

August 25, 2025

President Donald J. Trump
The White House
Washington, D.C. 20500

Through: Mr. Michael Chesney, Acting Regional Administrator
Federal Emergency Management Agency, Region 5
536 South Clark Street, 6th Floor
Chicago, Illinois 60605

Dear Mr. President:

On July 22, 2025, you declared a Major Disaster for the counties of Alcona, Alpena, Antrim, Charlevoix, Cheboygan, Crawford, Emmet, Kalkaska, Mackinac, Montmorency, Oscoda, Otsego, and Presque Isle, as well as the Little Traverse Bay Bands of Odawa Indians in response to a severe winter storm that occurred between March 28 and March 30, 2025. With your declaration, you activated categories A through E and G of the Public Assistance program (FEMA-4880-DR). On July 28, 2025, Acting Associate Administrator of the Federal Emergency Management Agency (FEMA) Office of Response and Recovery Keith A. Turi informed me that our request for activation of Category F – Public Utilities of the Public Assistance (PA) program, the Hazard Mitigation Grant Program (HMGP), and the Individual Assistance (IA) program for the same incident had been denied.

In accordance with the provisions set forth in 44 Code of Federal Regulations (CFR) § 206.46, I submit this letter of appeal to urge you to reconsider your decision and activate Category F of the PA program, HMGP, and all areas of the IA program.

The State of Michigan and impacted local governments mobilized all collectively available resources and capabilities to address the impacts of this disaster. The State Emergency Operations Center was activated for 19 days and processed 259 requests for resources from local jurisdictions and state agencies that were engaged in the response to this incident. The Michigan National Guard (MING) and Department of Natural Resources (DNR) deployed several hundred personnel to provide direct state assistance for field operations in impacted communities. To address remaining shortfalls in resources and capabilities, the state response force was augmented through private contractors that provided additional on-the-ground staffing and technical assistance, and the State of Michigan also activated the Emergency Management Assistance Compact (EMAC) as a requesting state for the first time. While we regularly deploy personnel and resources to assist other states in their times of need (the State of Michigan has assisted other states 12 times in 2024 alone), this incident marked the first time that our state was required to utilize external assistance under this interstate assistance compact. As you can see, the State of Michigan exhausted all available avenues to address the needs created by this incident before requesting federal assistance.

While we are grateful for the resources that you have already committed through your declaration of a Major Disaster and activation of portions of the PA program, many recovery needs remain. Despite our unprecedented response and continuing commitment to

provide support, the requirements of this Major Disaster continue to be outside the scope of what the state and local governments, augmented by assistance from other states, non-governmental organizations, and the private sector, can shoulder. The requested federal programs are uniquely positioned to fill existing gaps and allow local jurisdictions and disaster survivors to recover from this incident. Please find considerations regarding each of the requested programs below.

1. Public Assistance – Category F

In his denial letter, Acting Associate Administrator Turi stated that “damage to infrastructure was significant in the areas designated for Public Assistance” after the Joint Preliminary Damage Assessment (PDA) with FEMA, state, and local officials verified over \$137 million in eligible damages, which is the highest ever total of PA-related damages assessed in FEMA Region V. It is noteworthy that of these damages, \$89.7 million were identified for Category F, representing over 65 percent of all assessed damages. This illustrates that of the severe infrastructure impacts acknowledged by Acting Associate Administrator Turi, public utility damage was the most significant category and logically should have resulted in the activation of Category F assistance.

As it stands, the federal PDA process often only captures a snapshot of all eligible PA cost. For example, for Major Disaster FEMA-4547-DR, declared by you for severe storms and flooding for five Michigan counties in 2020, the PDA confirmed \$20.1 million in eligible costs. However, after applications for PA assistance were processed, a total of \$31.3 million in PA grants were obligated, exceeding the established PDA cost by over 50 percent. Similarly, we expect the actual Category F cost for this incident to rise as eligible public utilities and utility cooperatives continue to document impacts and make repairs. For example, Presque Isle Electric & Gas (PIE&G), a cooperative impacted by the winter storm that serves over 35,000 members (including households, farms, and small businesses), estimates restoration cost to reach \$150 million for their infrastructure alone. Despite being a smaller utility with only 94 full-time employees, they are repairing over 2,800 utility poles, 900 transformers, and 3,800 miles of power lines, requiring over 400,000 work hours from utility workers. The worst storm recovery cost that PIE&G has experienced in the last two decades was \$1.3 million, 115 times less than the anticipated cost for this incident. Their recovery operations had to be financed through emergency loans, which, without assistance, will have to be repaid by their members through surcharges and rate increases equivalent to at least \$4,500 per household.

Similarly, Great Lakes Energy, another cooperative impacted by this incident, estimates more than \$155 million in restoration and recovery costs. While not all the additional estimated utility costs will ultimately be eligible for Category F reimbursement, they illustrate that the significant damage acknowledged by Acting Associate Administrator Turi can be expected to be even larger than assessed during the PDA. I also want to note that only public utilities and utility cooperatives are eligible for support under this PA category. They can only recover their costs directly from residents in the impacted area if additional assistance does not become available.

Further, the primary factors for determining if assistance under the PA program is warranted established under 44 CFR § 206.48(a) clearly indicate that Category F assistance

should be made available for this Major Disaster:

Estimated cost of assistance (44 CFR § 206.48(a)(1))

Per the CFR, the estimated cost of PA assistance is evaluated based on a statewide per capita impact indicator of \$1.89 for fiscal year 2025. The per capita cost for all damages assessed during the PDA reached \$13.62. For damages related to the categories of the PA program activated by you (Categories A to E and G), the per capita impact was \$4.72. However, for public utility damage under Category F only, the statewide per capita cost confirmed through the federal PDA process was \$8.90. The denial of the activation of Category F assistance fails to reflect that this category's estimated cost of assistance based on the statewide per capita cost was almost twice as high as for the categories that were approved. If the lower overall costs in the approved categories indicate significant damage that warrant federal assistance, this is all the more applicable to Category F with its substantially greater damages.

Localized impacts (44 CFR § 206.48(a)(2))

The disaster impact at the county and local government level is another factor for evaluating PA-related damage established in the CFR. A countywide per capita impact indicator of \$4.72 has been established for fiscal year 2025, which each county exceeds many times over based on the overall PDA results. Per capita costs for confirmed Category F-only damages range between \$48.46 per capita for Antrim County to \$1,269.04 per capita for Montmorency County. These are extraordinary local costs. In fact, the CFR states that in cases of damage to critical facilities or extremely high per capita impacts at the county level, federal assistance might be warranted even if the statewide per capita indicator is not exceeded (which has been many times over for this Major Disaster). Critical utility infrastructure was damaged during this incident, and the CFR refers to "localized damages in the tens or even hundreds of dollars per capita" as an example of extraordinary concentrations of damages. However, Category F-related per capita cost reaches the thousands of dollars for one county (Montmorency County), hundreds of dollars for ten counties (between \$138.57 for Alcona County and \$954.53 for Otsego County), and tens of dollars for two counties (Kalkaska County at \$71.70 in addition to Antrim County). Therefore, the decision to deny activation of Category F assistance ignored impacts that drastically exceed even the federal government's own reference points for extraordinary damages that warrant assistance.

Insurance Coverage in force (44 CFR § 206.48(a)(3))

The amount of insurance coverage in force or that should have been in force as required by law and regulation is examined, and the amount of anticipated assistance is reduced when insurance is not in place. The impacted public utilities and utility cooperatives had all levels of insurance coverage that were appropriate and required of them. The federal PDA process did not need to reduce any verified costs in response to utilities not having appropriate insurance in place, and the confirmed damage totals already exclude the cost of any insured damages.

Hazard Mitigation (44 CFR § 206.48(a)(4))

The CFR states that hazard mitigation should be recognized and encouraged, and measures that contributed to the reduction of disaster damage will be considered when determining if federal assistance is warranted. The State of Michigan and the impacted local governments are dedicated to hazard mitigation and have approved hazard mitigation plans in place. Within the impacted counties, 136 municipalities adopted and approved of these plans. Based on their plans, jurisdictions implemented mitigation measures such as the installation of generators at critical facilities that reduced the impact of this incident. Further, public utilities in the area had engaged in infrastructure hardening activities that resulted in a reduction of damage and therefore reimbursable costs. For example, Great Lakes Energy converted 174 miles of primary power line from overhead to underground over the last ten years, which prevented line damage during the ice storm. Similarly, PIE&G has implemented a reliability process to mitigate potential impacts to their infrastructure that includes regular testing of all poles, replacement of faulty poles, and scheduled tree trimming and herbicide treatment at circuits. This has resulted in the replacement and installation of more than 2,000 poles in the last five years, trimming of trees away from every circuit on their system within the last seven years, and over 4,000 system upgrades within the last 10 years. Despite these measures to ensure system reliability, the unprecedented nature of this disaster still caused major damage to their lines, as very tall trees from outside of the utility right-of-way fell onto their infrastructure, and the sheer weight of ice accumulated on poles and lines not impacted by vegetation was enough to cause catastrophic damage.

Recent multiple disasters (44 CFR § 206.48(a)(5))

Within the 12 months before this Major Disaster, I had to declare one state of emergency under the Michigan Emergency Management Act (Public Act 390 of 1976, as amended) for four counties due to tornadoes and high winds in May 2024. Within the last two years, I have declared three additional states of emergency, one of which resulted in the declaration of Major Disaster FEMA-4757-DR, which made IA programs available in the counties of Eaton, Ingham, Ionia, Kent, Livingston, Macomb, Monroe, Oakland, and Wayne in response to tornadoes, high winds, and flooding in August 2023. Additionally, a tornado hit Otsego County, which is also included in your Major Disaster declaration for this incident, in May 2022. We also requested the declaration of a Major Disaster in response to this incident, but federal assistance was not made available.

Over the past year, I have also made state post-disaster assistance available to counties and municipalities for three incidents. Under Public Act 390 of 1976, as amended, MCL 30.401, et seq., the Governor may authorize expenditures (with limits based on the jurisdiction's population sizes) from Michigan's Disaster and Emergency Contingency Fund when local disaster related expenses are unreasonably great. The awarded assistance to local jurisdictions for these incidents exceeded \$11 million.

Programs of other Federal assistance (44 CFR § 206.48(a)(6))

Other federal agency programs that more appropriately meet the needs of an incident are supposed to be utilized before the PA program is activated. However, there are

no other federal programs available to address the extraordinary public utility damage caused by this Major Disaster.

2. Hazard Mitigation Grant Program

In your Executive Order “Achieving Efficiency Through State and Local Preparedness” issued on March 18, 2025, you outlined that you want to make communities more resilient to threats and hazards by using common sense approaches and empowering state and local preparedness. Hazard mitigation is one of the most important and effective methods to ensure communities are resilient by reducing or avoiding the risk of future disasters. A 2018 study from the National Institutes of Building Sciences determined that federal mitigation grants have a benefit-cost ratio of \$6:1. A non-federal cost share applied to program expenditures ensures that states and local jurisdictions have a reasonable stake in the use of funds, and states administer expenditures in alignment with mitigation priorities and strategies that are established based on local hazard analyses and prioritizations. The positive benefit-cost ratio of hazard mitigation, the high reliance of HMGP projects on local identification and analysis of hazards, and the disbursement of funds based on priorities and strategies established at the community level make HMGP assistance a cost-effective and common-sense approach to increase the resilience of local communities and therefore the nation.

This is especially true considering the nature of this incident and its cascading, long-lasting secondary impacts that increase risk in the disaster area for the foreseeable future. For example, the vegetative debris generated by this storm’s tree damage substantially increases dead vegetation available to fuel wildfires. Following a storm event, fuels are rearranged near the surface, where they can more easily ignite and/or be consumed during fires. Abrupt increases in fuel can result in fires that spread more rapidly and burn with greater intensity. As vegetative debris experiences a rate of curing, it becomes increasingly more flammable as it dries. Smaller, finer fuels increase fire danger within weeks to months after a storm, while the heaviest fuels can remain dangerous for years or even decades. This storm also increased fuel from Michigan’s most flammable tree types, such as the jack pine. The decreased canopy further increases the wind speeds in forests, which causes faster drying of fuels and may result in faster moving and longer-range fires. The vegetative debris generated through this Major Disaster significantly increases future wildfire risk by intensifying fire danger during typical fire seasons and resulting in potentially extended fire seasons and increased fire danger during parts of the year when fire activity is typically lower. Therefore, the implementation of wildfire mitigation measures, which the Michigan Hazard Mitigation Plan places significant emphasis on and that typically have a benefit-cost ratio of \$3:1, are of the utmost importance.

In addition to increasing wildfire risk, vegetative debris also exacerbates flood risk by accumulating in waterways, where it might partially or fully block the flow of water. Debris may also clog storm water infrastructure including culverts and drains, posing additional flood risk. While the removal of debris from streams and storm water systems may be an eligible activity under Category A – Debris Removal of the PA program, additional flood mitigation projects, which reach a benefit-cost ratio of \$5:1 for riverine flooding, could be implemented with HMGP support.

The HMGP activation would not only help to mitigate increases in risk resulting from this Major Disaster but also ensure that the impacts of similar events in the future will be lessened. HMGP funding would be prioritized to mitigate future power loss, with wind mitigation projects that protect electric and telecommunications infrastructure having an impressive benefit-cost ratio of \$8.5:1. A 2006 HMGP project implemented by the City of Portland in Ionia County, Michigan, for example, illustrates the success of burying power lines to mitigate outages. The city rerouted overhead electrical lines to an underground system that includes two river crossings to avoid loss of power from severe windstorms and ice jams on the Grand River (which often push ice onto land, where it impacts infrastructure) that frequently damaged power poles. Not only did HMGP fund the burial of an initial portion of critical lines but also served as the catalyst for the conversion of additional lines. As a result, approximately 85 percent of the city's power distribution system is now underground and much less vulnerable to adverse weather events. In February 2019, the city experienced significant ice jamming that would have caused most of the poles that were removed as part of this effort to be damaged. This would have led to significant power outages in the past, but no outages occurred. Before the conversion of lines from overhead to underground, the city's electric department also received daily calls regarding power outages. By the time of the 2019 ice jam incident, they received no more than three calls per year.

The local hazard mitigation plans for the impacted counties confirm that the disaster area is heavily forested and susceptible to wildfire (especially now due to the increased risk that has resulted from the ice storm). All 13 plans list wildfire as one of their top natural hazards and identify wildfire mitigation projects that could be implemented with HMGP funding. Pre-identified potential projects include vegetative fuel reduction and cutting strategic fire breaks to stop the spread of fires. Similarly, the plans also identify power interruption from wind and ice events as a significant vulnerability and include strategies such as burying power lines that would be implemented if funding were to become available. Federal support for hazard mitigation would enable communities to implement their identified mitigation strategies and become more resilient and prepared.

Please be advised that the State of Michigan also meets all state responsibilities for HMGP eligibility established under 44 CFR § 206.433, so there are no obstacles to approving HMPG assistance for this Major Disaster:

Recipient (44 CFR § 206.433(a))

The State of Michigan will be the recipient of HMGP funds and will be accountable for their use. The Michigan State Police, Emergency Management and Homeland Security Division (MSP/EMHSD) will serve as the recipient and administrator of funds. The division has been responsible for the successful implementation of the HMGP for 14 prior federal disasters.

Priorities (44 CFR § 206.433(b))

The State of Michigan has determined priorities for funding, as outlined in 44 CFR § 435. The process and criteria by which the state will set HMGP funding priorities are described in the federally approved Michigan Hazard Mitigation Plan. The Michigan Citizen-Community Emergency Response Coordinating Council (MCCERCC), in

coordination with MSP/EMHSD, will set funding priorities. Given the nature of this Major Disaster, projects that mitigate the loss of electrical power and damage from wildfires and flooding will be prioritized for project selection.

Hazard Mitigation Officer (44 CFR § 206.433(c))

The State of Michigan has appointed a State Hazard Mitigation Officer that is responsible for all HMGP matters and is named in the FEMA-State Agreement for this incident for purposes of state performance of hazard mitigation activities.

Administrative Plan (44 CFR § 206.433(d))

The State of Michigan maintains a HMGP administrative plan in conformance with 44 CFR § 437. It was most recently approved in January 2025.

3. Individual Assistance

Since I submitted my initial request for a declaration of a Major Disaster to you on May 16, 2025, reports of difficulties that individuals and households face as a result of this incident have continued. The PDA initially confirmed damages to homes that included 12 destroyed homes; 257 homes with major damage; 280 homes with minor damage; and 28 affected homes in the disaster area. In addition, 160 households were found to be potentially eligible for temporary housing funding, 123 households for housing repair assistance, one household for housing replacement assistance, and 142 households for Other Needs Assistance (ONA) for essential household items and services. Assessments also established that households would be eligible for an estimated \$2,360,271.93 in Housing Assistance and ONA. Unfortunately, under Michigan law, I do not have an instrument to provide this assistance with state funds. Public Act 390 of 1976, as amended, limits state post-disaster assistance to grants to counties and municipalities.

It is important to note that like the assessment of PA-related damage, the federal PDA process for the IA program may also underestimate the impacts on individuals and households caused by this disaster. For example, the 2014 Major Disaster declaration FEMA-4195-DR, which included the counties of Macomb, Oakland, and Wayne, was granted based on official IA PDA results that included 2,269 assessed homes eligible for an estimated \$11,644,809 in federal assistance through the Individuals and Households Program (IHP). However, following the declaration, 73,411 applicants were found eligible for approved payments of \$156,690,304. As you can see, IA applications far exceeded the number of homes that were identified as impacted during the PDA (by a factor of over 32), and the approved financial assistance was over 13 times larger than the initial estimate based on the PDA results.

The damage assessed during the PDA also captures the physical damage to homes, but not other individual effects that disaster survivors experienced. The most tragic impact of this disaster has been the death of a 48-year-old Emmet County resident that was struck by debris while engaging in cleanup work on family's property in July. The deceased was a police officer that is remembered in the community as a public servant that always put others before himself. He is survived by his wife and two children.

In the aftermath of the ice storm, the loss of heating due to power outages during extreme cold temperatures temporarily displaced many residents from their homes and created health risks like hypothermia and frostbite. Many residents lost the ability to refrigerate and prepare food, and there were fuel shortages due to fueling stations being closed due to widespread power outages, leaving residents unable to procure fuel for vehicles or generators. Vegetative debris, damaged utility poles, and downed wires made travel through the disaster area difficult, and extended emergency vehicle response times. The damage to trees permanently altered the landscape of the area, and many residents still have not been able to clean up their properties and remove the debris. Attachment A includes pictures that further illustrate the impacts of this Major Disaster.

The cost to repair, replace, or clean lost and damaged property, in addition to increasing cost for electricity as a result of utility infrastructure damage (particularly if assistance under Category F of the PA program is not approved), combined with remaining uncertainty about ice storm impacts on economic sectors such as the tourism industry, foresting, and maple syrup production, pose significant financial challenges for disaster survivors. The economic pressure caused by this Major Disaster is also evidenced by the 521 applications for assistance under the State Emergency Relief (SER) program administered by the Michigan Department of Health and Human Services. Reasons such as applicants already having received assistance for the fiscal year or having exceeded income limits for program eligibility led to the denial of 69 percent of applications, but while some applicants may have been found ineligible for relief under the guidelines of this program, these applications are still a reflection of the remaining IA-related needs in their communities.

This is particularly significant as the per-capita income for ten of the counties and the overall impacted area is lower than the per-capita income for Michigan, and for 11 of the counties the per-capita income is lower than that for the United States. Eight disaster-area counties have an elevated share of residents that live below the poverty limit. All counties also have large populations of residents over 65 years of age who rely on retirement and social security income. In 12 of the 13 counties and the area as a whole, rates of residents with disabilities exceed the state and nationwide averages. These socioeconomic indicators illustrate that many of these residents in the impacted areas are particularly vulnerable to disasters and will struggle to recover from its impacts. They urgently require support and will benefit most from federal assistance.

	<i>Per capita income</i>	<i>Persons with Income below poverty (last 12 months)</i>	<i>Govt. assistance : social security</i>	<i>Govt. assistance: suppl. security income</i>	<i>Retirement income</i>	<i>Pre-disaster unempl. rate</i>	<i>Age 65 years and older</i>	<i>Non-institutionalized Persons with a disability</i>
Data Source:	ACS 2023 5-yr. CP03	ACS 2023 5-yr. CP03	ACS 2023 5-yr. CP03	ACS 2023 5-yr. CP03	ACS 2023 5-yr. CP03	ACS 2023 5-yr. CP03	ACS 2023 5-yr. CP05	ACS 2023 5-yr. CP02
United States	\$43,289	12.4%	31.2%	5.1%	24.2%	5.2%	16.8%	13.0%
Michigan	\$39,538	13.1%	34.7%	5.7%	28.2%	5.8%	18.2%	14.2%
Alcona Co.	\$34,595	14.3%	56.6%	7.2%	46.5%	5.0%	36.2%	23.0%
Alpena Co.	\$33,093	17.0%	45.5%	9.7%	35.9%	7.1%	24.5%	21.6%
Antrim Co.	\$41,548	9.4%	44.1%	5.4%	36.3%	4.1%	28.3%	15.9%
Charlevoix Co.	\$47,337	8.7%	41.3%	3.9%	33.2%	3.8%	26.2%	14.7%
Cheboygan Co.	\$34,750	12.8%	49.3%	5.7%	39.8%	7.0%	28.4%	19.3%
Crawford Co.	\$31,449	14.8%	49.3%	6.9%	38.8%	7.2%	26.6%	22.9%
Emmet Co.	\$45,122	9.3%	39.8%	5.5%	32.2%	3.6%	24.2%	14.0%
Kalkaska Co.	\$32,904	18.2%	41.1%	6.2%	33.0%	4.3%	21.2%	18.2%
Mackinac Co.	\$34,862	16.9%	46.7%	4.9%	35.4%	9.4%	29.0%	20.2%
Montmorency Co.	\$30,306	17.9%	53.2%	8.3%	42.4%	6.1%	32.9%	24.5%
Oscoda Co.	\$27,858	15.8%	53.3%	7.3%	38.8%	8.8%	28.5%	22.3%
Otsego Co.	\$36,269	9.6%	37.9%	4.8%	28.7%	4.5%	21.7%	16.5%
Presque Isle Co.	\$36,235	12.2%	53.3%	6.7%	43.4%	6.3%	33.1%	18.9%
13-County Total:	\$37,481	12.4%	45.3%	6.2%	36.6%	5.4%	26.7%	18.3%

Yellow shading denotes greater potential vulnerability to disaster impacts.

In addition to applicable social service programs administered by local jurisdictions and state agencies, and the disaster-specific assistance that was coordinated through local and state-level emergency operations centers, voluntary organizations provided exemplary assistance to help meet the needs of impacted residents. These programs supported or facilitated the operation of shelters and warming centers, food preparation and distribution, distribution of personal care items and hygiene kits, assistance with debris removal from private property, and the identification of other unmet needs. Business and private sector organizations also provided support and donations of items such as bottled water and

electrolyte drinks, meals and shelf-stable foods, pet food, personal care kits, and baby products.

Despite these efforts of local governments, state agencies, non-governmental partners, and the private sector, IA-related needs continue to exist. Activation of the IHP and all other IA programs would supplement locally driven, community-centered, and state-supported recovery efforts, and ensure that the basic disaster-related needs of all residents met.

Based on the information provided above, I maintain that this incident was of such severity and magnitude that effective recovery is beyond the capabilities of the State of Michigan and the affected local jurisdictions. It requires supplemental federal assistance under Category F of the PA program, HMPG, and all areas of the IA program. Activation of these programs is warranted and critically necessary, and I urge your reconsideration of their denial.

Insp. Michele Sosinski of the MSP/EMHSD has been appointed as the State Coordinating Officer for this Major Disaster. She continues to coordinate with FEMA to implement the already activated assistance programs and will provide any further information or justification for this request on my behalf, as needed.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stephen White". The signature is fluid and cursive, with a large initial "S" and a long horizontal stroke at the end.

Attachment(s):

Attachment A – Disaster Area Photographs

Attachment A: Disaster Area Photographs



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| <p>Row 1: Disaster area deforestation; Tree damage, Montmorency County.</p> <p>Row 2: Disaster area tree damage; Disaster area debris removal.</p> <p>Row 3: Disaster area debris removal (both).</p> <p>Row 4: Disaster area property damage (both).</p> |
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Row 1: Property damage, Alcona County; Disaster area property damage.
Row 2: Property damage, Alpena County; Property damage, Cheboygan County.
Row 3: Property damage, Presque Isle County (both).



Row 1: Property damage, Cheboygan County (both).
Row 2: Property damage, Oscoda Couty; Property damage, Otsego County.