

From: Ralph Braden [rbraden@nor-wood.com]  
Sent: Thursday, September 30, 2010 1:41 PM  
To: !FHFA REG-COMMENTS  
Subject: Public Comments on Guidance on Private Transfer Fee Covenants (No. 2010-N-11)

To whom it may concern:

I am the project manager for the Wolf Ranch masterplanned community in Colorado Springs, Colorado. In 2003, I recorded the Wolf Ranch Community Covenant that established the Wolf Ranch Community Council, a Colorado non profit corporation. The Covenant also created a Community Enhancement Fee not to exceed 0.25% of the gross sales price of any home sold in Wolf Ranch. I established the actual amount of the Fee at 0.1% not to exceed \$500. So if a home sells for \$400,000, the fee is \$400, and if the sales price is \$600,000, the fee is \$500. The stated purpose of the Wolf Ranch Community Council in the Covenant is

"This Community Covenant is intended:

- a.. to establish a relationship between Wolf Ranch Community Council, Inc., Wolf Ranch Owners Association, Inc., and the Wolf Ranch community;
- b.. to provide a framework for conducting activities and programs to involve and enhance the lifestyle of the residents of Wolf Ranch and the surrounding community; and
- a.. to provide a mechanism for funding the Council's operations, programs, services, and activities."

In 2010, the budget for the Wolf Ranch Community Council was approximately \$24,000. The specific activities funded by the Council in 2010 were:

- a.. The purchase of flags to put out in the community on holidays.
- b.. Every week this summer concerts were held at a park in Wolf Ranch. Attendance has ranged from 300 to 600.
- c.. Wolf Ranch at the Sky Sox day. The Sky Sox is a AAA baseball team that is farm team for the Rockies. The stadium is about 5 miles from Wolf Ranch.
- d.. Each year, the Community Council sets a community garage sale date and puts out advertising and signage for that.
- e.. Potluck dinners at the elementary school located in Wolf Ranch.

In past years, the Community Council has also hosted a picnic for the benefit of the residents.

The residents of Wolf Ranch are very supportive of the activities conducted by the Wolf Ranch Community Council. It would be counterproductive to disallow legitimate collections of transfer fees such as that in Wolf Ranch that truly enhance the quality of life in community.

I encourage FHFA to withdraw the proposed regulations that would restrict the ability of Fannie Mae and Freddie Mac and all federal home loan banks from purchasing mortgages in communities with a private transfer fee.

Alternatively, I encourage modification of the regulation to permit the types of transfer fees where the fees are used for the benefit of the community as is the case in Wolf Ranch.

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