

From: Greg Yankee [greg.yankee@cclt.org]

Sent: Thursday, October 14, 2010 4:00 PM

To: !FHFA REG-COMMENTS

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

To whom it may concern:

I appreciate the opportunity to make the following comments regarding the proposed prohibition on private transfer fees. I would like to request that the Federal Housing Finance Agency (FHFA) insert an exception for tax-exempt organizations' use of transfer fees. I would also like to request that the comment period be extended through January 30, 2011 to allow for informed decision making that considers the implications of this proposed change. Speaking from just a land conservation perspective, this issue is deserving of much more thought and consideration and we would welcome that opportunity. The ability to use transfer fees to augment the stewardship endowment of 501(c)(3) land trusts is valuable to many of our members.

Again, I appreciate the opportunity to comment and urge that the FHFA insert an exception for tax-exempt organizations and, at a minimum, extend the comment period through January 30, 2011.

Sincerely,

Greg Yankee

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Greg Yankee

Policy Director

Colorado Coalition of Land Trusts

1245 E. Colfax Avenue, Suite 203

Denver, CO 80218

Ph (303) 271-1577

Fax (303) 271-1582