



FEMA

February 3, 2026

James Remillard
Director, Missouri State Emergency Management Agency
2302 Militia Drive Post Office Box 116
Jefferson City, Missouri 65102

Dear Director Remillard:

FEMA Region 7 is providing the following information to support Missouri's State Emergency Management Agency (SEMA) in their recovery efforts for DR-4877-MO under the Public Assistance grant program. The information below follows the City of St. Louis (Applicant) letter to SEMA dated December 8, 2025, concerning the eligibility of work under the Public Assistance program.

- **Emergency Protective Measures** – The Stafford Act gives FEMA the authority to provide grant assistance for work necessary to save lives, protective public health and safety, and to protect improved property in response to a major disaster.¹ FEMA administratively classifies this work as “emergency protective measures” (Category B) under the Public Assistance Grant Program.²
 - General eligibility requirements that apply to all work under the Public Assistance Grant Program, include but not limited to, (1) the work must be required as a result of the major disaster, (2) the work must be located within the designated area of the major disaster, and (3) the work must be the legal responsibility of an eligible applicant.³
 - Specific to Category B; Eligible work as an emergency protective measure must either (1) eliminate or lessen immediate threats to lives, public health or safety; or (2) eliminate or lessen immediate threats of significant additional damage to improved property through cost effective measures.⁴
- **Demolition of Private Structures** – Demolition of Private Structures does not require prior approval from FEMA as emergency protective measure. For reimbursement, the demolition work must meet all requirements for eligibility under the Public Assistance Grant Program.

¹ Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. No. 93-288, § 403 (1974) (codified as amended at 42 U.S.C. § 5170b) (“Stafford Act”); *see also* 44 C.F.R. § 206.225.

² FEMA Policy No. 104-009-2, *Public Assistance Program and Policy Guide*, at 130 (Jan. 6, 2025) (“PAPPG”).

³ *Id.* § 206.223(a).

⁴ 44 C.F.R. § 206.225(a)(3).

- The baseline qualifying standard for all emergency demolition of structures located on private property is a demonstration that partial or complete collapse is imminent, and that collapse poses an immediate threat to the general public.⁵ This requires the Applicant to certify the structures are unsafe and pose an immediate threat to lives or public health and safety as determined by the authority having jurisdiction, in coordination with a qualified individual such as a licensed engineer or architect.
- In addition, the Applicant must:
 - Notify FEMA that demolition of private structures will be conducted and identify the type of property on which the demolition work will be conducted.
 - Provide documentation to confirm legal authority and responsibility to enter private property and demolish privately-owned unsafe structures.
 - Indemnify the federal government from any claims arising from the demolition of privately-owned unsafe structures and removal of the resulting debris; and
 - Obtain all necessary permits and comply with all federal, state, and local laws, regulations, and executive orders.⁶
- **Commercial Structures** – FEMA has not received a request to authorize the demolition of commercial structures for DR-4877-MO. The demolition of commercial structures is generally ineligible except under extraordinary circumstances granted by the Regional Administrator⁶
- **Structures Qualifying as Private Property** – Private residential properties generally consist of four or fewer units. Multiple structures owned by the same entity or person regardless of the number of units are considered commercial properties and not eligible.
- **Private Nonprofit Structures** – Eligible private nonprofit applicants should pursue reimbursement of demolition costs through their own Public Assistance projects.
- **Condemned and Vacant Structures** – Demolition of structures condemned prior to the major disaster are not eligible.⁷ Private vacant structures that were not condemned prior to the major disaster may be eligible if the work meets all eligibility requirements, including (1) the demolition work is required as a result of the major disaster, and (2) the structure poses an immediate threat to lives, public health or safety.
- **Slab Removal and Foundation, Exterior Concrete, and Wall Demolition** – The removal of a slab, foundation, exterior concrete steps, or retaining walls is generally ineligible demolition work.⁸ The work could be eligible in limited circumstances; evaluated on a case-by-case basis.
- **Hazardous Materials** – Costs incurred to test for and remove hazardous materials is eligible for reimbursement if the demolition work meets all other eligibility requirements.⁹ Applicants must comply with all environmental regulatory requirements for handling hazardous materials. Applicants

⁵ PAPPG, at 154.

⁶ *Id.* at 130.

⁷ *Id.* at 154.

⁸ *Id.* at 156 (“Ineligible work associated with the demolition of private structures includes, but is not limited to:...[r]emoval of slabs or foundations that do not present a health or safety hazard....”).

⁹ *Id.* at 155.

are required to contact the appropriate agency to obtain required permits, notify proper agencies of hazardous materials storage, and develop any required facility specific emergency response plans for spills, safety, and proper handling.¹⁰ FEMA will also ensure compliance with all applicable environmental laws when providing Public Assistance funding for work involving the handling of hazardous materials.¹¹

- **Water Tap Destroys/Securing Utilities** – Costs to secure utilities are eligible on the property where the eligible demolition is performed. Cost to remove water taps or other utilities beyond the adjacent demolition footprint are ineligible for reimbursement under Public Assistance.

If you have any questions, please contact Justin D. Petersen, Federal Coordinating Officer for DR-4877-MO, at (816) 349-9481 or Justin.Petersen@fema.dhs.gov.

Sincerely,

Catherine R. Sanders
Regional Administrator (Acting)
FEMA Region 7

¹⁰ *Id.* at 136.

¹¹ *Id.*