CARA SPENCER
MAYOR

OFFICE OF THE MAYOR
CITY OF ST. LOUIS
MISSOURI

CITY HALL - ROOM 200
1200 MARKET STREET
SAINT LOUIS, MISSOURI 63103-2877
(314) 622-3201

July 11, 2025

FOR: Mr. James Remillard
Director
Missouri State Emergency Management Agency
2302 Militia Drive
Jefferson City, MO 65101

THROUGH: Ronald C. Broxton
Recovery Division Manager
Missouri State Emergency Management Agency
2302 Militia Drive
Jefferson City, MO 65101

FROM: Cara Spencer
Mayor, City of St. Louis
1200 Market Street, Room 200
St. Louis, MO 63103

Re: Justification For Usace Private Property Debris Removal Mission DR-4877-MO

PURPOSE

The purpose of this memorandum is to justify the execution of a United States Army Corps of Engineers (USACE) private property debris removal mission in response to the DR-4877-MO tornado, severe storms, and straight-line winds, and flooding, which occurred on May 16, 2025, in the City of St. Louis ("City") and Scott County. This request is for a USACE mission specifically for the City.

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BACKGROUND

On May 16, 2025, devastating tornadoes, straight-line winds, severe storms, and flooding struck Missouri. An EF-3 tornado with maximum winds up to 152 mph destroyed or damaged almost 15% of all structures within the City. Approximately 50,000 individuals have been impacted. Reports describe the damage as the largest-scale in the area since the 2011 tornado in Joplin, Missouri. It is estimated that the tornado caused $1.6 billion in damage. In the aftermath, extensive debris consisting of vegetative material, construction and demolition, white goods, household hazardous waste, asbestos-containing material, and other potentially hazardous materials has accumulated primarily on private property. It poses threats to public health and safety. The debris is estimated at 1 million tons, potentially affecting more than 24,000 parcels. The City asserts that debris quantities and/or types on private property are so widespread and of such magnitude that it has created an immediate threat to public health and safety.

DEBRIS REMOVAL APPROACH

The City first prioritized and coordinated debris removal operations in the public right-of-way. However, most debris removal needs exist within privately owned homes, most of which are low-income families. A request for private property debris removal (PPDR) was submitted to the Missouri State Emergency Management Agency (SEMA) on July 8, 2025. FEMA received the PPDR package on July 9, 2025, and is currently under review. A three-phase debris removal strategy has been developed by the City, exceeding the its capacity and capability to execute.

Phase I: Immediate Removal

Phase I was the immediate removal and began May 16, 2025, shortly after the tornado struck. The City's operating departments began removal from public streets and alleys. On May 19, 2025, data collection began with Debris Tech. Volunteers did an initial sweep and pick up from the right-of-way (ROW). The National Guard was staffed from May 29, 2025, to June 10, 2025, to support residential debris collection sites with air quality control monitoring and water suppression measures in place. This occurred 7 days a week during that time period. The National Guard has not submitted costs to date. A pre-positioned emergency contract was activated with Michael's Tree and Loader with an order not to exceed $4 million. A preexisting contract for disposal to reduce vegetative debris was enacted with St. Louis Composting. Under emergency procurement procedures, a contract was awarded to Debris Tech for monitoring with a not-to-exceed order of $1 million. The contractors worked from June 1, 2025, through July 3, 2025. Approximately 333,200 cubic yards of vegetative and 20,000 cubic yards of mixed debris have been removed.

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Phase II: Intermediate Removal

Phase II is the intermediate strategy and began on July 8, 2025. In this phase, public ROW hauling from streetside to landfill for mixed waste will continue, along with temporary debris staging site clearing. The City has been forced to shift focus to seek additional vegetative ROW removal from unperformed work from Phase I. The City will follow its standard procurement policy and procedures, which will take approximately 90 days. A growing list of structures is being prioritized for emergency demolition due to immediate threats to occupied adjacent buildings. Phases II and III have overlapping components.

Phase III: Long-term Removal

Phase III is the long-term debris removal from residential properties. The City has determined a need for hazardous site assessments (HSA), rights-of-entry (ROE), and database tracking contracts for efficient and effective debris removal operations. Based on early estimates from USACE of 1 million tons, it is estimated that the full phase will cost $300M (HSA, ROE, and database tracking contracts will cost upwards of $50 million, debris removal at $220 million, and monitoring at $30 million).

USACE PPDR MISSION REQUEST

The incident of May 16, 2025, is on a scale comparable to the 2011 Missouri Joplin tornado, and the City does not have the capacity or expertise to execute a recovery effort of this magnitude. In addition, the mission is extremely complex given the varying levels of damage and debris removal for each parcel/building. Under the City-executed and State-led mission, the mission is estimated to take at least 18 months to complete versus 6 to 8 months estimated for USACE, drastically extending the public safety threat and slowing the speed of recovery for the City.

City-Executed Mission

The City does not have the staff to manage this scale's contracts and debris operations. Those City personnel in response positions have left essential city functions to support this recovery effort. The City will require multiple contracts for program management positions, demolition work, debris removal, and monitoring. The City must contract and subcontract 99% of the positions to deliver the work. This level of contracting may increase the risk of jeopardizing reimbursement through FEMA Public Assistance. See Figure 1 for the draft organizational structure for the proposed debris removal mission.

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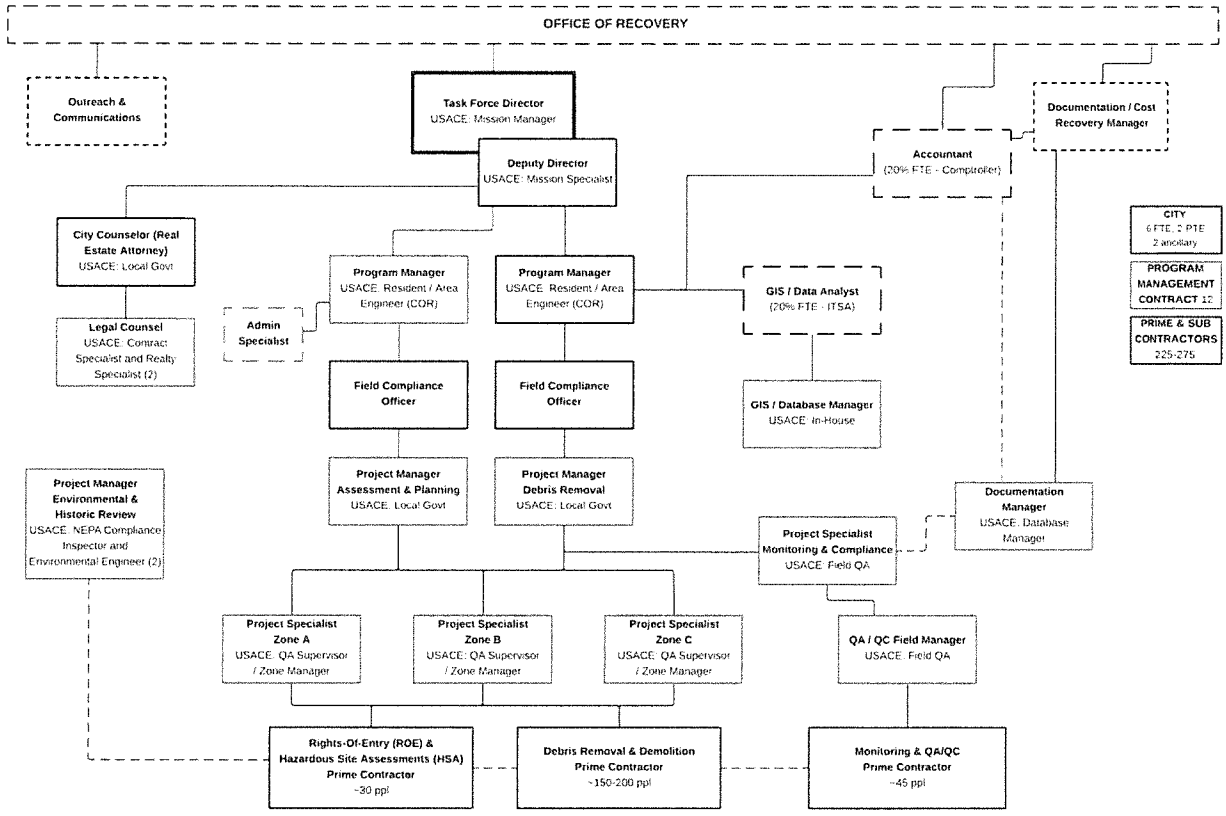
Figure 1 – City of St. Louis draft organization structure for debris removal, to include City and contracted personnel, developed in consultation with USACE SMEs.



The City projects that the debris removal mission could take at least 6 months to onboard new staff and program management consultants and complete contractor procurement, and a minimum of 18 months to complete the full debris removal mission. This assumption excludes missing deadlines, contractors with unsatisfactory performance, disposal issues, environmental and historical concerns, or Tribal concerns. The City would follow their normal procurement process to ensure compliance with 2 C.F.R. and reduce risk of emergency exigency contracting issues given the potential duration of this mission. Additionally, the bids the City received for a part of the right-of-way (ROW) scope revealed deficits within the local bidder pool. See Figure 2 for the City-executed debris mission timeline.

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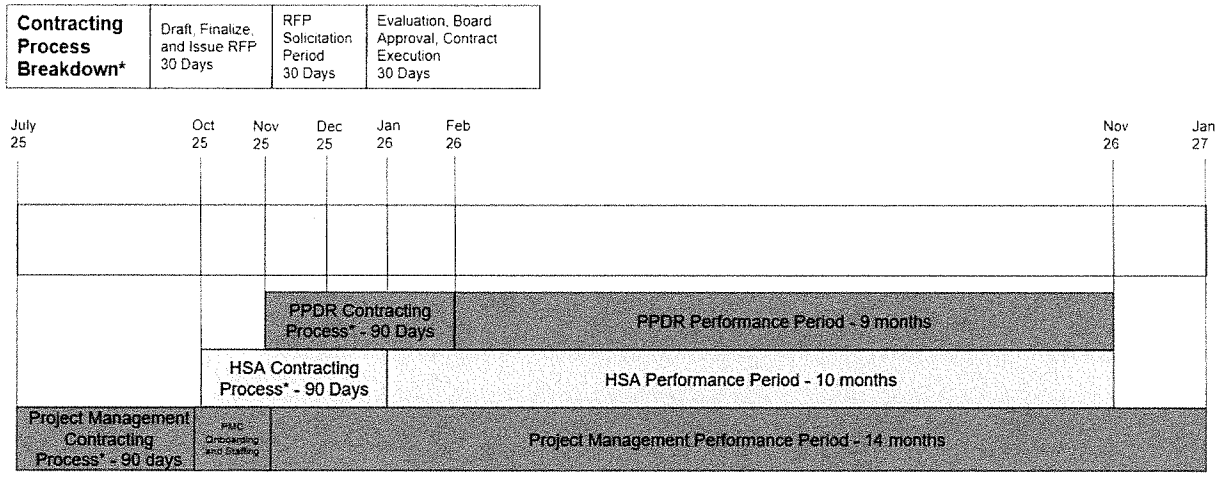
Figure 2 - City of St. Louis estimated timeline debris removal mission



This timeline poses a threat to the health and safety of citizens. Debris exposed to the elements for extended periods that contains asbestos material, lead paint, or household hazardous materials may cause severe respiratory issues, or contaminate water and soil. The affected area experiences worse health outcomes than the surrounding region, such as 14 times greater rate of elevated blood lead levels in young children and nearly 5 times the emergency room visitation rate for asthma and chronic lower respiratory disease[1].

United States Army Corps of Engineers (USACE) Executed Mission

However the debris mission is estimated to take 6 to 8 months to complete utilizing USACE mission support. USACE estimates 4-5 days per parcel would be required to complete demolition, removal, brick recycling, sample testing for asbestos, and debris segregation. This estimate assumes the USACE mission is following City and State regulations for demolition and excludes foundation removal.

To support the 6-to-8-month recovery timeframe, USACE is projecting 45 debris removal crews will be needed to expedite the removal and disposal process. The total cost of $300M includes mobilization, demobilization, crews, right of entry forms, hazardous site assessments, disposal site identification, environmental monitoring, quality control/monitors, and program management. USACE has available contract options, such as the Advanced Contracting

[1] Home Is Where Our Health Is: Health and Housing Quality Brief. 2024.

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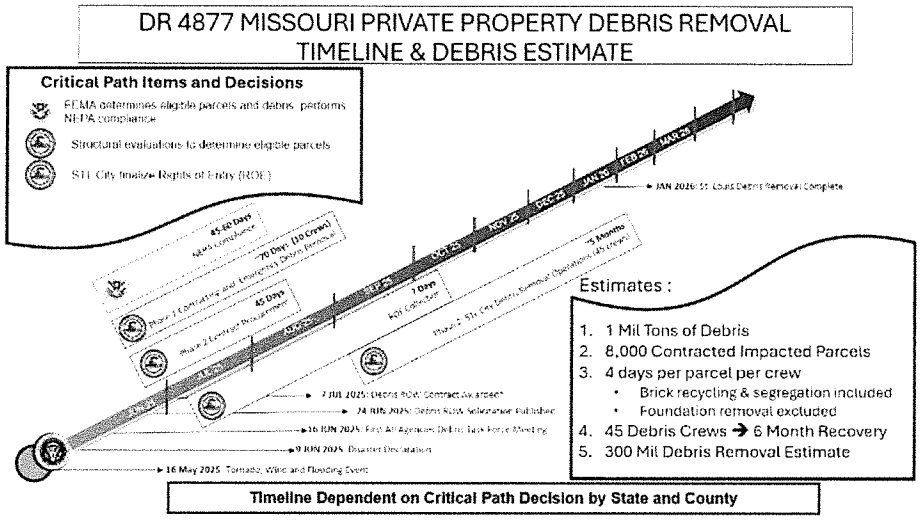
Initiative (ACI). USACE maintains an inventory of pre-awarded contract tools and leverages the national Disaster Response Registry (DRR),, part of the General Services Administrator's System for Award Management (SAM). The DRR includes a database of contractors willing to remove debris and other emergency relief activities. See Figure 3 for the USACE debris-executed mission.

Figure 3 – USACE estimated timeline to complete debris removal mission



RECOMMENDATION AND REQUEST FOR USACE DEBRIS MISSION

With this context, we recommend and request that USACE be approved to conduct the estimated $300 million private property debris removal mission to expedite the City of St. Louis' recovery.

The City does not have the staff required to manage multiple contracts, enforce multiple contracts, perform consultations with other state agencies, and/or triage debris operations in the field in real time. USACE brings additional capacity, expertise, and equipment. USACE brings standardized, scalable logistics and contractor oversight, ensuring cost-effective and timely removal. Additionally, as opposed to the USACE mission projections of 6-8 months with a start date of August 2025, the City projects a minimum of 18 months for completion, with a start date of February 2025.

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Most of the timeline differential is due to the up-front effort required to procure the capacity and contracts necessary to manage the mission. This timeline poses a threat to the health and safety of citizens due to mold growth, asbestos-containing material, lead paint/chips, and household hazardous materials left on parcels exposed to elements, increasing the risk to nearby citizens.

Sincerely,

Cara Spencer
Mayor, City of St. Louis

Julian Nicks
Chief Recovery & Neighborhood Transformation Officer, City of St. Louis