

From: Roger Smith <rsmith@cleanwater.org>  
Sent: Tuesday, September 04, 2012 10:47 PM  
To: !FHFA REG-COMMENTS  
Subject: RIN 2590-AA53 - Support residential PACE

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:

As a resident of Connecticut, I write to ask you to reconsider your agency's stance that PACE is in any way risky or puts Fannie Mae and Freddie Mac mortgages in a negative position.

My state is rolling out a commercial PACE program with careful safeguards in place. It has a primary lien requirement and has received support from the CT bankers association as they will have a seat at the table during the rule-making process. I would like to see PACE assessments made available to residents, too, but the FHFA stands in the way. Please allow well designed PACE programs with robust quality control and consumer protections to coexist with federally backed mortgages.

In sum, FHFA should adopt a modified Alternative 3 to the Proposed Rule and get out of the way of local governments helping to mitigate risk from rising energy costs.

Thank you.

Roger Smith  
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