

From: cgavin@coastallandtrust.org Cassie Gavin [cassie@coastallandtrust.org]
Sent: Wednesday, September 29, 2010 1:53 PM
To: !FHFA REG-COMMENTS
Subject: Guidance on Private Transfer Fee Covenants, (No. 2010-N-11)

Public Comment regarding the Guidance on Private Transfer Fee Covenants, (No. 2010-N-11):

The North Carolina Coastal Land Trust supports the use of private transfer fees when they benefit land and water conservation, the homeowner, the HOA or provide another specific community benefit through payment to a non-profit or home owners' organization. We request that the FHFA delay consideration of the proposed guidance through January 30, 2011 to allow for informed decision-making that fully considers the implications of the proposed harsh change.

Further, the North Carolina Coastal Land Trust requests that the FHFA:

- (1) Insert an exception for tax-exempt organizations' use of transfer fees;
- (2) Continue to support homes and homeowners with community-benefits fees;
- (3) Support reasonable Community-Benefits Fee Standards that distinguish between community-benefits fees (charitable purpose) and abusive fees that benefit only developers;
- (4) Allow communities to freely associate to support community services, schools, affordable housing, and conservation with no new taxes; and
- (5) At a minimum, extend the comment period through January 30, 2011, to allow for fully informed decision-making that fully considers the implications of the proposed harsh change.

Thank you,

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