



County of San Diego

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September 12, 2012

Mr. Alfred Pollard, General Counsel
Attn: Comments/RIN 2590-AA53
Federal Housing Finance Agency, Eighth Floor
400 Seventh Street, SW.
Washington, DC 20024

Dear Mr. Pollard:

On behalf of the County of San Diego (County) I write to express concern over the Federal Housing and Finance Agency's (FHFA) Proposed Rule, which will effectively block the implementation of the Property Assessed Clean Energy (PACE) program for residential participants.

In 2009, the San Diego County Board of Supervisors approved the County's participation in CaliforniaFIRST, a statewide PACE program which was set to launch in 2010, however our program was not able to move forward when FHFA issued guidelines to mortgage lenders Fannie Mae and Freddie Mac. Under the Proposed Rule Fannie Mae and Freddie Mac would be prohibited from purchasing mortgages with PACE liens. This position will stall PACE programs across the nation, including ours, stranding millions of dollars in public and private investments.

The County of San Diego objects to the Proposed Rule that continues to block PACE. Property Assessed Clean Energy programs would make it possible for San Diegans and millions of Americans to jumpstart the economy, create green jobs, save money, clean the air and reduce the use of foreign oil.

Thank you for your attention to this matter and for including our comments with the thousands of comment letters in support of PACE that have been submitted by state and local governments in response to FHFA's Advance Notice of Proposed Rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoff Patnoe".

GEOFF PATNOE
Director
Office of Strategy and Intergovernmental Affairs
County of San Diego

Cc: San Diego Congressional Delegation