



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY

July 2, 2025

The Honorable David Richardson
Senior Official Performing the Duties of FEMA Administrator
Federal Emergency Management Agency
500 C Street, S.W.
Washington DC 20472

Dear Administrator Richardson:

On behalf of the Commonwealth of Pennsylvania, I write to express our concerns regarding the proposed changes and cuts to the Federal Emergency Management Agency's (FEMA) disaster assistance policies, as outlined in the April 2025 memo to the White House Office of Management and Budget. The Commonwealth is a committed partner in the stewardship of taxpayer dollars and efficient disaster management. However, the proposed changes will not further those important goals. Instead, these proposed changes will severely hinder Pennsylvania's capacity to adequately respond to and recover from future disasters, particularly impacting local communities.

Under current FEMA policy, Pennsylvania must validate approximately **\$24.5 million** in damage to public infrastructure to qualify for a Presidential Major Disaster Declaration for Public Assistance. The proposed policy would raise this threshold **fourfold to nearly \$100 million**. Retrospective analysis indicates that under this new threshold, the Commonwealth would have received **zero federal disaster declarations since Tropical Storm Lee in 2011**, even though the Commonwealth has faced significant disasters in the 14 years since, including: flooding from Tropical Storm Debby (2024), Hurricane Ida (2021), Hurricane Sandy (2012), and countless severe winter storms. Sadly, according to NOAA, 109 people were killed in Pennsylvania by weather-related hazards between 2012-2024, many of which occurred during federally declared disasters. This change alone would have denied Pennsylvania access to **\$467 million** in critical public assistance recovery funding from seven major disasters over the past 14 years.

Furthermore, FEMA's longstanding approach to disaster recovery cost-sharing has provided a non-federal share ranging from 10 to 25 percent, depending on disaster severity. The proposed change to a minimum 50 percent non-federal match would substantially increase the financial burden on the Commonwealth and our 2,560 municipal partners, who are already struggling with limited resources. This change would create long-term recovery challenges for communities across Pennsylvania, impacting their resilience for generations.

Since 2004, the Commonwealth has received \$147.9 million in hazard mitigation grant funding as part of 17 federally declared disasters. The proposal to make hazard mitigation funding optional rather than automatic following disaster declarations risks eliminating one of the most cost-effective tools available to reduce future disaster impacts. Our Commonwealth has many properties susceptible to hazards, including flooding. Continued access to hazard mitigation funds is essential to reduce future impacts of such disasters all over the Commonwealth, which ultimately reduces future reliance on both state and federal recovery funding from disasters. Additionally, the Commonwealth is one of the few states that has developed an Enhanced Hazard Mitigation Plan, which shows our steadfast commitment toward reducing both the impact and costs of future disasters.

Additionally, snowstorms, although less frequent than other hazards, pose a significant threat to public safety and infrastructure in Pennsylvania. The proposal to eliminate eligibility for federal disaster declarations for snowstorms disregards regional hazards unique to northern states like Pennsylvania. Over the past 20 years, two snowstorm-related disaster declarations provided more than \$87 million in federal support, critical aid, particularly for our municipal governments.

The Commonwealth remains fully committed to supporting our municipalities before, during, and after all disasters. We are diligently working to provide state-run and state-funded programs. In 2023, Pennsylvania launched the Disaster Recovery Assistance Program (DRAP) to support survivors in cases where federal aid is unavailable. However, without a dedicated public assistance fund at the state level, the burden of infrastructure recovery largely falls on local governments. The proposed policy changes would force DRAP to fill financial gaps it is neither designed nor funded to address.

Additionally, Pennsylvania has always been a strong partner with FEMA in the past on leading disaster response and recovery operations for federally declared disasters within the Commonwealth. However, it will require additional time, training, and the appropriate policies and procedures to develop and deploy the surge workforce needed at the state level to fulfill roles that have customarily been filled by FEMA in the past for larger disasters. Any delays in providing much needed Individual Assistance to those most impacted by a disaster will only exacerbate their suffering and extend the time for their personal or family recovery.

We strongly urge FEMA to reconsider these proposed policy changes and instead engage in collaborative dialogue with state emergency management leaders to achieve our shared goals of resilience, fiscal responsibility, and public safety. The Commonwealth would welcome more flexibility for state and local emergency management, but we strongly oppose any cuts to funding that would hurt our communities and deny Pennsylvanians help when they need it the most. To support our position, we have included an appendix with data tables outlining the financial impacts of the proposed policy changes on past disasters.

Thank you for your willingness to engage on this critical issue. We welcome the opportunity to discuss these concerns further and contribute to constructive policy reform that reflects our shared responsibilities of disaster response and recovery across all levels of government.

Sincerely,

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

David R. Padfield
Director, PA Emergency Management Agency

Enclosures

Appendix A –Retrospective Analysis of Financial Impacts of Proposed FEMA Policy Changes on Pennsylvania

Table 1: Disasters and Events Since Last Federal Major Disaster Declaration That Resulted in at Least \$99 million in Public Infrastructure Damage (2011)

Disaster/ Event	Actual or Estimated Public Assistance Damages
Tropical Storm Debby - Aug 2024 (DR-4815)	\$26,933,190
*NE Flooding - Sept 2023	\$12,953,212
*Bucks/Northampton Flood - July 2023	\$7,268,317
*Berks Flooding - July 2023	\$4,672,941
Hurricane Ida - Aug/Sept 2021 (DR-4618)	\$89,597,974
*Tropical Storm Isaias - Aug 2020	\$27,218,975
Severe Storms - Aug 2018 (DR-4408)	\$77,034,112
Severe Storms - Oct 2016 (DR-4292)	\$24,535,103
Winter Storm - Jan 2016 (DR-4267)	\$43,769,072
Severe Storms - June 2013 (DR-4149)	\$11,695,102
Hurricane Sandy - Oct 2012 (DR-4099)	\$12,384,188
Total Potential Financial Impact to the Commonwealth Based on Retrospective Analysis of FEMA Proposed Per Capita Threshold Increase to \$99 million	\$338,062,186

*Denotes events where a request for federal disaster aid was denied or not requested.

Table 2: Increased Non-Federal Match Requirements – Impact Example

Disaster	25% Match for Both PA & IA (Current)	50% Match for Both PA & IA (Proposed)
Tropical Storm Debby (DR-4815)	\$7,349,455*	\$14,698,910*
Hurricane Ida (DR-4618)	\$29,584,976	\$59,168,951
Total	\$36,934,431	\$73,867,861

*Estimated based on current public assistance applications and anticipated project costs

Table 3: Loss of Eligibility for Snowstorm Declarations

Snowstorm Disaster	Federal PA Received	Hazard Mitigation Received	Total Funding at Risk
Winter Storm (DR-1898)	\$43,570,610	\$6,507,659	\$50,078,269
Winter Storm (DR-4267)	\$43,769,072	\$8,270,519	\$52,039,591
Total	\$87,339,682	\$14,778,178	\$102,117,860

Table 4: Hazard Mitigation Funding at Risk if Not Automatically Authorized

Disaster	Hazard Mitigation Funding Received
Tropical Storm Debby - Aug 2024 (DR-4815)	\$7,000,000
Hurricane Ida - Aug/Sept 2021 (DR-4618)	\$27,080,014
Severe Storms - Aug 2018 (DR-4408)	\$8,374,722
Severe Storms - Oct 2016 (DR-4292)	\$3,839,534
Winter Storm - Jan 2016 (DR-4267)	\$8,270,519
Severe Storms - June 2013 (DR-4149)	\$2,351,038
Hurricane Sandy - Oct 2012 (DR-4099)	\$2,157,527
Tropical Storm Lee - Sept 2011 (DR-4030)	\$43,275,322
Hurricane Irene - Aug 2011 (DR-4025)	\$12,221,812
Severe Storms - Apr 2011 (DR-4003)	\$1,624,299
Winter Storms - Feb 2010 (DR-1898)	\$6,507,659
Severe Storms - Nov 2006 (DR-1684)	\$1,619,550
Severe Storms - June 2006 (DR-1649)	\$7,328,405
Severe Storms - Apr 2005 (DR-1587)	\$2,125,559
Tropical Depression Ivan - Sep 2004 (DR-1557)	\$12,949,819
Tropical Depression Frances - Sep 2004 (DR-1555)	\$203,805
Severe Storms July 2004 (DR-1538)	\$997,481
Total	\$147,927,065

*Estimated based on current public assistance applications and anticipated project costs

Table 5: DRAP Financial Impact Without Federal Aid (Since 2004)

Disasters with <1,500 Registrants for IA	Registrants	Estimated DRAP Financial Impact if Solely DRAP Funded
Tropical Storm Debby	815	\$6,120,000
Severe Storms (2005)	1,496	\$11,220,000
TD Frances (2004)	953	\$7,147,500
Total		\$24,487,500

*Assumes 75% of maximum benefit per eligible household/applicant in DRAP.