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**NFPA / MHCC – 2010 Annual Meeting, at the Marriott Tulsa Southern Hills, Tulsa, OK
April 29, 2010, 8:05AM; Public Comments Segment (8 PAGES)**

Public Comments entered by: Stewart 'Stu' Larrabee, current resident of the 'Rockwood Village Manufactured Home Community' 10435 E. 42nd Place S., Tulsa, OK 74146 (918) 622-3385 -h (954) 829-7961 -c sssttu2@hotmail.com -email

Subject Matter: Unnoticed Immediate Danger of Death(s), Serious Injury(s), and/or Damage to -or- Complete Loss of Property(s) (effectively); Extreme Disparity in Enforcement of Laws or Standards and the like, and the almost complete lack of the most basic common sense towards any form of proper or safe Installation(s) of a substantial portion of Mobile or Manufactured Homes in the surrounding multi-state region; Equity of Law; complete systemic confusion of 'building inspectors' being drawn from the 'International Residential Code(s);' Systemic Violations of the Federally Listed Product of a Mobile or Manufactured Home relating to its Installations(s) and/or Uses; and more.

INTRODUCTION

Mr. Larrabee has lived in California for most of his life and due to medical reasons was forced to relocate to a different portion of the country in mid-2008. While searching for a Manufactured Home in Northwest Arkansas and the immediate adjoining three other states (MO, KS, OK), Mr. Larrabee viewed many other Mobile / Manufactured Homes, probably thousands, as this search went on for over four months. During this time many extreme disparities were seen in all relations of Mobile / Manufactured Home 'living,' including the 'set-ups' or their final installed methods. Mr. Larrabee has been in various forms of construction for vast portions of his life and has worked on many premier projects, including successfully taking over a project as a project manager for a contractor at NASA at Edwards AFB, Edwards, CA, in which the contractor was about to be defaulted thereon by the government for lack of progress and other contract issues. Because of Mr. Larrabee's life experiences, he was more akin to noticing construction related issues while viewing almost any structure, and thereby, has noticed much disparity regarding 'installations' for Mobile / Manufactured Homes in the overall multi-state region.

PERSONAL EXPERIENCES THAT DISCLOSED MANY VERY SERIOUS PROBLEMS

In November 2008, a purchase of a used private party owned Dutch 1996 16'x80' Manufactured Home occurred, in which the 'deal' included Delivery and Set-Up. The 'seller' was under the understanding that it would only cost him around \$700 -to- \$800 dollars to accomplish the needed fifty (50) mile relocation

and installation, as he indicated that he routinely saw such rates posted in a local newspaper advertisement. This turned out to not be available and the price ranges that were being quoted were ranging from \$1400 –to- \$4000 dollars for relocation and basic installation, which did not include the needed utility hook-ups or other factors such as steps and the like. Needless to say sellers remorse set in, but the Manufactured Home was eventually relocated and installed. However, it was discovered well after-the-fact, that the “Installer” had has his license Revoked-for-Cause in mid-2006, and was not currently licensed or insured.

This was seriously complicated by the City Building Inspectors of the City of Broken Arrow, OK, who had no-clue whatsoever as to what-would-be-correct, vs., what-would-be-incorrect, for absolutely any type of Manufactured Home installation whatsoever. The Chief Building Inspector personally admitted that he has ‘approved’ a somewhat recent nearby ‘installation,’ with only three (3) typical Ground Anchors and Straps, per side. He also admitted that he and his entire department of eight (8) other field building inspectors, plus the additional inside support staff, had never seen Manufactured Installation Instructions before. The also did not know of the Oklahoma standards, of which, the current versions have been in effect since year 2000/2001. It took well over six (6) months to get any form of admittance of error from that city.

SOME SPECIFIC “BROKEN ARROW” DETAILS

The Manufactured Home Community of “*Johanna Woods*,” Broken Arrow, OK, has a move-in incentive of \$1000 Dollars to help obtain higher occupancy, and, typically uses these monies to help offset the related utility installation expenses. Johanna Woods, being the ‘land-owner’ obtained all permits and chose all other needed trades to facilitate the installation of the Manufactured Home. This included the coordination of the ‘seller’s’ contracted “Installer.” Johanna Woods has gently rolling hills and as a matter of routine for Johanna Woods, they place 1-2 large dump truck loads of fresh dirt in the immediate set-up area, just before the arrival and placement of a Manufactured Home. This ‘dirt’ is placed directly over grass in the lower portion of the set-up area, in an attempt to level the set-up-area, however, it was not compacted and this turns out to be routine on the park of Johanna Woods, as they have their own small tractor to work with. Wither or not the ‘installer’ was notified of this fact, the Manufactured Home did greatly tear into the new soft un-compacted soil, the same as stepping ones foot into the bed of a freshly roto-tilled flower or vegetable garden area. For the most part, that unlicensed ‘installer’ placed the ABS Pads directly on top of the fresh soil, without ‘cutting’ them in, and in some areas the ABS Pads were placed directly on top of grass. None of this was known to be incorrect by any of the residents of that Manufactured Home, until much later. A few weeks after moving-in, it was discovered that the

required outside permit folder was getting wet and the paperwork inside was checked for damage; it was then that everything went south. It was discovered that every piece of paper for the official record keeping of passed inspections, was blank, as never being filled-in by any of the multitude of different inspectors that had been on-site.

It was also discovered that not even one of the first required inspections for "Blocking" or "Tie-Down" had ever been completed at all. In fact, the City went against its own rules and approved the installation of utilities and transmitted separate activation notices for each, again, without ever following their own rules, which are the Pier and Anchor inspections must occur first, before anything is even allowed to be started, let alone, energized.

During the next six (6) months: several admissions were made by the Chief Building Inspector; and, it was also discovered that the "Installer" was not licensed; and, it was discovered that Johanna Woods was a licensed dealer that should have had the proper knowledge; and that, the Johanna Woods resident Maintenance Manager, who was directly involved in almost every aspect of every part of the overall installation, had been to the State Approved Installation Training Class, and a lot more.

Upon addressing this in writing to Johanna Woods, one day later, harassment started including but not limited to: starting the day after Johanna Woods received the letter, persons were showing up at the front door from a local church insisting that we needed to go to a specific church; persons stopping in the street stating that we needed to be saved and passing out literature of 'salvation by ridding ourselves of addictions' (note- these were full color flyers with pictures of needles, pills, cigarettes, liquor, etc. (Mr. Larrabee smokes legal tobacco cigarettes – nothing else)); the repeated issuance of 'lawn-tickets' demanding that the lawn be mowed immediately or they will do it at a cost of twice fair market value (note- these 'tickets' were issued sometimes 5 days after the Johanna Woods recommended mowing service had last mowed the lawn, and even that person stated in writing that the lawn was fine and he did not know what their problem was, but, nevertheless, we still paid over and over to over-mow the lawn to not give Johanna Woods any legal edge at any later date); and lots more.

Mr. Ken Whitehead who is the Deputy Director of the Used Motor Vehicle and Parts Commission (UMVPC) (the states licensing agency) had even stated that the Manufactured Home may have to be completely removed and the soil conditions corrected, and then, completely re-install the Manufactured Home. Mr. Whitehead with another UMVPC Inspector had personally seen that installation and the many other not disclosed herein, "installation deficits," but, to state just a few, this included: not enough Piers; and, was also short on Anchors. Oklahoma has a "State Generic Standard" (SGS) in-which, it even cites one example being a 16'x80,' and gives the correct number of absolute minimum number of

Anchors required, being, eight (8) per side by the SGS standard; the Johanna Woods installation only had six (6) per side and not even one stabilizer plate anywhere, for traditional anchors installed after the Manufactured Home unit, sitting / placement (typical perpendicular, non-inline fashion). The area of the Manufactured Home that was over the fresh soil area, was twisting and bowing, as it just freely sank.

To close out the Johanna Woods experience, remembering that there are a lot more details that are being left out for the sake of the short time framed public comments period, there is one more event to touch on. Several months into this mess, another Manufactured Home Transporter & Installer was driving by, as he had been performing other work in the park. That person was flagged down, then and there, and He proceeded to state how bad the Manufactured Home installation was, while he still was in his truck, stopped in the street. That installer parked and got out and proceeded to give an in-person on-site walk-around inspection. He stated that he always uses Stabilizer Plates, spoke to proper placement of ABS Pads and Piers, etc. He even spoke to an after-the-fact fix that exists in the Oklahoma SGS for missing stabilizer plates, that being an 10"x18" concrete cylinder approved fix. The Oklahoma SGS was totally unknown by the residents at that point.

Johanna Woods and the City of Broken Arrow became increasing hostile and threatening, seemingly due to the liabilities involved.

ENOUGH WAS ENOUGH – MANUFACTURED HOME MOVED TO TULSA, OK

Rockwood Village Manufactured Home Community in Tulsa, OK, was advertising a 'we will move you for free' offer, which turned out to be a bait-and-switch, and was a misrepresentation with many other un-paid expenses. It was discovered that they solely use the same exact transporter and installer, that gave the walk-around inspection at Johanna Woods, so, this logically seemed like a good deal and that was in-fact, the deal-maker. That move occurred in late September 2009, and it was not discovered until later that the installation was incorrect at Rockwood Village. The City Building Inspectors for the City of Tulsa, OK, also had no-clue, with respect to the Manufacture Installation Instructions, or, the Oklahoma SGS. It was effectively rubber stamped, "approved" by the City Inspectors (to date, 3 different 'Site and Sign Inspectors' have been on-site, with no-clue whatsoever, plus other admissions occurring).

One important note- Johanna Woods within a day or two of the lot vacancy, immediately removed all of the extra fresh soil on the now vacant portion of the lot that was under the Manufactured Home, however, we still had legal control of the lot for several more days, with other personal property still on the lot. There were other excess dirt piles on the lot left over from utility excavation that had remained on the lot

since moving in, and those piles were totally undisturbed except for all of the 'problem dirt,' which was instantly removed and/or spread over the greater portion of the lot.

Getting back to Rockwood Village, the Manufactured Home was moved at the end of September 2009, and there are the following problems that still exist to this current day, and, can be viewed by anyone today or within the next few weeks. These problems include, but are not limited to: ABS Pads on top of Grass and other decaying Shrubbery; warped or bowing ABS Pads; Anchor Heads residing effectively below grade and submerged in water anytime it rains and remaining in underwater water for days after the rain stops (painted non-galvanized anchors); the concrete areas on the lot that are all slopped towards the Manufactured Home and not away there-from; the Lot is **lower** than street, so there is no way that the water can ever drain off of the Lot, let alone from underneath the Manufactured Home itself; incorrect overall Lot sloping, wherein almost all water drains towards and to the underneath portion of the Manufactured Home; Over-the-Top Straps that are crossing at angles and are not at all lining up with structural supports in the Manufactured Home roofing system; Straps into Split-Bolts, which are only rotated, or turned, or tightened, 1/4 or 1/2 of a rotation, wherein you can visually see the **brass color** of the Split Bolt, thereby, not being tightened or tensioned at all; no Stabilizer Plates anywhere for traditional Ground Anchors installed perpendicularly, as in, not installed as an 'inline' fashion; very lose Straps the week after they were 'installed'; Anchors installed at dramatic almost useless angles (some at 45 degrees plus) which puts the Helix above the Frost Line, and provides no useful resistance to movement; some Anchors sticking way-out of the ground, one being 12" of bare shaft sticking-out of the ground with the Anchor being 30" long in-the-first-place; Frost Heave and Water Heave occurring, wherein you need a crow-bar to open or close doors at times; many Piers without any 'capping' whatsoever with the Shims directly on top of 'open-celled' blocks / Piers; all 'shimming' is single one-side application, wherein only one Shim is used at any location, and there is no use of 'opposing' paired shims, anywhere; ETC.

At Rockwood Village, this same 'installer' first set-up the Manufactured Home so that the back door would only open about 18" before physically hitting the Electrical Meter Pedestal. Then, the axles and wheels were placed back-on and it was moved slightly, so the door would open, but, it has been made clear that it will be illegal to even place steps at that door, since that would then violate the Three Foot Clearance Rule for the Electrical Meter Pedestal. Additionally, this same 'installer' has stated that several of his family members that were 'assisting' him in the 'installation,' were also licensed and that most everyone with him on-site, had already been through the State Approved Installers Class. This same 'installer' has installed approximately FIFTY (50) other Mobile / Manufactured Homes in Rockwood Village in the last year, may of which I can visually see from a distance don't look correct to what I am being told and now have knowledge of.

To close out Rockwood Village, there is a lot more, however, both Rockwood Village and The City of Tulsa have become very hostile and very threatening. We have been subjected to a wrongful Evection, where the complaint of Rockwood Village was that "We Feel They Would Be Happier Elsewhere." That was an acceptable reason for the Judge, and, we are to bear our own costs and more, or forfeit the property to Rockwood Village. This Court Case included an instant after hours (6PM), non-calendared Hearing, that was instantly *demanded* by the Judge *over the phone*. There were no witnesses as the Court House Public Doors *were locked*, the Court Room was "Dark," the Clerk had gone home, and there was no Bailiff for that Courtroom. If I did not have a recorder in-hand trying to document any of this, while also demanding the Court Reporter that I had already paid in-advance therefore, (which forced the Judge to run out of the Court Room and search for a Court Reporter), there is no telling what would have happened. Eventually, a Court Reporter was located and an "*Instant-Hearing*" was held, wherein the only persons present were: one brand new park manager and their Attorney (which still does not show on any official record as being present); the two residents of the Manufactured Home; the Judge; and a Court Reporter – everything else was closed and locked down. The previous day, at the Calendared Hearing for which we and everyone else were present, the Judge would only hear part of the problems and accepted the mere desire of a new park manager as "burden-met" on the part of the park.

The Oklahoma Landlord Tennant Laws equate a person renting a furnished room, typical name being a "Border," and/or, a person in a Mobile / Manufactured Home, as all being one-and-the-same and under the same-gun. In essence what was experienced, is that, if the Landlord Fires the "First-Shot", or for that matter, "Any-Shot," then the Landlord automatically WINS, even if they have no other legal standing otherwise than being able to afford the filling-fee. This is a SERIOUS DISPARITY, amongst many others.

IN CLOSING

HUD, and anyone here is personally invited as my guest, as a whole group as in a continuation of this meeting, or, individually in any number, to come over and see the conditions, however, there is a clock-ticking away and it is recommended that it be done in the next few days. I ask that I be telephoned at 918-622-3385h or 954-829-7961c, before anyone arrives. There is no gated access, so, anyone can drive right up. As for the location, it is just a little bit out of the way, for anyone leaving from this meeting while traveling to the airport. It is the mobile home park located at US169 and 41st Street. It is only a few miles round trip, out of the way, while in-route to the airport, and, is only about 7 miles away from this meeting location.

I MOST SINCERELY REQUEST THE HUD PERSONNEL TAKE ADVANTAGE OF THIS OPPORTUNITY, AS YOU CAN SEE WHAT AN INCORRECT INSTALLATION LOOKS LIKE. THE INSTALLATION METHODS OF THE OKLAHOMA SGS ARE ALMOST EXACT TO THE NOW BOILER PLATE GARDEN VARIETY MANUFACTURE INSTALLATION INSTRUCTIONS, THAT ALMOST EVERYONE USES FOR A NEW SET. IT IS WORTH THE TIME.

LOCAL CITIES HAVE NO-CLUE. OTHER CODE PUBLICATIONS, SUCH AS COMMON RESIDENTIAL BUILDING CODE PUBLICATIONS, NEED TO AT LEAST CITE REFERENCE TO WHERE THE CORRECT STANDARDS MAY BE LOCATED. I CAN SEE THAT THIS PROBLEM EXISTS IN MANY STATES.

IT IS VERY CLEAR THAT THERE HAVE BEEN A CHAIN OF REPRISALS THAT HAVE OCCURRED AGAINST KNOWING THE TRUTH, OR, THE PROPER AND SAFE METHOD, THAT AN 'INSTALLATION' SHOULD BE PERFORMED THEREIN.

PERSONS LIVES ARE IN DANGER OF UNANNOUNCED DEATH FROM AN OVERTURN OCCURRING WHEN IT SHOULD NOT. IT IS A SYSTEMIC PROBLEM IN THE MULTI-STATE REGION FOR BOTH NEW SETS AND OTHERWISE. PERSONS ARE AT RISK OF TOTAL PROPERTY LOSS, INCLUDING ELDERLY, VETERANS, AND MANY OTHER CLASSES OF PERSONS. EVEN IF PERSONS WHO DO HAVE INSURANCE ARE SUBJECTED TO SUCH DAMAGE, AND THE INSURANCE COMPANY FIGURES OUT THAT THE MANUFACTURED HOME WAS INSTALLED IN-CORRECTLY, THE INSURANCE COMPANY THEN HAS A STANDING TO SHORT-PAY A CLAIM, OR, NOT-PAY AT ALL, CITING THE INCORRECT INSTALLATION. CONSIDERING THERE ARE LONG STANDING HURRICANE KATRINA INSURANCE DISPUTES THAT ARE STILL ONGOING NOW ALMOST FIVE YEARS RUNNING, THE SHORT-PAY OR NON-PAY SCENARIOS ARE NOT OUT OF THE QUESTION, HOWEVER, WHY SHOULD SOMEONE LOSE THEIR LIFE SAVINGS, AS IN THEIR "HOME," WHEN THEY SHOULD NOT, BECAUSE SOME INSTALLER AND/OR INSPECTOR, SYSTEMICALLY, DID NOT DO THERE JOBS, OR, HAVE NO-CLUE WHATSOEVER.

STATES LAWS NEED ADDRESSING IN MANY STATES. PERSONS NEED PUBLIC NOTIFICATION OF THE KNOWN OR POTENTIAL DEFECTS. FEDERAL LISTINGS ARE BEING VIOLATED, NEW OR USED, AND I CAN GUESS THAT EVERY MANUFACTURE IF QUESTIONED, WILL STATE IT SHOULD ONLY BE INSTALLED IN ONE FASHION, WHICH IS THE LEGAL WAY.

MANY MANUFACTURED HOMEOWNERS ARE IN DANGER AND ARE TOTALLY CLUELESS. THIS NEEDS TO BE ADDRESSED BY HUD AND THE COMMITTEE. IT WILL SAVE LIVES, LET ALONE PROPERTY DAMAGE. OF COURSE, I AM NOT REFERRING TO MOTHER-NATURES F3 TO F5 TORNADOS, BEING AND ACTING LIKE A PENCIL ERASURE FOR THE FACE OF THE EARTH, I AM SPEAKING TO THE FAR MORE COMMON, "WING-EVENTS," IN WHICH THE MOST SUSCEPTIBILITY EXISTS CURRENTLY.

I CANNOT POSSIBLY ADDRESS EVERYTHING THAT SHOULD BE ADDRESSED, OR, ALL OF THE EVENTS THAT HAVE OCCURRED IN THIS PUBLIC COMMENT TIME FRAME. I AM THANKFUL THAT I HAVE FOUND SOME GOOD AND HONEST PERSONS IN TULSA, OK, OF WHICH, SOME ARE AT THIS MEETING, BUT HAD NO CLUE THAT I WAS GOING TO SPEAK OR PRESENT ANY INFORMATION.

AGAIN, HUD, AND OTHERS, PLEASE SEEK ME OUT AND SEE THIS FOR YOURSELVES WHILE YOU ARE IN TOWN. CHANGES NEED TO OCCUR RAPIDLY.

Sincerely,



S Larrabee

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[PS- This original writing was created only hours before the public comments time and was intended as an aid to Mr. Larrabee during the presentation. It had many typos that have been corrected in this version. This typo-corrected version was re-submitted during the lunch period of the same day of the public comment segment, and it is requested to replace the typo-ed version, and to mark and store the typo-ed version only for reference, if it is needed, respectfully (typo corrected version completed 11:52am, 4-29-2010)]

End