From: Matt Macko <macko@ebsconsultants.com> Sent: Wednesday, February 08, 2012 6:23 AM

To: !FHFA REG-COMMENTS Subject: RIN 2590-AA53

To Whom it May Concern,

On behalf of Environmental Building Strategies we would like to show our support for PACE as a creative financing mechanism that would greatly enhance our ability to affect a more positive impact on the built environment through the commercial and residential real estate clients we serve. One of our greatest strengths is proving financial viability of sustainability initiatives – we do so with the use of other creative financing mechanisms such as Commercial Local PACE districts, On-Bill Financing, Off-Bill Financing and PPAs.

We believe there are reasonable ways to mitigate the financial risks associated with tiers of debt instruments and the loan organizations who issue those instruments. That said, governmental effort, support, creativity, and collaboration are needed to help shape a program of this magnitude and even more importantly we'll need the gall to work with those who oppose it for strictly monetarily motivated reasons. The PACE program and ideal it creates is too strong and the environment too important to let it fail again.

Thank you

-- Matt Macko NOTE: New E-mail, Office & Web Address www.EBSconsultants.com

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