

September 8, 2026

Regulations Division, Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-0500

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

The Council of State Community Development Agencies (COSCD A) appreciates the opportunity to comment on HUD's proposed rescission of recent Federal Flood Risk Management Standard (FFRMS) rules. COSCD A is a national association comprised of state agencies that administer HUD's grant programs related to community development, housing, disaster recovery, and homelessness. State agencies oversee federal grant compliance, including environmental review and floodplain requirements.

HUD's proposed rule would rescind most of the 2024 final rule: "Floodplain Management and Protection of Wetlands; Minimum Property Standards for Flood Hazard Exposure; Building to the Federal Flood Risk Management Standard." COSCD A supports HUD's proposal to rescind the 2024 final rule. In general, our members find that compliance with the final rule's FFRMS standards has been too challenging. State agencies have also not received enough guidance or support to fully implement the final rule's provisions. COSCD A agrees that a return to FFRMS requirements prior to the 2024 final rule would simplify compliance and support development while still maintaining floodplain protection.

COSCD A thanks HUD for retaining parts of the 2024 final rule and clarifying certain regulations. Part of the 2024 rule allowed for much-needed flexibility and alignment across various agencies. HUD's approach in this proposed rule is even-handed by both rescinding part of the regulation that has not been successfully implemented and maintaining updates that will improve floodplain management. For example, the proposed rule maintains a revision to §55.20(b)(1) that "allows public notices to be posted on an appropriate government website as an alternative to publication in local news media." This provision of the 2024 rule modernizes public notice requirements in response to modern realities, as more people gather information online in 2026 than through print media outlets.

COSCD A appreciates HUD's efforts to streamline compliance requirements in a common-sense manner. We support this proposed rule and look forward to a continued partnership with HUD. Our staff is available for further communication.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tess Hembree', with a stylized, cursive script.

Tess Hembree
Executive Director
Council of State Community Development Agencies (COSFDA)