



FREDERICK COUNTY GOVERNMENT

Jessica Fitzwater
County Executive

DIVISION OF ENERGY & ENVIRONMENT

Department of Stormwater

Shannon Moore, Director
Donald Dorsey, Department Head

SB0225 - Environment - Interjurisdictional Watersheds - Flood Management

DATE: April 2, 2026
COMMITTEE: House Environment and Transportation Committee
POSITION: Oppose
FROM: Shannon Moore, Director, Division of Energy & Environment,
Frederick County Government

Thank you for your consideration of **SB0225 - Environment - Interjurisdictional Watersheds - Flood Management**. As the Director of the Division of Energy & Environment for Frederick County, which includes its Department of Stormwater, I urge the committee to give SB0225 an UNFAVORABLE report.

The requirements of this bill would be costly and duplicative of existing processes we use.

SB0225 is substantially similar to last year's SB0042, in that it designates Carroll Creek and three other water bodies, their headwaters and tributaries, as interjurisdictional flood hazard watersheds. Last year, MDE informed MLIS that passage of SB0042 would trigger a new requirement to conduct a comprehensive flood management study. Despite Senator Washington's testimony that SB0225 would not require new flood studies, we defer to the interpretation of MDE in our estimate of the impact of this bill, and include an estimated fiscal impact of \$443,594.65 within Frederick County. Frederick County Government's share of this cost is an estimated \$131,931.17. The City of Frederick's share would be approximately \$311,663.48. The City has concurred with this analysis. We estimated these costs based on PCSWMM modeling for the 500- and 1,000-year storm events in existing flood studies for Brunswick and Emmitsburg completed by our Division of Emergency Management. If MDE interprets the study requirement to include storm drainage and capacity as well as impacts to infrastructure, the estimated costs would increase by an order of magnitude based on a study our Division recently performed in the Clover Hill development.

Basis of Analysis	\$/sq mi	Carroll Creek Watershed Square Mile	Extrapolated \$ for Carroll Creek Flood Management Plan	COUNTY - Extrapolated \$ for Carroll Creek Flood Management Plan 6.9/23.2mi	CITY - Extrapolated \$ for Carroll Creek Flood Management Plan 16.3/23.2mi
PCSWMM Modeling (Emmitsburg/Brunswick)	19,120.46	23.2	443,594.65	131,931.17	311,663.48

The County performs a high-level definition of risk and project identification through its Hazard Mitigation and Climate Adaptation Plan (HMCAP), which outlines a broad modeling of pluvial and fluvial stages at the 100-year floodplain. The HMCAP identifies areas where there may be structural water intrusions, water rescues, frequent road closures, and vulnerable/underserved communities. The HMCAP process allows us to target specific areas that require further analysis. Hazard Mitigation Plans are required under Title 44,

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Chapter I, Section 201.6, of Code of Federal Regulations (44 CFR 201.6), as authorized by the Disaster Mitigation Act of 2000.

Thank you for your consideration of SB0225. On behalf of Frederick County Government, I urge an UNFAVORABLE report.

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