



Amalgamated Transit Union

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Office of the International President

October 15, 2010

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

Re: Guidance on Private Transfer Fee Covenants (No. 2010-N-11)

Dear Mr. Pollard:

We appreciate the opportunity to comment on the Federal Housing Finance Agency's (FHFA) proposed guidance on Private Transfer Fee covenants (PTFs), dated August 16, 2010. While we share FHFA's concerns with certain abusive practices, community-benefits fees that provide critical transportation infrastructure, affordable housing, and community services should not be restricted. We urge you to narrow the scope of the proposed guidance to allow for transfer fees that build strong, livable communities and to extend the comment period until January 31, 2011, to allow for a full and deliberative process.

Communities, government agencies, non-profit organizations, and developers across the country have worked together to create livable communities funded by community benefits fees. For example:

* In Dublin, California, the Bay Area Rapid Transit District partnered with a private developer to establish a transfer fee that funds increased light rail service for a new, mixed income community and other local residents.

* In Teton County, Wyoming, the Snake River Sporting Club Development agreed with the County to establish a transfer fee devoted to affordable and workforce housing that helps ensure that public school teachers can afford to live in the communities where they teach.



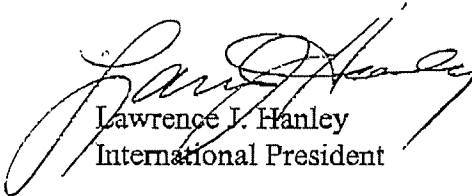
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* In Boston, Massachusetts, the Boston Redevelopment Agency working with private developers has established community benefits on a number of their projects, helping to fund affordable housing and other redevelopment efforts.

The proposed guidance would disrupt these and other communities with community-benefits fees arrangements and take away a critical funding tool that helps build strong, diverse, livable communities.

We, therefore, reiterate our request that FHFA extend to public comment period through January 31, 2011, and revise the proposed guidance to distinguish between the abuse practices that we all seek to end, on the one hand, and community-benefits fees that support much-needed affordable housing and livable communities on the other.

Sincerely,



Lawrence J. Hanley
International President

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