



**CALIFORNIA  
TRANSIT  
ASSOCIATION**

October 15, 2010

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

Attention: Public Comments “Guidance on Private Transfer Fee Covenants, (No. 2010–N–11)

Dear Mr. Pollard,

On behalf of the California Transit Association, I write to you today to urge the Federal Housing Finance Agency to reconsider its proposed “Guidance on Private Transfer Fee Covenants” so as not to remove the ability for transit agencies to partake in these covenants.

Transit agencies which enter into these covenant agreements provide a community benefit to the residents who live in these areas and pay property fees. In the case of transit agencies, a percentage of the fees from properties existing within transit-oriented development areas or transit access areas participating in private transfer agreements goes to the transit agency that provides much-needed service to the residents of that area. Therefore, homeowners do benefit from the transfer of fees through dedicated access to transit, and additionally, transit systems, which are struggling financially nationwide, benefit from this revenue stream to continue to provide their services.

Private transfer fee covenants incentivize public transit investment and facilitate increased accessibility to transit for those who seek an alternative to travel by automobile, and need greater walking, biking, and transit options where they live. People who live within a one-half-mile radius of transit stations utilize the transit system much more than the general public living elsewhere, and the greater use of public transit also improves overall mobility for local streets, road, and highways. The American Public Transportation Association estimates that \$6 in economic activity is generated for every dollar that is spent on transit. Therefore, creating further incentive for transit investment and increased ridership not only reduces congestion and smog, but also benefits the California economy.

Our Association represents most public transit agencies in the state of California. Our members oppose eliminating or restricting the ability of transit agencies to take advantage of private transfer fees.

Thank you for your consideration of this request. Please feel free to contact me at 916-446-4656 if you have any questions.

Sincerely,

Joshua W. Shaw  
Executive Director