

June 8, 2026

Michael Miron, Committee Management Officer  
Office of Partnership and Engagement  
Mailstop 0385,  
Department of Homeland Security  
2707 Martin Luther King Jr. Ave. SE, Washington, DC 20032

**Re: Public Comments on the FEMA Review Council Final Report**

Dear Mr. Miron:

I write as Comptroller of Maryland to express serious concerns with the FEMA Review Council Report issued May 8, 2026, and its recommendations for overhauling the federal government's approach to disaster preparedness, response, and recovery. These recommendations, if implemented, would shift significant financial burdens onto states and leave our communities less safe and less resilient in the face of intensifying climate threats.

Maryland is not a hypothetical case study. According to the National Oceanic and Atmospheric Administration (NOAA), our state experienced 85 confirmed weather or climate disaster events between 1980 and 2024, each causing losses exceeding \$1 billion.<sup>1</sup> Hurricane Irene caused \$16 million in damage. Hurricane Sandy caused \$42 million. The NOAA-classified 1,000-year floods that struck Ellicott City in 2016 and 2018 caused \$61 million in combined damage and losses. These are not abstractions - they are communities that had to be rebuilt, families that lost everything, and costs that fell on Maryland taxpayers.

The pattern has continued. When Western Maryland was devastated by flash flooding in May 2025, FEMA estimated recovery costs at more than \$15.8 million, while total estimates are closer to \$33 million. Yet FEMA denied the state's request for disaster recovery assistance. That decision left Marylanders without the federal support they needed and had every right to expect.

As extreme weather events grow more frequent and more severe, the federal government's role should be expanding, not retreating. Maryland is a coastal state with over 3,000 miles of shoreline and faces compounding, measurable climate risks:

- Roughly 133,700 Maryland properties faced substantial flood risk as of 2020.<sup>2</sup>
- Approximately 15,000 lane miles of state-maintained roads are affected by flooding.<sup>3</sup>

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<sup>1</sup> National Centers for Environmental Information. [U.S. Billion-Dollar Weather and Climate Disasters](#). (2025).

<sup>2</sup> First Street Foundation. [The First National Flood Risk Assessment: Defining America's Growing Risk](#) (2020).

<sup>3</sup> Pew. [New Study Reveals Impact of Flooding on Maryland's Transportation Infrastructure](#). Matthew Fuchs (May 2021).

- Sea levels along Maryland's coast are projected to rise between 1 and 1.5 feet by 2050, pushing coastal flooding further inland and making it more frequent.<sup>4</sup>
- In 2021 alone, the City of Crisfield on the Eastern Shore experienced 80 days of high-tide flooding.<sup>5</sup>

The FEMA Review Council report asks states to do more with less. I have specific concerns with the following:

### **Timeline**

The Council's recommended two-to-three-year timeline for the proposed reforms to FEMA is not feasible for states and tribal governments to prepare their fiscal and physical resources to lead disaster response efforts. Many states do not currently have sufficient emergency management resources, legislation to establish and support relief funding, or identified revenue streams to pay for the increased cost-share for states. States would need far more time and resources than two or three years to build new operational processes, pre-stage resources, assess state budgets, and hire additional staff to meet life-threatening needs before, during, and after disasters.

### **Funding**

Decreasing the overall federal share for disaster assistance funding leaving states to cover the rest of the cost is problematic as many states do not have the resources to cover the difference. The prioritization of 'high performing' states would favor certain states, leaving states with fewer financial resources with less support when most needed.

Maryland, like most states, relies on federal preparedness grants for a significant portion of our operating budget largely for efforts to sustain our existing capabilities and staffing. These funds are used in varying ways at the local level, with some county governments reliant on these funds for sustaining emergency management staffing, and others relying on the funds to support training, exercises, and equipment for first responders.

### **Qualification**

FEMA's proposal would make it significantly harder for states to qualify for disaster relief — and the costs would fall on those least able to bear them. Raising the per-capita damage threshold by 54% and imposing new minimum expenditure requirements before a federal declaration can be requested would mean roughly 16 fewer major disaster declarations nationally each year and \$113 million less in funding. States and localities would be left holding the bill for moderate, frequent disasters - the kind that don't make national headlines but compound over time and hollow out communities. For small, rural, and low-income areas already stretched thin, this isn't a policy adjustment: it is abandonment.

### **Public Assistance Program**

Funding set by pre-defined parameters of disaster events, like wind speed, or flood depth, rather than individual damage assessments and dropping the minimum payment from 75% of eligible activities to 50% risks limiting needed assistance for under-resourced and vulnerable communities that generally qualify for assistance under the current thresholds.

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<sup>4</sup> University of Maryland Center for Environmental Science. [Sea-Level Rise Projections](#) (2023).

<sup>5</sup> Nature Conservancy, George Mason University, University of Maryland Environmental Finance Center. [Collaborative Adaptation Planning for a Resilient Crisfield](#) (July 2024)

## **Flood Insurance**

The recommendation to shrink the National Flood Insurance Program (NFIP) by shifting some flood insurance policies to private companies is misguided. Taking this action will prohibitively increase premiums, decrease consumer protections, and lead to more uninsured and underinsured households in risk-prone areas. **The NFIP was originally created, in part, because the private sector wouldn't write flood insurance.** As climate change fuels even more unnatural disasters that put people at risk and drive insurance rates up, these recommendations make preparation and recovery even harder, as communities need support the most. We believe the NFIP would benefit from additional thoughtful exploration from experts best positioned to offer cogent solutions.

In closing, **recommendations in this report will have a negative financial impact to the state of Maryland** and our residents, businesses, and communities. The federal government has a responsibility to support states when disaster strikes, not leave them behind.

Thank you for considering these recommendations. We encourage DHS to rethink its approach, consult with state and local governments, and craft new policies that protect Americans and our economy.

My Best,



Brooke E. Lierman