



September 8, 2026

Secretary Scott Turner
U.S. Department of Housing and Urban Development
451 7th Street, S.W., Washington, DC 20410

Submitted electronically via regulations.gov

Re: Rescission of Floodplain Management and Protection of Wetlands; Minimum Property Standards for Flood Hazard Exposure; Building to the Federal Flood Risk Management Standard (Docket No. FR-6527-P-01)

Contacts:

Michael Donovan – michaeldonovan@aia.org

Ben Evans – bevans@usgbc.org

Dear Secretary Turner,

On behalf of the U.S. Green Building Council (USGBC) and the American Institute of Architects (AIA), we strongly oppose the proposed rescission of HUD’s Federal Flood Risk Management Standard (FFRMS) rule. If enacted, this proposal will put people and communities at risk and result in increased costs, especially as floods continue to increase in frequency and intensity across the country, including in communities once considered safe from flooding.

Floods are the most common natural disaster in the U.S. with a total estimated cost of over \$180 billion each year.¹ Mitigating flood risk not only saves lives and livelihoods, but it is also cost-effective—saving more in avoided future losses than the cost of mitigation measures. For example, a recent study from the National Institute of Building Sciences (NIBS) finds that building above-code in riverine floodplains would save \$4.2 billion in avoided future losses,

¹ <https://www.jec.senate.gov/public/index.cfm/democrats/2024/6/flooding-costs-the-u-s-between-179-8-and-496-0-billion-each-year>

or \$5 in savings per \$1 invested.² Meanwhile retrofitting existing buildings for flood mitigation would save \$6 per \$1 invested.

Based on HUD's own estimates in this proposed rule, 9.31% of the existing Public Housing portfolio and 7.1% of the existing Multifamily-assisted and -insured portfolios are in the FFRMS floodplain. Maintaining the FFRMS rule would ensure that essential flood mitigation and resilience are incorporated when those properties are rehabilitated, in addition to requiring those measures for new construction projects as well. These basic protections are essential to safeguarding the supply of affordable housing in this country.

We are particularly concerned that the proposed ruling would terminate HUD's use of sea level rise data, which ultimately increases the vulnerability of federally subsidized housing. The National Oceanic and Atmospheric Administration (NOAA) estimates sea level rise along the U.S. coasts is accelerating and is likely to rise as much over the next 30 years as it has over the last 100 years (i.e., about 1.3 feet by 2050 in the "Intermediate" scenario).³ Under the "high" scenario, sea level rise is projected to average as high as 1.7 feet around the coastline and could reach as high as 2.2 feet in some places.

The proposed rule prioritizes reductions in first cost without adequately considering lifecycle costs, displacement, and the long-term value of federally supported assets – shifting potentially staggering costs to our children and grandchildren. The proposed ruling acknowledges that "...the agency has not conducted a revised cost analysis for the purposes of this proposed rule." This implies that HUD's analysis does not account for additional losses associated with future sea-level rise or increased riverine and inland flooding. It would be appropriate for HUD to account for costs that would be borne by owners, residents, insurers, taxpayers, and federal disaster programs. As is, it is unclear if the reductions in construction costs proposed by HUD would be outweighed by rising risk of flood damage, increased insurance premiums, along with other costs.

The proposed rule would also put Federal Housing Administration (FHA) insured mortgages at risk. In a report on "Flood Damage and Federally Backed Mortgages in a Changing Climate" the Congressional Budget Office estimated that expected annual damage from flooding to homes with FHA-backed mortgages could increase by 32-50% by 2050. Further, CBO found that "almost half of expected damage to homes with federally backed mortgages is located in areas where homeowners are not required to carry flood insurance."⁴

² https://nibs.org/wp-content/uploads/2025/04/ms_v4_overview.pdf

³ <https://oceanservice.noaa.gov/hazards/sealevelrise/noaa-nostechrpt01-global-regional-SLR-scenarios-US.pdf>

⁴ <https://www.cbo.gov/publication/59753>

We believe that robust standards of flood resilience should be used by the federal government and that such standards ultimately reduce the impact of the projected increases in future flooding. This is particularly true for vulnerable and disadvantaged households who lack the resources to protect themselves.

The American Institute of Architects and the U.S. Green Building Council urge HUD to retain the 2024 FFRMS standards. Ultimately, the FFRMS provides a critical framework for identifying and mitigating current and future flood risks for HUD-assisted and -insured properties. Rescinding it would leave low- and moderate-income residents more vulnerable to flooding and increase costs and financial risks for those individuals, communities and the federal government.

As flooding grows in frequency and complexity, we stand ready to support HUD to fulfill its mission to foster strong communities and support access to quality, affordable housing. Given the importance of flood modeling to our members, we are also willing to support HUD in its training and outreach to the architecture and green building communities who stand to benefit from HUD's guidance. Thank you for the opportunity to submit comments on this important topic. Please do not hesitate to contact us if you have any questions or need additional information.

Who We Are

The American Institute of Architects (AIA) represents over 100,000 architects and design professionals. For nearly 170 years, AIA has been committed to safeguarding the public's health, safety, and welfare, and to the improvement of our nation's quality of life through the built environment.

The U.S. Green Building Council (USGBC) is a nonprofit organization dedicated to transforming the way buildings and communities are designed, built and operated. We help the private and public sectors build better buildings that are more sustainable, affordable, durable, and resilient. For over 30 years, we have pursued this vision through our flagship program Leadership in Energy & Environmental Design (LEED), a third-party certification that verifies and celebrates the achievement of best practices in building design, construction, operations and maintenance.