

Congress of the United States
Washington, DC 20515

December 21, 2015

The Honorable Julian Castro
Secretary
U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410

RE: Rulemaking Process for Amending 24 CFR Section 3280.8(g)

Dear Secretary Castro,

We are writing regarding a Notice of Proposed Rulemaking that HUD has apparently drafted addressing the Office of Manufactured Housing's (OMH) definition of a recreational vehicle (RV). Due to our concerns with delays in your department, we urge you to immediately publish this regulation for public notice and comment, and promptly complete a final regulation.

As you are aware, your own Manufactured Housing Consensus Committee (MHCC) voted in December 2014 to clarify the RV definition in a new regulation. Since there appears to be agreement among key stakeholders on the major definition points recommended by the MHCC, we expected the Notice of Proposed Rulemaking would have been issued by now.

It came as welcomed news in January 2015 that, pending the outcome of this formal rulemaking process, OMH clarified it would not take enforcement action against park model recreational vehicle (RV) manufacturers. The Program Memorandum from HUD's Office of Manufactured Housing Programs provided short-term clarity for some jurisdictions that were confusing larger RVs with manufactured housing when setting tax and zoning regulations at campgrounds where RV products are used.

However, the continued lack of clarity on OMH's final definition of a recreational vehicle is disrupting an American industry that is still rebounding from the economic downturn. An update of this policy, originally set in the early 1980s, will provide certainty and guidance for RV manufacturers, consumers and campgrounds. Given the industry consensus, we see no reason for these stakeholders to wait any longer.

Please inform us immediately when you intend to publish the Notice of Proposed Rulemaking that seeks to codify the MHCC recommendation. We understood this Proposed Rule was a high priority for HUD and OMH. If this is the case, the Notice of Proposed Regulation should be issued immediately.

Thank you in advance for your cooperation. We look forward to hearing from you about HUD's plans for publishing the Notice of Proposed Rulemaking and producing a final regulation.

Sincerely,



Marlin Stutzman
Member of Congress



Jackie Walorski
Member of Congress



Todd Rokita
Member of Congress



Kristi Noem
Member of Congress



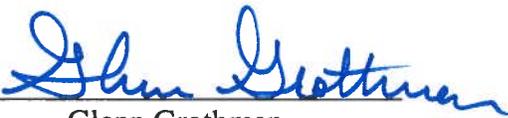
Luke Messer
Member of Congress



Sam Graves
Member of Congress



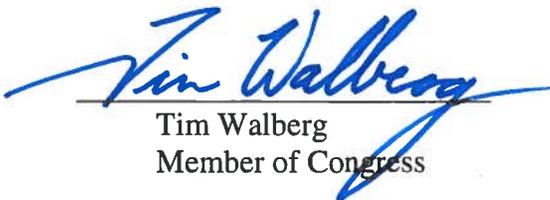
Lynn Westmoreland
Member of Congress



Glenn Grothman
Member of Congress



Mike Kelly
Member of Congress



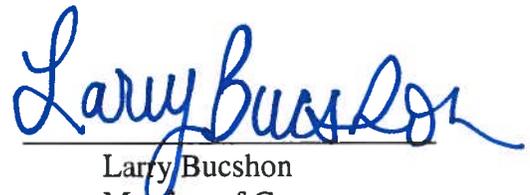
Tim Walberg
Member of Congress



Susan Brooks
Member of Congress

A handwritten signature in blue ink, appearing to read "Young", written in a cursive style. A horizontal line is drawn across the signature.

Todd Young
Member of Congress

A handwritten signature in blue ink, appearing to read "Larry Bucshon", written in a cursive style. A horizontal line is drawn across the signature.

Larry Bucshon
Member of Congress