



October 4, 2010

The Honorable Alfred M. Pollard  
General Counsel  
Federal Housing Finance Administration  
Fourth Floor  
1700 G Street, NW  
Washington DC 20552

Mr. Pollard,

I am the Executive Director of a 509(a)(3) non-profit organization which is dedicated to natural and historical resource protection for a property called Palmetto Bluff. Since its formation in 2003, significant conservation activities have been achieved. My organization works to document, enhance and protect habitats and biological species in one of the largest land masses in the coastal plain of the southeast. Additionally, we have cutting edge biological research initiatives that have extremely broad consequences nationwide. This work occurs in a planned community. More importantly, the organization is funded primarily by a real estate transfer fee.

It goes without saying that the proposed legislation regarding limitations on mortgage credit for communities with transfer fees would eliminate our primary revenue, and therefore cripple our environmental work. But there is a much larger impact which should also be pointed out. There are a handful of communities who genuinely use this tool to promote conservation. (One community we work with is not large enough to support a stand-alone non-profit, so the transfer fee income is given to a Community Fund organization for grants to support community initiatives.)

Transfer fees, if applied correctly, can become a strong tool for philanthropy and conservation from planned communities; which often fall short in these areas. I understand there must be some motivation for the proposed legislation, but I strongly urge you to reconsider or re-craft the legislation.

I've attached an annual report for my organization which will show you the many accomplishments we are able to achieve due to funding from a real estate transfer fee. Thank you so much for your time.

Sincerely,

Patty Kennedy  
Executive Director  
Palmetto Bluff Conservancy