



OFFICE OF THE GOVERNOR

March 22, 2012

Alfred M. Pollard, General Counsel  
Attn: Comments/RIN 2590-AA53  
Federal Housing Finance Agency, Eighth Floor  
400 Seventh Street, SW  
Washington, D.C. 20024  
By e-mail: [RegComments@fhfa.gov](mailto:RegComments@fhfa.gov)

Re: RIN 2590-AA53

Dear Mr. Pollard:

I strongly oppose the Federal Housing Finance Agency's (FHFA) proposed rule that would stop Fannie Mae and Freddie Mac from repurchasing mortgages subject to Property Assessed Clean Energy (PACE) liens. Adopting this rule would formalize the FHFA's current misguided policy, which is blocking PACE programs in California and other states, and is killing the new jobs and green energy these programs would bring.

PACE liens are authorized by states to be levied as tax assessments by special districts. State-created tax assessments have long been recognized by the FHFA as having a lien priority, and there is no good reason to make an exception for PACE liens.

I emphatically urge you to reject the proposed regulation.

Sincerely,

  
Edmund G. Brown Jr.

cc: California Congressional Delegation