



June 16, 2026

Regulations Division
Office of General Counsel
U.S. Department of Housing and Urban Development
2415 Eisenhower Avenue
Alexandria, VA 22314

Re: Docket No. FR-6598-I-01, Removal of Environmental Clearance Officer Review and Comment for Assessments for Projects Over 200 Lots/Dwelling Units or Beds

To Whom It May Concern,

The undersigned national associations represent for-profit and non-profit owners, operators, developers, lenders, property managers and housing cooperatives involved in the provision of rental housing, both affordable and conventional. We write to applaud the U.S. Department of Housing and Urban Development (HUD) for issuing the interim final rule removing the requirement that Environmental Assessments for projects over 200 dwelling units/beds be reviewed by a Field Environmental Clearance Officer (FECO) or Program Environmental Clearance Officer (PECO).

This rule is an important step toward streamlining the environmental review process as it removes a duplicative layer of internal procedures that are not required by statute or underlying environmental law. For large new construction and substantial rehabilitation projects utilizing FHA financing, processing delays caused by onerous regulations can create significant challenges for loan closings, project financing, construction timelines, and the overall delivery of affordable housing. By eliminating this additional review step while still maintaining compliance with existing National Environmental Policy Act (NEPA) and related environmental requirements, HUD is making meaningful progress toward reducing barriers that can unnecessarily slow the development and preservation of critically needed housing.

We appreciate HUD for its continued commitment to improving administrative efficiency and removing duplicative regulations that can delay housing production. We look forward to continuing our partnership on solutions that expand the nation's rental housing supply.

Sincerely,

Institute of Real Estate Management
Manufactured Housing Institute
Mortgage Bankers Association
National Apartment Association

National Association of Home Builders
National Leased Housing Association
National Multifamily Housing Council