



COMMONWEALTH OF PENNSYLVANIA  
OFFICE OF THE GOVERNOR

August 25, 2021

The Honorable Deanne Criswell  
Administrator  
Federal Emergency Management Agency  
500 C Street, S.W.  
Washington, D.C. 20472

Dear Administrator Criswell:

Beginning on July 12, 2021, individual primary homes and businesses in the Commonwealth of Pennsylvania's Bucks, Philadelphia and Tioga Counties sustained significant flood damage as the result of flash flooding. Based on the results of a U.S. Small Business Administration (SBA) Damage Survey, the damage in these counties met the SBA criteria of at least 25 homes and/or businesses with uninsured losses of 40 percent or more of their estimated fair market value. As a result, I requested that the SBA declare Bucks, Philadelphia and Tioga Counties a disaster area on July 27, 2021. The request was granted on July 29, 2021.

While I am grateful to the SBA for granting this declaration, I want to bring to your attention a troubling trend in our commonwealth. In Pennsylvania, the frequency and intensity of heavy precipitation events continues to increase. While these short duration, high intensity precipitation events result in significant damages and impacts to human lives, these localized incidents rarely meet the thresholds needed for federal disaster aid in the form of Individual Assistance under the provisions of section 401 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5170.

Flooding is one of the most significant and recurrent hazards in the commonwealth. In 2019 alone, over 5,200 Pennsylvania homes were damaged from flooding events; however, not one incident rose to the federal threshold level needed to apply for Individual Assistance. SBA loans offer some assistance, and my administration is working diligently to support recovery efforts, but significant gaps remain when socially vulnerable populations are unable to qualify for loans when these localized events do not meet federal damage assessment thresholds.

Additionally, while flooding risk was originally thought to be associated with living in or near a special flood hazard zone or flood plain, data collected since 1993 has shown that 96% of flooding incidents in Pennsylvania reported to the National Weather Service occurred outside of established flood plains. Despite this, many homeowners and renters do not believe flood insurance is needed, many are not required to purchase it by their lender or landlord, or, in the instance of our most socially vulnerable communities, many are unable to afford the additional expense.

With these considerations in mind, I ask that you consider lowering the federal damage assessment thresholds required for these localized events to qualify for federal aid, specifically Individual Assistance. Evaluating impacts solely on a micro level at the municipal or county level alone, rather than toward a whole state assessment, would provide a more realistic assessment of the impacts to that community. Doing so will provide much needed direct assistance to the most vulnerable who are most often ineligible for other disaster assistance.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Tom Wolf". The signature is fluid and cursive, with a long vertical stroke extending downwards from the end of the name.

TOM WOLF  
Governor