



DATE: June 1, 2021

TO: Steve Ehlmann, County Executive  
Joann Leykam, Director of Administration

CC: Rory O'Sullivan, Acting County Counselor  
Donna Vogt, County Council

FROM: Michael Hurlbert, AICP, Director of Community Development

RE: Item for the June 28, 2021 County Council Meeting

The Community Development Department is submitting the following item for the June 28, 2021 County Council Agenda.

**BILL FOR INTRODUCTION:**

Approval of this bill would designate a Certifying Officer and Environmental Officer to prepare environmental reviews and certify compliance with all National Environmental Policy Act (NEPA) requirements for programs and projects funded by the U.S. Department of Housing and Urban Development.

**BACKGROUND:**

As a recipient of Community Development Block Grant (CDBG) funds, the Code of Federal Regulations (24 CFR Part 58) requires that St. Charles County designate a "Certifying Officer" to certify compliance with the National Environmental Policy Act and other relevant federal laws. The Certifying Officer may be the chief elected official, chief executive official, "or other official designated by formal resolution of the governing body". This function must be carried out by St. Charles County and may not be delegated to outside agencies or consultants. The County Executive now serves as the Certifying Officer. This bill would designate the Community Development Department Director as the Certifying Officer.

Additionally, St. Charles County should designate an Environmental Officer responsible for conducting environmental review tasks such as preparing project narratives and maps, soliciting comments from appropriate governmental agencies, and facilitating responses to comments received on environmental findings. This function may be carried out by outside agencies or consultants. St. Charles County contracts with the City of St. Charles for CDBG professional services, including those services provided by an Environmental Officer. This bill would designate the CDBG Administrator of the City of St. Charles as the Environmental Officer.