Congress of the United States

Washington, DC 20515

October 17, 2025

Mr. Keith Turi, Associate Administrator Response and Recovery Directorate Federal Emergency Management Agency U.S. Department of Homeland Security 500 C Street, SW Washington, DC 20472

Dear Mr. Turi,

As members of Mississippi's Congressional Delegation, we write to support the City of Biloxi's Second Appeal of the Federal Emergency Management Agency's (FEMA) decision which denied fully funding Biloxi's remaining repairs to the water, sanitary sewer, and storm drainage infrastructure project (PW# 11253).

The City of Biloxi is appealing to pursue an increase in project funding of \$111,159,912.00 based on the estimate developed by the State (MEMA) consistent with FEMA's requirement to estimate funding for large complex multi-year projects by means of the Cost Estimating Factor (CEF) formulation used for Hurricane Katrina (DR-1604MS).

The Mississippi Emergency Management Agency (MEMA) recently transmitted its letter dated September 30, 2025, to your office through FEMA Region IV, Mr. Robert P. Ashe. MEMA fully supported Biloxi's Second Appeal, which requested sufficient funding to complete the repair of its water distribution, sewer collection, and storm drainage damaged due to Hurricane Katrina.

Inflationary pressures have led to increased costs across all construction-related materials, including fuel, labor, PVC pipe, concrete, and asphalt. In its December 20, 2019, letter to the State (MEMA), FEMA agreed that it did not utilize the Cost Estimating Format (CEF) means as required for estimating large, complex multi-year projects. FEMA further acknowledged that costs for general conditions, contingencies, change orders, cost escalation, contractor overhead and profit, permitting, and other soft cost factors were "inadvertently omitted from FEMA's original estimate." But for the lack of FEMA not initially applying CEF factors to estimate funding for Biloxi's water, sewer, drainage infrastructure repair project, the City would not now have to appeal for additional funding to complete the work.

As of October 7, 2025, Biloxi has completed over \$318 million of the current \$366 million infrastructure repair project, PW#11253, and has two ongoing construction projects scheduled to be complete by December 2025. The remaining two construction infrastructure projects to which the Applicant is appealing to fully fund will be "bid ready" by the second quarter of 2026.

We encourage FEMA to change course on this matter and to grant the City of Biloxi's second appeal. We appreciate your attention to this matter, and will follow your progress closely.

¹ Wells, Tod, Acting Director, Public Assistance Division, Federal Emergency Management Agency, December 20, 2019

Sincerely,

ROGER F. WICKER United States Senator

CINDY HYDE-SMTIH

United States Senator

MIKE EZELL

Member of Congress