

Written Public Comment
Housing Development and Finance Committee
Executive Committee Meeting
June 15, 2026

Dear Ms. Pond,

Although I had a brief opportunity to speak at today's HDFC meeting, I come away with the impression that the chief cause of housing scarcity/affordability -- the perpetuation of the on-site, "hand-made" approach by the development industry -- remains lost to the general public and officialdom.

Accordingly I should like to submit the document I presented from today, which focuses on this causal factor -- to wit, prefabrication must be statutory, instead of the industry's usual approach, on-site, "hand-made" -- or we cannot expect housing affordability! Incentives or code streamlining are meager inducement in light of the margins the construction, banking, and architectural industries have extracted from buyers for these many decades!

Note the attached documents the industry's near 100% overcharge to the home buyer versus the rest of industry's adoption of mass production -- prefabrication in the housing industry's case. Consequently, I submit an initial, suggested legislative draft proposal for the Legislatures' Housing Committees review and referral to the floors for voting.

If you would please distribute this document to each of the Executive Committee members and forward it to the respective Senate and Assembly Housing Committee Chairmen Arreguin and Haney respectively.

In view of the decades-long period the home-buying public has endured the housing industry's efforts to evade mass production to artificially maintain overcharging, the Legislature, indeed Congress, must impose corrective measures -- as has been done in the financial industry's usury laws, and with the car industry's smog control mandates! Again, we cannot expect affordability without regulating this overly-restricted means of production!

Thank you again for your prompt assistance -- leading to relief at long last from gratuitous market restriction by the said industry(ies)!

Assiduously,

David Brian Harrington
San Francisco

From: DAVID BRIAN HARRINGTON
Subject: Haney-Wiener Draft Legislation Proposal
Date: July 8, 2025 at 5:14:28 PM PDT

Honorable Assembly and Senate Members Haney and Wiener:

Since the Governor's office has declared a 3.5 million-unit housing need in

California: <https://www.sfchronicle.com/politics/article/gavin-newsom-housing-record-19971316.php>, it will not be fulfilled by the prevailing "handmade" lumber or molded concrete methods. Instead I should like to proffer my documentation of prefabricated structural insulated panels (SIPs):

Under today's tight construction labor conditions, only mass production -- utilizing modularized SIP components -- will enable fulfillment of California's, indeed the nation's, housing shortage.

Not only volume, but affordability has been an unremitting impact on California's housing crisis. SIPs provide a solution to the labor-intensive, cost-bloating factor of our housing construction. You cannot expect affordability where housing is constructed piece-by-piece, on site, with scarce labor! Compare the stud lumber or molded concrete and steel housing construction components:

Further, concrete and steel follow fossil fuels as the planet's source of drought and flood-inducing global warming. Note the car industry's transition to electric engines -- so must the construction industry come up to the 21st century's prevailing mass-production standard! There is no logical reason why the construction industry has not become a mass production one as have virtually all other major industries!

Fire resistance of SIPs housing construction:

https://www.google.com/search?q=fire+resistance+of+SIPs+housing+construction&gs_lcrp=EgZjaHJvbWUyBggAEEUYOTIHCAEQIRigATIHCAMQIRigAdIBCTIxMDE0ajBqN6gCALACAA&sourceid=chrome&ie=UTF-8

Accordingly, we must mandate modularized, SIP construction -- perhaps the most cost-effective and sustainable one (aside from Boxabl, which uses steel as their SIPs facings) -- **be instituted as our housing industry's predominant standard.** , **in view of the facts presented here, it is entirely to the benefit of the consumer, and to the detriment if not, that prefabricated housing be required.** Just as almost no one can afford a hand built car, appliance, or garments, the same is true when it comes to housing construction. **It is high time that industry becomes a mass-production one!** **Wherefore to correct our state's gross housing price imbalance, I should like to propose draft legislation mandating modularized SIP prefabricated housing statewide:**

Preface: In view of our ongoing climate crisis, wood must replace steel and concrete:

<https://www.fastcompany.com/90574889/wood-buildings-should-be-a-requirement-of-any-climate-change-policy>

The CBSC has the authority to mandate codes:

https://www.google.com/search?q=Does+the+California+Building+Standards+Commission+have+the+authority+to+mandate+California+building+codes%3F&gs_lcrp=EgZjaHJvbWUyBggAEEUYOTIH

modularized (for further labor cost reduction) structural insulated panels (SIPs) for the foundation(s), all walls, and all roofs. Lumber roof reinforcing may specified as necessary. Floors framing shall be specified as lumber joists and/or trusses. Structural grade plywood (shear walling) shall be specified for those areas requiring it. For reasons stated in the foregoing, no concrete or steel shall be allowed for any foundation(s), floors, walls, or roofs except for fasteners and connection brackets/tie-downs/straps.

Documentation links:

<https://www.youtube.com/watch?v=as4bipbfJYw>

<https://www.greenbuildingadvisor.com/article/concrete-free-slab>

<https://www.thermapan.com/product/foundation-panels/>

<https://www.wbdg.org/resources/structural-insulated-panels-sips#l>

https://www.google.com/search?q=Can+treated+wood%2Ftimber+be+used+for+foundation+footings%3F&sca_esv=cbc386de4b870031&ei=xHUjaI7IH_ju0PEPxuzAmA8&ved=0ahUKEwiO1_ed8aCNAXv4NzQIHUY2EPMQ4dUDCBA&uact=5&oq=Can+treated+wood%2Ftimber+be+used+for+foundation+footings%3F&gs_lp=Egxnd3Mtd2l6LXNlcnAiOENhbiB0cmVhdGVkIHdvd2QvdGltYmVylGJlIHVzZWQgZm9yIGZvdW5kYXRpb24gZm9vdGluZ3M_MgUQIRigATIFECEYoAEyBRAhGKABSPAmUO0SWJgicAJ4AZABAJgBkgGgAfoGqgEDMy41uAEDyAEA-AEBmAIJoALXBsICChAAGLADGNYEGEfCAgUQIRirApgDAIlgGAZAGCJIHAzMuNqAH8TCyBwMxLja4B8kG&scient=gws-wiz-serp

For maximum housing unit production and affordability,

multifamily buildings are necessary. Examples of affordable yet aesthetic multifamily housing:

<https://www.sips.org/aeon-alliance-sip-multifamily-minneapolis-mn>

<https://www.sips.org/sip-senior-living-facility-minneapolis-mn>

<https://sips.premierbuildingsystems.com/project-portfolio/montana-student-housing>

<https://www.sips.org/zero-energy-sip-apartments-kansas-city-ks>

<https://offsitebuilder.com/multifamily-with-sips/>

Section II., Structures Four Stories or Less:

In addition to the SIPs provisions in Section I, reinforcing framing shall be lumber, or multiple elements thereof where required. Any shear walling shall be conventional structural plywood.

Section III., Structures Above Four Stories:

In addition to the SIPs provisions in Section I, laminated veneer lumber (LVL) and/or cross laminated timber (CLT) shall be specified for reinforcement framing -- supplanting concrete and steel, for the reasons cited above and following:

https://www.google.com/search?q=SIPs+construction+at+4+or+less+stories+can+be+SIPs+alone%2C+while+above+4+stories+requires+CLT+and%2For+LVL+reinforcement&sc_esv=7bb009e77409c6d9&ei=-6dtaluPC5nKkPIP_a7KuA8&ved=0ahUKEwjL-MHDs66OAxUZJUQIHx2XEvCQ4dUDCBA&uact=5&oq=SIPs+construction+at+4+or+less+stories+can+be+SIPs+alone%2C+while

[+above+4+stories+requires+CLT+and%2For+LVL+reinforcement
&gs_l=Eqxnd3Mtd2l6LXNlcnAidVNJUHMgY29uc3RydWN0aW9uIGF0IDQgb3lqbGVzcyBzdG9yaWVzIGNhbiBiZSBTsvBzIGFsb25lCB3aGlsZSBhYm92ZSA0IHN0b3JpZXMgcmVxdWlyZXMgQ0xUIGFuZC9vciBMVkwgcmVpbmZvcmlbWVudEgAUABYAHAAeAGQAQCYAQcQAQC4AQPIAQD4AQGYAgCgAgCYAwCSBwCgBwCyBwC4BwDCBwDIBwA&sclient=gws-wiz-serp](https://www.google.com/search?q=above+4+stories+requires+CLT+and%2For+LVL+reinforcement&gs_l=Eqxnd3Mtd2l6LXNlcnAidVNJUHMgY29uc3RydWN0aW9uIGF0IDQgb3lqbGVzcyBzdG9yaWVzIGNhbiBiZSBTsvBzIGFsb25lCB3aGlsZSBhYm92ZSA0IHN0b3JpZXMgcmVxdWlyZXMgQ0xUIGFuZC9vciBMVkwgcmVpbmZvcmlbWVudEgAUABYAHAAeAGQAQCYAQcQAQC4AQPIAQD4AQGYAgCgAgCYAwCSBwCgBwCyBwC4BwDCBwDIBwA&sclient=gws-wiz-serp)

Housing prices -- a further impetus for prefabricated, modularized SIPs construction requirements:
Median single family home price in California is \$910,160:

https://www.google.com/search?q=Current+average+California+home+prices&sc_esv=18541cb920c8cb9c&ei=t4RmaP6AErSt0PEP1Jqt2QY&ved=0ahUKEwi-uNf05KCOAxW0FjQIHVRNK2sQ4dUDCBA&uact=5&oq=Current+average+California+home+prices&gs_l=Eqxnd3Mtd2l6LXNlcnAidVNJUHMgY29uc3RydWN0aW9uIGF0IDQgb3lqbGVzcyBzdG9yaWVzIGNhbiBiZSBTsvBzIGFsb25lCB3aGlsZSBhYm92ZSA0IHN0b3JpZXMgcmVxdWlyZXMgQ0xUIGFuZC9vciBMVkwgcmVpbmZvcmlbWVudEgAUABYAHAAeAGQAQCYAQcQAQC4AQPIAQD4AQGYAi mgApggwgIKEAAYsAMY1gQYR8ICChAAGIAEGEMYigXCAgsQABiABBiRAhiKBclCDRAAGIAEGLEDGEMYigXCAhkQLhiABBhDGMcBGJgFGJkFGloFGJ4FGK8BwgIREC4YgAQYsQMY0QMYg wEYxwHCAg4QLhiABBixAxiDARiKBclCCxAuGIAEGLEDGIMBw glLEAAYgAQYsQMYgwHCAg4QLhiABBjHARiOBRivAcICEBAuG IAEGNEDGEMYxwEYigXCAgUQABiABMICCBAAGIAEGLEDwgl EEAAYA8ICBRAAGO8FwgIGEAAyFhgewglLEAAYgAQYhgMYig XCAggQABiABBiiBMICCBAAGKIEGikFmAMA4gMFEgExIECIBg GQBgiSBwcyMi4xOC4xoAeK AGyBwCxOS4xOC4xuAeHIMIHCDAuOC4zMi4xyAe3AQ&sclient=gws-wiz-serp

The *average* (median price data NA) California SIPs single family modular home price finished costs is \$186,413 to \$195,413 per standard 1,800 square foot home:

https://www.google.com/search?q=Current+median+California+SiPs+modular+home+price&sca_esv=18541cb920c8cb9c&ei=JZptaJH5OL7ckPIPgbysyQY&ved=2ahUKEwj6yKXJpq6OAxWTIUQIHfPtCeoQ0NsOeqQIAxAA&uact=5&sclient=gws-wiz-serp&udm=50&fbs=AlljpHxU7SXXniUZfeShr2fp4giZ1Y6MJ25_tmWITc7uy4Kleioyp3OhN11EY0n5qfq-zENwnGygERInUV_0g0XKeHGJBEXLz4R1Z33kknVKOo4kIBCBUXB_qzLrdNRNYy8LIRWaXFKzOlk3yrzi6oxXapxWjFAxfhrlczpL5AWNFB0WBcQMUB9tpoXNthqAkUu_GoYURnE0FlwljzoV1i2QsfhhRT3TPg&aep=10&ntc=1&mstk=AUteXfAJGsSUQKO_eBAjGNCAIm68pPy_D7QBzOzNf53wh_ZSCo1R7zn7pXpcsuCvHkAcy_glAkA-fkK_42e_3M0DoQVMxRb5IAR51PxcZzGqnaHADKFhSEp0ArmlPrFR_fdSTZoc-jumJP9tMamz6A2odsPKPsjsuycHzCYsByvwVgbyMzuMESs014ATC_L3qx-bmipg2fR1mLoNTUFv7ZVOGzk3liYcyB-feIQIZYPY3rOBHR32ja8PkuWE3Q&csuir=1

An aesthetic **modular** home, **Sacramento area**, 1,796 sqft 3BR 2BA \$166,115 (not SIPs; base model not including sales tax, delivery, setup):

<https://www.thehomesdirect.com/homes/palm-harbor-homes/farmhouse>

The foregoing is what the market should be producing, but the prevailing graftitious stick building or molded concrete methods stymie it. Please forward this documentation/draft to your legislative assistance staff, and then to the Assembly and Senate Housing Committees for final drafts. I will will be glad to assist -- so we may all collaborate to at last bring the demand-price ratio into proper balance!

Abidingly,

David Brian Harrington
San Francisco

We all agree that we want more affordable housing. However, we can't expect that more funding allocations or code streamlining will solve **the root problem – the way houses are usually built.**

Look at this typical house construction:



Note the numerous connections – each stud/rafter is cut to size and nailed into place on site, at local labor rates!

Now look at the other principal construction method, reinforced concrete:



We see the same problem, excessive labor-intensive connections – with yet more costly concrete mold fabrication, pouring, and curing!

Now see the way affordable housing should be produced:



Note here the entire house is **prefabricated, off site, at lower non-metropolitan labor rates!** These modular components are **then trucked to the building site and fastened together.** The result is **far faster, less costly than the usual “hand-made” approach** of the previous two! In fact, **the quality is higher** since the modules have to be made to withstand highway transportation jostling -- which the on-site approach does not!

Pricing, you ask?

The median California single family, 2,000 square foot, 3-bedroom, 2 bath house in a middle-priced area, say Sacramento:

\$660,000 - \$690,000

https://www.google.com/search?udm=50&sourceid=chrome&ccb=1&cs=0&hl=en-US&q=meiian+Sacramento%2C+CA+area+home+price%2C+2%2C000+square+feet%2C+3+bedroom%2C+2+bath&sca_esv=85eb12dc1a1c780b&sxsrf=ANbL-n5qbVo0DhI5PuYd0vfQToJln-KVXA%3A1779758009299&fbs=ADc_l-aN0CWEZBOHjofHoaMMDiKpaEWjvZ2Py1XXV8d8KvII3sbM0Xv-BZKE_VrZb6-djVgPsTSy5UjazDfPq8BLa8BrpC2CeRVYjn-nx4-2axs2CgsRgzb5tVCUXuIVHMPnhRENe4W0g6yZzaXhSHgkeUXcVN6a0fXPCbPVAxoJkKOrRDZivRgUR8xFuLy_mYATnaDHAOTLHNRZOIE0dqC3gCAus9pTqA&aep=1&ntc=1&sa=X&ved=2ahUK

[EwiZvbif49WUAxWwIjQIHcp7C0UQ2J8OegQIEBAD&biw=745.7142944335938&bih=416.0000305175781&dpr=2.2&mstk=AUtExfA-hg_GfvjrjghkQzeTWCmEsS0I6YDckOCZLJUotL3-ECx3-2f3PsYtEubmPjP3iCr444Qb46zkhJSL4BxWQGmhAatE6BKErTbMj20NIiPbQw-9UiraOKaP3W_Wfy7NX50atYLSG5CUJ_N4n0MPN9XW5ewrCtwJFoyA&csuir=1](https://www.google.com/search?q=median+Sacramento%2CCA+area%2C+2%2C000+square+foot%2C+3+bedroom%2C+2+bath+prefabricated+house+price&oq=median+Sacramento%2CCA+area%2C+2%2C000+square+foot%2C+3+bedroom%2C+2+bath+prefabricated+house+price&gs_lcrp=EgZjaHJvbWUyBggAEEUYOTIHCAEQIRiPAtIBCTM0MTMyajBqNKgCALACAA&sourceid=chrome&ie=UTF-8)

Now the same location, size, and rooms for a prefabricated one:

\$250,000 - \$450,000!

https://www.google.com/search?q=median+Sacramento%2CCA+area%2C+2%2C000+square+foot%2C+3+bedroom%2C+2+bath+prefabricated+house+price&oq=median+Sacramento%2CCA+area%2C+2%2C000+square+foot%2C+3+bedroom%2C+2+bath+prefabricated+house+price&gs_lcrp=EgZjaHJvbWUyBggAEEUYOTIHCAEQIRiPAtIBCTM0MTMyajBqNKgCALACAA&sourceid=chrome&ie=UTF-8

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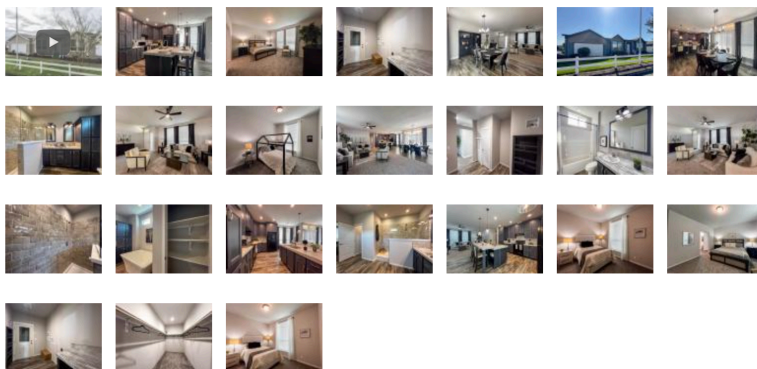
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Mt. Vernon, Washington

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*Online price is for the base model only (no options) and does not include setup and delivery or sales tax.

St. Andrews

3 Bed | 2 Bath | 1,872 Sq. Ft. | 30' x 64'

Floor plan

Standard Orientation 2-car garage \$33,000

Exterior

Board & Batten w/ Lap Siding

+ \$2,850

Rookwood Red Body Color

Toasty Accent Color

Snowbound Trim Color

Architectural Shingles Material

Driftwood Architectural Shingles

Kitchen

Wrapped Picture Frame Cabinet Material

Cabinets Wrapped Picture Frame Color Smokey

Quartz Countertop

Needs quote \$99.98 per square foot (1.25 inch slab) (Range: \$5,470 - \$8,200)

Carrara Mist Quartz Countertops

Kitchen | Stacked Tile Backsplash

Fuoritono Bianco Matte - 4 x 12 Tile Backsplash

Sheet Vinyl Kitchen & Bathroom Flooring

9659 European Oak Nantucket Dune Kitchen Linoleum Flooring-Optional

Brushed Nickel Pull Out w/ Spray

Interior

9' Flat Ceiling Height

Needs quote \$4,000 and \$9,500

Bathroom 1

Standard Shower

Bathroom 2

Standard Shower

Flooring

Sheet Vinyl Kitchen & Bathroom Flooring

9659 European Oak Nantucket Dune Kitchen Linoleum Flooring-Optional

Takeaway Carpet Living Room Flooring

Cornerstone Living Room Carpet Takeaway-Non FHA

Takeaway Carpet Bedroom Flooring

Cornerstone Bedroom Carpet Takeaway-Non FHA

Appliances

Premium Stainless Steel Appliance Package

+ \$4,000

Advanced Details

Price estimate

Unit Base

\$166,524

Upgrades

+ \$6,850

Unit Total

\$173,374 + \$4,000 ~ \$9,500 + \$5,470 ~ \$8,200 = \$182,817 + \$33,000 ~ \$191,074 + \$33,000 = \$215,817 ~ \$224,074

How do we fix this? We must **mandate prefabrication, or the housing industry will perpetuate its same excessively labor-intensive burden upon the home buyer!**

E.g., we stipulate in statewide and federal statute that all residential construction be prefabricated, unless stipulated otherwise by the owner.

For the naysayers, recall that smog control was mandated upon the car industry by Congress – therefore prefabrication must be instituted for the long-bilked home buyer!

Here an initial draft legislative proposal:

In in response to the prevailing labor-intensive, artificially-inflated residential construction pricing structure, and to the increasing global-warming weather disasters – henceforth all non-customized-design new residential construction [applies to commercial as well] shall be composed of sustainable building materials, entirely of modularized prefabricated sections at present, and structural insulated panels (SIPs) when higher volume production is reached, to minimize labor cost – for the foundation(s), all floors, all walls, and all roofs. Structural grade plywood shall be specified for those panels requiring it. Being the second highest contributors to the global warming crisis, consequently no concrete or steel shall be allowed for any foundation(s), floors, walls, or roofs except for fasteners and connection brackets/tie-downs/straps. Structures above four floors shall utilize laminated veneer lumber (LVL) and/or cross laminated timber (CLT) for framing (for their higher structural capacity) in addition to the aforesaid modular-section floors, walls, and room partitions. Same concrete/steel exclusions.

Glue Laminated Timber (Glulam)
Beams & columns



Cross-Laminated Timber (CLT)
Solid sawn laminations



Cross-Laminated Timber (CLT)
SCL laminations



Photo: Freres Lumber