

Private Transfer FeesFrom: Bob Whitney [BobWhitney@instawave.net]  
Sent: Friday, October 01, 2010 1:56 PM  
To: !FHFA REG-COMMENTS  
Cc: Leslie Ratley-Beach; Marc Deprey  
Subject: Private Transfer Fees  
To Whom It May Concern:

The Golden State Land Conservancy supports the use of Private Transfer Fees that are paid to a non-profit corporation or home owners' organization upon the transfer of real estate when there is a specified community benefit, such as land and water conservation.

Please take the following actions:

- (1) Insert an exception for tax-exempt organizations;
- (2) Continue to support homeowners with community-benefits fees;
- (3) Support reasonable Community-Benefits Fee Standards that distinguish between community-benefits fees (charitable purpose) and fees that benefit only developers; and
- (4) Allow communities to freely associate to support community services, schools, affordable housing, and conservation.

Finally, please delay consideration of the proposed guidance through January 30, 2011 to allow for informed decision-making that fully considers the implications of the proposed prohibition on Private Transfer Fees. Thank you.

Best regards,

Bob Whitney, President  
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