



October 13, 2010

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

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


Dear Mr. Pollard:

We are writing to express opposition to the Federal Housing Finance Agency's (FHFA) proposed guidance on Private Transfer Fee covenants (PTFs), dated August 16, 2010. While CHC shares the concern of potential abuses in the current fee structure, we believe the focus should be on creating a system that ensures the promotion of public benefits as opposed to wholly prohibiting the use of transfer fees.

CHC is the statewide "big tent" housing advocacy organization that works to advance housing and community development efforts across California. Our membership includes representatives from both for and non-profit affordable housing developers, lenders, investors, and state and local funding agencies all committed to and involved in the work of affordable housing. Collectively, our membership represents the entire State and has been involved in the production of tens of thousands of units of affordable housing for low and moderate income California residents.

We respectfully request that FHFA allow for additional time for public comment until January 31, 2011. Additionally, we urge you to create a new process that focuses on regulating transfer fees but does NOT prohibit them.

Thank you for your consideration.

Sincerely,

Ray Pearl
Executive Director
California Housing Consortium