



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-8000

ASSISTANT SECRETARY FOR HOUSING-  
FEDERAL HOUSING COMMISSIONER

**DATE:** May 4, 2026

**MORTGAGEE LETTER: 2026-04**

**TO: All FHA-Approved Multifamily Mortgagees**

**SUBJECT: Updates to Multiple Environmental Requirements for the Multifamily Accelerated Processing Guide (“MAP Guide”)**

**I. Purpose**

This Mortgagee Letter (ML) updates a selection of environmental requirements in the 2020 MAP Guide. They are as follows:

- a. Railroad Vibration
- b. Pressurized Pipelines
- c. Fall Hazards and High Voltage Power Lines
- d. Defining Noise Sensitive Outdoor Use

**II. Background**

On March 24, 2021, HUD published the [2020 MAP Guide](#) which included changes to environmental policies not covered in regulation or statute. HUD is revisiting some of those updated environmental requirements as part of the January 20, 2025, Presidential Action “[Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis](#)” which asks agencies to pursue actions to lower the cost of housing and expand housing supply. HUD’s actions include removing the requirement to assess noise vibration from railroad tracks as part of MAP Guide Chapter 9, providing clarity on what does and does not constitute a noise sensitive outdoor use, reverting to the 2011 MAP Guide policy on pressurized pipelines and high voltage power lines, and updating requirements for fall hazards.

**III. Specific MAP Guide Modifications**

**a. Railroad Vibration**

1. The 2020 MAP Guide incorporated language on railroad vibrations from Office of Residential Care Facilities Handbook 4232.1 to a new Section 9.6.8.K so the two FHA programs would be aligned. The underlying basis is language in the [HUD Noise Guidebook](#) that states: “Buildings closer than 100 feet to a railroad track are often subject to excessive vibration transmitted through the ground. Construction at such sites is discouraged.” The language is targeted to new construction and is not in HUD’s noise regulation at 24 CFR Part 51.

HUD has determined that considering risks from railroad vibration are underwriting concerns and do not belong as separate requirements in Chapter 9.

HUD has also removed the language related to railyards from this section of the MAP Guide. Railyards must still be considered as sources of loud impulsive sounds as per 24 CFR 51.103(b). HUD will post separate guidance that includes a shorter screening distance and more precise measurements.

2. This mortgagee letter removes 9.6.8.K. “Regarding Railroad Vibration, Noise, and Location” from the MAP Guide.

#### **b. Pressurized Pipelines**

1. HUD updated the language regarding pressurized pipelines in the 2016 MAP Guide following a 2012 ICF International report “Research to Support U.S. Department of Housing and Urban Development Regulation 24 CFR Part 51 Subpart C, Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature.” The 2016 MAP Guide language was confusing and difficult to implement, so HUD provided more detailed guidance in the 2020 MAP Guide.

HUD notes that the regulation at 24 CFR Part 51, Subpart C does not define “pipelines for the transmission of hazardous substances, if such pipelines are located underground, or comply with applicable Federal, State and local safety standards” as hazards; and that HUD did not redefine them as hazards in the regulation following the ICF report. These pipelines are already regulated by the Pipeline and Hazardous Materials Safety Administration (PHMSA). HUD has therefore decided to revert back to the 2011 MAP Guide language on pipelines with clarification from the 2020 MAP Guide.

2. This Mortgagee Letter replaces Section 9.6.19.B. of the 2020 MAP Guide with the following:

All parts of any residential structures, including those structures occupied by residents or property staff for regular duration during the day, such as management offices or club houses, must be at least 10 feet from the outer boundary of the easement of a pipeline transferring flammable or combustible

liquids and gases that exceed 200 psi operating pressure (pressurized pipelines). This does not apply to distribution lines supplying only the mortgaged property/facility itself. In limited cases, at HUD's sole discretion, HUD may consider headquarters level waivers of the 10-foot buffer requirement based on appropriate justification and documentation.

**c. High Voltage Power Lines and Fall Hazards**

1. HUD updated the language regarding high voltage power lines and fall hazards at Section 9.6.19.C of the 2020 MAP Guide to provide additional clarity and guidance, and to allow a pathway for existing facilities to proceed with FHA mortgage insurance even if the Multifamily facilities are near a fall hazard.

HUD reviewed this requirement and determined that replacing engineered fall distance with a distance of 50% of the height of the free-standing support structure would provide equivalent protection with no need for an engineering report. For projects closer than 50% of the height of the free-standing support structure, HUD is replacing an undefined engineering report with a reference to the established standard ASCE-7 "Minimum Design Loads and Associated Criteria for Buildings and Other Structures" for clarity. HUD is also limiting the requirements to residential structures, including those structures occupied by residents or property staff for regular duration during the day, such as management offices or club houses.

2. This Mortgagee Letter replaces the language at Section 9.6.19.C of the 2020 MAP Guide with the following:

No residential structure, including those structures occupied by residents or property staff for regular duration during the day, such as management offices or club houses, or playground, may be located within the easement of any overhead high voltage transmission line. Additionally, all residential structures must be located at a distance that is at least 50% of the height of any support structure for high voltage transmission lines, free-standing radio/TV/cell towers and other like free-standing structures. Exclusions from this definition include items affixed to the multifamily structure (such as a radio/TV antenna, satellite dishes, cellphone towers, and similar features). This does not apply to local service electric lines and poles.

For proposed or existing residential structures located at a distance less than 50% of the height of the support structure, the Lender must submit a report from a licensed professional engineer that the support structure has been designed to withstand wind, ice, and seismic loads in accordance with ASCE-7 "Minimum Design Loads and Associated Criteria for Buildings and Other Structures" or TIA ANSI/TIA-222-I "Structural Standard for Antenna Supporting Structures, Antennas and Small Wind Turbine Support Structures," is structurally sound, and has been properly maintained.

**d. Outdoor Noise Sensitive Uses**

1. This Mortgagee Letter proposes to add guidance on a topic not currently covered in MAP Guide Section 9.6.8: Outdoor Noise Sensitive Uses.

Section 9.6.8 of the MAP Guide provides guidance to implement HUD’s noise regulations at 24 CFR Part 51, Subpart B. Since the 2020 MAP Guide updates, HUD hired the U.S. Department of Transportation Volpe Center to review the regulation and propose updates to HUD’s Noise Guidebook. Significant change to HUD’s noise approach can only come from regulatory updates. However, HUD will implement sub-regulatory updates and clarifications via Mortgagee Letters and MAP Guide updates. This ML changes HUD’s approach to railyards (See Section III.a.) and adds guidance on what HUD considers to be noise sensitive outdoor use.

Outdoor uses that are not noise sensitive do not require noise assessment or mitigation.

2. This Mortgagee Letter amends Section 9.6.8 of the 2020 MAP Guide by adding a new Section L:

Section L. HUD’s noise regulation at 24 CFR Part 51, Subpart B has an exterior noise acceptability level of 65 decibels and an interior noise goal of 45 decibels. The following table provides a guide to determining whether an outdoor ancillary use is noise-sensitive and therefore subject to this exterior noise acceptability level.

Ancillary use area description	Is the area noise sensitive?	Justification
Swimming pool Playground	Yes	Potential safety issues if verbal warnings are not intelligible
Dog run or dog wash Car wash Trails Undefined/Open areas	No	Speech communication not required AND average duration of activity <14 hours/week
Private gathering space associated with individual dwelling unit (balconies, patios, porches, decks, and terraces constructed integrally to a building)	No, however, must comply with Balcony Exemption Policy	See Balcony Exemption Policy at Section 9.6.8.I
Shared or common gathering outdoor space Other types of outdoor space, performance venue, sport or play area with specific use	Case-specific	Yes, if speech communication required for safety or is an integral part of use  No, if speech communication not required AND average duration of activity <14 hours/week

For the ‘case-specific’ category, HUD does not consider hot tubs to be a noise sensitive use. Sports courts for basketball, tennis, pickleball, bocce and similar activities where individual residents are not expected to spend more than 14 hours a week do not meet the threshold of a noise-sensitive use. Rooftop and other gathering spaces with grills and similar optional amenities are not noise-sensitive uses.

#### **IV. Implementation**

Changes will be implemented immediately for any application that has not reached initial endorsement. This Mortgagee Letter is effective immediately and remains effective until amended, superseded, or rescinded. The MAP Guide will be revised to incorporate the changes specified in this Mortgagee Letter. Additionally, related MAP Guide cross references will be revised for consistency with the revisions. For questions about this Mortgagee Letter, please contact Margaret Lawrence, Deputy Director, Office of Multifamily Production at [margaret.a.lawrence@hud.gov](mailto:margaret.a.lawrence@hud.gov).

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Frank Cassidy, Principal Deputy Assistant Secretary for Housing