

Citizen Participation Plan

For HUD-funded Programs and Activities

Community Development Block Grant Program
HOME Investment Partnership Program
Emergency Solutions Grant Program

**St. Louis County Department of Planning
Office of Community Development
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Introduction

The St. Louis County Office of Community Development is tasked with supporting and developing viable communities, particularly through efforts focused on quality housing, suitable living environments, and expanded economic opportunities for low- and moderate-income citizens. To this end, the Office of Community Development administers funds from the United States Department of Housing and Urban Development (HUD), distributing funding to municipalities and nonprofits across the County. Citizen participation is an integral part of this process, ensuring accountability to the community and a public voice in determining how funds are used.

The Citizen Participation Plan is designed to involve citizens and other stakeholders in an advisory role in the development and review of the Office of Community Development's guiding documents, as well as any changes made to them. Specifically, the plan seeks to encourage participation by low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where funds are proposed to be used, and by residents of predominantly low- and moderate- income neighborhoods. Low-income persons are defined as having an income below 50 percent of the average median income; moderate-income persons are defined as having an income less than 80 percent of the area median income. A predominantly low- and moderate-income neighborhood is comprised of 51 percent or more low- and moderate-income citizens. Citizen participation enhances both the quality of the Office of Community Development's decision-making and the engagement of the public in planning processes. As such, this document incorporates all participation elements required by HUD, which will help to achieve the Citizen Participation Plan's goals:

- To encourage participation in community development funding decisions by all St. Louis County residents, particularly those of low- and moderate-income; and
- To provide opportunities for all residents to identify needs in their communities and propose or respond to solutions for these needs; and
- To inform all St. Louis County residents of the Consolidated Plan and the Annual Action Plan and their specified activities and expenditures; and
- To provide opportunities for all residents to review and comment on program performance.

The federal programs administered by the Office of Community Development for the benefit of low- and moderate-income people include the Community Development Block Grant program (CDBG), the HOME Investment Partnership program (HOME), and the Emergency Solutions Grants program (ESG). To coordinate these, HUD requires the Office of Community Development to develop the following three documents:

- Consolidated Plan – This is a five-year plan which examines the housing and community development needs for the community and outlines anticipated strategies to address those needs.

- Annual Action Plan – This summarizes how the Consolidated Plan will be carried out on a yearly basis, describing in more detail how CDBG, HOME, and ESG funds will be used over the course of the upcoming year.
- Consolidated Annual Performance and Evaluation Report – This report is used to evaluate progress toward the goals set forth in the Consolidated Plan.

Together, these documents guide the administration of the CDBG, HOME, and ESG programs in St. Louis County.

As an urban entitlement county, St. Louis County is required to allow all local jurisdictions within its boundaries to participate in the County’s community development programs. Additionally, St. Louis County serves as the lead agency for the St. Louis HOME Consortium, which includes the City of Florissant in St. Louis County, the Cities of St. Charles, Wentzville, and O’Fallon in St. Charles County, and St. Charles and Jefferson Counties. All participating jurisdictions execute cooperation agreements with St. Louis County and are subject to the same citizen participation requirements that are presented in this Citizen Participation Plan. If a participating jurisdiction wishes to develop and implement its own Citizen Participation Plan instead of following the County’s plan, the plan must conform to all applicable federal regulations and be approved by St. Louis County.

Requirements for Citizen Participation

Consolidated Plan and Annual Action Plans

The Consolidated Plan is designed to help St. Louis County assess affordable housing and community development needs and market conditions, and make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the grant programs administered by the Office of Community Development and the St. Louis HOME Consortium.

The Consolidated Plan is carried out through Annual Action Plans, which provide concise summaries of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

Citizen participation is crucial to the development of the Consolidated Plan and Annual Action Plans. In the fall of each year, the Office of Community Development will take the following steps in order to ensure optimal citizen engagement with development of the Consolidated Plan and Annual Action Plans:

- *Notify citizens of public hearings associated with development of the Consolidated Plan or an Annual Action Plan.*

This notice will be published in a minority newspaper, posted on the County's website and social media pages, posted at the four regional county government centers, and sent via email and mail lists designated for this purpose. The notice will also be sent to community groups and nonprofit organizations that specifically serve minorities, non-English speaking persons, and persons with disabilities. At least one public hearing will be held in advance of making the draft Consolidated Plan available for comment.

- *Notify the public that a draft Consolidated Plan or Annual Action Plan is available.*

This notice will be published in a newspaper of general circulation, published in a minority newspaper, posted on the County's website and social media pages, posted at the four regional county government centers, and sent via email and mail lists designated for this purpose. The notice will also be sent to community groups and nonprofit organizations that specifically serve minorities, non-English speaking persons, and persons with disabilities. The draft Consolidated Plan or Annual Action Plan will be available on the Office of Community Development's website and physical copies of the document will be available at the four regional county government centers and via the St. Louis County Library system. The Plan will also be made available in a form accessible to persons with disabilities upon request. The draft Plan will include the amount of assistance anticipated, the range of activities to be undertaken, the estimated amount of funding that will benefit people of low- and moderate-income, and a plan to minimize displacement, if necessary.

- *Observe a comment period of no less than 30 days in order to take comments from the general public.*

When public comments are received, whether in writing or orally at public hearings, they will be considered and responded to, if appropriate. The final Consolidated Plan or Annual Action Plan will include a summary of all public comments or views, including any comments or views not incorporated and the reasons therefor.

- *Submit the final version of the document to HUD and make it available to the public.*

The final Plan will be available on St. Louis County's website and via the St. Louis County Library system. Additionally, a reasonable number of printed copies will be available upon request and will be made available in a form accessible to persons with disabilities upon request.

Consolidated Annual Performance and Evaluation Report

In the winter and spring of each year, St. Louis County reports on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER). In order to ensure citizens have another opportunity to engage with community development initiatives as well as ample opportunity to comment on the CAPER, the Office of Community Development will:

- *Notify the public that a draft of the CAPER is available.*

This notice will be published in a minority newspaper, posted on the County's website and social media pages, posted at the four regional county government centers, and sent via email and mail lists designated for this purpose. The notice will also be sent to community groups and nonprofit organizations that specifically serve minorities, non-English speaking persons, and persons with disabilities. The draft CAPER will be available on the Office of Community Development's website and physical copies of the document will be available at the four regional county government centers and via the St. Louis County Library system. The CAPER will be made available in a form accessible to persons with disabilities upon request.

- *Notify the public of hearings regarding performance and the CAPER.*

This notice will be published in a minority newspaper, posted on the County's website and social media pages, posted at the four regional county government centers, and sent via email and mail lists designated for this purpose. The notice will also be sent to community groups and nonprofit organizations that specifically serve minorities, non-English speaking persons, and persons with disabilities.

- *Observe a comment period of no less than 15 days in order to take comments from the general public.*

When public comments are received, whether in writing or orally at public hearings, they will be considered and responded to, if appropriate. The final CAPER will include a summary of all public comments or views including any comments or views not incorporated and the reasons therefor.

- *Submit the final version of the document to HUD and make it available to the public.*

The final CAPER will be available on St. Louis County's website and via the St. Louis County Library system. Additionally, a reasonable number of printed copies will be available upon request and will be made available in a form accessible to persons with disabilities upon request.

Substantial Amendments

Despite the best planning efforts, there will be instances requiring a change in how grant dollars are allocated and/or spent. Per 24 CFR 91.505, an amendment to a plan is required:

- To make a change in allocation priorities or a change in the method of distribution of funds;
- To carry out an activity not previously described in the action plan; or
- To change the purpose, scope, location, or beneficiaries of an activity.

A Substantial Amendment, which will be subject to citizen participation requirements, will be required for nonmunicipal subrecipients when changes or additions are funded at more than 20% of St. Louis County's total allocation for the applicable program and plan year. At or above this threshold, a Substantial Amendment will be required when:

- There is a change in the amount of funding allocated for any eligible activity; or
- An activity is undertaken that was not previously included in the current Consolidated Plan or any corresponding Annual Action Plan; or
- There is a meaningful change in the location, scope, or purpose of an activity so as to affect the persons benefiting from the project.

Individual participating municipalities that seek to change their proposed activities will not trigger the Substantial Amendment provision. Municipalities undertaking changes in proposed activities will be required to adhere to the citizen participation guidelines outlined in the section, "Information for CDBG Participating Municipalities."

To ensure adequate citizen participation in the adoption of Substantial Amendments, St. Louis County the Office of Community Development will:

- *Notify the public that a draft Substantial Amendment is available.*

This notice and the amendment will be posted on the County's website and social media pages, posted at the four regional county government centers, and sent via email and mail lists designated for this purpose. The amendment will also be posted in areas impacted by the proposed activity. Physical copies of the document will be available at the four regional county government centers and will be made available in a form accessible to persons with disabilities upon request.

- *Notify the public of hearings, if any, associated with development of the Substantial Amendment.*

This notice will be posted on the County's website and social media pages, posted at the four regional county government centers, and sent via an email and mail list designated for this purpose. The notice will also be posted in areas impacted by the proposed activity.

- *Observe a comment period of no less than 30 days in order to take comments from the general public.*

When public comments are received, whether in writing or orally at public hearings, they will be considered and responded to, if appropriate. The final Substantial Amendment will include a summary of all public comments or views, including any comments or views not incorporated and the reasons therefor.

- *Make the final version available to the public.*

The final amendment will be available on St. Louis County's website. Additionally, a reasonable number of printed copies will be available upon request and will be made available in a form accessible to persons with disabilities upon request.

Public Notice

Public Hearings

Notification of a public hearing shall include a brief summary of the public hearing's purpose along with the date, time, and location of the hearing. It will also include contact information (including TTY/TDD) residents may use to request more information, request special accommodations, or submit written comments if they are unable to attend a hearing. The notification will also be made available in languages other than English for residents who comprise a significant portion of the low- and moderate-income population and are nonnative speakers. All notices available on the St. Louis County website will be in a format compatible with web readers for the visually impaired.

Consolidated Plan, Annual Action Plan, CAPER, and Substantial Amendments

Notification that documents are available will include a brief description of the document's content and purpose along with a list of locations where copies can be examined. It will also include a contact number (including TTY/TDD) residents may use to request more information or request special accommodations. The notification will also be made available in languages other than English for residents who comprise a significant portion of the low- and moderate-income population and are nonnative speakers. All notices available on the St. Louis County website will be in a format compatible with web readers for the visually impaired.

Public Hearings

As described earlier, public hearings are designed to address housing and community development needs, development of proposed activities, and review of program performance. The County will hold at least two public hearings per year to coincide with the development of planning and evaluation documents. Planning and evaluation are two different stages of the program year, thus public hearings will occur at two different times of year. The purpose of these hearings is to obtain citizens' views and respond to proposals and questions.

St. Louis County will notify the public any time it holds a public hearing to solicit citizen feedback. The first notice of hearing will be made at least two weeks prior to a public hearing. In addition, notification of hearing will be a strategic, multi-layered effort designed to reach a broad audience, specifically including residents in low- and moderate-income neighborhoods.

While there are certain required methods of notification of a public hearing described earlier in this document, citizens may be notified of hearings via other methods as they are feasible. These methods include posting flyers in strategic locations, notifying resident or advisory committees, and notifying other community development organizations and networks in the area. Special efforts will be made to ensure that the message reaches the appropriate audience, with particular attention paid to low- and moderate-income communities.

Public hearings will be held at times and locations that are convenient for those residents who are most likely to be affected by the proposed actions. While the County's Office of Community Development is readily accessible by public transportation, this office will also reach the intended audience by partnering with housing authorities, community development agencies, and other organizations in the community that may host hearings at times and locations that are most appropriate for the issues to be considered. Any location used shall meet ADA accessibility standards. Reasonable accommodations will be made for people with disabilities upon request, and language interpreters will be provided for non-English speaking participants upon advance request.

The County recognizes that the public hearing as a citizen participation mechanism can be enriched, with the goal of making it more accessible and useful for all citizens. When possible, the County will work to include elements such as educational handouts, focus groups, break-out sessions, and other activities that expressly facilitate dialogue and the exchange of ideas and information.

Consultation with Other Government Agencies and Community Partners

The County recognizes the value of engaging organizations that represent the interests of neighborhoods and communities, as well as other agencies and community partners that are involved in projects and advocacy to assist low- and moderate-income citizens. In developing its plan for the best use of CDBG, HOME, and ESG funds, the County will solicit input from these agencies at the neighborhood, county, and regional levels. These agencies may include the East-West Gateway Council of Governments, other members of the Consortium, and other agencies or organizations as appropriate. With respect to the HOME program, St. Louis County may engage nonprofit groups providing assistance to homeless residents, Community Housing Development Organizations and other nonprofit organizations that provide public service activities to low- and moderate-income residents. In addition, the County will encourage participation of businesses, developers, and faith-based organizations. These agencies and organizations are encouraged to participate in the development of the Consolidated Plan, the Annual Action Plan, and the CAPER, and are asked to review and comment on the proposed documents.

The Office of Community Development will consult directly with the St. Louis County Housing Authority concerning consideration of public housing needs and any planned grant program activities. This consultation will help ensure that activities for the benefit of public housing residents funded by the County Housing Authority and the Office of Community Development are fully coordinated to achieve comprehensive community development goals. Independent housing authorities located within the County may also be contacted for considerations of public housing needs. This consultation with public housing entities will also provide a basis for certification by the St. Louis County Executive that the Consolidated Plan or Annual Action Plan is consistent with the County's assessment of low-income housing needs.

Information for CDBG Participating Municipalities

All St. Louis County municipalities that utilize CDBG funds are incorporated into the County's Consolidated Plan and corresponding documents. As participating municipalities develop their own individual plans for their CDBG allocations, however, they are also required to involve citizens in their planning process. Citizen participation is a required part of each municipality's annual application to the Office of Community Development for CDBG funds, and also is required any time that a municipality makes a substantial change to its approved use of funds.

Prior to any public hearing, the municipality is required develop a plan or list of potential CDBG activities to be funded. The Office of Community Development can offer technical assistance with this process, if needed.

Notify the Public of Hearings

Each municipality must publicize a public hearing at least ten calendar days in advance via one of four approved methods:

- Publish the notice of public hearing in a newspaper of general circulation; or
- Post a notice of hearing at a minimum of three public sites within the jurisdiction; or
- Distribute a flyer advertising the public hearing to every household in the community; or
- Publish the notice of public hearing in a municipal newsletter or other publication that is delivered to every household in the community.

The advertisement or notice must include the text from the sample advertisement (provided in the municipal application) in its entirety. The notice may be additionally published in languages other than English, as needed. In addition, the Office of Community Development encourages municipalities to incorporate one or more of the following additional methods of publicizing the public hearing:

- Email notification to residents; or
- Post on the municipality's website and social media accounts; or
- Post flyers in additional public spaces; or
- Involve resident/advisory committees; or
- Other methods deemed appropriate by the municipality.

Hold the Public Hearing

The public hearing must be held at a time and location convenient to residents, specifically those of low- and moderate-income status. The hearing may be part of a regularly scheduled board or council meeting. Any location used must meet ADA accessibility standards. In addition, reasonable accommodations must be made for people with disabilities upon request, and language interpreters provided for non-English speaking participants upon advance request.

During the hearing, the municipality must review the eligible activities for CDBG funding. This can be done by reading aloud or distributing a handout that describes eligible activities (a handout is provided in the municipal application). In addition, municipal officials must announce the amount of funding under consideration, what year the funding is for, and the plan or list of potential CDBG activities.

At the hearing, the municipality must provide an opportunity for citizens to express their comments regarding the use of CDBG funds in the community. The municipality also must accept written comments if citizens are unable to attend the hearing. All citizen comments must be clearly described in hearing minutes. Any comments that are not incorporated into the municipality's application for CDBG funding must be addressed and explained, with this explanation included in the final application to the County.

The municipality must make its final application available to citizens upon request for a minimum of 30 days, although the municipality may submit its application to the County before this period has expired.

Report Citizen Participation to the Office of Community Development

The municipality must include the following information in its annual application for CDBG funding:

- Documentation of the method and publication date for the notice of public hearing; and
- A copy of the signed or approved minutes from the public hearing; and
- The sign-in sheet from the public hearing; and
- A copy of any written comments and an explanation of reasoning about any comments that were not incorporated into its final application.

This information is also required when a municipality submits a New Activity Description form.

Changes to Planned Activities

When making changes to approved activities, municipalities must adhere to the public hearing guidelines described in this section, "Information for CDBG Participating Municipalities."

Amendments

St. Louis County will require participating municipalities to consult and/or inform the public using the public hearing guidelines described in this section when:

- A municipality changes a planned activity from one eligible activity to another and this activity was not included in the current Consolidated Plan or any Annual Action Plan within five years of the current fund year; or
- There is a substantial change in the location, scope, or purpose of an activity so as to affect the persons benefiting from the project.

Public hearings for changes in planned activities may be held in conjunction with annual public hearings, provided that the public notice includes the total amount of available funding and corresponding fund years.

Remaining Funds

Municipalities may have funds remaining after a planned activity is completed. If the municipality wishes to apply the remaining funds to another activity that has already been approved in any Annual Action Plan within five years of the current fund year, no public consultation is needed provided the additional funding for the activity does not substantially change the purpose, scope, location, or beneficiaries of the activity. If the municipality wishes to apply the remaining funds toward an activity that has not already been approved in any Annual Action Plan within five years of the current fund year, the municipality must consult the public using the public hearing guidelines described above.

Information for HOME Consortium Members

For-sale and rental housing development guidelines and applications are made available on the St. Louis County website or mailed to interested parties on an ongoing basis. St. Louis County reviews and accepts applications for production of rental and for-sale housing based upon the availability of funds, soundness of project, and experience of the team. Annually, the St. Louis HOME Consortium releases requests for qualifications for nonprofit organizations interested in providing homebuyer assistance services to low- and moderate-income households in St. Louis County, Florissant, the Cities of St. Charles, O'Fallon, and Wentzville, and Jefferson and St. Charles Counties. All consortium members are required to individually conduct one annual public hearing to inform the public and solicit input regarding proposed activities in the Consolidated Plan. Hearings will be conducted in accordance with this Citizen Participation Plan or the appropriate consortium member's approved Citizen Participation Plan.

Complaints

Complaints from citizens regarding the Consolidated Plan, Annual Action Plan, CAPER, and Substantial Amendments will be reviewed and forwarded to the Director of the County's Office of Community Development for final consideration. Once a decision has been made about

whether to act on the complaint, the complainant will receive a written response explaining the decision. This will happen within 15 working days of receiving the complaint.

Citizens who are dissatisfied with their municipality's use of its CDBG allocation should attend their local municipal hearing. Additionally, citizens may wish to attend the County's Consolidated Plan hearing or Annual Action Plan hearing in order to voice their concerns.

Information and Access to Records

The current Consolidated Plan, Annual Action Plan, CAPER, and any Substantial Amendments will be made available to the public on the website of the County's Office of Community Development. This Citizen Participation Plan will also be available on the website. The County will supply a reasonable number of printed copies of these documents upon request, and can also make these materials available in a form accessible to persons with disabilities upon request.

The County will also make available, upon request, reasonable and timely access to records and information relating to the County's Consolidated Plan and use of assistance under the programs covered by this Plan during the preceding five years.

Technical Assistance

Upon request, the County's Office of Community Development will provide technical assistance to groups representing low- and moderate-income persons to develop funding requests for CDBG-, HOME-, or ESG-eligible activities. This will not constitute an endorsement of funding.

Minimizing Displacement of Persons

In the expenditure of its CDBG funds, the Office of Community Development will take measures to minimize the displacement of low- and moderate-income residents and families. When this is unavoidable on a temporary or permanent basis, the Federal Uniform Relocation and Assistance Act will be followed.

Applicability of the Citizen Participation Plan

In accordance with 24 CFR Part 91.105, effective March 1, 2016, the Office of Community Development has hereby adopted this Citizen Participation Plan that supersedes all prior Citizen Participation Plans and sets forth the County's policies and procedures for citizen participation for the County's CDBG, HOME, and ESG programs. Citizens were afforded 30 days to comment on this plan, which is hereby adopted.

The Office of Community Development will solicit citizen engagement regarding any changes to this Citizen Participation Plan using the process outlined herein for adopting Substantial Amendments. This Citizen Participation Plan will be available to the public via the County's

website and the St. Louis County Library system, and can be made available in a format accessible to persons with disabilities upon request.

If a participating jurisdiction wishes to develop and implement its own Citizen Participation Plan instead of following the County's plan, the new plan must conform to all applicable federal regulations and be approved by St. Louis County.

Contact Information

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