MEMORANDUM

TO: Steve Ehlmann, County Executive
FROM: Michael Hurlbert, AICP, Director of Community Development
SUBJECT: Items for May 27, 2020 County Council Meeting: (1) Public hearing for CDBG Citizen Participation Plan amendment, and (2) County Council consent agenda approval
DATE: May 11, 2020

The Community Development Department is submitting two items to be placed on the May 27, 2020 County Council Agenda.

- Public hearing to receive any final comments on amending the County’s CDBG Citizen Participation Plan, and
- Request for the County Council to approve an amended CDBG Citizen Participation Plan on the Council’s consent agenda

The primary purpose of updating the Citizen Participation Plan is to provide for expedient programming and use of supplemental CDBG funds allocated by the U.S. Congress in response to the COVID-19 pandemic.

Background

St. Charles County is the responsible agency for the St. Charles Urban County, a cooperative arrangement allowing nine jurisdictions (the City of St. Charles, City of St. Peters, City of St. Paul, City of Lake St. Louis, City of Cottleville, City of Wentzville, City of Weldon Spring, City of New Melle and Unincorporated St. Charles County) to collectively receive Community Development Block Grant (CDBG) funds directly from the U.S. Department of Housing and Urban Development (HUD). The Urban County has been allocated $1,098,142 in FY2020 CDBG funds.

In response to the Coronavirus Pandemic (COVID-19) the U.S. Department of Housing and Urban Development has notified the County that it will receive an allocation of Community Development Block Grant (CDBG-CV) in the amount of $646,001 to be used to prevent, prepare for, and respond to the COVID-19. This allocation was authorized by the coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, which was signed by President Trump on March 27, 2020, to respond to the growing effects of this historic public health crisis.

For CDBG funding under fiscal year 2019, fiscal year 2020, and the CARES Act, the County may provide a 5-day notice of a proposed change beginning April 8, 2020 as allowed under a
HUD waiver. With respect to a declared disaster, the County may elect to use CDBG funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA), or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless allowed by the federal government. HUD may provide new guidance on eligible uses in which the County will comply and may utilize as well. The changes in the citizen participation plan will allow expedited amendments to the Annual Action Plan, Consolidated Plan in the event of a declared disaster or emergency for funding new activities and/or the reprogramming of funds including canceling activities to meet community development needs resulting from a declared disaster or emergency.

The revised information in the Citizen Participation Plan is mainly related to the CDBG-CV funds anticipated to be received by the Urban County and using CDBG funds in general in case of emergency and disaster declarations. The revisions include the following:

- Include virtual hearings as an allowed method for citizen participation in case of emergencies;
- Update the types of declared disasters or emergency events to include terrorism and infectious diseases, such as the recent COVID-19 pandemic, that may necessitate expedited substantial amendments;
- Provide details on possible actions, including reprogramming of funding and types of possible activities, that may be undertaken in response to the COVID-19 pandemic;
- Includes provisions relative to Consolidated Plan Citizen Participation, Community Development Block Grant, waivers made available under the CARES Act;
- Make minor edits that do not change current citizen participation policies; and
- Allow moving up to 25% of any annual entitlement grant to other programs administratively without prior public notice or comment when responding to urgent needs, and as authorized by Federal laws and regulations.