

# **Citizen Participation Plan St. Charles County, Missouri**

Version: 05-08-2020 Substantial Amendment to address COVID-19

Version: 03-12-2018 Substantial Amendment after City of St Charles joining Urban County

Version: 01-19-2016 1 footnote added administratively for clarification

Version: 12-17-2015 6 footnotes added administratively for clarification

Version: 01-12-2015 Approved by County Council

Original Version: 8-30-2010 Approved by County Council

## **1. Background**

St. Charles County is the responsible agency for the St. Charles Urban County, a cooperative arrangement of the cities of St. Peters, St. Charles, St. Paul, Lake Saint Louis, Cottleville, Wentzville, Weldon Spring, New Melle and unincorporated St. Charles County, to collectively receive Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds from the U.S. Department of Housing and Urban Development (HUD). All participating jurisdictions execute cooperation agreements with St Charles County and are subject to the same citizen participation requirements that are presented in this Citizen Participation Plan.

Additionally, to receive HOME funds, St. Charles County participates in the St. Louis HOME Consortium, which includes the City of Florissant, the City of St. Charles, the City of O'Fallon, the City of Wentzville, Jefferson County and St. Louis County (lead agency).

Although the St. Charles Urban County receives CDBG funding directly from HUD, St. Charles County receives HOME funding as a member of the St. Louis HOME Consortium. Additionally, St. Charles County contracts with the City of St. Charles to administer and manage the daily operations of the Urban County's CDBG and HOME-funded programs.

## **2. Purpose of the Citizen Participation Plan - Introduction**

The St. Charles County Citizen Participation Plan provides a guide for public input and participation in identifying housing, community development and public service needs, and the funding priorities for programs and target populations to be served through resources for the St. Charles Urban County. The St. Charles County Department of Community Development is responsible for developing and implementing a citizen participation plan with the other plans and reports required by HUD. The purpose of this Citizen Participation Plan is to encourage citizen participation in the decision-making processes with particular emphasis on the participation of low- and moderate-income residents<sup>1</sup> for whom CDBG and HOME funds are to be used.

Federal regulations were revised in 1994 to provide for the consolidated submission of documents (the Consolidated Plan) which cover the planning and application aspects of CDBG

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<sup>1</sup> Low- and moderate-income persons and areas refer to HUD definitions of low and moderate income being 50% and 80% of the area's median income.

and HOME programs. The Citizen Participation Plan provides for and encourages citizen participation in the development of the consolidated plan, annual action plan, and any substantial amendments to these plans and the performance report:

- **Consolidated Plan** is a five-year plan to examine the housing and community development needs for the community and outlines anticipated strategies to address those needs.
- **Annual Action Plan** is an annual plan to describe in detail how CDBG and HOME funds will be used and how the Consolidated Plan will be carried out.
- **Consolidated Annual Performance and Evaluation Report (CAPER)** is the annual report to evaluate progress toward the goals established in the Consolidated Plan.

The objectives of the Citizen Participation Plan are to:

- Encourage citizen participation by providing citizens with adequate information concerning the amount of funds expected to be available for community development, housing activities, and public services through federal and local funding sources, the proposed range of activities that may be undertaken with those funds, including the amount that will benefit very low and low income and the plans to minimize displacement and to assist any persons displaced, other important program requirements, and proposed and approved uses of funds;
- Provide for and encourage citizen participation from all sectors of the community, with particular emphasis on participation by low and moderate income persons, low and moderate income residents of blighted areas and in areas in which federal funds under federal funding sources are used or are proposed to be used; and for the participation of minority and non-English speaking residents<sup>2</sup>, as well as persons with mobility, visual, speech or hearing impairments, and in-conjunction with public housing agencies the participation of residents of public and assisted housing developments;
- Provide opportunities for participation of local and regional institutions and other organizations including businesses, developers, and community and faith-based organizations.<sup>3</sup>
- Provide citizens, public agencies, and all other interested parties with reasonable and timely access to information and records relating to the County's Consolidated Plan, and the use of assistance provided by federal funding sources included in the Plan for the preceding five (5) years;

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<sup>2</sup> Notice will be sent to the St Charles NAACP chapter to encourage minority participation and the ESL (English as a Second Language) program at the St. Charles Community College for the participation of non-English speaking population.

<sup>3</sup> Includes Continuum of Care, non-profit organizations, and philanthropic organizations.

- Provide technical assistance to groups representing very low- and low-income persons and to interested residents that request such assistance in developing proposals for funding assistance under federal and local funding sources covered by the Consolidated Plan, with the level and type of assistance to be determined by the County;
- Conduct public hearings to obtain the views of citizens on housing, community development and public services needs, proposed activities, which hearings shall be held after adequate notice, at times and locations convenient to potential and actual beneficiaries, with accommodation for persons with disabilities and non-English speaking residents;
- Prepare a summary of comments or views received from citizens in writing or orally through public hearings, focus groups, community meetings and other methods when preparing the Consolidated Plan, and any amendments to the Plan or the performance report and attach the summary to the Plan or report. In addition, provide for a timely response to such comments and views within fifteen (15) working days, where practicable; and
- Provide criteria for determining what constitutes a substantial change in the planned or actual activities described in the approved Consolidated Plan which would require an amendment to the Plan.

### **3. Adoption and Amendment of the Citizen Participation Plan**

A 15-day public comment period was provided for the original Citizen Participation Plan ~~to be~~ included within the initial Consolidated Plan accepted by HUD in 2010. Various agencies involved in housing, community development and public service needs were notified of the initial Citizen Participation Plan review period and how to review the draft plan. Notification of these various agencies utilized the Community Council’s membership list.

Citizen Participation Plan amendments are to be approved by the St. Charles County Council on its meeting consent agenda. Proposed changes to the Citizen Participation Plan will be posted at least 15-days prior to the adoption of such amendments. In addition, various agencies involved in housing, community development and public service needs<sup>4</sup> will be notified as specified above. The proposed revisions to the St. Charles County Citizen Participation Plan will become effective upon the date of approval on the County Council’s consent agenda.

### **4. Consultation for the Consolidated Plan and Annual Action Plan**

In preparation for the Consolidated Plan and Annual Action Plan, the Department of Community Development will consult with other public and private agencies that provide assisted housing, health services and social services including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and Homeless persons. The public and private agencies to be contacted include, but are not limited to, the St. Charles County Public

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<sup>4</sup> Including convening organizations such as the Community Council of St. Charles County, the Tri-County Continuum of Care (MO-503), and the United Way of Greater St. Louis.

Health Department, the Mid-East Area on Aging, the Community Council of St. Charles and the Missouri Department of Social Services Division of Family Services.

In preparation for the Consolidated Plan and the portion of the Consolidated Plan dealing with lead-based paint hazards, the Department of Community Development will consult with the St. Charles County Public Health Department and any child welfare agencies to examine existing data related to lead-based paint hazards and poisonings, including data on the addresses of housing units in which children have been identified as lead poisoned.

In preparation for the County's Consolidated Plan, the Department of Community Development will notify participating and adjacent units of local government of any non-housing priority needs.

The Department of Community Development will consult with adjacent units of general local government as well as the East-West Gateway Council of Governments to identify any problems that go beyond a single jurisdiction. Such agencies or jurisdictions will be consulted with respect to finding solutions to any identified problems of a regional nature.

The Department of Community Development will consult with the North East Community Action Corporation, St. Charles County Housing Authority and the St. Charles Local Housing Authority concerning consideration of public housing needs and any planned grant program activities. This consultation will ensure and provide a better basis for the certification by the St. Charles County Executive that the Consolidated Plan is consistent with the County's assessment of low-income housing needs. This type of consultation will also help insure that any proposed activities that are directed towards local drug elimination, neighborhood improvement and or any resident programs and/or services funded under or by the North East Community Action Corporation, the St. Charles County Housing Authority and the St. Charles Local Housing Authority and those funded under any programs covered by the Consolidated Plan are fully coordinated to achieve comprehensive community development goals.

## **5. Development of the Consolidated Plan and Annual Action Plan**

The County encourages citizen participation by providing citizens with adequate information concerning the amount of funds expected to be available for community development and housing activities, and public services through federal and local funding sources, the proposed range of activities that may be undertaken with those funds, including the amount that will benefit very low and low income persons and the plans to minimize displacement and to assist any persons displaced. Such plans related to displacement and assistance to those displaced will be prepared and considered in the review and approval of the annual action plan.

A notice regarding the proposed plan will be published on the St. Charles County Department of Community Development's web site at <http://www.sccmo.org/203/Community-Development> and a copy of the Proposed Consolidated Plan and Annual Action Plan will be available to the public for review and comment at least 30 days prior to submission to HUD. The notice advising of the opportunity for public comment and the notice of its availability will also be emailed to neighborhood groups, associations, nonprofit, ecumenical, business and other community

organizations and other interested individuals which have been involved in past funding cycles for each program or have expressed an interest in being notified of such hearings or plan availability. The proposed plan will be available for review 1) at the Department of Community Development at 201 N. Second Street, Room 410, St. Charles, Missouri 63301, and 2) St. Charles City Hall, 200 N. 2<sup>nd</sup> St., St. Charles, Missouri 63301, and 3) on the web at <http://www.sccmo.org/203/Community-Development>.

The final plan will be available online at <http://www.sccmo.org/203/Community-Development> and notice of its availability will be emailed to participating jurisdictions; neighborhood groups; associations; nonprofit, ecumenical, business and other community organizations; and other interested individuals which have been involved in past funding cycles for each program. Other neighborhood groups, associations, organizations, and individuals will be added to the email list upon request to the Department of Community Development. Printed versions of the plan will also be available to those who cannot otherwise access the plan or those that request the printed version. Printed versions of the plan will be available at the Department of Community Development at 201 North Second Street – Room 410, St. Charles, MO 63301. A paper copy can also be printed for individuals at no charge upon request.

## **6. Citizen Participation Process**

### **Public Hearings**

The County will conduct public hearings to obtain the views of citizens on housing, community development and public services needs, proposed activities, and program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential and actual beneficiaries, with accommodation for persons with disabilities and non-English speaking residents<sup>5</sup>. For planning the Annual Action Plan and all Five Year Plan cycles a minimum of two public hearings will be held. As per HUD regulations the first public hearing is to occur six months prior to the start of the Annual Action Plan year.

One public hearing will be held by the Community Development Department at the beginning of the Consolidated Plan process or program year to solicit citizen comments on housing and community development needs, and proposed activities. This hearing will discuss the programs that the County administers and will be held to present a proposed budget and funding for activities, to obtain the views of citizens on housing and community development needs, including priority non-housing community needs. This hearing will discuss the programs that the County administers and will be held to obtain the views of citizens on housing and community development needs, including priority non-housing community needs and housing needs. The first public hearing shall also be held to allow interested groups and or agencies the opportunity to discuss their programs and make presentations in seeking funding. Testimony received at this hearing will be considered by the Community Development Department in preparing the proposed Consolidated Plan/Annual Action Plan. In addition, the Community Development Department may gather community input through a variety of means, such as forums and focus groups, and the use of surveys for the development of funding priorities and criteria. Upon the

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<sup>5</sup> No charge for printed copies to citizens and groups requesting such plan. When a significant number of non-English speaking residents can be reasonably expected to participate, a translator will be provided.

development of a proposed plan and posting a notice thereof, the Department will accept comments for 30 days and include such comments along with those from the public hearing within the plan. Prior to approval and the submission of the plan to HUD, the County Governing Body will consider public comments during the second public hearing on the proposed plan as recommended by the Department of Community Development.

This second hearing shall be after HUD provides the announcement of the funding allocation for the budget year. This second public hearing is held to gather citizen input regarding official CDBG budget and proposed activities and is held during an open County Council meeting whereby the Council introduces an Ordinance to introduce the official CDBG budget. According to the Charter the Council holds a second meeting to approve the Ordinance which is also open to the public.

All public hearings will be held in the St. Charles County Administration Building, located at 201 N. Second Street, St. Charles, Missouri 63301 or other centralized locations as noted in the hearing announcement.<sup>6</sup>

All public hearings will be advertised at least 15 days in advance on the St. Charles County Department of Community Development's web site at <http://www.sccmo.org/203/Community-Development> in the County Executive Building/Historic Courthouse, and at the web sites of participating jurisdictions. The notice advising the public hearing will also be emailed to neighborhood groups, associations, nonprofit, ecumenical, business and other community organizations and other interested individuals which have been involved in past funding cycles for each program or have expressed an interest in being notified of such hearings.

Notices will also be posted at the St. Charles Public Housing Authority, 1041 Olive St.; Charles MO; the Kathryn Linnemann Branch Library, 2323 Elm Street, St. Charles, MO; and the St. Charles County Library District, Spencer Road, St. Peters, 63376. Public hearing notices shall also be published at least 15 days prior to the meeting in a City of St. Charles newspaper of record which is currently the *St. Charles Business Journal*.

All meetings will be held at convenient times in order to accommodate potential or actual beneficiaries. These meetings may be conducted during the evening hours in order to accommodate citizen participation. Persons with disabilities may request that the county provide them with necessary and reasonable accommodations. Callers should make these requests for arrangements at least 48 hours in advance of any public hearing by calling the Department of Community Development at 636-949-7335. Any and all citizens have the opportunity to comment orally or in writing on any matter(s) relating to the public hearing. All comments will be incorporated into the Consolidated Plan and the Consolidated Annual Evaluation and Performance Report (CAPER) and made part of the record of the citizen participation process for each program year.

In response to a declared disaster, the County may conduct public hearings through alternative means and with compressed deadlines, as specified hereinafter.

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<sup>6</sup> Other locations may be selected that are convenient to potential and actual beneficiaries.

## **Response to Citizen Comments**

Written or oral comments received from citizens as a result of public hearings or other activities to gather community input held on the plan will be given serious consideration in the preparation of the final plan document, amendments to the plan, or the performance report. A summary of the comments received from citizens, both accepted and not accepted, will be attached to the final plan, plan amendments, or performance report. Comments, concerning the Consolidated Plan or Annual Action Plan should be addressed to the Department of Community Development, Consolidated Plan, 201 North Second Street – Room 410, St. Charles, Missouri 63301.

### **7. Amendment of the Consolidated Plan and Annual Action Plan**

St. Charles County may from time to time amend the activities in its Consolidated Plan or Annual Action Plan.

A “substantial amendment” to a Consolidated Plan or Annual Action Plan will be defined as:

- A 50% or greater decrease in funding allocated to any category of activity; and/or
- Creation of new programs.

For substantial amendments, public notice will be given by placing a notice on the St. Charles County Department of Community Development’s web site at <http://www.sccmo.org/203/Community-Development> notifying the public that a public hearing will be conducted to discuss the *Substantial Amendment* and solicit input from concerned citizens. The notice announcing the public hearing will also be emailed to neighborhood groups, associations, nonprofit, ecumenical, business and other community organizations and other interested individuals which have been involved in past funding cycles for each program or have expressed an interest in being notified of such hearings. A period of thirty days will be allowed for the public to submit comments. After the comment period has expired any *Substantial Amendment* to the plan will be forwarded to the County Council for approval prior to being sent to the U.S. Department of Housing and Urban Development.

Any and all oral and written comments from the public will be reviewed and considered by St. Charles County prior to the approval of any *Substantial Amendment*. A summary of all comments or views and a summary of any comments or views not accepted and the reasons, therefore, will be attached to the *Substantial Amendment* and submitted to the Department of Housing and Urban Development.

Consolidated Plan or Annual Action Plan amendments which are not defined as substantial can be made administratively without prior public notice or comment.

### **8. Provisions for Declared Disasters and States of Emergency**

To the extent authorized by Federal laws and regulations, plans and plan amendments proposed in response to disasters<sup>7</sup> and states of emergency declared by the County Executive of St. Charles

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<sup>7</sup> Declared disasters and emergencies may include man-made (including terrorism) and natural (including pandemics).

County, the Governor of Missouri, or the President of the United States may necessitate alternative procedures from those provided in the Citizen Participation Plan, including, but not limited to, alternative procedures authorized by the CARES Act (Public Law 116-136) in response to the COVID-19 pandemic.

In order to meet urgent needs, the County may expedite amendments to the Annual Action Plan and Consolidated Plan, utilizing a five (5) day public comment period, create new programs and activities, and reprogram funds.

Additionally, in such cases a “substantial amendment” will be defined as reallocating more than 25% of the most recent annual allocation within adopted Consolidated Plans and Annual Action Plans. In such cases, moving up to 25% may be accomplished administratively without prior public notice or comment.

Virtual public meetings and hearings may be used to fulfill applicable public hearing requirements instead of in-person. Real-time responses and accommodations for persons with disabilities and/or limited English proficiency will be made available to the extent practicable.

Even when alternative procedures may be used, the County’s uses of CDBG funds shall continue to meet national CDBG program objectives and other Federal laws and regulations.

## **9. Performance Reports**

The St. Charles County Department of Community Development prepares and disseminates an annual Consolidated Annual Performance and Evaluation Report (CAPER). This report is due to the U.S. Department of Housing and Urban Development within 90 days of the end of the program year. This report will be made available for public review and comment with a public hearing, which will be conducted by the Department of Community Development with a notice of such public hearing posted on the St. Charles County Department of Community Development’s web site at <http://www.sccmo.org/203/Community-Development> fifteen (15) days prior to the hearing. Additionally, the public hearing notice will be published in the City of St. Charles’ newspaper of record, which is currently the St. Charles Business Record.

The performance report will be available 1) at the Department of Community Development at 201 N. Second Street, Room 410, St. Charles, Missouri 63301, and 2) St. Charles City Hall, 200 N. 2<sup>nd</sup> St., St. Charles, Missouri 63301, and 3) on the web at <http://www.sccmo.org/203/Community-Development>

Citizens will be allowed a period of at least 15 days to comment on this Report. Comments, suggestions and or complaints regarding this report may be forwarded to the Department of Community Development, Performance Report, 201 N. Second Street, Room 410, St. Charles, Missouri 63301. All public input will be made a part of the performance report and forwarded to the U.S. Department of Housing and Urban Development.

## **10. Access to Public Meetings and Materials**

St. Charles County Administration and City Hall buildings are wheelchair accessible. Those in need of auxiliary aids should contact the City sufficiently in advance to assure that accommodations may be made. For the hearing impaired, City Hall can be contacted on the TTY\TDD system by calling (636) 949-3289. For accessible materials, delivery formats, or language translations regarding the Citizen's Participation Plan, Consolidated Plan, Annual Action Plan, or CAPER please call Anita Telkamp 636-949-3224 or email Anita.Telkamp@stcharlescitemo.gov

St. Charles County offers all interested citizens the opportunity to attend public meetings and comment on public matters. If you wish to attend a public meeting and require an accommodation due to a disability, please contact the CDBG administrator at 636-949-3224 or 636-949-3289 (TTY – for the hearing impaired) to coordinate an accommodation at least two (2) business days in advance of the scheduled meeting. St. Charles County, Missouri fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information or to register a Title VI complaint, please address the County contact indicated below.

## **11. Access to Records**

St. Charles County will make available to all citizens, groups, and jurisdictions, access to all information and any records that relate to the County's Consolidated Plan. Such information will be available for a period that covers the preceding five years from the date from which any request for information is made. Access to all information will be made in a reasonable and timely manner as may be required by the County to retrieve documents<sup>8</sup>.

## **12. Technical Assistance**

The County will provide technical assistance to groups representing very low and low income persons, as well as interested residents that request such assistance in developing proposals for funding assistance under any of federal or local funding sources covered by the Consolidated Plan, with the level and type of assistance to be determined by the County. County staff will be available upon request to answer any questions concerning the requirements of federal and local funding sources included in the Consolidated Plan, such as available funding amounts, funding priorities, eligible activities, environmental review procedures, equal opportunity requirements, relocation provisions, citizen participation requirements and any other requirements of federal and local funding sources. In cases where staff cannot answer questions pertaining to federal HUD funds, assistance will be requested from HUD.

As part of the on-going citizen participation effort, County staff will meet with citizen groups in St. Charles County which represent very low, low, and moderate-income residents and with citizen groups which express interest in participating in federal and/or local funding sources

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<sup>8</sup> Access to all materials will be provided in a reasonable and timely manner in a form accessible to persons with disabilities, upon request.

included in the Consolidated Plan, to explain program and application procedures. Technical assistance will be provided when requested by neighborhood groups, minority groups, community-based organizations, and other residents interested in participating in federal and local funding sources included in the Consolidated Plan. All such groups, including the disabled and elderly, and those serving non-English speaking ethnic/minority populations, will be encouraged and assisted in submitting their views and proposals. County staff will be available to provide assistance in the development and submission of program funding requests and other input. Any persons requiring assistance should contact the Department of Community Development at 636-949-7335 or the TTY number 1-800-735-2966.

### **13. Complaints**

Citizens, activity participants, funded jurisdictions and non-profits in St. Charles County are afforded the opportunity to register complaints related to the Consolidated Plan, Consolidated Plan Amendments and Annual Consolidated Performance Reports. St. Charles County will respond to any and all complaints within 15 working days, where practicable, of the receipt of such complaints. All complaints will be recorded and responded to in writing. All written responses shall address the nature of the complaint and be substantive. Complaints and correspondence should be addressed to the contact indicated below.

#### **County Contact:**

Robert Myers  
Planning and Zoning Division Director  
St. Charles County  
Community Development Department  
201 N Second St, Room 410  
St. Charles, MO 63301  
[RMyers@sccmo.org](mailto:RMyers@sccmo.org)  
(636) 949-7335 x 7225  
(636) 949-7336 (fax)  
[www.sccmo.org](http://www.sccmo.org)