



OFFICE OF THE MAYOR
CITY OF ST. LOUIS
MISSOURI

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

CARA SPENCER
MAYOR

December 8, 2025

FOR: Mr. James Remillard
Director, Missouri SEMA

Ronald C. Broxton
Recovery Division Manager, Missouri SEMA

FROM: Cara Spencer
Mayor, City of St. Louis

Julian Nicks
Chief Recovery Officer, City of St. Louis

**SUBJECT: Clarification of FEMA PPDR Eligibility Under FCO Nunn Approval and PW
963632 – FEMA-4877-DR-MO**

Dear Director Remillard and Mr. Broxton,

Thank you for the on-going support of our recovery priorities over the last six (6) months following the tornado. From the Governor's Office and the State Emergency Management Agency (SEMA) to our federal partners within FEMA, we have collectively made significant progress with the debris mission. Between the Federal Coordinating Officer (FCO) initial clarification memorandum which provides broad eligibility determinations for the demolitions and debris, to the expedited Project Worksheet that provides millions of dollars up-front to speed this mission, we are very optimistic of a successful recovery for the City.

There is a great deal of work to do going forward and the journey through long term recovery will be long, but with continued close coordination we will be successful in supporting the tornado victims and rebuilding the City.

The City reaffirms our unwavering commitment to working closely with our State and Federal partners to achieve this.



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To further this objective, I am writing to follow up on several outstanding questions related to the PPDR / demolition mission. The City of St. Louis plays a critical role in the collection of Rights-of-Entry (ROE) and preparing them for transmission to the State - and we want this to go efficiently and effectively. We have dedicated significant public and private resources to move this program as quickly as possible.

Upcoming Request for Non-Demolition Debris Removal: *In parallel with the Demolition program, the City is preparing to execute a second private property program for non-demolition related debris removal. We understand FEMA does not want to include non-demolition elements in PW #963632; however, this additional debris removal work is necessary to support the public health and safety of the community. As we collect the data requested by the State, we will return with a second, standalone request addressing non-demolition debris removal once that scope is finalized through traditional PA Program channels.*

Property Eligibility Clarifications

Through a review and analysis of (1) FEMA-approved Private Property Debris Removal (PPDR) authorities outlined in FCO Nunn's July 14, 2025 letter (2) Project Worksheet #963632 and (3) the FEMA/State clarifying language provided in your email dated November 21, 2025, we have developed a series of questions for your review.

Our goal is to ensure that the broad Demolition authorities granted under FCO Nunn's approval are applied consistently in support of efficient recovery operations for the City of St. Louis, while maintaining full compliance with Public Assistance policy and environmental and historic preservation requirements.

We hope that the State is able to engage with FEMA on this issue or even share this correspondence with FEMA directly.

1. Define Private Property Homes

The PW calls to "Demolish 1,000 private property homes (parcels) within the Independent City of St. Louis". We are requesting confirmation that the definition of "private property home" is a tornado-damaged structure with four or less residential units.

Reasoning: The City is intensely preparing hundreds of ROE packages for submission to the State. Understanding the definition of a private property home will speed up the evaluation process for the State since the City will be providing packages in line with the definition.

2. Expand Eligible Property Types



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The PW is silent on other types of properties that may meet the criteria for demolition. These properties are also causing a public health and safety threat within the City. We are requesting that SEMA coordinate with FEMA to include the following property types:

- Small Commercial Buildings
- Buildings Owned by Houses of Worship and Private Nonprofits (PNPs)
- Vacant and/or Condemned Buildings

Reasoning: The buildings may contain hazardous materials—including asbestos, lead-based paint, and other particulate matter—released from damaged structures, posing respiratory and long-term health risks to residents. Accumulated debris also contaminates soil and creates conditions that support mosquito breeding, insect-borne illnesses, and the proliferation of illegal dumping, pests, mold, and mildew, exacerbating existing vulnerabilities in affected neighborhoods.

These threats are further heightened by the fact that many affected private property owners - including small businesses, houses of worship, and rehabbers - many of whom are low income and uninsured, leaving them without the financial means to address debris hazards on their own. Together, these conditions create an imminent risk not only to individual households but to the broader community, justifying coordinated, government-led demolition on private property to protect public health and safety.

Scope of Work Clarifications & Revisions: Demolition Project Worksheet

1. Foundation and Slab Removal

The PW and clarifying guidance list slab and on-grade foundation demolition as ineligible but does allow for “fill open below-grade structures, such as basements and swimming pools”. The PW also allows for “removal of hazardous materials, such as asbestos” as well as “backfill to stabilize impacted parcels and prevent secondary hazards”. In addition, FCO Nunn’s letter provides discretionary authority for case-by-case foundation removal when in the public interest or when structural conditions warrant it.

We request that SEMA work with FEMA to reaffirm the case-by-case eligibility pathway for the removal of slabs or other structures if certain conditions are met. This ensures safety, avoids partial demolitions that leave hazardous materials in place, or conditions that could lead to a secondary hazard, thus allowing environmental and engineering determinations to guide.

Examples of case-by-case eligibility include:

- Removal of basements when lead-based paint or asbestos are present



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- Removal of exterior, concrete steps between the sidewalk and home that are a danger to the public or secondary hazard
- Removal of retaining walls when necessary for site stabilization that are in danger of collapse

2. Water Tap Destroys

The PW allows that contractors "Secure utilities to include wells, pumping and capping of septic tanks" however wells and septic tanks do not apply to structures in the City. We believe that the intent of this section is to secure water and sewer lines to include the removal of water taps, as they are part of the demolition protocols for the City. We believe that the only way to secure them is to properly destroy them to reduce these risks to public health and safety (such as leakage and backflow contamination if a connection is left) and to the City infrastructure, while also supporting economic recovery.

We are requesting that SEMA work with FEMA to clarify this line as an eligible activity and include this in the State's vendor Scope of Work.

Summary

The clarifying restrictions issued post-PW narrow FEMA's originally approved authority under FCO Nunn's letter. To preserve both compliance and recovery effectiveness, FEMA and SEMA should apply a broad, case-by-case interpretation of eligibility consistent with that letter's intent. Doing so will prevent delays, reduce administrative duplication, and better support equitable recovery for affected residents of the City of St. Louis.

Conclusion

The City of St. Louis requests that SEMA seek these clarifications and flexibilities from FEMA Region 7. Clear, written guidance will ensure that PPDR and demolition operations proceed efficiently and in full compliance with FEMA policy—while accelerating safe and sustainable neighborhood recovery.

The City respectfully requests FEMA and SEMA to:

1. Provide written clarification of property eligibility requirements.
2. Affirm that foundation/slab removal/other paved improved areas may be approved case-by-case under the FCO's discretionary authority when warranted by structural or safety conditions.
3. Define securing utilities to include the removal of water taps.



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4. Reinstate the public-interest and SVI-based justification process to align with the FCO's stated approval criteria.

We appreciate SEMA's continued advocacy on behalf of the City of St. Louis following this extraordinary disaster. If you have any questions or need any additional information regarding this request, please contact Julian Nicks at nicksj@stlouis-mo.gov or 314-296-1082.

Respectfully,

Cara Spencer
Mayor, City of St. Louis

Julian Nicks
Chief Recovery Officer, City of St. Louis

