

13 November 2019

FHFA Division of Housing Mission and Goals

400 Seventh Street, S.W.,
Seventh Floor
Washington, D.C. 20219

CC: HUD Secretary Ben Carson, the White House, The Honorable Ami Bera, House of Representatives, Other Interested Parties

RE: Request for Input (RFI) on Fannie Mae and Freddie Mac Proposed Modifications to their 2018-2020 Duty to Serve Plans (October 2019).

To Addressees and Those It May Concern,

I am the new kid on the block. I first moved into my new Manufactured Home in December of last year. Before the first month was out, my wife and I knew [we had hit the jackpot](#) by purchasing our 39 year old manufactured home in a beautifully land-lease park with a fantastic community.

Unfortunately, I was soon exposed to the dark side of living in a land-lease park. I am now President of the Mobil Country Club's Home Owner's Association. My life is now focused on identifying the reasons we have serious health and welfare issues in my new community. Why are my new found friends suffering and what can I do to help them.

I've discovered that the reasons are complex and there are many things that need to be done to help.

The biggest issues my people are facing are related to finances. [Surviving parasitic rent increases is difficult](#). But there is also the fact that we get zero respect when it comes time to deal with financial organizations.

I needed a \$20,000 loan to replace the roof on my home. In spite of my high credit ratings, the only reason I was successful in getting a personal loan was the manager of my local branch fought for me. All the years I lived in my 90 year old site built home, financing was never an issue. This helped open my eyes to one of our major issues. Your failure to perform.

Duty to Serve Program

From the [FHFA website](#):

The Duty to Serve (DTS) requires Fannie Mae and Freddie Mac (Enterprises) to facilitate a secondary market for mortgages on housing for very low-, low-, and moderate-income families in: Manufactured housing, Affordable housing preservation, and Rural housing. The 2018-2020 Plans describe specific activities each Enterprise will undertake to fulfill their Duty to Serve obligations in each underserved market.

From one of [Fannie Mae's fancy documents](#):

In December 2016, the Federal Housing Finance Agency (FHFA) issued the Duty to Serve Underserved Markets rule, as required by the Housing and Economic Recovery Act (HERA) of 2008, which guides our activities at Fannie Mae every day.

I am sorry, but I don't see any sign that you have done anything in compliance with these guidelines. I knew large organizations might be slow in responding, but it has been over a decade for you to do what the law REQUIRES! As a young man, I spent twelve years in the US Navy, including four tours of Vietnam. We followed the law and served our country honorably. Isn't it about time for you to do the same?

I am not the only one calling for change.

[MHARR: GSEs' "Duty To Serve Underserved Markets" Plans](#)

[MHLivingNews.com: Paltering, Manufactured Homes, CrossMod™ Homes, Manufactured Housing Institute, Clayton Homes, Berkshire Hathaway Manufactured Home Lenders, DTS, and You](#)

I see strange notices about support a new class of homes while ignoring all the rest of us. Whose great idea is that? Based on my personal knowledge of HCD inspectors colluding with MHC owners, to the detriment of the MHC residents, I suggest you have someone look carefully at the money trail attached to that "CrossMod" proposal. We don't need financial support for some weird, alien form of Manufactured Homes. We need support for the manufactured homes that real people live in today.

Tim Sheahan, when he was president of the National Association of Manufactured Home Owners (NMHOA) noted that when there was plenty of competition and new land-lease manufactured home (MH) communities were coming online, that the law of supply and demand kept site fees affordable. Unfortunately, there have been no new communities in California in the past thirty years and only ten in the USA since 2000. There is plenty of demand, but no supply.

How about you working to support, during this time when national focus is on our Affordable Housing Crisis, the removal all the obstacles to building new MH Communities. That includes the financial obstacles that would be address by fully enforcing the Duty to Serve laws related to *very low-, low-, and moderate-income families in: Manufactured housing, Affordable housing preservation, and Rural housing.*

Also, tell the GSEs that **all** HUD Code manufactured homes should be treated equally. Forget about "CrossMod" and the big profit corporations. They have plenty of ways to get money. Look to the needs of the residents. Remember, your focus must be on the *very low-, low-, and moderate-income families in: Manufactured housing, Affordable housing preservation, and Rural housing.*

State of the Community

Last year a survey was taken after a seven percent increase in the monthly site rental, at the senior park I now live in. They found that only 11% of the people living in our community fit the HUD definition for Not Burdened. 38% met the definition of Moderately Burdened and 41% qualified for the **Severely Burdened** category. This year we were hit with a six percent rent increase, make the score 18% in a two year period.

Those people are the faces behind the Duty to Serve laws. I believe it is your Duty to help those people in anyway you can.

I have added links to some of my articles about Manufactured Home living below.

Respectfully Submitted;

Robert E. Van Cleaf

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Legislative Committee: [Golden State Manufactured-Home Owners League](#)
Park Representative: [Sacramento Area Coalition of Mobilehomeowner Associations](#)

Website: [SOB.Boatswain.US](#)
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19 Jun 19 — Blog: [Requesting an Antitrust Investigation](#)
30 Jun 19 — Blog: [The Impact of Manufactured Home Community Rent Increases](#)
29 Jul 19 — Blog: [Mobil Country Club Community: We hit the Jackpot!](#)
08 Sep 19 — [MHLivingNews.com](#): [Manufactured Home Community Leader Discusses – Manufactured Housing Insanity?](#)
28 Oct 19 — [Gold River Messenger](#): [Seniors Face Economic Eviction Due to Rising Rental Costs](#)
04 Nov 19 — [CBS Sacramento](#): [Rent Increases Making Life Difficult For Seniors Living In Manufactured Home Community](#)