



OFFICE OF HOUSING

ADMINISTRATIVE MEMORANDUM
OFFICE OF MULTIFAMILY HOUSING PRODUCTION

MEMORANDUM FOR: All Multifamily Mortgagees
All Third-Party Project Design and Needs Assessment
Providers
All Multifamily Regional and Satellite Office Directors &
Production Staff

FROM: Willie Fobbs III, Director, Office of Multifamily Production

SUBJECT: Guidance on Considering Environmental Assessment Factors
for Multifamily Projects

A. PURPOSE & BACKGROUND

This memo establishes an updated implementation plan for the transition from the previous floodplain regulations to the new Federal Flood Risk Management Standard final rule.

B. UPDATED COMPLIANCE GUIDANCE

In a memorandum issued June 20, 2024, HUD FHA provided implementation guidance in response to the HUD published [final rule](#) to implement the Federal Flood Risk Management Standard (FFRMS) on April 23, 2024. The final rule updates [24 CFR Part 55](#) to redefine the floodplain of concern, increase the required elevation for new construction and substantial improvement activities, strengthen public notice requirements, clarify flood insurance requirements, and incorporate limited flexibilities in allowing HUD assistance in floodways for existing HUD-projects when certain criteria are met.

The rule went into effect on May 23, 2024 and the compliance date is June 24, 2024 for most HUD programs. However, HUD Housing programs have an optional extended compliance date through January 1, 2025 where applicants may choose which rule to follow. The January 1, 2025, extended compliance deadline for Housing programs in the FFRMS final rule is tied to a completed floodplain management review, not to an application date.

C. IMPLEMENTATION

As a result of industry feedback and potential implementation challenges to new projects, HUD FHA has decided to extend the previous application threshold by 30 days, to October 1, 2024. Although this date is extended by 30 days, HUD remains confident that it can complete applications and pre-applications under the previous floodplain regulation for new construction or substantial rehabilitation projects currently in process that are in the FFRMS floodplain when the applicant provides sufficient information for HUD to complete the full environmental review in the HUD Environmental Review Online System (HEROS) or conduct a floodplain 8-step. As a reminder, the threshold application date is for new pre-applications and new straight to firm applications to continue to follow the previous floodplain regulation.

Except for the changes provided in this memorandum, no other changes are proposed. For any questions concerning this memorandum, please contact Willie Fobbs, Director, Office of MF Housing Production at willie.fobbs@hud.gov or Sara Jensen, Housing Program Environmental Clearance Officer at sara.jensen@hud.gov.