

From: Mike Krajovic <MikeK@faypenn.org>  
Sent: Monday, March 26, 2012 1:09 PM  
To: !FHFA REG-COMMENTS  
Subject: FHFA and PACE

March 26, 2012

Mr. Alfred Pollard  
General Counsel  
Federal Housing Finance Agency  
400 7th St., N.W.  
Washington, DC 20024

RE: RIN 2590-AA53 Mortgage Assets Affected by PACE Programs; Comments on Advanced Notice of Proposed Rulemaking and EIS Scoping Comments

Dear Mr. Pollard:

I would like to comment on FHFA's position on the Property Assessed Clean Energy (PACE) program. I believe that FHFA's action to unilaterally halt local government PACE programs on July 6, 2010 was not in the best interest of the people, communities and economies served by FHFA. I do not understand why FHFA would oppose PACE programs.

Supporting individuals and communities that are trying to achieve energy independence has a direct benefit to local economies. As property owners invest in renewable home energy systems, not only are they creating employment opportunities for the companies that manufacture and install such systems, but they are also reducing their ongoing household expenditures for energy that will increase household spendable income resulting in a positive local economic impact for decades into the future. It also supports reaching our national goal of achieving energy independence and self sufficiency reducing the need for larger government expenditures to secure energy resources worldwide. At a macro-economic level, it will eventually help reduce the need for spending hundreds of billions of dollars on new power plants and maintaining the extensive transmission and distribution systems needed to deliver the power. This will further reduce utility costs to local consumers across the country.

I urge FHFA adopt to reasonable underwriting standards that ensure local PACE programs are designed to maximize benefit and minimize risk and recommend that it should revise its current Statement and Directive. Specifically I also recommend that FHFA's proposed rule provide that Fannie Mae, Freddie Mac, and any other mortgage lenders regulated by FHFA (Enterprises) be allowed to buy residential mortgages with PACE assessments that are originated by programs that conform to standards and guidelines such as those established in HR 2599 (The PACE Assessment Protection Act) to protect the interests of local governments, homeowners, mortgage lenders and Government Sponsored Enterprises (GSEs). This is in the best interest of our country, our citizens and our economy.

Thank you for your consideration of my recommendations. If you should have any questions, feel free to contact me at your earliest convenience.

Sincerely,

Michael W. Krajovic, President and CEO  
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Chairman, American Sustainable Business Council Action Fund