



National Safe and Healthy Housing Coalition

Comments on FHA's PowerSaver Home Energy Retrofit Loan Pilot Program Published at 75 FR 69112 on November 10, 2010

The National Safe and Healthy Housing Coalition is a broad, voluntary, non-dues coalition of organizations working to improve housing conditions nationwide, especially for low-income families, through education and outreach to key national stakeholders and federal public decision-makers. The Coalition was formed in 2009 to bring together the leaders of prominent nonprofits and agencies in housing, public health, property management, environment, energy efficiency, home ownership, and community development to develop and implement a *National Healthy Housing Action Plan* that emanated from the first-ever National Healthy Housing Summit, held in Washington, D.C. on May 7, 2009. It is guided by a 17-member Steering Committee that is chaired by the National Center for Healthy Housing. The members of the Coalition noted at the end of this document respectfully submit these comments.

We commend FHA for initiating the proposed loan program. Ascertaining and delivering the best financing tools possible to assure housing energy efficiency will contribute tangibly to occupant health and housing affordability. Building on favorable conditions in communities with the programmatic infrastructure and lender eligibility will ensure a solid foundation for the pilot. By strengthening capacity in communities excluded from the targeted geographies, FHA can help broaden the ultimate reach of PowerSaver loans after the Pilot. Offering incentives to lenders to venture into this new market is an important strategy for expanding energy efficient living and energy cost savings. We have two specific comments directed at strengthening the health-protectiveness of the plan.

II. F. 1. a. Single family property improvement loans. We urge the inclusion of single family attached properties and multifamily properties. Without them, the findings will be skewed toward low-density communities and in some cases higher-incomes/higher property values. Making funds available for lower-value owner occupied properties and extending favorable financing to affordable unsubsidized multifamily rental property are important policy objective. While these can be accomplished through the ultimate program, including single family attached properties and multifamily properties in the pilot will aid early understanding of these underserved borrowers. Contrary to the preamble, we believe that the variables involved in including attached properties are not significant to merit their exclusion.

II. F. 4. b. Eligible use of loan proceeds. We urge careful consideration of the plan to limit the measures to those that "improve home energy performance or directly make such measures possible." We believe that a "do no harm" approach should be taken, where the loan would cover the cost of ameliorating ill health effects of tightening the building. For example, improving ventilation will add back fresh air cut off by highly effective insulation and building air sealing interventions. Further, we believe that this pilot should allow proceeds to be used for window replacement, which will have the corollary benefit of preventing lead poisoning in pre-1978 homes.

We are available to provide additional information; please contact Jane Malone at jmalone@nchh.org or 202-580-7203 if we can be of assistance. Thank you for advancing this effort and considering this input.

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National Center for Healthy Housing
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