

July 20, 2010

Mr. Alfred M. Pollard
General Council
Federal Housing Finance Agency
Fourth Floor
1700 G Street, NW
Washington, DC 20552

Subject: **COMMENTS/RIN 2590-AA27**

Dear Mr. Pollard,

I have reviewed the Notice of Proposed Rulemaking that has been published by your agency that is designed to fulfill the requirement as outlined in the Housing and Economic Recovery Act of 2008. As part of your constituency who is supposed to be served by your agency, you failed to serve with these new guidelines. The principle reason is because all you have done is maintain the status quo.

It would be nice if this home was able to be placed on a permanent foundation on a piece of land that was owned. Unfortunately, zoning regulations and subdivision covenants restrict manufactured homes to leased land communities, such as the one we live in, no matter how well constructed or beautiful the home is.

The chattel lending restrictions you propose are nothing more than maintaining what currently exists. I have been hurt by the current rules – which are also the proposed rules in the following way(s): I am a business owner, and I subcontract for Clayton homes, among others. Because it is so difficult for buyers to qualify for loans on homes that would be placed in local manufactured communities, or on local lands within city limits, there is a large amount of potential business that passes me by completely, because it never materializes. Potential buyers that would live in the local area are turned away, because while they can qualify for the home loan, they are passed up by the standards because they do not own land. I watched my friends, salesmen for Clayton Homes be laid off, because there were sales closed almost exclusively for buyers with land, and not many people have land lying around to put a home on, or can afford to shell out the money to install utilities. Eventually, the entire office was closed down—without notice. I went to the office one day (a 42 mile drive) to clean the lot homes, and the door was locked with a sign on the door saying that the sales office was now closed down.

I believe the practice to loan on only homes that become “real property” (by being set on a foundation) has been in place because lenders believe any one can get their hands on an 18 wheeler & remove a home. There are procedures that have to be followed to do that, such as proving a person or company has the legal authority to move a home & the ability to move it safely, without endangering themselves, others, or the integrity of the home they are moving before a transport permit is issued. I also believe that the practice of discriminating in re loans is rooted in the labeling that mobile home dwellers have experienced for decades—and it is time to end that.

So now these potential home buyers are forced to either stay in an apartment until they have saved up enough funds to pay cash outright for a new manufactured home (which still

costs far less than a site built home) & have it set in a situation where they rent the land, or they end up buying a substandard home that needs a lot of repairs, and so, they dump their money into that home, not into my cleaning services, rendered through the sales office & included in the sale of a new home, & backed by a cleanliness guarantee.

The rest of the story is this, - so the only homes I get to clean are "in the middle of nowhere" Wyoming, Nevada, the Utah desert, sometimes the utilities aren't hooked up yet. I have to be away from my little girl for lengths of time, sometimes days. The wage isn't that great, & I'm an exhausted single grandmother raising my 10 year old granddaughter, all alone. How can I be in 2 places at once?! My car is falling apart. Driving home from job sites, I have fallen asleep at the wheel too many times to count as I try to reach a place of safety to sleep in my car, as there are no hotels for 150 miles. Rarely do I find a place that my cell phone can get a signal to call 911 in case I am awakened by some desert crawling stranger & need help. I do not think you would want your daughter working that kind of hard to earn a living in the middle of nowhere on an isolated stretch of road with only coyotes for neighbors.

Now, we have been forced to live in a manufactured home as well as of the last year. I owned 2 homes previously on one parcel of land. The home was built on a tailings pile, and the home was contaminated with lead and asbestos. We became very sick. Our only way out alive was to sell & displace my family of 4. I let our home go, and walked away with the little equity I had in it. Though I had great credit, and my business, I am working less & less, as I am becoming very disabled. I was not able to qualify for a site built home loan large enough for my family so we could all stay together & share family responsibilities. I realized I was going to have to try to purchase a manufactured home, and that my sons would have to stand on what survival skills I had taught them. I had over \$20k to put down on a manufactured home, but could not qualify for a loan because of the way the "Chattel Loan" is delivered. I could not afford a piece of land or a lot payment in addition to a home payment. My sons were young, one not quite out of high school, the other having just graduated Job Corps, so they could not be considered for a loan. I searched for a long time for a home that I could buy cash outright, and be able to deal with living in the amount space allotted, the neighborhood, ect. Finally, I found a large doublewide with a lot of potential. It was a (very) used (& abused) home on a beautiful large lot that is in a manufactured home community. I soon found out though that the residents are brutalized & terrorized by the landlord. We can be evicted at the drop of a hat on the landlords whim, and never know what to expect from him, as he takes the bitterness of his childhood out on his residents. The fear in the air is like living in a concentration camp.

There are 199 lots in my community, 128 of them are occupied. When a resident tries to sell their home, no one can qualify to buy it, no matter how little is asked for the homes price. We lose 3-5 residents every month, and rarely have a new resident move in. Only one home has been moved into the community in a 6 year period. Our community is in danger of being sold for commercial property price, because the landlord is used to raking in \$80k per month, without putting one dime into repairs, and now it is in a horrible state of disrepair. If a tenant asks the landlord to fix anything that is his responsibility, the landlord hikes up the rent, and issues it attached to an eviction notice, but does no repair to the land. I cannot afford to move my home at present, and the landlords broken pad under my home is damaging the structure of my home. When I asked for a repair, I got a fix it ticket with an eviction attached to it. I have looked for pieces of land in this fairly rural area, but have found that I would not be allowed to put my house on it, because the lands are not far enough out of the city limits. The land that I would be allowed to place my home on would require me to pay to put in utilities, \$10k each, & I don't see your agency lending me or anyone else the money for that. Given the current economy, my deteriorating condition, travel distance for work, ect, and the undercut we have all suffered from illegal residents taking our jobs for a low wage leaves me

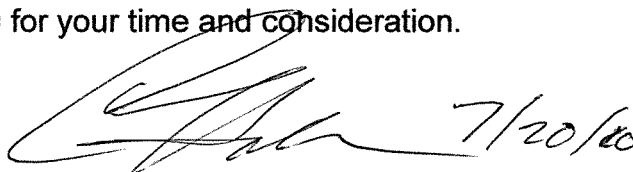
two choices 1 -buckle down, fight & HOPE my community stays open as a manufactured home community with affordable rents & someday we would be able to purchase it for the resident homeowners, & 2-apply for subsidized public housing, after losing my investment altogether.

I believe that a system of chattel lending could be put in place with appropriate safeguards that would protect the lenders interests, such as long term leases for the life of the loan with rent increases tied to the consumer price index, which would be fair to all parties concerned. Hopefully though, that would not be allowed to give the landlord an unfair way to cause the homeowner additional debt. I feel your agency needs to assume a leadership role in bringing this to pass. Manufactured homes must no longer be looked upon as "Trailer Trash". The industry has come a long way, and have managed to build some strikingly beautiful and well designed, sturdy homes, much more spacious than condominiums, and also more private.

I also would like to have the opportunity to purchase our community with the rest of my neighbors and friends. Most of the residents in my community have been asked what they really want in the end. 100% of those asked have said they want to purchase the community. I have also polled homeowners in other manufactured home communities across the state of Utah, as I have worked in the manufactured housing industry for 25 years. It is the strong general desire for people to want to own a piece of land, even since the time of the pioneers-(the first true "mobile homes"?) Programs should be set in place that would enable us to do just that. It has already been done successfully in several hundred communities such as ours throughout the country. Not one has ever failed! All those communities are well managed, and pleasing to the eye. All we want is the opportunity to do the same in our community.

I appreciate and thank you for your time and consideration.

Sincerely,
Colette Hadlock,
HOA president, R.E.A.C.H.
(Ridgewood Estates Association of Concerned Homeowners)
2875 N Hill Field Rd # 194
Layton Ut 84041

A handwritten signature in black ink, appearing to read 'Colette Hadlock', with the date '7/20/10' written to the right of the signature.

C. Hadlock
2875 N Hillfield Rd, #194
Taylors, UT 84044-AA27

SALT LAKE CITY UT 841

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Comments RIN 2598-AA27

When homeowners
move out of the community,
& cannot get a buyer to qual-
ify for a loan on their home,
the seller loses the entire invest-
ment in their home, because they
can no longer afford both the lot
rent in the community & the lot
costs where they have moved.
They are forced to sign their
home over to the landlord
losing the investment.
This hurts the landlord
out of their economic
rent. The price goes up
in the community.

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