



Tony Evers

Office of the Governor | State of Wisconsin

August 7, 2026

David Arnold, Acting Associate Administrator
Office of Response and Recovery
Federal Emergency Management Agency
500 C Street Southwest
Washington, D.C. 20472

Through: C/O Fred Kaehler, Acting Regional Administrator
Federal Emergency Management Agency, Region 5
536 South Clark Street, Sixth Floor
Chicago, IL 60605

Dear Mr. Arnold:

I am writing to respectfully urge you to reconsider the denial of a Major Disaster Declaration for Racine County for Public Assistance and statewide for the Hazard Mitigation Grant Program. This appeal is pursuant to Section 423 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5207 (Stafford Act), and implemented by 44 CFR §§ 206.31 through 206.48.

The storms that impacted Wisconsin April 13-23, 2026, were extremely damaging to communities across the state. The storms destroyed roads, public buildings, utilities, businesses, and homes. Government officials and non-governmental organizations have worked countless hours to ensure these communities can recover, but the costs of this disaster have exceeded local and state capacity. On June 30, 2026, Wisconsin was declared a federal disaster area, DR-4923 for Individual Assistance and Public Assistance. Public Assistance was provided for nine counties and one Tribal Nation, and entities within these jurisdictions have already submitted 102 Requests for Public Assistance to repair damages to local governments, facilities, and infrastructure.

However, on July 7, Wisconsin was denied Public Assistance for five counties and the Hazard Mitigation Grant Program statewide. The millions of dollars in damage to businesses, infrastructure, utilities, and homes has caused considerable financial strain on the impacted communities. It will continue to stress budgets as local governments struggle to cover the costs of repair throughout the period of long-term recovery. Federal assistance is critical when the disaster exceeds local and state capacity. Both the Public Assistance and Hazard Mitigation Grant Programs will stabilize these communities and prevent long-term displacement, financial strain, and economic loss.

In response to the denials, I directed Wisconsin Emergency Management (WEM) to gather additional information and perform a new comprehensive analysis of both quantitative and qualitative data to appeal these decisions. While four of the five counties determined they did not require additional assistance at this time, the needs in Racine County remain. As part of this review, WEM and FEMA conducted an additional Joint Preliminary Damage Assessment for Public Assistance for Racine County.

Given this new analysis and implications which are included in this letter, I respectfully request you review the updated information in detail and reverse the decision to deny Public Assistance in Racine County and the Hazard Mitigation Grant Program to Wisconsin. The following information supports this request.

Racine County

Racine County issued a local disaster declaration on April 21, 2026, following severe flooding, high-winds, and tornadic events. No fatalities or major injuries occurred, but the county experienced residential, infrastructure, utility, and business damage as well as increased government response costs.

Damage was reported across multiple public assets. The City of Burlington Police Department experienced basement flooding that damaged elevator electrical systems. The Village of Elmwood Park's municipal building also sustained flood damage. Disruption of community services was seen primarily in road closures due to flooding, debris, and unsafe conditions.

Roads suffered significant damage, with two major sections sinking or warping from failing culverts. A railroad crossing at Honey Creek Road and Highway 20 was damaged.



Photo: Road damaged by flooding in Racine County, WI.

Public parks and recreational facilities were considerably flooded, causing damage to sports fields/courts, pavilions, fencing, and walkways. One baseball field had their dugout roof torn off from high winds.

Water treatment plants had to halt normal operations due to flooding. Pumps at these facilities were damaged, resulting in reduced operational capacity.

For the county, the road repairs needed amount to close to a third of the annual allotted road repair budget. This will put considerable strain on the ability of the county to repair the damage in a timely manner, resulting in infrastructure closures, below-normal usage, and delays in normal road repair cycles. One of the failing culverts requires extensive repairs and cannot be completed by county resources; it will need to be contracted out. This adds another layer of difficulty to restoring this section of road to proper working order.

There were many power outages over the storm period, peaking around 2,000-3,000 at one time. Falling trees and high winds damaged power lines and poles. Beyond the immediate costs, these damages will cause long-lasting economic harm to the affected communities.

Preliminary Damage Assessment

On April 28, 2026, I requested Joint Preliminary Damage Assessments (PDAs) from the Federal Emergency Management Agency (FEMA) for the Individual Assistance (IA) and Public Assistance (PA) programs. Virtual

and field PDAs for PA started May 11 and culminated on May 15. While validated damages for Racine County totaled \$877,428 or \$4.44 per capita, Wisconsin completed a subsequent virtual PDA on July 27, 2026, to ensure any new, updated, or missed damages were validated in Racine County. This assessment identified an additional \$98,597 in damages in Racine County, bringing the total validated damages in Racine County to \$976,025. This amounts to \$4.94 per capita, which exceeds FEMA's per capita indicator of \$4.86 for recommending Public Assistance. Detailed information is provided in Enclosure A.

Hazard Mitigation Grant Program

The State of Wisconsin requests that the President reconsider the denial of the Hazard Mitigation Grant Program (HMGP) for the communities impacted by the April 13-23, severe weather event. The Federal Emergency Management Agency's (FEMA's) HMGP provides much-needed federal funds for long-term hazard mitigation projects to protect communities against future disasters.

Hazard mitigation grants fund life-saving projects such as community safe rooms and hardening of energy infrastructure that provide protection from tornadoes and other wind events such as those that affected Juneau and Marathon counties in April.

Flood mitigation projects such as stormwater upgrades and property buyouts substantially reduce future expenses of taxpayer dollars for flood response. The National Institute of Building Sciences publication *Natural Hazard Mitigation Saves: 2019 Report* shows that for every federal dollar spent on riverine flood mitigation seven dollars are saved in future flood damages. Capitalizing on riverine flood mitigation is an unequivocally sensible investment that will prevent costly future flood damages.

Need for Hazard Mitigation Funding

The scope of the damage experienced by Wisconsin's communities was significant and widespread. As of August 3, a little more than halfway through the application period, FEMA's Individual Assistance (IA) program has already approved 18,000 applications for over \$49 million for individuals and households impacted by this disaster. These numbers will only grow as the application period continues through August 31. The IA program only pays to bring homes up to a livable condition and does not replace all lost property. The maximum payment is \$42,500 with the average payment only around \$5,000. For homes that are destroyed or uninhabitable, that amount will not come close to meeting the needs of the survivors. This is particularly true for owners of repetitive loss or substantially damaged properties.

Repetitive Loss Properties

The IA declared counties together have 479 repetitive loss and severe repetitive loss properties. This means floods have damaged these properties on several occasions, and they have received multiple high-dollar-value paid claims through the National Flood Insurance Program (NFIP), which is heavily subsidized by taxpayer dollars. These properties are costly to the NFIP and a high priority for Wisconsin's hazard mitigation program. For properties like these that have repeated damage, and those that are destroyed or uninhabitable, one of the most effective mitigation measures is acquisition/demolition to remove the structure and prevent future damages in that location.

Through the voluntary program, property owners receive fair market value for their homes and move to a safer location outside the flood hazard area. This action eliminates the risk to residents' lives and structures, and the lives of first responders who no longer have to rescue residents from flooded areas. It lowers response and recovery costs as well as costs to the taxpayer-subsidized NFIP. It also prevents neighborhoods from becoming blighted. With the acquired land, communities can create recreational areas that will serve as flood storage in times of high water.

Some structures or neighborhoods have historic or intrinsic value and should not be removed. In those cases, structure elevation or floodproofing may be most appropriate to avoid future damage. Proposed projects under this disaster include structure buyouts, elevations, or floodproofing; storm sewer improvements; road elevations; and warning systems. Previous similar mitigation measures in these areas have proven very successful.

Substantially Damaged Properties

FEMA defines substantially damaged properties as those in which the cost of the repairs exceeds 50 percent of the property's value. Communities have already identified 43 substantially damaged structures, with additional determinations likely in hard hit areas such as Rock and Milwaukee counties. Structures within the FEMA-mapped floodplain that are deemed substantially damaged may not be repaired unless they are brought into compliance with their local floodplain ordinance through structure relocation, elevation, or demolition. This helps ensure that the future taxpayer funded repairs or flood insurance claims will not be necessary to pay for future repairs.

If the owner has flood insurance, they can receive up to \$30,000 to bring their structure into compliance. However, most of the structures affected by this disaster are not covered by flood insurance. In seven of the 19 counties declared for IA, fewer than 15 percent of structures in the floodplain carry a flood insurance policy. In only two of the 19 IA-declared counties are more than 50 percent of structures in the floodplain covered by flood insurance.

For property owners without flood insurance, who have already endured a terrible flood and may have been displaced from their home, bringing their properties into compliance will be an extreme and unmanageable financial burden. Property owners can apply for HMGP funds to cover these costs, and for these individuals HMGP may be their only hope for financial relief.

Continuing Impacts from Previous Disasters

Some of the areas impacted by the April floods were still recovering from major flooding that occurred only eight months earlier. In August 2025 the Milwaukee area experienced over 14 inches of rain in 24 hours, overwhelming local sewer systems and leading to the disaster declaration (DR-4892) with the highest dollar amount of IA payments nationwide in 2025. This prior declaration was also denied funding for the Hazard Mitigation Grant Program. Therefore, many individuals and households remain in need of help to recover from the impacts of the flood and to bring structures into compliance with their local floodplain ordinances. Additionally, had hazard mitigation taken place after the first disaster, many of the damages for the current disaster declaration (DR-4923) would have been avoided and taxpayer dollars saved. It is imperative that the HMGP is added to this declaration so the communities in our state are able to recover and prevent similar impacts from future disaster events while saving local, state, and federal taxpayer dollars.

Previous Successes

The communities affected by this disaster have effectively used federal, state, and local funds to implement buyouts and other mitigation projects to reduce long-term disaster risk. Buyouts are one of the most effective mitigation projects for riverine flooding in Wisconsin. They permanently eliminate the risk to life and property and allow the space to be used to safely store flood waters. They also provide a lifeline to individuals and families who would otherwise be left in financial ruin when a flood destroys their home. The number of buyouts completed in each impacted county with partial FEMA funding are listed below.

County	Number of Properties	County	Number of Properties
Buffalo	2	Racine	2
Jefferson	105	Rock	15
Juneau	31	Sauk	104
Kenosha	122	Vernon	50
Marathon	8	Waukesha	23
Milwaukee	62	Winnebago	2

In addition to many buyout projects in the impacted areas, federal, state, and local mitigation funding has provided five generators for critical facilities, constructed six community and 33 individual tornado safe rooms, and completed three soil stabilization projects for properties at risk of erosion. A major storm sewer

project was also carried out in Whitefish Bay which protected 50 homes from a 10-year storm and 97 homes from a 100-year storm.

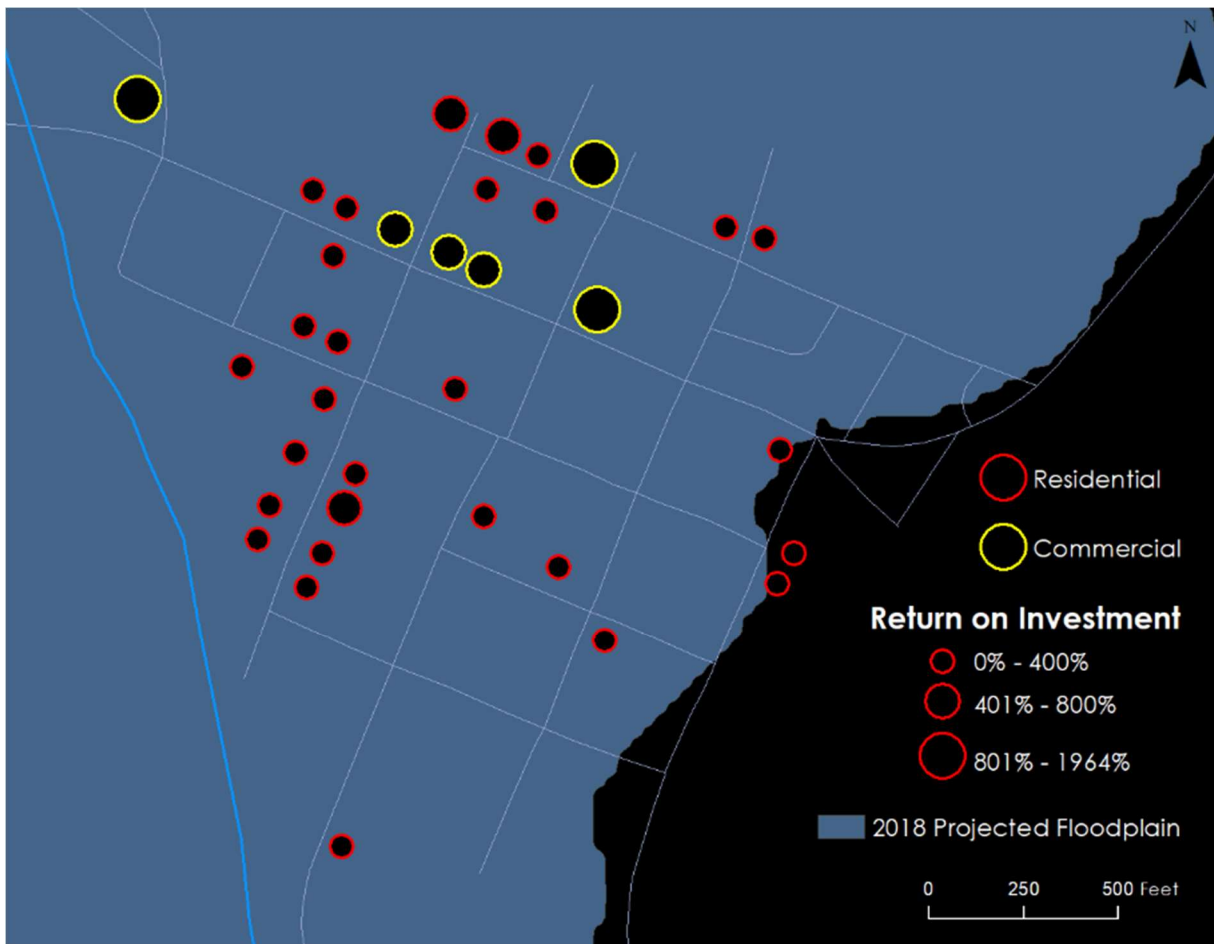
Jefferson and Kenosha Counties

Since 1993, Jefferson and Kenosha counties have acquired over well over 200 properties total in the floodplain of the Rock River and Fox River using a combination of federal, state, and local funds. Many of these properties were on Blackhawk Island in Jefferson County, which is technically a peninsula that becomes an island during floods. Removing these properties has resulted in significant reductions in damages, which were costly to federal and state taxpayers. Over the years, 19 of 61 repetitive loss and severe repetitive loss properties in Jefferson County and 16 of 52 in Kenosha County have been mitigated and no longer receive payments through the taxpayer-subsidized National Flood Insurance Program. In this flood event, no properties in Jefferson County were determined to be substantially damaged. Removing these properties from the floodplain also means first responders do not have to risk their own lives trying to rescue people from dangerous floodwaters.

Village of Gays Mills

While not in the declared area, the Village of Gays Mills in Crawford County is representative of many similar communities in the impacted counties. Mitigation and recovery efforts over the years, particularly since 2007, have resulted in a revitalized economy, flood reduction, and substantial financial return on investment.

Gays Mills used federal, state, and local funding to complete a major buyout and structure elevation project and then constructed an economic hub and new housing in a safe location, away from the river. Wisconsin Emergency Management completed a loss avoidance study on the community in 2018 and updated it in 2020. As shown below, the return on investment for residential structures in the 13 years since the project took place was 124 percent and for commercial structures, it was an impressive 646 percent. These calculations only looked at damage and repair costs avoided and did not include any environmental, social, or other economic benefits. As additional flood events occur, these numbers will only increase.



Gays Mills return on investment 2007-2020. Wisconsin Emergency Management.

Hazard mitigation is an unequivocally smart investment. Taxpayer dollars spent on these projects today will see much greater savings in taxpayer dollars in the future. For these reasons, and to help the survivors of this event who have been left with nothing, please approve the Hazard Mitigation Grant Program for Disaster Declaration DR-4923 for the people of Wisconsin.

Proven Track Record

Wisconsin Emergency Management (WEM) takes very seriously our responsibility to the people of our state and our nation to be effective stewards of taxpayer dollars. Wisconsin is an Enhanced Plan state meaning we have demonstrated that we have a robust statewide mitigation program involving federal, state, local, nonprofit, and private partners. We have also demonstrated strong grants management processes through annual reviews by FEMA as well as biennial in-depth grants monitoring. Using all available funds, implementing cost-effective projects, and closing grants timely are priorities for WEM's hazard mitigation program. This has allowed us to put in place and effectively execute a Program Administration by States (PAS) agreement with FEMA for the HMGP for every disaster declaration for over 10 years. This agreement allows WEM to take on certain program administration tasks, like approving demolition time extensions and hazard mitigation plan updates, to relieve FEMA of some of the administrative burden. There is of course ample federal oversight written into the agreement to ensure WEM is meeting all requirements and responsibilities.

Commitment to Grant Closeout

Wisconsin has two open disaster grants under the HMGP, one of which will be closed before the end of the federal fiscal year. No HMGP declarations have open application periods. We also have four open BRIC funding years, one of which has been submitted for closeout and another of which is nearing closeout. The State of Wisconsin implements projects, draws down funds, and closes grants efficiently as shown in the tables below.

Open HMGP Disasters	First Project Obligation	Status
FEMA-4402-DR-WI	2020	In closeout
FEMA-4459-DR-WI	2021	Closed
FEMA-4477-DR-WI	2021	Closed
FEMA-4520-DR-WI (COVID)	2022	Application period closed; waiting for FEMA to award additional subgrants; 24 subgrants have already closed or are ready for closeout.

Open BRIC Funding Cycles	First Project Obligation	Status
BRIC FFY 2020	2021	Closeout submitted to FEMA 4/13/2026
BRIC FFY 2021	2022	Fully awarded; in progress; closeout starts 10/6/2027
BRIC FFY 2022	2023	Fully awarded; in progress; closeout starts 9/22/2026
BRIC FFY 2023	2024	Fully awarded; in progress; closeout starts 9/26/2027

State Resources not Enough to Address Resilience

Flooding is the most common and costly disaster in Wisconsin, and the state currently invests considerable resources in hazard mitigation through the following programs:

- Wisconsin Department of Natural Resources (DNR) Municipal Flood Control Grant Program
 - This program funds flood mitigation projects with acquisition/demolition of flood-prone properties as the top priority.
 - Typically funded at \$2 million per biennium.
- Wisconsin Emergency Management Pre-Disaster Flood Resilience Grant
 - This program funds restoration projects in flood-prone areas to increase natural flood storage.
 - Typically funded at \$2 million per biennium.
- Wisconsin Department of Transportation Disaster Damage Aids Grant
 - This program funds road repairs from disaster damages. Mitigation measures can be included.
 - Typically funded at \$1 million per year.

While the state is making efforts to recover from this disaster and build for a better future, those resources alone will not be enough to address the needs of so many that have been impacted. Federal funding is a critical piece of the puzzle. Wisconsin is requesting the FEMA Hazard Mitigation Grant Program statewide because there are unmet needs from this disaster and the previous disaster in communities around the state. Federal mitigation dollars will make a substantial contribution to the recovery efforts.

Conclusion

Without the support of a Major Disaster Declaration for the Public Assistance program for Racine County and Hazard Mitigation Grant Program statewide, Wisconsin will face significant challenges in achieving an effective recovery from this event. I have determined that the severity and magnitude of these storms exceed the capabilities of the State and affected local governments to respond and recover adequately.

Therefore, I am formally appealing the denial of Public Assistance for Racine County.

Furthermore, I am formally appealing the denial of the Hazard Mitigation Grant Program for the State. The state has an approved Enhanced State Hazard Mitigation Plan.

In closing, I want to reaffirm the urgency of this appeal request and emphasize the need to assist the survivors and communities as quickly as possible so that life can return to normal. Responding is only part of a larger picture to create stability after a disaster. Investing in hazard mitigation will reduce future costs many times over and is a strategic investment in Wisconsin's long-term resilience to flooding and severe weather. It protects taxpayers, communities, and future generations from larger impacts of natural disasters.

Your favorable consideration of this appeal is appreciated.

Respectfully,

A handwritten signature in cursive script that reads "Tony Evers".

Tony Evers
Governor

Enclosures

Enclosure A: Public Assistance

Enclosure B: Requirements for Other Federal Agency Programs