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Subject: Request for public clarification and renunciation of federal partnerships that lend authority to First Street (First Street Foundation / First Street Technology) property-level “Flood Factor” data

Dear Agency Leaders,

I write to urge your agencies to (1) publicly renounce or suspend any partnership language and implied endorsements that lend federal imprimatur to First Street Foundation and its affiliated public-benefit corporation, First Street Technology, and (2) clearly state that First Street/Risk Factor outputs must **not** be used in lieu of FEMA flood maps for regulatory, insurance, lending, disclosure, or listing purposes. This request reflects the issues summarized in the attached background memorandum provided to me, as well as reported errors in property-level Flood Factor scores and the way First Street markets federal “partnership” status to third-party real-estate platforms.

Why this matters now

Your agencies’ names and logos—through formal agreements, data integrations, or research use—are cited by First Street as evidence of federal alignment with its property-level climate risk scores. For example, [EPA’s EJScreen v2.3 technical documentation](#) states that “First Street is partnering with EPA to provide climate risk data to EJScreen.” NASA likewise announced a [collaboration with First Street](#) and executed a [Space Act Agreement](#). FHFA’s [Data Analytics Platform Privacy Impact Assessment](#) lists a First Street Foundation dataset, and the CFPB’s

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January 2025 report on flood risk uses both FEMA and First Street data (see [report page](#) and [PDF](#)).

First Street's own press materials market this federal connection, including a December 23, 2022, release claiming its models were "helping to inform over 30 federal agencies and government-sponsored enterprises." See ["Partnerships and Impact Expand Greatly Throughout 2022."](#)

How the federal halo is being leveraged on public listing sites

Major listing platforms have embedded First Street's scores directly into listings. Zillow's investor newsroom announced: ["Zillow introduces First Street's comprehensive climate risk data on for-sale listings across the US"](#). Realtor.com hosts explanatory pages like ["Flood Risk Information"](#) that present Flood Factor as a 1–10 property-level score. Even USGS has noted that homebuyers can now see these First Street risk scores on Realtor.com and Zillow; see [USGS \(EROS\) write-up \(Mar. 6, 2025\)](#).

Reported inaccuracies and resulting consumer harm

Recent reporting and public complaints indicate that First Street's property-level scores can be materially wrong and difficult to remedy. For example:

- WLOS News 13 (Asheville, NC, July 8, 2025) documented homeowners whose listings showed "10/10 Extreme" Flood Factor scores despite no flood history; First Street later acknowledged a modeling limitation and suppressed one property's score. See [News 13 investigation](#) and the [updated post](#).
- The Boston Globe reported sellers disputing "10/10 Extreme" labels that "didn't ring true," following Zillow's integration of climate scores; see [Globe coverage \(Oct. 17, 2024\)](#).
- The Better Business Bureau's complaint page for First Street Technology includes consumer reports of misaligned flood maps (e.g., a ditch drawn through a house) and limited recourse; see [BBB complaints page](#).
- First Street's own dispute policy states: "As a rule, we do not update Factor scores based on individual requests or disputes." See ["Disputing Property Scores."](#)

FEMA is the legal standard; non-regulatory products should not substitute

FEMA's own guidance is explicit that flood risk products beyond the regulatory Flood Insurance Rate Maps (FIRMs) are non-regulatory and [“not intended to be used as the basis for official actions required under the NFIP.”](#) FEMA's [Risk MAP product descriptions](#) similarly clarify their non-regulatory role. These standards should be reinforced when consumer-facing sites present non-regulatory scores next to listings.

Requested actions

- 1) **Publicly renounce or suspend partnership branding/claims:** Each agency should issue a statement clarifying that any collaboration with First Street—whether EJScreen data ingest (EPA), research collaboration (NASA), internal analytics (FHFA), or comparative analysis (CFPB)—does not constitute endorsement of property-level scores for listing, regulatory, or underwriting purposes. Request that First Street cease citing your agency as a “partner” in marketing aimed at real-estate platforms or consumers. See the EPA, NASA, FHFA, and CFPB materials cited above.
- 2) **Affirm FEMA's primacy and bar substitution:** Jointly with FEMA, state unequivocally that FEMA maps and NFIP standards control for regulatory and insurance determinations; non-regulatory models (including First Street) must not be used in lieu of FEMA products for any official purpose or to imply mandatory insurance or code requirements in listing interfaces.
- 3) **Direct corrective messaging to real-estate platforms:** Ask Zillow, Realtor.com, Redfin and others to (a) display FEMA flood zone information at equal or greater prominence than third-party scores; (b) add clear, plain-English explanations that First Street scores are non-regulatory estimates that may differ from FEMA; and (c) provide a visible, time-bound error-resolution channel when owners supply credible documentation (e.g., LOMAs, elevation certificates). See Zillow's announcement and Realtor.com's flood risk page.
- 4) **Institute validation, transparency, and recourse requirements:** If your agencies continue any data access or research usage, condition it on: publication of model error rates and limitations at the property scale; independent methods review; and a dispute process that can update public-facing scores when verifiable site-specific information shows the label is likely wrong.



- 5) **Audit where federal branding appears:** Conduct an interagency review of how federal collaborations are referenced in First Street press, websites, sales decks, and on third-party sites (e.g., listing portals), and require removal or re-phrasing where the language risks implying endorsement.

Thank you for your prompt attention to this matter.

Respectfully,

Will Hild

Will Hild
Executive Director

CC:

David Richardson, Acting Administrator, Federal Emergency Management Agency

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