Roofing Industry
Southwest Energy Efficiency Association
Structure Insulated Panel Association
The U.S. Green Building Council

Cc: Members of the Senate Committee on Banking, Housing and Urban Affairs