



CAL CUSTOM BUILDING SERVICES, INC. | LICENSE # 377330
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ALFRED M. POLLARD, GENERAL COUNSEL
FEDERAL HOUSING FINANCE AGENCY
1700 G STREET, NW
WASHINGTON, DC 20552

RE:(RIN) 2590-AA53

DEAR MR. POLLARD,

I AM WRITING TO RESPECTFULLY DISAGREE WITH THE FHFA'S POSITION ON PACE PROGRAMS.

I AM A GENERAL CONTRACTOR, WHO'S BEEN IN BUSINESS IN SANTA ROSA, CALIFORNIA SINCE 1979. FOR THE PAST 3 YEARS THE MAJORITY OF MY WORK HAS BEEN IN THE ENERGY RETROFIT FIELD.

I RECEIVED MY TRAINING AND CERTIFICATION AS A CERTIFIED BUILDING ANALYST, THRU THE BUILDING PERFORMANCE INSTITUTE (BPI) IN MALTA, N.Y. BPI IS THE NATION'S PREMIER STANDARDS DEVELOPMENT AND CREDENTIALING ORGANIZATION FOR RESIDENTIAL ENERGY EFFICIENCY RETROFIT WORK. THEY HAVE HELPED BUILD AN INDUSTRY, CREATE A WORKFORCE, AND SUPPORT PROGRAMS THROUGH PROFESSIONAL CERTIFICATION, CONTRACTOR ACCREDITATION, AND QUALITY ASSURANCE SERVICES. SINCE ACHIEVING MY CERTIFICATION, I'VE COMPLETED OVER 40 ENERGY RETROFITS TOTALING IN EXCESS OF \$1,000,000.00. MY COMPANY UTILIZES THE PACE FUNDING SOURCE WITHIN OUR JURISDICTION KNOWN AS SCEIP (SONOMA COUNTY ENERGY INDEPENDENCE PROGRAM). WE ARE, AS I UNDERSTAND IT, THE LARGEST PACE PROGRAM IN THE UNITED STATES.

OF THE 40 ENERGY UPGRADES I'VE COMPLETED, OVER 90% OF THEM UTILIZED THIS FUNDING SOURCE. OUR AVERAGE ENERGY RETROFIT HAS RESULTED IN A DECREASED GAS CONSUMPTION OF ALMOST 50%! I WOULD SAY THAT'S A MEANINGFUL REDUCTION IN ENERGY CONSUMPTION. ALSO, NOT A SINGLE ONE OF OUR CLIENTS HAVE POSED A RISK TO THEIR LENDERS BY DEFAULTING. TO THE CONTRARY, THEY ARE IMPROVING THEIR RESIDENCES WITH FEATURES SUCH AS HIGH EFFICIENCY FURNACES, DUCTING, WATER HEATERS, WINDOWS, INSULATION, AND SOLAR SYSTEMS. OUR CUSTOMERS BENEFIT BY IMPROVED COMFORT, HEALTH, SAFETY AND ENERGY EFFICIENCY WHILE INCREASING THE VALUE OF THEIR HOMES. MANY OF OUR CLIENTS, AFTER COMPLETING AN ENERGY RETROFIT, HAVE ENGAGED OUR SERVICES FOR KITCHEN AND BATHROOM REMODELS AFTERWARDS. THEY WISH TO IMPROVE ON THEIR HOMES BECAUSE THEY ARE IN IT FOR THE LONG HAUL AND WANT TO STAY.

THE COMMUNITY BENEFITS BY NOT HAVING TO FUND INFRASTRUCTURE UPGRADES TO POWER GENERATION AND TRANSMISSION FACILITIES. WE ALSO BENEFIT BY REDUCING THE NUMBER OF GREEN HOUSE GASES GENERATED WHENEVER WE COMPLETE AN ENERGY RETROFIT.

I ASK THAT YOU PLEASE RECONSIDER FHFA'S POSITION ON PACE, SO PROGRAMS LIKE SCEIP CAN CONTINUE IN EXISTENCE, AND HOMEOWNERS CAN CONTINUE TO UTILIZE THIS FUNDING SOURCE TO IMPROVE THEIR HOMES COMFORT, HEALTH, SAFETY, ENERGY EFFICIENCY AND VALUE.

VERY TRULY YOURS,

CRAIG A. LAWSON
PRESIDENT/CEO



CERTIFIED
PROFESSIONAL

