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Constance B. Moore
President and Chief Executive Officer



September 9, 2013

Federal Housing Finance Agency
Multifamily Housing Policy
400 7th Street, S.W., Room 9-261
Washington, DC 20024

RE: August 9, 2013 Notice For Public Input on 2014 Multifamily Scorecard

To Whom It May Concern:

On behalf of the shareholders, associates and most importantly, the residents in our apartment communities, BRE Properties, Inc. welcomes the opportunity to provide comments on the Federal Housing Finance Agency's (FHFA's) proposed strategies to further contract Fannie Mae and Freddie Mac's multifamily mortgage activities.

BRE Properties was founded in 1970 in San Francisco, California and focuses on the development, acquisition and management of apartment communities located primarily in the major metropolitan markets of Southern and Northern California and Seattle. BRE directly owns 74 multifamily communities totaling in excess of 21,000 apartment homes. BRE Properties is a real estate investment trust (REIT), trades on the New York Stock Exchange under the symbol BRE and is listed in the S&P MidCap 400 Index.

We find it difficult to comment on FHFA's options to implement program changes to shrink Fannie Mae and Freddie Mac's capacity because we view the proposed action as wholly unnecessary. While the perception might be that Fannie Mae and Freddie Mac play an "outsized" role in multifamily mortgage markets, the facts tell a wholly different story.

The enterprises' market share continues to decline and has actually fallen more than the 10 percent FHFA mandated at the start of the year. Indeed, the Mortgage Bankers Association estimates the multifamily origination market in 2012 was approximately \$143 billion, with Fannie Mae and Freddie Mac financing 44 percent of that total. If estimates for a 30 percent or larger increase in multifamily lending in 2013 are accurate, Fannie Mae's and Freddie Mac's market share likely will decline to the 30 percent level or below. This drop reflects the fact that private capital sources have been, and will continue to be, the primary source of mortgage debt for the apartment industry.

On a macro level, our firm's market experience leads us to conclude that artificially limiting the debt provided by the Fannie Mae and Freddie Mac's multifamily programs will harm owners and investors in apartment real estate by limiting options and creating voids in select markets. Private commercial real estate debt can be limited or, in some cases, unavailable in local markets, making critical a national debt source that features a full range of mortgage options.

Furthermore, it is vital to note that Fannie Mae and Freddie Mac support and complement all sources of multifamily debt, and do not exist solely as capital sources in the market. Because they provide the widest range of multifamily mortgage products in today's market, they have broad influence on other debt providers and lead the industry in standard setting. As such, without the Enterprises, the market will lose the competition and innovation that has benefitted borrowers and renters alike.

Additionally of concern, multifamily credit markets do not have a one-for-one replacement dynamic among participants, which in turn creates meaningful instability in our market if any one participant arbitrarily withdraws. All other sources of multifamily mortgage debt have constraints on their mortgage products, but also have their own beneficial access to capital. Banks have access to depository capital, insured deposits and can borrow from the Federal Reserve at a discount. Insurance companies and pension funds have no requirements or mandates to meet public purpose goals, allowing them to place capital in only the most desirable and beneficial markets, and with the most experienced and credit worthy owners. Accordingly, if implemented, FHFA's proposed actions would negatively impact access to capital and increase borrowing costs market wide to the detriment of borrowers and renters.

Fannie Mae's and Freddie Mac's multifamily lending programs are a model for prudent apartment real estate lending. Their programs have a long history of strong credit performance and have recently adapted to both backstop the markets effectively and shift their programs from balance sheet investment lending to securitized lending. We implore FHFA to avoid implementing further reductions or placing caps on Fannie Mae and Freddie Mac's origination levels and securitization activities with regard to multifamily finance.

We appreciate the opportunity to share our views and welcome your questions, should you have them.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christine Moore". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.

Cc:

The Honorable Barbara Boxer
The Honorable Dianne Feinstein
The Honorable Maria Cantwell
The Honorable Patty Murray
The Honorable Nancy Pelosi
National Multifamily Housing Council, c/o David Cardwell