

JAY INSLEE
Governor



STATE OF WASHINGTON
Office of the Governor

September 10, 2014

The Honorable Barack Obama
President of the United States
The White House
1600 Pennsylvania Avenue
Washington, DC 20500

Through: Mr. Kenneth Murphy
Regional Administrator
FEMA Region X
Federal Regional Center
130 – 228th Street SW
Bothell, WA 98021

Dear Mr. President:

Pursuant to 44 CFR § 206.46(b), I am appealing the Federal Emergency Management Agency's (FEMA) August 12, 2014, denial of my request for the Individual Assistance Program for Okanogan County and the Confederated Tribes of the Colville Reservation as a result of the Central Washington Firestorm which began July 9, 2014, and continued through August 5, 2014.

All information in my original August 6, 2014, request for a major disaster declaration is still relevant and should be reconsidered as part of this appeal unless specifically changed in this letter.

I am requesting reconsideration for the following reasons:

1. Additional damages have been identified through a supplemental Joint Preliminary Damage Assessment and by the county since my original request.
2. Additional data collected on insurance information shows a significant number of uninsured, as well as *underinsured* losses (experiencing more than 40% uninsured loss).
3. The concentration of damage has been further documented.
4. Additional information about the impact on special population groups and municipalities meeting FEMA's definition of "small impoverished communities" has been documented.
5. A critical shortage of housing is occurring due to a lack of affordable and available housing, which is impacting the long-term vitality of the affected communities.

Preliminary Damage Assessments

The numbers of destroyed and impacted homes referred to in this appeal come from three separate assessments. The first two assessments were Joint FEMA/State Preliminary Damage Assessments (PDAs). The first of these was conducted on July 31 and August 1, 2014. On August 18, 2014, a



supplemental Joint PDA was conducted, which identified additional impacted homes. The combined damage results from these two PDAs are detailed in Table 1. The final assessment was conducted by the county in an effort to provide additional insurance data for this appeal.

Since my initial request on August 6, 2014, we have gathered additional data on damaged homes via the county's call-in center and a voluntary group that canvassed the county collecting information from impacted households. This necessitated a supplemental Joint PDA, which a joint FEMA/State team conducted on August 18, 2014. During the supplemental PDA, the team confirmed an additional 19 homes, bringing the total number of homes impacted by the firestorm to 263. The complete list of known damages from the fires can be found in Enclosure A.

Since the final PDA was completed, the county has made every effort to obtain additional information about insurance coverage and to determine whether or not the home served as an owner-occupied primary residence. Through this process, an additional 16 families were discovered to be occupying rentals on properties identified during the PDA. Table 1 depicts the combined detailed PDA, including the additional renters, which increases the total number of impacted homes to 279.

Table 1: Combined Preliminary Damage Assessment Results

	Destroyed	Major	Minor	Affected	Total	Number Insured	Number Uninsured	Unknown Insurance Status
Owner-Occupied Primary Residences	161	4	1	14	180	118	52	10
Second Homes	39	0	1	1	41	23	8	10
Renters	30	0	0	0	30	3	27	0
Owner of Rental	26	1	0	1	28	9	19	0
Totals	256	5	2	16	279	153	106	20

The information from the supplemental PDA shows:

- 92% or 256 of the homes impacted by the fires were categorized as Destroyed.
- 63% or 161 of those Destroyed were owner-occupied, while an additional 12% were occupied by renters.
- 55% of the impacted homes were insured.
- 7% of the homes have unknown insurance status, due to the owners lack of availability to provide information.
- 38% of homes were confirmed as uninsured, thus impacting the homeowners' ability to recover financially and perhaps rebuild on their property.
- 63 of the homes that were insured were under-insured by more than 40%, which increases the likelihood that owners will not have the reserve financial capital to rebuild within the community over the near-term.

Supporting Information from Okanogan County:

The Okanogan County Appraiser has provided the state a significant amount of data on the impacted properties, based on appraisals conducted soon after the fires. Where possible the Appraiser's data

has been included in the Damage Database. Because many parcels of land supported the owner of the property as well as multiple renters, some parcels will appear multiple times in the database.

An Okanogan County volunteer group gathered a significant amount of data specifically to support this appeal. This group was organized by a community member and recommended by the County Emergency Manager as a trusted source. The group circulated a worksheet to impacted homeowners and renters which included a comprehensive list of questions about insurance as well as their type and extent of loss. The group supplied almost 200 worksheets to the State Emergency Management Division. The data they provided greatly enhanced the supplemental PDA. However, 74 additional properties identified by the volunteers were not validated by the PDA team, as they were identified well after the PDA was completed. These properties are discussed in this appeal, but only in respect to overall impact. We have validated damage where possible with the Okanogan County Assessor, but have not been able to identify level of damage or validate the data beyond what is described in Enclosure A.

These 74 additional homes consist of the following:

- 55 owner-occupied primary residences.
 - 31 of these homes were reported as having homeowners insurance.
 - The remaining 24 homes were reported as uninsured.
- 5 second homes.
 - All 5 homes were reported as uninsured.
- 3 rental properties.
 - All 3 of these properties were reported as uninsured.
- 11 additional homes were reported as being occupied by renters.
 - 1 renter reported that they had rental insurance.

Total Community Impact:

Taking into consideration all damages that were identified, both through the PDA process and through the county’s efforts, we have identified the following impacts to homes from the Okanogan County firestorm:

- A total of 353 residential properties were impacted.
- Total uninsured residential losses are estimated to be \$8,659,957.
- Total uninsured losses of owner-occupied primary residences are estimated to be \$5,495,350.
- Total uninsured loss of personal property is estimated to be \$3,461,107.

Table 2: Total Damage Information from PDAs and County

	Total Impacted Homes	Number Insured	Number Uninsured	Unknown Insurance Status
Owner-Occupied Primary Residences	235	149	76	10
Second Homes	46	23	13	10
Renters	41	4	37	0
Rental Owners	31	9	22	0
Totals	353	185	148	20

While these damages are extensive, we know they do not capture the full extent of loss. Local officials have informed my staff that there were many households who refused to provide information on damages out of fear of deportation, language disparities, and a general misunderstanding of how the data would be used.

Impacts and Concentration of Damage

At 3,400,000 acres, Okanogan County is the largest county in Washington State by area, of which only 22.5% (767,803 acres) is privately owned. The Carlton Complex and other major fires burned over 12% of the privately owned land in the county (94,740 acres), affecting an estimated 4,466 land owners.

“If a few houses were destroyed we could have helped; you know who to call for help. Okanogan County is self-reliant because we want to be and because we need to be. But now all the resources that are usually there for help are gone. Not just people’s homes but their flatbed trucks, backhoes, trailers, tools, everything is gone... This is a resourceful community but we need help.” – Jord

Despite the large size of Okanogan County, the population is largely concentrated into the Methow Valley and the area along the Columbia River from Pateros to Omak, making it a close-knit community. Although damages from the firestorm appear to be spread out over a wide area, the resulting damage is to these communities, not just to individual structures. Extended families have lost their homes. Business owners no longer have a place to live in the community, making survival of their businesses questionable. The cascading effects of this disaster will reverberate throughout the county producing far greater impacts than can be assumed from looking at a map of impacted houses.

Losses were especially concentrated in the small town of Pateros, where 53% of all households had their home destroyed or significantly impacted by the firestorm. Of the total impacted households, 111 were completely destroyed, and of the owner-occupied primary residences, 37% were uninsured. The firestorm completely devastated two square blocks of Pateros, destroying 36 homes and 12 businesses within that small area alone. In the Alta Lake neighborhood of Pateros, the fire destroyed 53 homes, 40 of which were owner-occupied primary residences; less than 10 residences in the neighborhood are still standing. Prior to the firestorm, Pateros had 238 households and an estimated population of 662, of which more than 25% are below the federal poverty level.

Prior to the fires, Pateros had a 1% vacancy rate for rental housing.¹ With the significant loss of housing from the firestorm, the community now has both traditional renters and homeowners competing for what little rental housing remains. The limited availability of rental housing means that individuals and families may never be able to return to the community they called ‘home.’

The Pateros School District includes two schools that, prior to the fires, served approximately 300 students in grades K-12. The District has an estimated 43 students that are now homeless because of the fires, which is approximately 15% of the District’s student body. Additionally, 11 staff members were left homeless by the fires; one has already resigned due to her inability to find housing. The District is delaying the start of classes until September 10, 2014, in order to make the schools themselves minimally habitable. The repairs to the high school gymnasium will not be complete for several months, meaning student-athletes will have to use the Brewster gym for practice after the Brewster teams have finished for the evening. This only adds to the burden many of these student athletes are facing on top of insecure housing, uncertain employment opportunities for themselves and their parents, and a future that looks radically different due to the devastation from the wildfires.

¹ According to the U.S. Census, the Second Quarter 2014 rental vacancy rate for Washington State was 5.3%.

The overall impact to Pateros is nearly indescribable due to the sheer devastation that occurred as a result of the firestorm. With more than half of its housing stock destroyed, recovery for this community will be incredibly challenging. The loss of these structures and their occupants will decrease both the fiscal returns they provided to a small municipality as well as the goods and services provided to the community by local retail establishments. Without federal assistance, even a large urban area would have a difficult time recovering after the loss of half of its housing stock.

Beyond Pateros, adjacent communities were also devastated by the firestorm. In nearby Brewster, at least 47 homes were destroyed and another 16 were impacted as a direct result of the fires. This represents a more than 17% loss of or significant impact to single-family homes within the Brewster community, displacing families and impacting schools. Similarly, the town of Twisp experienced nearly a 12% loss of or significant impact to single-family homes. In Twisp alone, more than 56 businesses reported financial losses directly related to the firestorm and 10% suffered physical damage. A map of the impacted businesses in Twisp can be found in Enclosure B.

Table 3: Most Impacted Communities

Jurisdiction	Population ¹	Number of Households ²	Number of Destroyed Homes	As a % of total households	Homes Impacted	As a % of total households	Number Uninsured
Pateros	662	238	111	47%	14	6%	45
Brewster	2,358	699	47	15%	16	2%	30
Twisp	939	474	42	9%	13	3%	26

1: Source: U.S. Census Bureau. 2013 Population Estimate (as of July 1, 2013)

2: Source: U.S. Census Bureau's 2008-2012 American Community Survey

Without the requested federal assistance, the long-term economic impacts from the fires will turn a disaster into a catastrophe for these communities. The loss of homes has had a dramatic impact on nearly all local, community-based businesses as the occupants of many of these dwellings represent business owners, employees, and suppliers. Exacerbating this situation is that many small business owners continue to try to run their businesses while struggling to find affordable housing within reasonable commuting distance, replace basic necessities of life lost in the fire, and try to rebuild their lives. Following the firestorm, the Economic Alliance conducted an economic impact survey of Okanogan County and discovered:

- 40% of local businesses are concerned about a lack of housing for their employees.
- 80% of local businesses employ less than 10 people.
- 31% of local businesses in the area have lost over \$10,000.
- 66% of local businesses are in the retail or tourism industries.

Sun Mountain Lodge, a major employer in the region, sustained heavy economic losses due to cancellations during its prime revenue period. As of mid-August, losses approached \$1,000,000. Many in the community fear that employees will soon be laid off.

The damage caused by these wildfires is significant and, in spite of the large, rural geographic area, the damage to households, businesses, and communities is highly concentrated in small populated centers, which are representative of the heart and soul of Eastern Washington. Moreover, these rural towns serve as the hub of community life for those not only living within their municipal borders, but those that live well outside of them. Losses to businesses in Pateros, Twisp, Brewster, and elsewhere affect the ability

of residents to obtain even basic goods and services. Generally, in large communities, when one business, such as a grocery store, is lost there are other options nearby that can meet basic needs. However, these small, close-knit population centers operate as hubs to the outlying areas they serve. The loss of even one retail establishment reverberates through the hub to the broader outlying community, which does not have other commercial options available.

Special Population Impacts

All five of the Okanogan County towns impacted by the Central Washington Firestorm meet FEMA’s definition of small impoverished communities, as outlined in the chart below, and lack the necessary capital to recover from the dramatic social and economic impact of the fires.

Table 4: Small Impoverished Communities

Jurisdiction	Population ¹	Per Capita Income ¹	Unemployment Rate
Pateros	662	\$40,924	7.5% ²
Brewster	2,358		
Twisp	939		
Winthrop	415		
Okanogan	2,576		
State		\$58,374	5.8%
National		\$53,046	6.1% ³

- 1: Source: U.S. Census Bureau. 2013 Population Estimate (as of July 1, 2013)
- 2: May 2014, not seasonally adjusted. Source: Washington State Department of Employment Security and June 2014 U.S. Bureau of Labor Statistics
- 3: June 2014, seasonally adjusted. Source: Washington State Department of Employment Security

Okanogan County’s median household income is 30% below the state average and is the second lowest in the state. According to the Housing Authority of Okanogan County, 22% of the county’s residents live in poverty compared with 13.3% statewide.²

People over the age of 60 account for 27% of the county’s population and 31% of all households have one or more persons 65 years and older. The U.S. Census for Okanogan County estimates 16% of the population are disabled, 41% of whom are 65 and over.

Approximately 34% of individuals and families in the county rent housing³, of which 52% are rent burdened⁴ (spending 30% or more of household income on housing). There is at least one subsidized apartment project in each of the 8 larger communities in Okanogan County. These apartment projects provide 553 units, 367 of which offer rental assistance; however, in the last 5 years, the county has lost over 12% of its affordable housing units. Additionally, there are only 9-units of HUD202 Senior Housing in the entire county.

² This is a change from the 2010 U.S. Census Bureau datum of 20.6% for the county used in the original request.

³ Data from the Housing Authority of Okanogan County.

⁴ This is a change from the Washington State Department of Commerce May 2010 Affordable Housing Inventory Report datum of 33% used in my original request. Source for the new data: U.S. Census Bureau’s 2008-2012 American Community Survey.

The Housing Authority of Okanogan County has a 100% occupancy rate in their low income housing with long waiting lists (5-15 families) and low turnover. Even before the firestorm Section 8 voucher recipients had trouble finding homes/apartments to rent. The critical loss of affordable housing for these special populations located within the impacted communities, especially during this tenuous economic period, will further complicate the ability of individuals and families to acquire even basic housing to meet their sheltering needs. The situation becomes even more dire when adequate housing is critical for survival during the coming winter months.

*The road I've lived on for 30-years,
all the homes are gone. There is
nothing left to identify house to
house. Everything from my
daughter's childhood is gone.
Everything from my parents is gone.
There will be a time when there is
nothing left to do but cry." - Sue*

Many people in this area live seasonally, making their entire year's income in the summer months. This firestorm has not only deprived them of their homes but also of the money they use to survive the winter. One Pateros resident explained it this way: "It's like going into winter with no acorns."

Trauma

Adding to the trauma of this incident was the speed with which the firestorm swept through the valleys where these communities are located. Almost half of the total acreage scorched in the fire (123,159 acres) burned within an incredibly brief 9-hour period the night of July 17, 2014. During this time the firestorm consumed an average of 3.8 acres a second, and advanced at approximately 21 miles per hour. Seasoned wildland firefighters remarked that they had never witnessed such extreme fire behavior.

On this one night, the communities of Brewster, Okanogan, Pateros, Twisp, Winthrop, and large swaths of unincorporated Okanogan County were engulfed in flames. The extreme and extraordinary fire behavior forced many to evacuate without official warnings. Due to the unprecedented speed of the fire, county officials did not have sufficient time or resources to implement evacuation protocols. People were fleeing for their lives with only the clothing on their backs and making harrowing escapes. It is a miracle there were no direct fire-related fatalities. Enclosure C contains a map of the fire progression; the large blue areas depict what was burned the night of July 17.

Of the 353 homes in Okanogan County identified as impacted by the Central Washington Firestorm we were able to obtain insurance data on all but 20. Of the remaining 333 properties, 148 or 44% are uninsured. Of those properties that are insured, 63 properties or 34% have experienced more than 40% uninsured loss. In this economic climate, it is unlikely that these impacted property owners will be able to rebuild. This will further impact the ability of these close-knit communities to rapidly recover and regain the invaluable housing stock that supported the local and regional economies. Not only did these dwelling units provide primary and secondary homes, many served as rental units and provided a substantial source of tourism revenue, a key economic driver for this region. The loss of revenues generated from the availability of these units will further complicate the success of both the emotional and economic recovery.

The signs of Post-Traumatic Stress Disorder are becoming evident, with insomnia, night-terrors, and constant fear of fire being a few of the reported symptoms. Additionally, people are re-traumatized every time it rains, with landslides and floods taking out homes, roads, and access to household water sources. Local governments are also seeing an uptick in crime and we expect this winter to bring more domestic violence, drug abuse, and other stress/trauma related behavioral problems.

Due to the housing shortages, discussed below, families continue to be separated. In order to stay in close proximity to their jobs, parents are staying in farm worker cabins or in studio apartments that do not allow for multiple-occupants. This has required parents to send their children out of the county to stay with friends and family. This separation is extending and deepening the suffering of both parents and children.

Housing Shortage Impacts

The communities hit by the firestorm are experiencing a housing crisis. Disaster survivors need immediate temporary housing assistance until they are able to return to their homes; this assistance is only available from FEMA. Without such assistance, hundreds of families may be homeless or living in substandard housing (tents, RVs, etc.) not compatible with winter weather conditions.

Without federal housing support, families will be forced to leave the area. These communities are extremely tight-knit; the disappearance of families will not only affect those leaving but those staying as well. Their potential relocation out of Okanogan County threatens both the fabric of these communities and their long-term economic health.

The FEMA Individual Assistance Program is needed immediately to stem this housing shortage and protect the region's future health.

The rental housing market in Okanogan County was severely constrained even before the fires. In addition to the owner-occupied primary residences, the fire impacted 41 rental properties, of which we know 30 were destroyed. Eighteen of these were providing basic housing to low income individuals and families. Additionally, 46 second homes were impacted of which we know 39 were destroyed. These potential rental units are no longer available to augment the County's limited rental market.

Winter will further exacerbate these needs as many disaster survivors are currently staying in recreational vehicles, tents, summer cabins, and other non-winterized structures. Without other options, individuals and families may try to live in these structures through the winter and, based on previous disasters, the potential for fatalities due to carbon monoxide poisoning and electrical fires from improvised heat sources will only increase. December's average daily temperatures in the Methow Valley range from a high of 29 degrees to a low of 14 degrees; it is also not unheard of for 3 feet of snow to fall overnight.

There are now more families competing for fewer rental units at higher prices. This upward market pressure is putting families not affected by the fires at risk of becoming homeless as well.

FEMA provided Okanogan County a list of 170 available rental units within both Okanogan and Chelan Counties.⁵ Of these, the majority are in the cities of Wenatchee and Chelan; this would be the equivalent of relocating impacted families from Washington, DC to Martinsburg, WV. One of the requirements for

"Our house was totally destroyed by fire. My wife and I have been living in a hotel for over 3-weeks, at \$125 a day. We have tried to rent but there is a housing shortage. The average rent in Wenatchee, WA is \$1,500 a month with \$1,500 damage deposit and last month's rent. So my wife and I will have to put up \$4,500 just for the first month's rent. We get \$1,500 a month from Social Security. It is very hard to find anything to rent. We all need help!" – Keith

⁵ On August 15th, FEMA Region X provided my staff a list of 170, of which 109 were confirmed on August 28.

Adequate Alternate Housing is that it is located “within normal commuting patterns of the area” (44 CFR § 206.111).⁶

An analysis of distances from the most affected communities to the most available units provided by FEMA is below.

Table 5: Commute Trip Distance to FEMA Proposed Rental Units

City	Winthrop One-Way Mileage	Brewster One-Way Mileage	Pateros One-Way Mileage
WENATCHEE	99.9	65.6	58.2
CHELAN	60.8	26.4	19

The potential distance/time impacts that survivors would be facing if they were able to secure one of these units is substantial. Commuting on rural, mountainous roads will be made more treacherous due to severe winter weather conditions, which typically begins in mid-October. Moving people out of their community does not solve any of their problems; it just re-locates them to areas where they do not have their social, spiritual, or familial support systems and adds to their stress of having to deal with the impacts of the disaster. It also adds to their financial burden through increased costs associated with travel. Therefore, I do not concur with FEMA’s premise that these available rental units meet the definition of Adequate Alternate Housing.

The Washington State Department of Commerce and the County Long-Term Recovery Organizations have reached out to cabin and vacation rental entities, real estate and property management companies, housing and service providers, and voluntary organizations in order to encourage more property owners to rent their properties and offer flexible leasing terms. This work has yielded few options and even fewer that meet the federal criteria for Adequate Alternate Housing as defined by 44 CFR § 206.111.

Alternative housing resources pursued:

- **Hotels & Resorts:** Several hotels and resorts in the area are housing fire victims, some in donated rooms and others at market rates. This is not a sustainable long-term solution. Hotels donating rooms cannot continue to do so long-term and survivors cannot be expected to pay upwards of \$125 a night for the next year. With winter weather quickly approaching, most home repairs/re-builds will not be completed until the summer of 2015. Additionally, most rooms lack cooking facilities, which increases food costs and decreases general nutrition.
- **Vacation Rentals & Second Homes:** Owners of vacation rentals and second homes have been contacted. There are some that are open to long-term rentals; however, most have existing winter reservations or the owners want to use their weekend home themselves.
- **Micro-Housing:** The County Long-Term Recovery Organizations have looked into micro-housing to help people through the winter. These might be viable options for some families, but they will need financial assistance with the \$12,000 - \$24,000 that these units will cost while they repair their primary residences.
- **Farm Worker Housing:** The U.S. Department of Agriculture has a 35-unit farm worker housing complex in the area which is 100% occupied. Additional available units are not winterized, not configured for families, and are scheduled to be decommissioned as they have outlived their functional lifespan. Additionally, these structures do not meet the criteria of “housing that accommodates the needs of the occupants” as defined by 44 CFR § 206.111.

⁶ According to the U.S. Census Bureau, the mean travel time to work for the County is 18.6 minutes.

Larger families and those with pets are experiencing even greater challenges. Many lodging facilities do not accept higher occupancy ratios and/or pets. Of the 109 rental units we have confirmed as available (see footnote 5), only 6 accept pets and only a small minority have three or more bedrooms to accommodate larger families.

Budget Constraints

Washington State's revenues are predicated on three primary tax sources: Sales Tax, Business and Occupation Tax (B&O Tax), and Property Tax. As a state largely dependent on sales related tax revenues, Washington has been particularly hard hit by the recession's lingering effect on consumer confidence. Real per capita state revenue collections remain well below pre-recession levels. The slow pace of our recovery is expected to continue for several years.

In the current biennium, we faced a projected \$1 billion shortfall due to reduced revenue collections on a \$33.6 billion budget. Additionally, the State Supreme Court in the McCleary Decision recently mandated that we increase funding for K-12 education; it is estimated that this decision will cost the state approximately \$3.7 billion through 2019. Approximately two thirds of the state's budget is protected by constitutional and federal requirements. These include debt service, mandatory Medicaid, and funds already dedicated to K-12 education. The funds needed to meet the Supreme Court's mandate will need to come from either redirecting funds from other state programs such as Higher Education, Corrections, Human Services, or Emergency Management, or generate additional revenues.

The state is facing an anticipated budget shortfall of up to \$3 billion in the upcoming 2015-17 Biennium. The one time fixes used to balance the current budget will not be available for the 2015-17 Biennial Budget. I have recently asked state agencies to prepare budget reduction proposals of 15% of their general fund budgets.

Local government budgets are faring no better than the state budget, especially in rural areas such as Okanogan County. Federal funding for local affordable housing and other programs has decreased over the past several years, putting even more pressure on Okanogan County's budget. Additionally, the fires are anticipated to negatively impact the county and town budgets due to lost tourism revenue and property taxes. Pateros estimates a loss of 20% of its tax base, the effects of which will be felt for years to come.

Available Assistance

Washington State does not currently have a dedicated funding source for disaster recovery and there has not been an outpouring of cash donations for disaster survivors. Small Business Administration resources will become available, but they do not provide the immediate housing assistance required in this dire situation.

State agencies, Okanogan County government, private voluntary organizations, and private individuals are pulling together in support of impacted individuals and families; however, even with federal resources, requests for post-disaster assistance will most likely exceed what we are collectively able to provide.

Current State Assistance:

- The Department of Social and Health Services offers several cash assistance programs designed to meet the basic needs of individuals or families. All of the programs are available to eligible victims of the recent wildfires. However, most programs can only be accessed by individuals or families having resources of \$1,000 or less. Most, if not all, fire victims do not meet this criterion. Other available short-term DSHS programs include the following:

- **Housing and Essential Needs Referral:** This program has no cash benefit; it provides access to available housing and essential needs assistance. As previously noted, no available rental housing exists. Therefore, it does not provide much utility in this situation.
- **Consolidated Emergency Assistance Program (CEAP):** This program provides cash assistance (once per 12-month period) to pregnant women and families with dependent children who are ineligible for other state administered cash assistance programs and demonstrate a need for emergency funds to meet their basic needs. This program can be extended to individuals and families without dependent children via the Disaster Cash Assistance Program (DCAP); however, even under this extended program, a family of two would only receive a one-time payment of up to \$385. CEAP funds are very limited, with a total appropriation of \$152,000 for State Fiscal Year 2015. DSHS usually runs out of CEAP funding (without activating the DCAP program) midway through each State Fiscal Year.
- The Department of Commerce has made several housing assistance programs available to disaster victims. However, all of these programs are oversubscribed; target low income families, leaving many individuals and families without support; and cannot help with the creation of housing units, which is what these disaster survivors need most. Current available programs include the following:
 - **Housing Search NW:** Washington State Department of Commerce has opened the Housing Search NW website to all property owners/managers in Okanogan, Chelan, Douglas, and Kittitas counties. This website is part of a standing contract the state has to assist people find affordable housing. This service is reliant on property owners/managers listing available units and it does not provide direct rental/housing assistance.
 - **Tenant Based Rental Assistance (TBRA):** Nineteen additional vouchers have been made available to the Housing Authority of Okanogan County to assist low-income fire victims in their search for housing. This program was oversubscribed before the fires; 19 vouchers are the most that the program is able to provide without adversely impacting other needy families in the state. The Housing Authority has reported that people receiving those vouchers are having a hard time using the rental assistance because the rental market is so limited.
 - **Housing Trust Fund:** We have increased income limits to up to 80% Area Median Income and simplified documentation requirements in order to house people more quickly; however, as with TBRA, there are no available units within Okanogan County or within a reasonable commuting distance.
 - **Consolidated Homeless Grant (HAU):** Local organizations receiving Consolidated Homeless Grants can provide emergency shelter and rent assistance for people who are homeless or at risk of becoming homeless. Income and eligibility requirements apply. Staff at Commerce and the Okanogan County Community Action Council are working together to ensure that grant restrictions are as flexible as possible for the use of these funds to serve people impacted by the fires. Unfortunately, this program is oversubscribed and often people are put on wait lists or turned away due to lack of funding.
 - **Community Services Block Grant (CSBG):** This program contracted with the Okanogan County Community Action Council for \$30,000 in grant funding to support case management efforts related to fire recovery. These funds are being matched by the Paul G. Allen Family Foundation.

- **Low Income Home Energy Assistance Program (LIHEAP):** This program helps repair or replace heating systems that are inoperable or unsafe. In order to help disaster survivors, we have simplified program eligibility requirements and raised income thresholds.

While these programs may meet some of the needs of the communities, none address the specific needs that the Individuals and Households Program or the Disaster Unemployment Program can meet.

Okanogan County and Local Government Assistance:

Okanogan County has no standing disaster recovery programs. The more than 350 homes that were impacted were either in unincorporated areas of the county or very small towns that are ill-equipped to deal with such monumental losses.

- The county will refund 2014 property taxes where values have been lost and will collect lower property taxes on these properties until they are fully restored. Due to the number of properties involved, this will have a large impact on the \$49 million county budget and reduces available resources to assist with disaster recovery efforts.
- The Twisp School District is preparing to assist students with mental health and other social services within its current budget; the Pateros School District is seeking funding to support mental health services in its schools.

Local Voluntary Assistance:

A variety of local businesses, non-profits, voluntary organizations, and individuals are providing the following support:

- A community based structure has been established to help coordinate assistance and resources which includes a county-wide Long-Term Recovery Group supporting two community-based groups, one in the Brewster-Pateros area and one in the Methow Valley.
- Local non-profits have hired Disaster Case Managers to work one-on-one with fire victims. As noted above, most have been funded by a CSBG grant and the Paul G. Allen Family Foundation.
- The 7th Day Adventists have agreed to assist with donations management.
- Local attorneys are offering free legal document recovery and various other legal services.
- Local veterinarians and animal shelters are helping animals impacted by the fire.
- The Okanogan Conservation District is working with landowners to restore forest and pasture.
- Voluntary Organizations are poised to help physically re-build homes, local businesses are providing them with free or reduced price housing materials.

Two issues placing additional stress on organizations working to support the survivors include:

1. High number of underinsured individuals and families and
2. Families that lost their homes due to the flooding and mudslides caused by the fire-related damage.

These individuals and families are generally not eligible for FEMA assistance; however, based on our Damage Assessments, they have considerable unmet needs and are having as much difficulty as the uninsured in finding suitable housing options. The needs of these families will have to be addressed as well as those of the completely uninsured. This will stretch the already limited capacity of the state, county, and tribal governments, and the Long-Term Recovery Organizations, delaying recovery for all families. Federal funding will greatly assist in our ability to serve the whole community.

Other Federal Assistance Requested:

- The Small Business Administration (SBA):

- Home Loans: The SBA disaster assistance program can help with long-term, low-interest loans for rebuilding and repair of damaged property. While these loans will be helpful in the long-term, rebuilding will not be completed by mid-November when construction must stop for the winter and disaster survivors need immediate assistance until they are able rebuild their homes.
- Personal Property Loans: Homeowners and renters may borrow money to replace or repair personal property damaged or destroyed in the fire.
- U.S. Department of Agriculture (USDA): The USDA has several disaster assistance programs that could assist disaster survivors but none are funded at this time.

In conclusion, the information provided in my original request of August 6, 2014, should be supplemented by the additional information on impacts to Okanogan County submitted herein, to include the following:

1. The determination that at least 353 homes were impacted or destroyed by the firestorm, a significant increase from earlier estimates;
2. Concentrated housing losses of more than 53% in Pateros and 17% in Brewster, respectively, coupled with a scarcity of rental units, prohibits residents from recovering in place;
3. Special populations and communities meeting the federal definition of “small impoverished communities” are unable to marshal the necessary state and local resources to provide adequate recovery options;
4. No viable options exist for placing affected individuals and families in proximal or affordable rental housing; and
5. Extraordinary budget and revenue shortfalls at both state and local levels prevent the unquestionable needs to be met through state and local programs.

Accordingly, I respectfully request reconsideration of FEMA’s August 12, 2014, denial of my request for the Individual Assistance Program for Okanogan County and the Confederated Tribes of the Colville Reservation.

I have designated Sheryl Jardine as the State Coordinating Officer for this request. She may provide further information or justification on my behalf.

Very truly yours,



Jay Inslee
Governor

Enclosures
A: Damage Database
B: Twisp Impacted Businesses Map
C: Fire Progression Map