

From: Tom Masland <tom@ranspell.com>
Sent: Monday, April 11, 2011 4:21 PM
To: !FHFA REG-COMMENTS
Subject: Proposed Rule on Private Transfer Fee Covenants, (No. 2590-AA41) -
Please Reject As Written

Mr. Pollard:

I am writing to urge you to REJECT the proposed rule No. 2590-AA41 relating to private transfer fees as it is currently written.

I agree that the abusive practice of transfer fees for private gain can and should be curtailed.

I make my comments from the perspective who represents landowners and land trusts in land conservation (including conservation easements), and transfer fees provide a very effective mechanism for raising stewardship (enforcement) dollars when protected land - or land benefitted by nearby conserved properties - are transferred, or when events occur that increase the stewardship risk. I believe that the current restriction allowing transfer fees only when the encumbered property is directly benefitted by the fee is too narrow, and should be expanded.

Sincerely,

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