

CDBG-DR ACTION PLAN

FOR ST. CLAIR COUNTY, IL

2024 SEVERE STORMS, TORNADOES, STRAIGHT-LINE WINDS, AND FLOODING EVENTS



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Executive Summary

Executive Summary

Overview

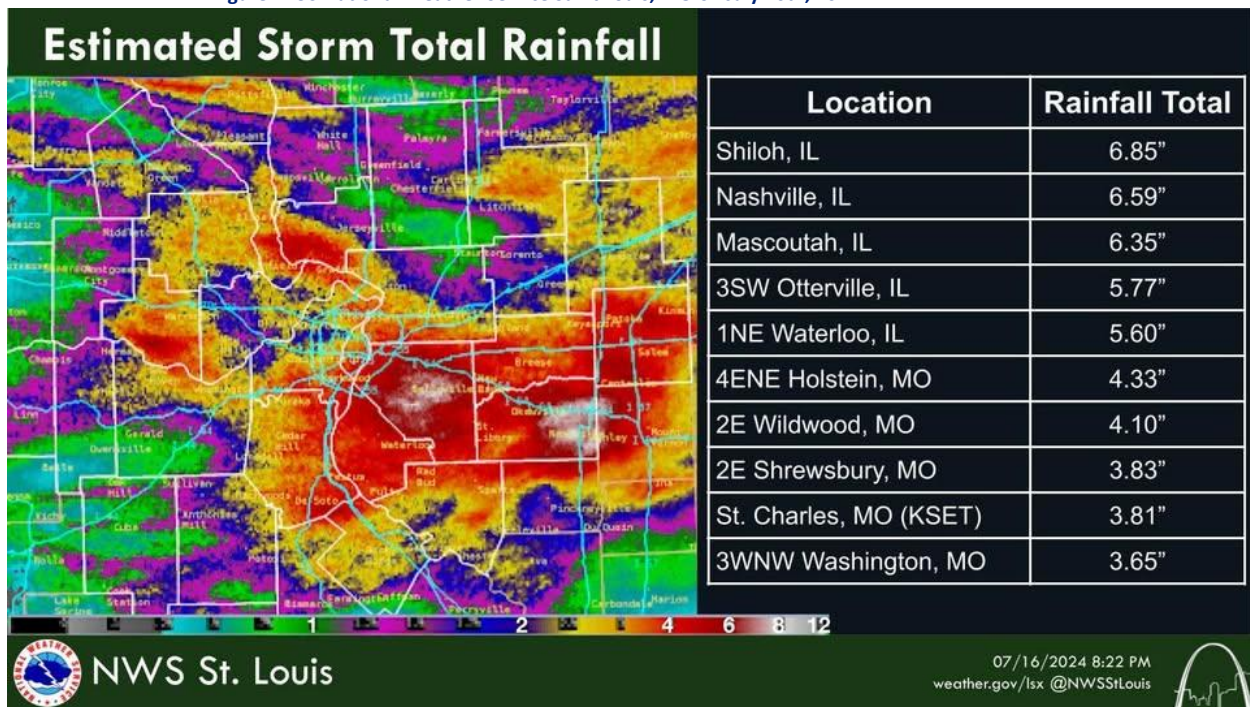
The U. S. Department of Housing and Urban Development (HUD) announced in January of 2025 that St. Clair County will receive over \$89 Million in Community Development Block Grant Disaster Recovery (CDBG-DR) funds for the 2024 Severe Storms, Tornadoes, Straight-line Winds and Flooding events that occurred during the period of July 13, 2024, to July 16, 2024 across several Illinois Counties. St. Clair County is the recipient of HUD's Community Development Block Grant – Disaster Recovery (CDBG-DR) funds. The CDBG-DR funding is designed to address the needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address the remaining unmet needs in St. Clair County due to Severe Storms, Tornadoes, Straight-line Winds and Flooding events that occurred during the period of July 13, 2024, to July 16, 2024.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for quicker recovery. HUD has allocated \$89,533,000 in CDBG-DR funds to St. Clair County in response to the 2024 Severe Storms, Tornadoes, Straight-line Winds and Flooding disaster events (DR- 4819) through FR-6512-N-01 (Public Law 118-158) made on December 21, 2024. This allocation was made available through the American Relief Act of 2025 for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 *et seq.*) (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the “most-impacted and distressed” (MID) areas resulting from a qualifying major disaster in 2023 or 2024. Additionally, the Disaster Relief Supplemental Appropriations Act 2025 (Pub. L. 118-158, Division B, Title XII) approved December 21, 2024, makes available CDBG-DR funds for major disasters that occurred in 2023 and 2024.

Disaster-Specific Overview

A line of thunderstorms entered western Illinois during the early morning of July 16th and moved southeast producing flash flooding in its track. Further south, additional thunderstorms in southern Illinois back built and filled in along its western edge, producing more flash flooding. Heavy rain triggered the flood disaster across St. Clair County during July 16, 2024, flooding homes and businesses, causing widespread damage, overwhelming storm water and sewage systems, and forcing the evacuation of some residents. On July 16th, five to six inches of rain fell. Heavy rain caused numerous roads in St. Clair County to flood, including Highway 50 in Lebanon, Route 13 in Freeburg, multiple roads at Scott Air Force Base, Route 15 at Belleville Parkway West in Belleville, Rieder Road north of Engle Creek Crossing near O'Fallon, and Route 4 at the Dollar General in Mascoutah. There was also a levee failure near Caseyville which caused flooding in the area.

Figure 1: US National Weather Service Saint Louis, MO on July 16th, 2024



Up to 6.8 inches of rain fell in a 6-to-10-hour period causing widespread flash flooding. Flood damage was reported throughout St. Clair County, including Belleville, East St. Louis, Cahokia Heights, O'Fallon, Shiloh, Swansea, Dupu, the Scott Air Force Base area and Millstadt. Much of the damage in Belleville occurred when Richland Creek overflowed on July 16.

ST. CLAIR COUNTY 2024 SEVERE STORMS, TORNADOES, STRAIGHT-LINE WINDS, AND FLOODING EVENTS

Figure 2: NWS Rainfall Map

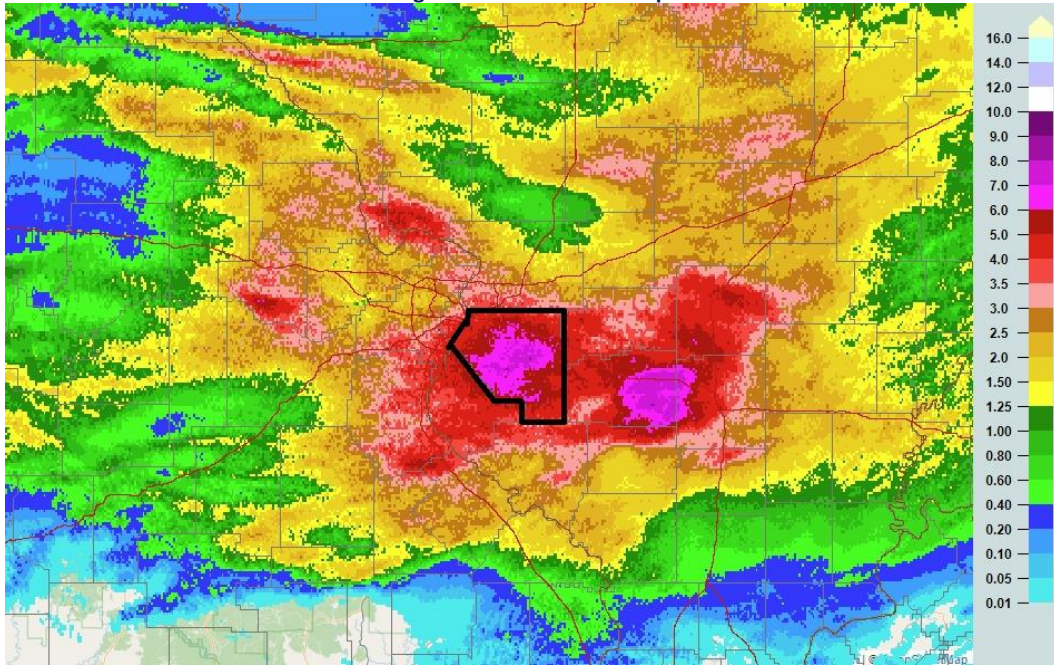
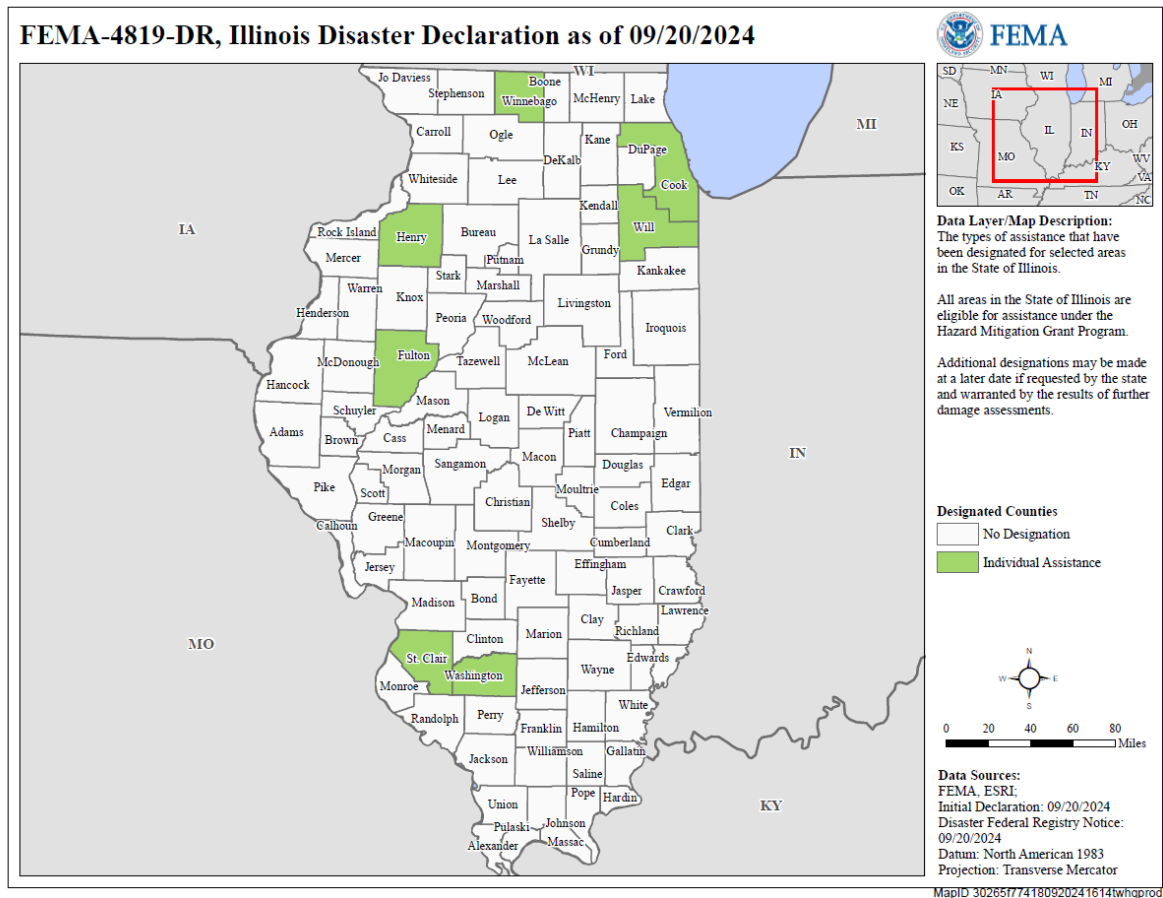


Figure 3: FEMA DR-4819, Presidentially Declared Disaster by County



Upon the recommendation of the Director of the St. Clair County Emergency Management Agency, a proclamation of disaster was issued on July 16th, 2024, by the Principal Executive Officer of St. Clair County. On August 28, 2024, Governor J.B. Pritzker requested a major disaster declaration due to severe storms, tornadoes, straight-line winds, and flooding during the period of July 13-16, 2024 for several counties in Illinois. The Governor requested a declaration for Individual Assistance for seven counties and Hazard Mitigation statewide. During the period of July 30 to August 14, 2024, joint federal, state, and local government Preliminary Damage Assessments (PDAs) were conducted in the requested areas and are summarized below. PDAs estimate damages immediately after an event and are considered, along with several other factors, in determining whether a disaster is of such severity and magnitude that effective response is beyond the capabilities of the state and the affected local governments, and that Federal assistance is necessary. On September 20, 2024, President Biden declared that a major disaster exists in the State of Illinois. This declaration made Individual Assistance requested by the Governor available to affected individuals and households in Cook, Fulton, Henry, St. Clair, Washington, Will, and Winnebago Counties. This declaration also made Hazard Mitigation Grant Program assistance requested by the Governor available for hazard mitigation measures statewide. In response to the President's declaration, the Federal Emergency Management Agency (FEMA) issued a disaster declaration on September 20, 2024. The U. S. Department of Housing and Urban Development (HUD) announced in January of 2025 that St. Clair County will receive over \$89 million in Community Development Block Grant Disaster Recovery (CDBG-DR) funds for the 2024 disaster.

These CDBG-DR funds are for necessary expenses for activities authorized under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) (HCDA) and Public Laws 117-180 and 117-328 related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the "most impacted and distressed" (MID) areas resulting from a qualifying major disaster in 2024.

Summary

To fulfill the requirements of this allocation, the County had the option to submit to HUD an Administrative Action Plan (already submitted to HUD) and must submit an Action Plan for Disaster Recovery that identifies its unmet recovery and resilience needs. This Action Plan outlines the proposed use of CDBG-DR funds and eligible activities available to assist impacted areas to meet unmet infrastructure, planning, and other needs that have resulted from the impacts of the flooding due to heavy rains. Specifically, this plan aims to strengthen communities and neighborhoods impacted by the disaster by investing in infrastructure and public facilities, housing, and economic revitalization. In addition, the Action Plan describes how CDBG-DR funds will be targeted toward and meet the needs of vulnerable communities and individuals experiencing homelessness.

The County has been engaging local communities and gathering data for the unmet needs assessment since the 2024 disaster. To ensure consistency of the CDBG-DR Action Plan with applicable regional redevelopment plans and other recovery initiatives, the County has initiated meetings with various county and municipal officials, and non-profit organizations. These meetings have been beneficial in gathering information about the impacts of the storm, existing challenges to address, and solutions. The County continues to work with local governments and non-profit organizations to collect information.

The County will provide citizens and units of local government with reasonable notice and the opportunity to comment on the Action Plan and its substantial amendments. The County will convene at least two public hearings on the draft CDBG-DR Action Plan after being posted on its disaster recovery website for public comment and prior to submission to HUD. Notice of all hearings will be posted a minimum of 10 business days prior to public hearings. The County has published this draft CDBG-DR Action Plan in a manner that affords citizens, units of local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The plan will remain available on St. Clair County's website throughout the 30-day comment period.

The County used the best available data sources to perform the analyses of the demographic characteristics of the areas of impact; the losses sustained; and the available resources in response to housing, infrastructure, and economic revitalization. The overall unmet need for the disaster currently totals over \$32 million. The County utilized FEMA IHP data sets provided by HUD along with data provided by the SBA to determine the overall unmet need. In addition, the County continues to work with local governments to calculate a more accurate value of unmet infrastructure needs.

CDBG-DR funds will be used to primarily address unmet infrastructure and housing needs for the 2024 disaster allocations. Investing in infrastructure will provide the most benefit and long-term recovery solutions to the impacted communities. CDBG-DR funding will be

directed to the communities most impacted and with the greatest unmet needs. The Infrastructure and Housing Programs will be implemented county-wide. The County will directly implement all programs.

Unmet Needs and Proposed Allocation

The table below gives losses across all categories where data was available before and after adjusting for identified funding sources. The unmet need is calculated by subtracting the resources available from the value of the total damage. The housing unmet need number represents the impact on housing that needs to be rehabilitated, reconstructed, or newly built. The table below reflects the most recent data available at the time of publication of this Draft Action Plan.

Table 1: Unmet Need Calculation

Category	Data Source	Total Verified Loss/Identified Unmet Need	Total Resources	Unmet Need	% of Need Unmet
Infrastructure	USACE	\$130,000,000	\$80,056,350	Unknown	61.5%
Housing	FEMA IA SBA Home	\$119,529,177	\$47,985,136	\$71,544,041	40.1.8%
Economic Revitalization	SBA Business	\$29,627,533	\$35,195,000	-5,567,467	N/A
Total		\$279,156,710	\$163,236,486		

Table 2: Unmet Needs and Proposed Allocations

Category	Total Verified Loss	Remaining Unmet Need	% of Need Unmet	FEMA/SBA/Other Program Allocation Amount	CDBG-DR Proposed Program Allocation Amount)
Infrastructure	Unknown	Unknown	Unknown	N/A	\$80,056,350
Housing (FEMA IA)	\$28,674,112	\$5,118,269	17.8%	\$17,270,936	\$4,000,000
Housing (SBA Home)	\$90,855,065	\$58,656,124	64.6%	\$26,714,200*	
Economic (SBA Business/EIDL)	\$29,627,533	\$13,595,571	45.9%	\$34,195,000*	\$1,000,000
Administration	N/A	N/A	N/A	N/A	\$4,476,650
Total	\$149,156,710	\$77,369,964	51.9%	\$78,180,136.39	\$89,533,000

* Sum of all loan amounts

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Unmet Needs Assessment

Unmet Needs Assessment

Overview

This section follows U.S. Department of Housing and Urban Development (HUD) requirements and details the losses and needs resulting from the 2024 disaster, including identifying any remaining unmet recovery needs within the eligible impacted areas. The qualifying 2024 disaster both included severe rain and flood events that caused widespread flooding.

The unmet needs analysis includes the Most Impacted and Distressed MID areas identified by HUD in the Federal Register Notice (FRN):

1. St. Clair County

The FRN requires that 100% of the allocation address unmet disaster needs or mitigation activities in the HUD identified MID areas, which for this disaster is the entire county.

The Unmet Needs Assessment relies on the methodology published by HUD in the January 16, 2025 Federal Register Notice and as revised by the HUD Memorandum issued on March 19, 2025.¹ The analysis uses the best available information from federal, state, and local resources to fully identify the total impacts, resources, and remaining unmet recovery needs and inform the programming of the County's Community Development Block Grant – Disaster Recovery (CDBG-DR) resources. To prepare this assessment, the County consulted with state agencies, local governments impacted by the disaster, Continuum of Care agencies, Public Housing Authorities, housing counseling agencies, nonprofits and private companies working in the impacted areas. For a full list of consultations, see the General Requirements Citizen Participation section.

Housing Unmet Need

Pre-Disaster Housing Conditions

Prior to the disaster, St. Clair County homeowners and renters were under economic pressure due to the current economy. Economic losses and job layoffs impacted renters' ability to stay in affordable units and homeowners' ability to finance mortgages.² Even in

¹ United States. Department of Housing and Urban Development (HUD). <https://www.govinfo.gov/content/pkg/FR-2025-01-16/pdf/2025-00943.pdf>
<https://www.hud.gov/sites/default/files/CPD/documents/CPDUniversalnotice.pdf>

² Benfer, E. A., Vlahov, D., Long, M. Y., Walker-Wells, E., Pottenger, J. L., Gonsalves, G., & Keene, D. E. (2021, February). *Eviction, health inequity, and the spread of covid-19: Housing policy as a primary pandemic mitigation strategy*. Journal of urban health: Bulletin of the New York Academy of Medicine. Retrieved July 28, 2022, from <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7790520/>

the years leading up to the pandemic, the County suffered from a variety of housing challenges; including high housing cost burden, high risk of lead-based paint hazards, and a housing voucher wait list over 5,500 strong as of April 2025.

The tables below show the distribution of housing units across St. Clair County. In total there are approximately 100,000 housing units across the county. Roughly 86% of housing units are occupied and 66% of occupied housing units are occupied by homeowners.

Table 3: Householder Demographic Summary Data

Race	Estimated Owner Occupied Housing Units	Percent Owner Occupied Housing Units	Estimated Renter Occupied Housing Units	Percent Renter Occupied Housing Units
White or Caucasian	50,894	76.38%	13,857	41.43%
Black or African American	11,721	17.59%	16,866	50.49%
Hispanic or Latino	1,952	2.93%	1,215	3.63%
Two + Races	1,590	2.39%	1,465	4.38%
Asian	723	1.09%	249	.74%
Native Hawaiian or Other Pac Islander	0	0.00%	0	0.00%
Some Other Race	556	0.83%	503	1.50%
Total Occupied Housing Units	67,436		34,155	

Source: American Community Survey 5-Year Estimates (2017-2021)

St. Clair County's housing stock of newly constructed affordable housing units is limited. Roughly 54% of residential units (both owner and renter occupied) were built before 1960, with only 6.2% built post 2010 (approx. 6.2K units)³.

The table below shows the homeowner and renter vacancy rates for impacted communities. Current ACS data (2017-2021) indicates that of the total housing stock (20,201), the rental vacancy rate was approximately 5.9% and an owner-occupied vacancy rate around 2%. This is compared with national averages of 6.7% and 1.4% respectively, indicating the county is well aligned with national averages.

³ ACS S2504 2017-2021 5-Year Estimates

Table 4: Pre-Disaster Vacancy Rates of Renter and Owner-Occupied Housing

County	Renter-Occupied Vacancy Rate (%)	Owner-Occupied Vacancy Rate (%)	Available Housing Vacancy Rate (%)
St. Clair	5.90%	2%	3.30%

Source: American Community Survey B25004 5-Year Estimates (2017-2021)

According to the National Low Income Housing Coalition, the State of Illinois lacks 293,354 affordable and available homes for extremely low-income renters. Statewide, 27% of renters are extremely low-income, of those, 73% experience severe cost burden, which means that these households spend more than half of their income on housing. It's also important to note that most of these households are actively in the workforce, indicating that they have one or more sources of income. A lack of appropriately priced housing can cause problems such as increased susceptibility to illnesses and homelessness.⁴

The table below shows the median home value and the median gross rent in St. Clair County. While the median home value in St. Clair County is significantly lower than the median U.S. home value (\$244,900), those impacted by the disaster have significantly lower incomes than the rest of the nation.

Table 5: Evidence of Cost Burden

County	Median Home Value (in \$)	Median Gross Rent (in \$ per Month)
St. Clair	\$140,600	\$925

Source: American Community Survey 5-Year Estimates DP04, B25064 (2017-2021)

Disaster Damage and Impacts

This section provides an analysis of the housing damage resulting from flooding. It utilizes Federal Emergency Management Individual and Households Program (FEMA IHP) and Small Business Administration (SBA) data as the basis of analysis. The disaster from flooding came as a result of heavy rainfall.

Severe storms and flooding impacted St. Clair County in July 2024, resulting in the FEMA DR-4819 disaster declaration and subsequent Preliminary Damage Assessment.⁵ The Preliminary Damage Assessment process is a mechanism used to determine the impact and magnitude of damage and resulting needs of individuals, businesses, public sector, and community as a whole. Information collected is used by the State as a basis for the Governor's request for a major disaster or emergency declaration, and by the President in

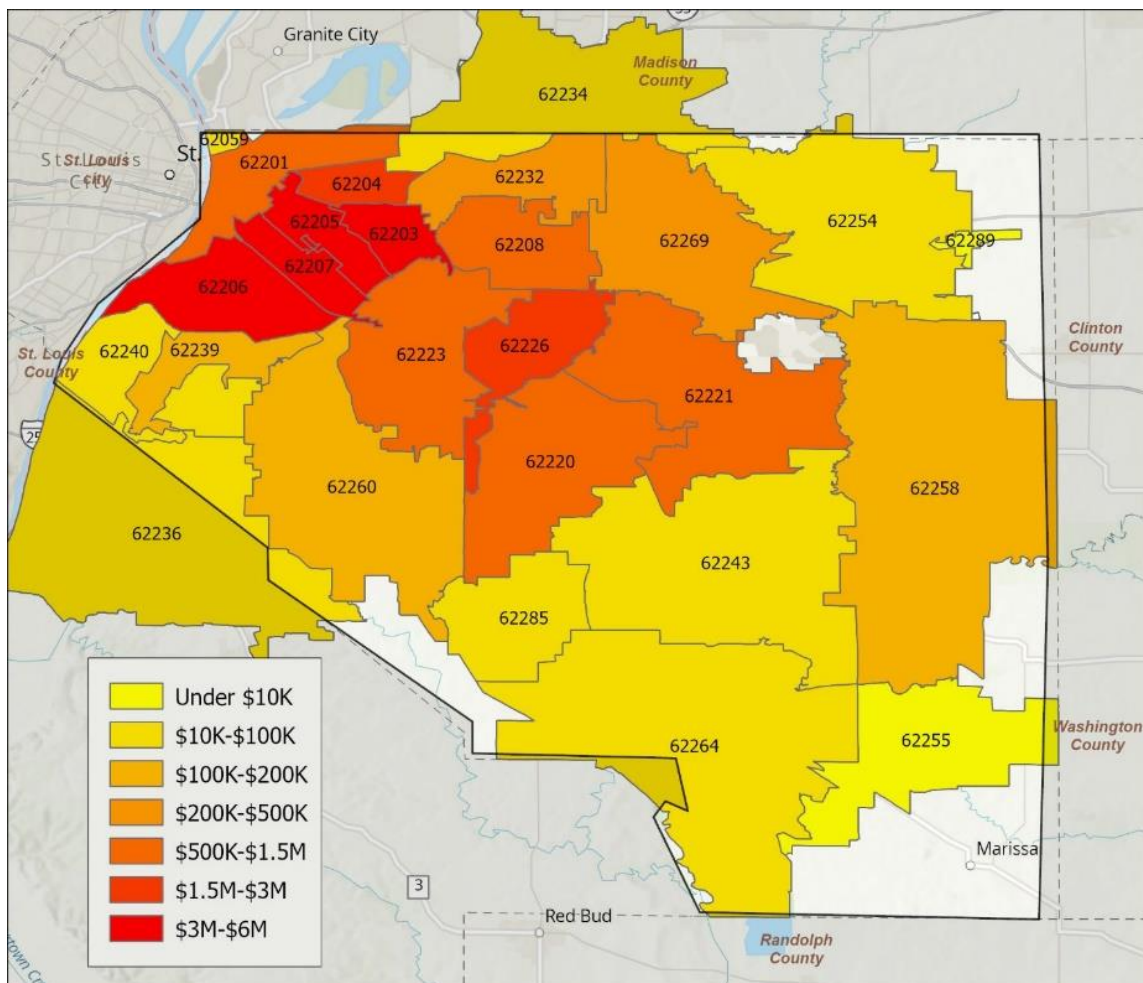
⁴ National Low Income Housing Coalition (NLIHC). *Housing Needs By State: Illinois*. Retrieved from <https://nlihc.org/housing-needs-by-state/illinois>

⁵ https://www.fema.gov/sites/default/files/documents/PDARreport_FEMA4819DR-IL.pdf

determining a response to the Governor's request (44 CFR § 206.33). In June of 2025, FEMA released a finalized data set⁶ of individual applicants including assessed damage amounts, awards, and additional information about each application. According to that final data, there were 10,076 applicants for FEMA Individuals and Households Program (IHP) assistance. In total 7,665 applicants were found to have a FEMA verified loss, with 23 sustaining severe damage, 1,392 sustaining major damage, 5,242 sustaining minor damage, and another 1,008 with a property loss. (The degrees of damage are based on FEMA's definitions outlined on page 19 of this report.) Of the total applicants, 5,532 (55%) were homeowners and 4,490 (45%) were renters.

The figure below shows the impacts spread across the county and how widespread the effects of the disaster were.

Figure 4: FEMA IHP Applications by Zip Code



Of the 7,665 total households that had any FEMA verified loss for DR-4819, none of the

⁶ Summarized from FEMA's Purpose 3 Individual Assistance Data for Disaster Recovery 4819, dated June 12, 2025.

applicants identified the property as secondary property. The following table provides the percentage of Seasonal Vacant Homes within St. Clair County. Based on this data, impacts to secondary homes were minor compared to impacts to primary homes.

Table 6: Seasonal Vacancy Compared to Total Housing Units

County	Seasonal Vacant	Total Housing Units	Percent Seasonal Vacant Homes
St. Clair	303	100,079	0.30%

Disaster recovery programs must spend 70% of funding to benefit low- and moderate-income households and to meet HUD’s LMI national objective. St. Clair County will comply with the overall benefit requirements in the Housing and Community Development Act of 1974 (HCDA) and 24 CFR 570.484, 24 CFR 570.200(a)(3), and 24 CFR 1003.208, which require that 70 percent of funds be used for activities that benefit LMI persons. An LMA area benefit activity is one that benefits all residents in a particular area, where at least 51 percent of the residents are LMI persons. An area is considered to meet the test of being LMI if there is a sufficiently large percentage (51 percent) of LMI persons residing in the service area. Improvements to public infrastructure benefit all LMI residents in a service area and thus are the type of activities that typically qualify under the LMI area benefit category for the purposes of meeting a national objective. According to HUD’s FY 2024 Income Limits that were in place at the time of the disaster event, the Median Family Income for households in St. Clair County’s metro area is \$103,200. The table below shows the HUD income limits by Area Median Income (AMI) and by number of persons within a household.⁷

Table 7: HUD Income Limits – St. Clair County, IL, 2024 (St. Louis MO-IL HUD Metro FMR Area)

2023 Income Level	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30% AMI)	\$21,700	\$24,800	\$27,900	\$31,200	\$36,580	\$41,960	\$47,340	\$52,720
Very Low Income (50% AMI)	\$36,150	\$41,300	\$46,450	\$51,600	\$55,750	\$59,900	\$64,000	\$68,150
Low and Moderate Income (80% AMI)	\$58,700	\$66,050	\$74,300	\$82,550	\$89,200	\$95,800	\$102,400	\$109,000

Single-family versus Multi-family Needs: Owner Occupied versus Tenant

⁷ United States. Department of Housing and Urban Development (HUD). (August 04, 2025). Fair Market Rents and Income Limits. Retrieved from <https://www.huduser.gov/portal/datasets/il.html>

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Table 8: FEMA IHP Owner Occupied ⁸

County	# of Applicants	# of Inspections	# Inspected with Damage & Assistance	Total FEMA Verified Loss	Average FEMA Verified Amount
St. Clair	5,532	5,108	3,168	\$25,200,351	\$5,631

The disaster impacts to renters was also extensive, with 2,437 applicants that received an inspection and were found to have a FEMA-verified loss.

Table 9: FEMA IHP Tenants Applications ⁹

County	# of Applicants	# of Inspections	# Inspected with Damage & Assistance	Total FEMA Verified Loss	Average FEMA Verified Amount
St. Clair	4,490	4,250	2,160	\$3,442,204	\$1,080

The table below provides a breakdown of housing type by applicants for the disaster. For owner-occupied households, most residences were categorized as a house/duplex (5,243 out of 5,532). 321 mobile home residents applied for assistance, though only a small majority (64%) were homeowners.

Table 10: FEMA IHP Applications by Housing Type ¹⁰

Residence Type	# of Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	1027	0% (3)	100% (1022)	0% (2)	10%
Condo	20	70% (14)	30% (6)	0% (0)	0%
Correctional Facility	1	0% (0)	100% (1)	0% (0)	0%
House/Duplex	8409	62% (5243)	37% (3120)	1% (46)	83%
Mobile Home	321	64% (207)	35% (112)	1% (2)	3%
Other	133	31% (41)	67% (89)	2% (3)	1%
Townhouse	159	14% (23)	85% (135)	1% (1)	2%
Travel Trailer	6	17% (1)	83% (5)	0% (0)	0%

⁸ Summarized from FEMA's Purpose 3 Individual Assistance Data for Disaster Recovery 4819, dated June 12, 2025.

⁹ Ibid.

¹⁰ Ibid.

The Federal Register Notice establishes damage categories for both owner-occupied and rental units. The following categories are used to calculate the total damage caused by the qualifying disaster.¹¹

Owner-occupied damage category for FEMA inspected units:

- Minor-Low: less than \$3,000 of FEMA inspected real property damage.
- Minor-High: \$3,000 to \$7,999 of FEMA inspected real property damage.
- Major-Low: \$8,000 to \$14,999 of FEMA inspected real property damage and/or 1 to 3.9 feet of flooding on the first floor.
- Major-High: \$15,000 to \$28,800 of FEMA inspected real property damage and/or 4 to 5.9 feet of flooding on the first floor.
- Severe: Greater than \$28,800 FEMA inspected real property damage or determined destroyed and/or 6 or more feet of flooding on the first floor.

Renter-occupied damage category for FEMA inspected units:

- Minor-Low: Less than \$1,000 of FEMA inspected personal property damage
- Minor-High: \$1,000 to \$1,999 of FEMA inspected personal property damage or determination of “Moderate” damage by the FEMA inspector
- Major-Low: \$2,000 to \$3,499 of FEMA inspected personal property damage or 1 to 3.9 feet of flooding on the first floor or determination of “Major” damage by the FEMA inspector
- Major-High: \$3,500 to \$7,500 of FEMA inspected personal property damage or 4 to 5.9 feet of flooding on the first floor
- Severe: Greater than \$7,500 of FEMA inspected personal property damage or determined destroyed and/or 6 or more feet of flooding on the first floor or determination of “Destroyed” by the FEMA inspector

The following table shows the number of FEMA IHP owner-occupied applicants by HUD damage category. For this disaster, a total of 989 owner-occupied properties fall under the Major/Severe categories for real property losses, indicating the highest level of damage.

Table 11: FEMA Real Property Damage Owner Occupied Units

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
St. Clair	844	1637	667	304	18

¹¹ <https://www.federalregister.gov/d/2023-10598/p-152>

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Similarly, a total of 425 renter-occupied properties fall under the Major/Severe categories for personal property losses, indicating the highest level of damage.

Table 12: FEMA Personal Property Damage Rental Units

County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
St. Clair	2052	709	302	118	5

As reported in the St. Clair County MHMP, there are 62 structures in St. Clair County that have experienced repetitive losses due to flooding. FEMA defines a repetitive loss structure as a structure covered by a contract of flood insurance issued under the NFIP that has suffered flood loss damage on two or more occasions during a 10-year period that ends on the date of the second loss, in which the cost to repair the flood damage is $\geq 25\%$ of the market value of the structure at the time of each flood loss. The Illinois Emergency Management Agency and Illinois Department of Natural Resources was contacted to determine the location of repetitive loss structures in St. Clair County. Records indicate that there are 62 repetitive loss structures within the county. The total amount paid for building replacement and building contents for damage to these repetitive loss structures is \$703,837.09.

Figure 6: Repetitive Loss Structures for each Jurisdiction in St. Clair County

<u>Jurisdiction</u>	<u>Number of Properties</u>	<u>Total Losses</u>	<u>Total Building Payments</u>	<u>Total Contents Payments</u>	<u>Structure Type</u>
St Clair County	16	39	\$630,879.93	93,162.29	14 Single Family / 1 Business / 1 Other Residential
Belleville	2	5	\$15,421.94	\$3,008.48	2 Single Family
Cahokia Heights	3	9	\$52,978.17	\$552.48	3 Single Family
Caseyville	1	2	\$11,610.85	\$0.00	1 Single Family
Centreville	2	5	\$17,076.15	\$7,000.00	2 Single Family
Dupo	1	2	\$21,875.23	\$0.00	1 Other Residential
East Carondelet	4	8	\$44,701.21	\$20,003.96	4 Single Family
East St Louis	31	84	\$653,074.12	\$158,835.07	29 Single Family / 1 Other Residential / 1 2-4 Family
O'Fallon	1	2	\$67,445.58	\$84,281.08	1 Business
Swansea	1	2	\$14,571.11	\$0.00	1 Single Family

Public Housing and Affordable Housing

The following section provides tables for documenting any damages to HUD-assisted Multi-family Housing. St. Clair County reached out to local governments and housing authorities to confirm any damages from the qualifying disasters, but no damages have been identified at the date of this publication. St. Clair County will update the tables when data becomes available.

Table 13: Multi-Family Assisted Housing

Type of Damage	# of Properties	# of Units	# of Units Assisted	# of Units Awaiting Assistance	Remaining Unmet Need
No damage reported	N/A	N/A	N/A	N/A	N/A

Public Housing Authorities Damaged

The tables below indicate the number of Public Housing Authorities (PHAs) in the disaster-impacted counties. St. Clair County reached out to the impacted PHAs, however, as of the date of publication, no response to St. Clair County's request for information was received from the East St. Louis Housing Authority. The St. Clair County Housing Authority (SCCHA) reported that no damage occurred to their properties.

Table 14: Public Housing Authorities Damaged

County/Municipality	Total # PHAs	Total PHA Damages	# Of Units Damaged	Remaining Unmet Need
St. Clair County	1	N/A	N/A	N/A
East St. Louis	1	N/A	N/A	N/A

The following table uses FEMA IHP data for homeowners and renters, along with HUD income limits. HUD income limits include low and moderate income (80% of AMI), very low income (between 31% AMI and 50% AMI), and extremely low income (30% AMI and below). FEMA collects information about FEMA IHP applicants with and without flood insurance. Most (97%) of the FEMA IHP applicants do not have flood insurance. Not all FEMA registrations include household income information (14%), so there is a discrepancy between the total number of households and the number of households that reported income.

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Table 15: IHP Applicants by Income Limits

Income Category	Count	# Without Flood Insurance	% Without Flood Insurance
30% of AMI (Extremely Low-Income)	4,149	4,051	98%
50% of AMI (Very Low-Income)	2,285	2,236	98%
80% of AMI (Low-Income)	1,439	1,399	97%
Over 80% AMI	833	796	96%
All Households	8,706	8,482	97%

Total Home Loans Approved by SBA

Table 16: Number of SBA Home Loans (Provided by SBA Aug 2025)

County	# of Claims Approved
St. Clair	625

Includes home loans with one of the following statuses: Approved Not Accepted, Completed, Completed Full Disbursement, Completed Partial Disbursement, E-Signature in Process - Borrower, E-Signature Pending

Calculating Housing Unmet Need

As stated in the Federal Register Notice, HUD notes:

The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the median real property damage repair costs determined by the SBA for its disaster loan program based on a match comparing FEMA and SBA inspections by each of the FEMA damage categories described above.¹²

The average verified loss of FEMA IHP properties with Major/Severe Damage is \$10,508. The FEMA IHP-verified losses undervalue the cost of reconstruction for the damaged properties, and under 10 households for SBA does not represent an adequate sample¹³. Despite these limitations, St. Clair County will use the HUD multiplier using Major/Severe damaged properties \$10,508, which is the average of the major/severe homeowner damage assessment amounts for its multiplier.

¹² <https://www.govinfo.gov/content/pkg/FR-2025-01-16/pdf/2025-00943.pdf>

¹³ According to the Federal Register 25-01-16, "If there is a match of fewer than 20 SBA inspections to FEMA inspections within individual damage categories for an individual disaster, these multipliers are used which are based on the 2020/2021 disaster years: Flood: Major-low \$47,074, Major-high \$57,856, and Severe \$64,513. <https://www.govinfo.gov/content/pkg/FR-2025-01-16/pdf/2025-00943.pdf>

Table 17: Housing Impact by Damage Category¹⁴

Damage Category	Owner Count	Owner - Total Damage	Renter Count	Renter - Total Damage	Total Count	Total Damage
Major-Low	667	\$7,198,520	301	\$775,066	968	\$7,973,586
Major-High	303	\$5,593,568	117	\$539,458	420	\$6,133,026
Severe	19	\$729,290	10	\$53,607	29	\$782,897
Total	989	\$13,521,378	428	\$1,368,131	1417	\$14,889,509

Eliminating Barriers to Affordable Housing

St. Clair County is committed to providing affordable housing to citizens through its disaster recovery efforts. All St. Clair County programs will comply with all relevant HUD rules and regulations. The Program Design section of this Action Plan provides further details on how housing requirements will be incorporated into CDBG-DR program design, policies and procedures, and program implementation.

St. Clair County does not anticipate that any of its programs will create or exacerbate barriers to housing. The programs will support communities in their development by investing in infrastructure and housing.

This section focuses on reviewing available data to understand the make-up of populations impacted by the disaster, which will serve as the basis for disaster recovery program design.

This section includes analysis of the following within the HUD-identified MID (St. Clair County):

- Renter and homeowner demographics
- Persons with disabilities and/or vulnerable populations
- Indigenous populations and tribal communities
- Federally Protected Classes
- Historically Distressed and Underserved Communities

Grantee Demographics and Disaster Impacted Populations

According to the 2017-2021 ACS 5-Year Estimates¹⁵, White was the largest racial group in St. Clair County (60.6%), followed by Black or African American (29.0%), followed by

¹⁴ Figures in this table were tallied from FEMA's Purpose 3 Individual Assistance Data for Disaster Recovery 4819, dated June 12, 2025 and applying the definitions of FEMA damage categories as outlined on page 19 of this report which are based on a combination of dollar amounts and flooding height.

¹⁵ American Community Survey 5-year estimates 2017-2021 Table S0201 Selected Population Profile in the United States [Census Bureau Tables](#)

4.35% of the population identifying as Hispanic or Latino.

Table 18: Race and Ethnicity

Race	Count	% Total
White or Caucasian	156,751	61.47%
Black or African American	74,992	29.41%
Hispanic or Latino	11,248	4.41%
Two + Races	10,421	4.08%
Asian	356	0.13%
Am. Indian or Pacific Isl.	43	0.01%
Some Other Race	1,202	0.47%
Total Population	254,973	

Renter and Homeowner Demographics

In St. Clair County, the highest percentage of occupied housing units by race are owner occupied housing units by white households at 51.39%. When looking within renter-occupied units alone, most renters remain white (44.3% vs. 39.1% Black), though within home ownership the disparity is greater (51.39% of homeowners are White vs. just 12.73% Black).

Table 19: Household Race and Ethnicity by Tenure Type

Race	Occ. Housing Units	% Owner-Occupied	% Renter Occupied
White or Caucasian	64,054	51.39%	13.36%
Black or African American	24,265	12.73%	11.8%
Hispanic or Latino	4,075	2.62%	1.5%
Two + Races	8,021	3.99%	4.12%
Asian	1,227	.86%	0.38%
Am. Indian or Pacific Isl.	321	N	N
Some Other Race	1,038	.53%	.51%
Total Occ. Housing Units	98,926	69.82%	30.18%

Source: American Community Survey S2502: 5-Year Estimates (2017-2021)

Persons with Disabilities

According to 2018-2023 American Community Survey data on disability rates, 22,928 St. Clair County residents, or 9.2% of civilian, non-institutionalized persons, have a disability. Of these 22,928 residents, approximately 11.74% are youth under the age of 18, 25.1% are adults ages 18-64, and 63.1% are seniors 65 years of age or older. For the purposes of the American

Community Survey, residents who report having any one (or multiple) of six disability types (hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, or independent living difficulty) are considered to have a disability.

Additionally, approximately 10% of the people on the SCCCHA Public and income-restricted housing wait lists indicate that they have a disability (all SCCCHA voucher and other multifamily housing is for seniors, which means the likelihood of a disability is much higher). The majority of these cases do not equate to the need for fully accessible units, but rather more commonly there is a need for a ground floor unit due to the inability to climb stairs on a regular basis due to health issues. There is considered to be a relatively low level of need for fully accessible units related to wheelchair use (estimated at five percent (5%) or less of current applicants). The public housing resident population shows that approximately 34% of households report having a disability.

Table 20: Disability Status by Type & Age

1. POPULATION PROFILE

TABLE 15: DISABILITY TYPE

	St. Clair County, IL		St. Louis, MO-IL Metro Area	
	Estimate	Percent	Estimate	Percent
Hearing difficulty	9,081	3.7%	97,284	3.5%
Vision difficulty	7,115	2.9%	65,540	2.4%
Cognitive difficulty	14,276	6.1%	142,577	5.4%
Ambulatory difficulty	19,438	8.3%	183,711	7.0%
Self-care difficulty	7,664	3.3%	67,545	2.6%
Independent living difficulty	13,294	7.0%	128,807	6.0%

SOURCE: ACS 2023 5-year estimates, tables B18102, B18103, B18104, B18105, B18106, B18107

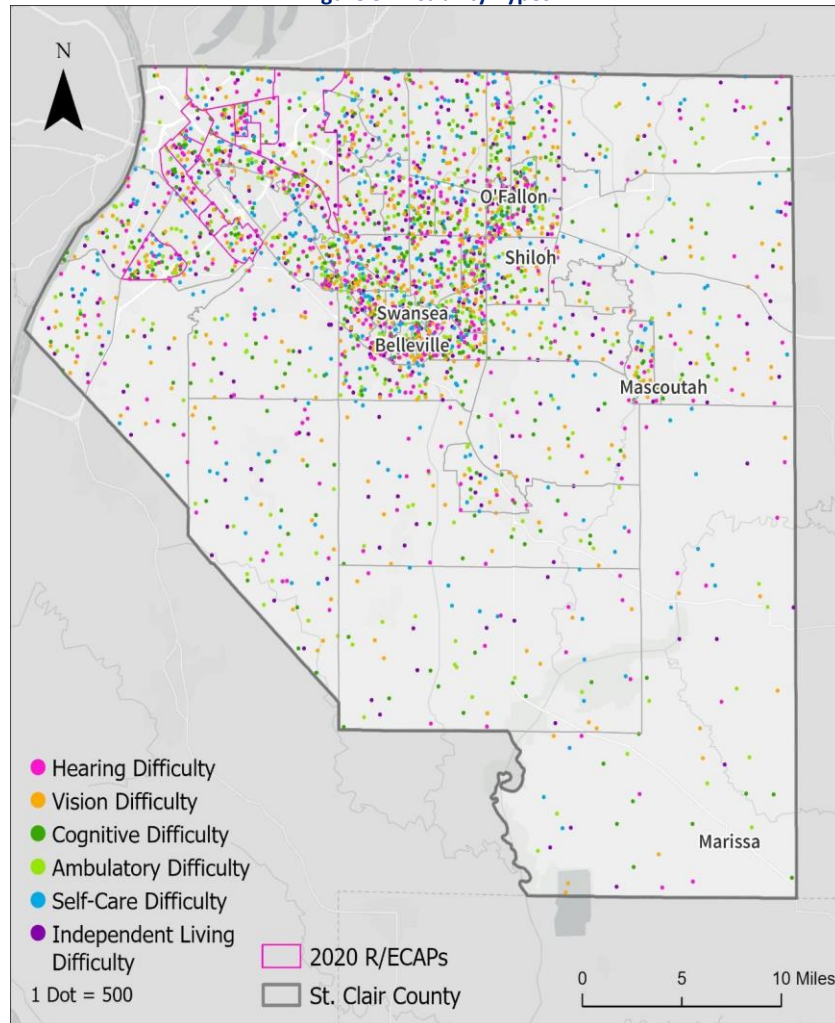
TABLE 16: PERSONS WITH DISABILITIES BY AGE RANGE

	St. Clair County, IL		St. Louis, MO-IL Region	
	Number	Percent	Number	Percent
Civilian, non-inst. population	248,186		2,775,424	
Under 5 with disabilities	108	0.04%	819	0.03%
5-17 with disabilities	2,583	1.04%	28,066	1.01%
18-64 with disabilities	5,764	2.32%	49,060	1.77%
65+ with disabilities	14,473	5.83%	138,605	4.99%

SOURCE: ACS 2023 5-year estimates table S1810

There are higher disability rates for each disability type for residents in St. Clair County compared to the St. Louis metro area. This is a notable shift since the last report where the figures were typically more in line with the region. Since then, there has been a shift toward younger age groups reporting higher rates of disability types, with those 65+ in age now reporting a much lower overall percentage of total disabilities. This could represent better healthcare diagnoses but also might represent worsening health influences upon the St. Clair County residents.

Figure 5: Disability Types



SOURCE: ACS 2023 5-year estimates, tables B18102, B18103, B18104, B18105, B18106, B18107

As depicted in Map 19, persons with disabilities in St. Clair County are geographically dispersed throughout the county. Areas on the map that appear to have a high concentration of persons with disabilities tend to correlate with areas of St. Clair County that have higher population density.

Indigenous populations and tribal communities

While there are no federally recognized tribes in the State of Illinois, the HUD Tribal Directory Assessment Tool does list 24 tribes as having interests in IL.¹⁶

Historically distressed and underserved communities

St. Clair County is not listed as a 2024 Distressed or Underserved nonmetropolitan Middle-Income Geography, though areas within are such.¹⁷

¹⁶ <https://www.bia.gov/service/tribal-leaders-directory/federally-recognized-tribes>

¹⁷ <https://www.ffiec.gov/cra/distressed.htm>

Proximity of Natural Hazards

The Environmental Protection Agency (EPA) Priorities List (SEMS_NPL) is a current list of Superfund sites, three of which are in St. Clair County.¹⁸ Again, these are in the northwest corner of the County and are within the areas that the FEMA data indicate were heavily impacted by this event.

These sites include the Old American Zinc Plant (45th/Cookson, Fairmont City 62201), and Sauget Area 1 and 2. All three of which are in Zip code 62201.

Figure 6: Superfund National Priorities List Map



Source: EPA Facility Registry Service, updated November 2022

EPA EJSCREEN

To measure environmental justice, exposure to polluting and toxic environmental harms, and socioeconomic factors, the following maps were pulled from the Environmental Protection Agency's EJScreen: Environmental Justice and Mapping Tool. The socioeconomic indicators shown include population under 5, population over 64, People of Color - percent of individuals in a block group who list their racial status as a race other than white alone and/or list their ethnicity as Hispanic or Latino, and limited English speakers - percent of people in a block group living in limited English speaking households,

¹⁸ United States. Environmental Protection Agency (EPA). ***NOTE: The EPA's EJScreen mapping tool has been removed from the public domain and the EPA EJScreen information shared in this report is from a previously available version of the tool.**

defined as a household in which all members age 14 years and over speak a non-English language and also speak English less than "very well"¹⁹. The colors on the map correlate with national percentile concentrations of these subpopulations. The EJScreen explains the percentiles this way: "if your results indicate that an area is 48% minority and is at the 69th national percentile, this means that 48% of the area's population is minority, and that is an equal or higher % minority than where 69% of the US population lives."

The maps below show that compared to national percentiles St. Clair County has a higher than national concentration of People of Color, particularly in the NW corner of the County, extending just beyond the I-255 loop.

The County does not, however, have many areas with limited English speaking though there are a few spots in the 80-90th percentile range.

Age risk factors (both under 5 and over 64) are spread throughout the county and do not coincide with any other factors. These are important metrics for vulnerability as the Centers for Disease Control and Prevention's (CDC) Social Vulnerability Index states "children and elders are the most vulnerable groups in disaster events."²⁰ It is important to account for households with children in disaster planning and recovery as children face increased vulnerability to psychological stress and post-traumatic stress disorder, educational disruptions, and physical vulnerability from disasters.²¹ Parents with young children may face increasing financial difficulties and stress from interrupted childcare and may face difficulties in returning to work.²² Households with adults over age 65 also face increased hardships and are "especially vulnerable during and after disasters (Bei et al., 2013; Malik et al., 2017; Weisler, Barbee, and Townsend, 2006). For example, half of the deaths from Hurricane Katrina were adults age 75 and older (Brunkard, Namulanda, and Ratard, 2008), and 63 percent of the deaths after the 1995 heat wave in Chicago were adults age 65 or older (Whitman et al., 1997). Older adults are more likely than others in a community to be socially isolated and have multiple chronic conditions, limitations in daily activities, declining vision and hearing, and physical and cognitive disabilities that hamper their ability to communicate about, prepare for, and respond to a natural disaster (Levac, Toal-Sullivan, and O'Sullivan, 2012; Aldrich and Benson, 2008). A sizable number of adults age 65 or older (about one-third of Medicare enrollees, or approximately 16 million nationally) live alone (Komisar, Feder, and Kasper, 2005). Disasters can also disrupt

¹⁹ United States. Environmental Protection Agency (EPA). ***NOTE: The EPA's EJScreen mapping tool has been removed from the public domain and the EPA EJScreen information shared in this report is from a previously available version of the tool**

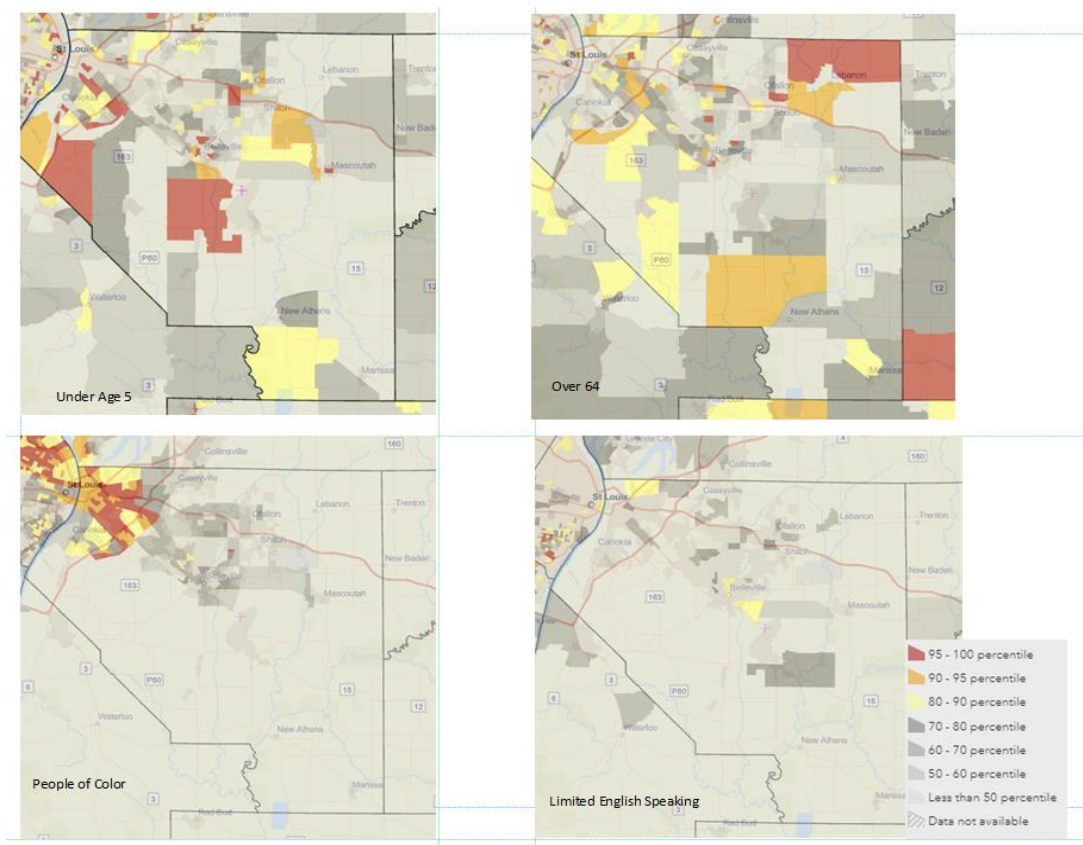
²⁰ United States. Centers for Disease Control and Prevention (CDC). (2020, January 31). *CDC SVI Documentation 2018*. Retrieved from <https://www.atsdr.cdc.gov/place-health/php/svi/index.html>

²¹ Lori Peek, "Children and Disasters: Understanding Vulnerability, Developing Capacities and Promoting Resilience: An Introduction", *Children Youth and the Environment*, 2008.
<https://www.jstor.org/stable/10.7721/chilyoutenvi.18.1.0001>

²² Carolyn Kousky, "Impacts of Natural Disasters on Children", Spring 2016.
<https://files.eric.ed.gov/fulltext/EJ1101425.pdf>

essential services that allow older adults to live in the community, such as assistance from family caregivers and social services like home-delivered meals, chore services, and personal care (Benson and Aldrich, 2007). A 2012 survey found that 15 percent of U.S. adults age 50 or older would not be able to evacuate their homes without help, and half of this group would need help from someone outside the household (National Association of Area Agencies on Aging, National Council on Aging, and UnitedHealthcare, 2012). A 2014 survey of adults age 50 or older found that 15 percent of the sample used medical devices requiring externally supplied electricity (Al-Rousan, Rubenstein, and Wallace, 2014). Thus, power interruptions could pose adverse health effects for this group.²³ A 2005 AARP poll found that “13 million persons age 50 or older in the United States say they will need help to evacuate, and about half of these individuals will require help from someone outside of their household.”²⁴ During the recovery phase of a disaster, it may be more difficult for older adults to access needed medicines or travel to social service agencies. Furthermore, many older adults live on a fixed income and may suffer from financial hardships after a disaster.

Figure 7: EJ Screen Demographic Maps



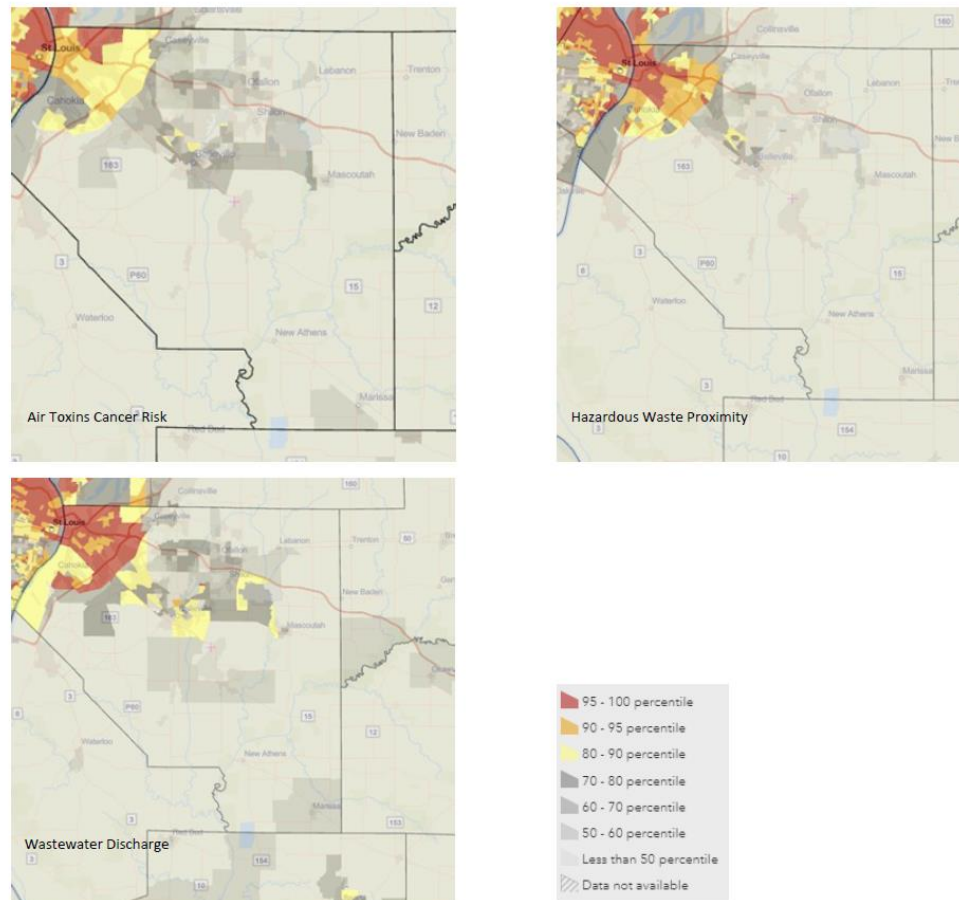
²³ NIH, “Improving Disaster Resilience Among Older Adults”, <https://pmc.ncbi.nlm.nih.gov/articles/PMC6075802/>

²⁴ AARP, Mary Jo Gibson & Michelle Hayunga, “We Can Do Better: Lessons Learned for Protecting Older Persons in Disasters”, 2006. <https://assets.aarp.org/rgcenter/il/better.pdf>

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The environmental justice screening, however, shows that St. Clair County has areas where there are four or more indicators (air toxic cancers risk, superfund proximity, hazardous waste proximity, and wastewater discharge) above the 80th percentile nationally. These areas are clustered in the same census tracts of the northwest portion of the county that was highly affected by this event, and which show the highest concentrations of people of color in the County.

Figure 8: EJ Screen Results



St. Clair County will aim to mitigate environmental concerns identified above through its CDBG-DR programs by:

- Limiting the proximity of new multifamily housing to these sites.
- Encouraging local resilience planning that focuses on climate risks and preparedness.
- Encouraging green infrastructure building and practices across the Infrastructure and Public Facilities and Multifamily Housing programs.
- Screening and evaluating scope in the applications to consider the specific location of projects and plan accordingly for the specific hazards and natural features that would affect impacted and vulnerable populations.

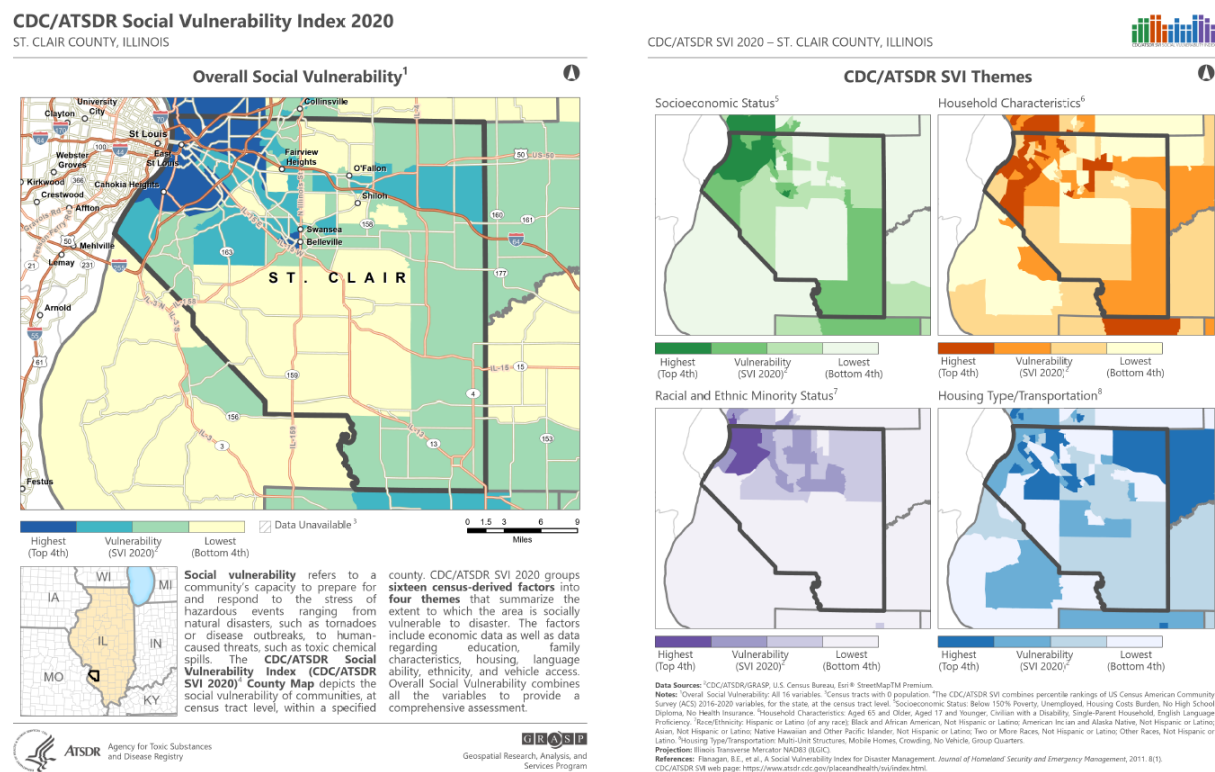
Federally Protected Classes Analysis

The CDC's Agency for Toxic Substances and Disease Registry's (ATSDR) Social Vulnerability Index (SVI) ranks counties and census tracts on 15 social factors, including unemployment, minority status, and disability, and then further groups them into four related themes. The SVI ranking variables for the four themes include Socioeconomic Status, Household Composition & Disability, Minority Status & Language, and Housing Type & Transportation. These indicators help support analysis on the relative vulnerability of a given census tract and help identify communities that will need continued support to recover following an emergency or natural disaster.

The infographic below²⁵ shows the overall summary from the CDC and Agency for Toxic Substances and Disease Registry's (ATSDR) Social Vulnerability Index for 2020. The northwest corner of the County remains the area of highest concern/vulnerability.

However, germane to this action plan the Housing Type/Transportation index in blue (bottom right box) which indicates a few other tracts that show high vulnerability in areas which are of high concern during flooding or other emergency events.

Figure 9: CDC/ATSDR Social Vulnerability Index Infographic



²⁵ https://www.atsdr.cdc.gov/place-health/php/svi/svi-interactive-map.html?CDC_AAref_Val=https://www.atsdr.cdc.gov/placeandhealth/svi/interactive_map.html

Circling back to the discussion started in the EJSscreen section on Children and the Elderly, when disaster strikes, households with children and/or seniors have additional needs including helping children cope with recurring trauma from being displaced from their communities and schools, and the loss of all their belongings. Seniors disproportionately face additional costs related to replacing medical equipment and face similar temporary and permanent housing accessibility challenges faced by individuals living with disabilities. There are 15,955 children under the age of 5 and just over 41,000 seniors living in St. Clair County, representing approximately 22% of the County's overall population²⁶. While all these residents may not have experienced direct housing losses from DR-4676 the trauma and additional strains on existing resources may have a disproportionate impact on services and housing available to accommodate children and seniors.

Persons with disabilities also have similarly additional challenges. They may have less mobility, need special equipment to evacuate, and many have service animals that need to be considered when a disaster occurs. Persons with disabilities face disproportionate challenges in finding suitable housing to accommodate their special needs and the additional costs for accessible safe permanent housing. The World Health Organization states that "people with disabilities may be less able to escape from hazards, may lose essential assistive devices such as spectacles, hearing and mobility aids and/or medications, or may be left behind when a community is forced to evacuate" as well as having "greater difficulty accessing basic needs" and also may face a reduced "capacity of caregivers and care settings".²⁷

While not every person with a disability may have experienced a direct impact from the disasters, the data informs how the programs will be made available to any person with a disability that was directly impacted by the disaster and making their social community more resilient for any future disasters.

Income Demographics

The income table below illustrates that St. Clair County has a lower median household income and per capita income than both the statewide amount, and the amount for the larger MO-IL Metro region to which it belongs. St. Clair County also has 34,603 (13.6%) people for whom income during the past 12 months was below poverty level, which is again greater than the State as a whole or the Metro area. People living in poverty are especially vulnerable to disasters because they are more oftentimes at greater risk of exposure due to being more likely to live in high-risk areas, losing a greater portion of their wealth when disaster hits, and having a lower ability to recover from disasters.

²⁶ American Community Survey 2017-2021 Table S0101

²⁷ World Health Organization, "Guidance note on disability and emergency risk management for health", December 2, 2013. <https://www.who.int/publications/i/item/guidance-note-on-disability-and-emergency-risk-management-for-health>

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Table 21: Median Household Income

Income/Economic Demographics	Statewide	St. Clair County	MO-IL Metro Area
Median Household Income	\$72,563.00	\$63,017.00	\$101,200.00
Per Capita Income	\$39,571.00	\$32,949.00	\$39,168.00
Income in the past 12 months below poverty level	1,483,378 (11.8%)	34,603 (13.6%)	289,903 (10.5%)

Source: American Community Survey B19301 & S1701: 5-Year Estimates (2017-2021)

The table below illustrates the number and percentage of LMI persons at the County and State level. Because all HUD recovery programs must meet an overall LMI benefit to expend 70% of the total allocation on activities that benefit LMI persons, it is important to understand the geography of low- and moderate- income persons in disaster impacted areas. St. Clair County has a higher percentage of LMI persons than the state, particularly in the most affected census tracts in the northwestern portion of the county.

Table 22: LMI Analysis – St. Clair County

County	Total LMI Persons	Total Population	Percent LMI
St. Clair	123,445	263,170	46.91%
State Total	5,412,861	12,572,576	43.05%

Source: HUD 2011 – 2015 LMI: <https://hud.maps.arcgis.com/apps/webappviewer/index.html?id=ffd0597e8af24f88b501b7e7f326bedd>

The Supplementary Nutrition Assistance Program (SNAP) provides nutrition benefits to families who may struggle with food budgets so that they can “purchase healthy food and move towards self-sufficiency”.²⁸ Eligibility for the program is based on the financial situation of all members in a household. Everyone who lives together and purchases and prepares food together is considered a member of the same household group and considered together in the application process. The Disaster-Supplementary Nutrition Assistance Program (D-SNAP) provides a one- time benefit during the disaster benefit period to aid in food-assistance for households that are not covered under regular SNAP.²⁹ While that data is not yet available, the table below shows a slight decline in the number of SNAP households in the months immediately after the disaster.

²⁸ USDA Food and Nutrition Services US Department of Agriculture, “Supplemental Nutrition Assistance Program (SNAP)”, accessed July 2020, <https://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program>

²⁹ USDA Disaster Assistance: <https://www.disasterassistance.gov/get-assistance/forms-of-assistance/5769>

ST. CLAIR COUNTY 2024 SEVERE STORMS, TORNADOES, STRAIGHT-LINE WINDS, AND FLOODING EVENTS

Table 23: SNAP and D-SNAP Applicants

County	Avg. # of SNAP Households Mar-July 2024	Avg. # of SNAP Individuals Mar-July 2024	Avg. # of SNAP Households Aug-Dec 2024	Avg. # of SNAP Individuals Aug - Dec 2024	% Change Pre/Post Disaster in HH Needs
St. Clair	28,311	52,196	28,220	51,537	-1.26%

Source: Illinois Dept of Human Services: <https://www.dhs.state.il.us/page.aspx?item=56952>

Comprehensive disaster recovery needs to consider the needs of people experiencing homelessness as many formal supports (shelters and supportive services) and informal supports (e.g., community resource sharing) may be impacted. People experiencing homelessness are especially vulnerable to disasters as they could be at heightened risk of losing what HUD terms their “margin of stability” leading to an increased risk of death, injuries, illness, and mental health crises.³⁰ The Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988, which authorizes presidentially declared disaster areas, protects individuals from discrimination on many bases including economic status in all disaster assistance programs in presidentially declared disaster areas.³¹

The tables below illustrate a one-night count of unhoused people in St. Clair County as of January 23, 2025. These counts measured the number of sheltered and unsheltered persons experiencing homelessness in the continuum of care jurisdiction. The results of the count indicate that there were 264 homeless persons in St. Clair County. It should be noted, however, that homeless counts often undercount the unsheltered population as it may miss people who are hidden from view, and does not count those who are “couch surfing” or may have other precarious living arrangements (e.g., motels, hotels, camping grounds).³²

Table 25: Point-in-Time Count – Type of Shelter

County	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
St. Clair	163	51	23	237

³⁰ HUD Exchange, Disaster Recovery Homelessness Toolkit, “Why this Guide: The Consequences of Disasters for Homeless and Other Vulnerable People”, Accessed July 2022. <https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/response-guide/>

³¹ HUD Exchange, Disaster Recovery Homelessness Toolkit, “Why this Guide: The Consequences of Disasters for Homeless and Other Vulnerable People”, Accessed July 2022 <https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/recovery-guide/>

³² Alastair Boone, “Is There a Better Way to Count the Homeless?” CityLab, March 4, 2019. <https://www.bloomberg.com/news/articles/2019-03-04/the-problem-with-hud-s-point-in-time-homeless-count>

ST. CLAIR COUNTY 2024 SEVERE STORMS, TORNADOES, STRAIGHT-LINE WINDS, AND FLOODING EVENTS

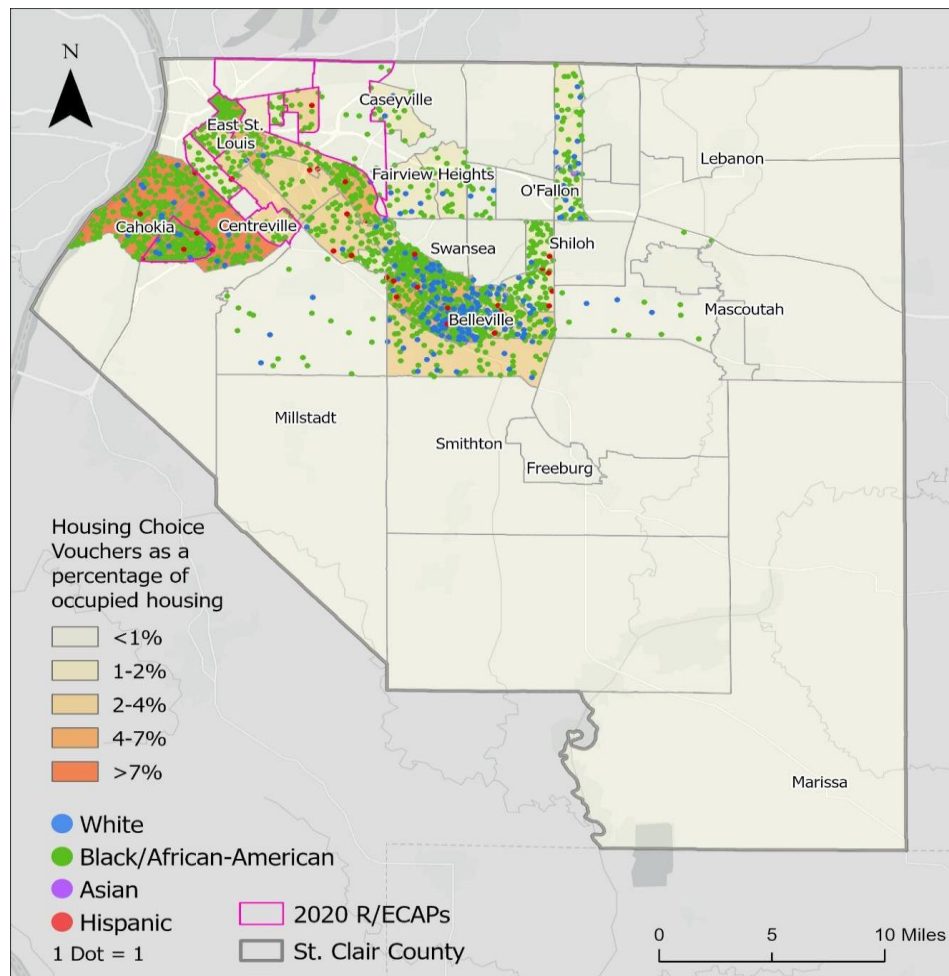
The tables below list the total Housing Choice Vouchers, Low-Income Housing Tax Credit (LIHTC) units, and public housing dwelling units in St. Clair County. The map below shows that these housing options are unevenly distributed throughout the county, and that the areas with the highest number of these options are also the areas that suffered the most because of this flooding disaster.

Table 26: Assisted Housing Impacted by Disaster

County	Total Housing Choice Vouchers	Total Impacted Housing Choice Voucher Units	Total LIHTC Units	Total Impacted LIHTC Units	Total Public Housing Dwelling Units	Total Impacted Public Housing Dwelling Units	Remaining Unmet Need
St. Clair	2,165	Unknown	1.1K (104 under 10 yrs Svc)	Unknown	2,532	N/A	N/A

Source: US Dept. of Housing and Urban Development Open Data: <https://hudgis-hud.opendata.arcgis.com/>, May 2, 2025

Figure 10: Housing Choice Vouchers by Tract:



Resources Available to Meet Unmet Housing Needs

While St. Clair County is proposing to mainly fund an infrastructure program with the CDBG-DR allocation, there are many resources in addition to the proposed CDBG-DR housing program that have been made available to address the additional unmet housing needs detailed in the previous sections of this document.

Additionally, the Illinois Department of Natural Resources began working directly with impacted residents on both buyouts and alternative housing following the 2022 Flood Disaster and will continue this work with households impacted by the 2024 disaster.

Further, St. Clair County intends to utilize HOME/CDBG to targeted areas for Rehabilitation/Repairs and for New Construction of for sale and rental housing in the upcoming years. St. Clair County will reevaluate the need on an annual basis. St. Clair County is also working with an organization and intends to utilize approximately \$4 million to create 12-14 affordable housing units in the Priority MID areas utilizing HOME ARP funding and the remaining CDBG-CV to create affordable housing for our most vulnerable populations, particularly in East St. Louis. St. Clair County recently provided HOME funds for a low-income-housing-tax-credit (LIHTC) development in the Winstanley Park neighborhood of East St. Louis that will provide 38 rental housing units affordable to those earning 30%, 50%, and 60% of Area Median Income. The development also received an allocation of 10 project-based vouchers, which will be utilized by households experiencing extreme housing cost burden and who are therefore at risk of or actively experiencing homelessness. Construction is nearing completion and leasing has already begun. A second mixed-use LIHTC development, New Broadview, recently added 110 units of affordable housing to East St. Louis, which was one of the most-impacted communities in the 2024 Severe Storms, Tornadoes, Straight-Line Winds, and Flooding Events Disaster.

The St. Clair County Housing Authority also has two new construction developments moving forward. The North Bend Residences will include single-family, duplex and tri-plex buildings containing a total of sixty (60) units including forty (40) one-bedroom and twenty (20) two-bedroom units. The units are designated for occupancy by senior citizens (age 62 and older) and to be affordable to households with incomes at 30%, 50%, and 60% of Area Median Income.

Vivian's Village is a new family housing development. Phase I of the project will include 16 new residential structures and also contemplates extensive site and infrastructure improvements, including asphalt and concrete paving and drives, parking areas, new sidewalks, curb, and gutter, new electrical distribution, landscaping and drainage repair, new sewer lines, cleaning and repair of existing sanitary mains, cleaning and repair of storm water mains, and installation of new water lines/mains.

The total development costs of Winstanley Park, New Broadview, North Bend Residences, and Vivian's Village exceed \$77 million and represent both public and privately owned housing. St. Clair County and its partners make concerted efforts to refer vulnerable populations, including

elderly households, victims of domestic violence, LMI households, individuals and families experiencing homelessness, persons living with disabilities, persons living with HIV/AIDS to both existing affordable housing opportunities and these new developments as units become available for leasing. St. Clair County has a long history of coordinating closely with affordable housing developers and the St. Clair County Housing Authority to assist vulnerable populations in accessing safe, decent, affordable housing and is closely monitoring progress on the affordable housing developments referenced above.

Finally, there are several routine funding sources made available for meeting the additional unmet housing needs of St. Clair County. While improving existing housing and development of new housing to a quality and in a quantity sufficient to completely meet the County's unmet housing needs will take decades of investment at current levels, the following resources are frequently utilized and made available in St. Clair County:

- Illinois Housing Development Authority (IHDA)– Several Rehab and New Construction Programs available that may be applied for by local government or various entities. <https://www.ihda.org/my-community/revitalization-programs/>
- Federal Home Loan Bank (FHLB)- Several Rehab and New Construction Programs available that may be applied for by local government or various entities. <https://www.fhlbc.com/>
- Rural Development - Several Rehab and New Construction Programs available that may be applied for by local government or various entities. <https://www.rd.usda.gov/programs-services/single-family-housing-programs>
- HOME/CDBG funds are utilized annually to provide rehab to owners and new construction projects. <https://www.co.st-clair.il.us/departments/intergovernmental-grants/community-development>

While continued investment in the County's existing housing stock is vital, there is one overarching conclusion to be drawn regarding the homes and communities that have experienced repetitive storm surcharge and sanitary sewer backups during rain events—until the infrastructure is addressed, the homes will continue to flood.

Infrastructure Unmet Need

St. Clair County's emergency agency has identified considerable impacts on public facilities and infrastructure from the July 2024 heavy rains that led to the catastrophic flooding across the county.

Roads and Bridges

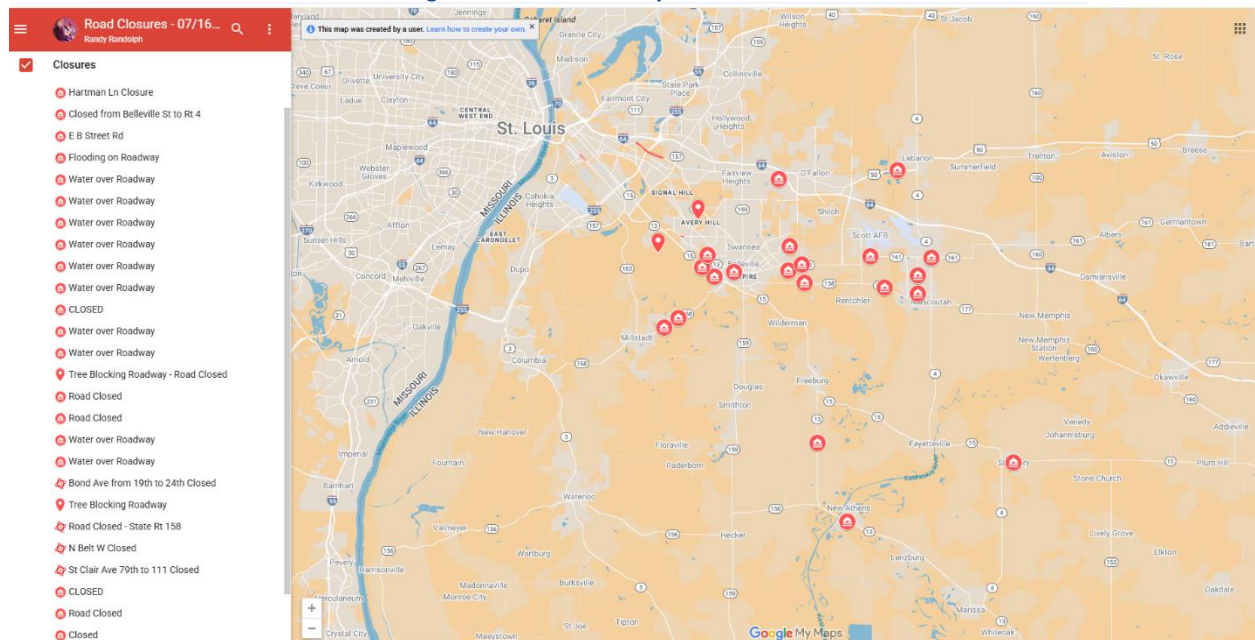
There were many roads that were impassable due to the flood waters. It took several days for water to recede in some places. Many employers closed on 7/16/24 due to flooding and people were unable to move about the county. Three roads suffered catastrophic damage:

Barber Rd, Freeburg - This road was temporarily repaired to allow one lane of traffic for emergency ingress / egress.

Turner Hall Rd, Smithton - This road was expected to be closed for 4-5 weeks for repairs.

Schwaub Rd, Millstadt - Investigation remains underway for this closed roadway.

Figure 11: St. Clair County Road Closures³³



Buildings and Equipment

The St. Clair County Animal Control and Humane Society remain vigilant to provide for any animals in need throughout St. Clair County. While there was not a designated pet shelter opened during the event, there were resources at the ready. The St. Clair County Animal Control building was substantially damaged by flooding and all animals had to be evacuated.

³³ Road Closures map created July 16, 2024 by Randy Randolph, Operations Manager for St. Clair County 911 Central Dispatch and Emergency Management.

ST. CLAIR COUNTY 2024 SEVERE STORMS, TORNADOES,
STRAIGHT-LINE WINDS, AND FLOODING EVENTS

The cats were removed to the Belleville Humane Society and the dogs were removed to Gateway Pet Guardians in East St. Louis. Damages were incurred at the St. Clair County Fairgrounds, Animal Control Facility and Emergency Operations Center. The Animal Control and Emergency Operations Center remain closed and will need substantial repairs to reopen. Further, the County Emergency Operations Center was not usable and the Belleville Police Department was temporarily inaccessible due to the flooding.

As reported in the St. Clair County MHMP and detailed in the Housing Unmet Needs section of this plan, there are 62 structures in St. Clair County that have experienced repetitive losses due to flooding. This is relevant to the Infrastructure Unmet Need as these repetitive flood events are either exacerbated or directly caused by failing stormwater and sewer infrastructure, reaffirming that the repairs and upgrades proposed under the Infrastructure Program will also ameliorate housing conditions and assist with meeting the unmet housing needs. FEMA defines a repetitive loss structure as a structure covered by a contract of flood insurance issued under the NFIP that has suffered flood loss damage on two or more occasions during a 10-year period that ends on the date of the second loss, in which the cost to repair the flood damage is $\geq 25\%$ of the market value of the structure at the time of each flood loss. The Illinois Emergency Management Agency and Illinois Department of Natural Resources was contacted to determine the location of repetitive loss structures in St. Clair County. Records indicate that there are 62 repetitive loss structures within the county. The total amount paid for building replacement and building contents for damage to these repetitive loss structures is \$703,837.09.

Figure 12: Repetitive Loss Structures for each Jurisdiction in St. Clair County

<u>Jurisdiction</u>	<u>Number of Properties</u>	<u>Total Losses</u>	<u>Total Building Payments</u>	<u>Total Contents Payments</u>	<u>Structure Type</u>
St Clair County	16	39	\$630,879.93	93,162.29	14 Single Family / 1 Business / 1 Other Residential
Belleville	2	5	\$15,421.94	\$3,008.48	2 Single Family
Cahokia Heights	3	9	\$52,978.17	\$552.48	3 Single Family
Caseyville	1	2	\$11,610.85	\$0.00	1 Single Family
Centreville	2	5	\$17,076.15	\$7,000.00	2 Single Family
Dupo	1	2	\$21,875.23	\$0.00	1 Other Residential
East Carondelet	4	8	\$44,701.21	\$20,003.96	4 Single Family
East St Louis	31	84	\$653,074.12	\$158,835.07	29 Single Family / 1 Other Residential / 1 2-4 Family
O'Fallon	1	2	\$67,445.58	\$84,281.08	1 Business
Swansea	1	2	\$14,571.11	\$0.00	1 Single Family

Storm Sewer Surcharge and Sanitary Sewer Backups

As with the July 2022 Flood Disaster event, the most severe impacts of the 2024 Severe Storms, Tornadoes, Straight-Line Winds, and Flooding Events Disaster occurred as a result of storm sewer surcharges and sanitary sewer backups, which resulted in severe damages to homes and communities. St. Clair County is coordinately closely with the U.S. Army Corps of Engineers (USACE) to identify the specific extents of the various infrastructure failures along with the repairs, upgrades, replacements, and construction of new infrastructure needed to mitigate the severity of future flood events. The USACE holds the technical expertise and federal mandate to respond to disasters such as the 2024 Disaster experienced by St. Clair County. The USACE's mission and vision are as follows:

Mission: "Deliver vital engineering solutions, in collaboration with our partners, to secure our Nation, energize our economy, and reduce disaster risk."

Vision: "Engineering solutions for our Nation's toughest challenges."³⁴

The USACE St. Louis District has actively participated in the development of this plan and has provided the following information detailing the unmet storm and sewer infrastructure needs vis-à-vis the 2022 Flood Disaster in St. Clair County. Much of this information comes from partner agencies who also have a role in addressing the critical failure of storm and sewer infrastructure, including the U.S. Geological Survey.

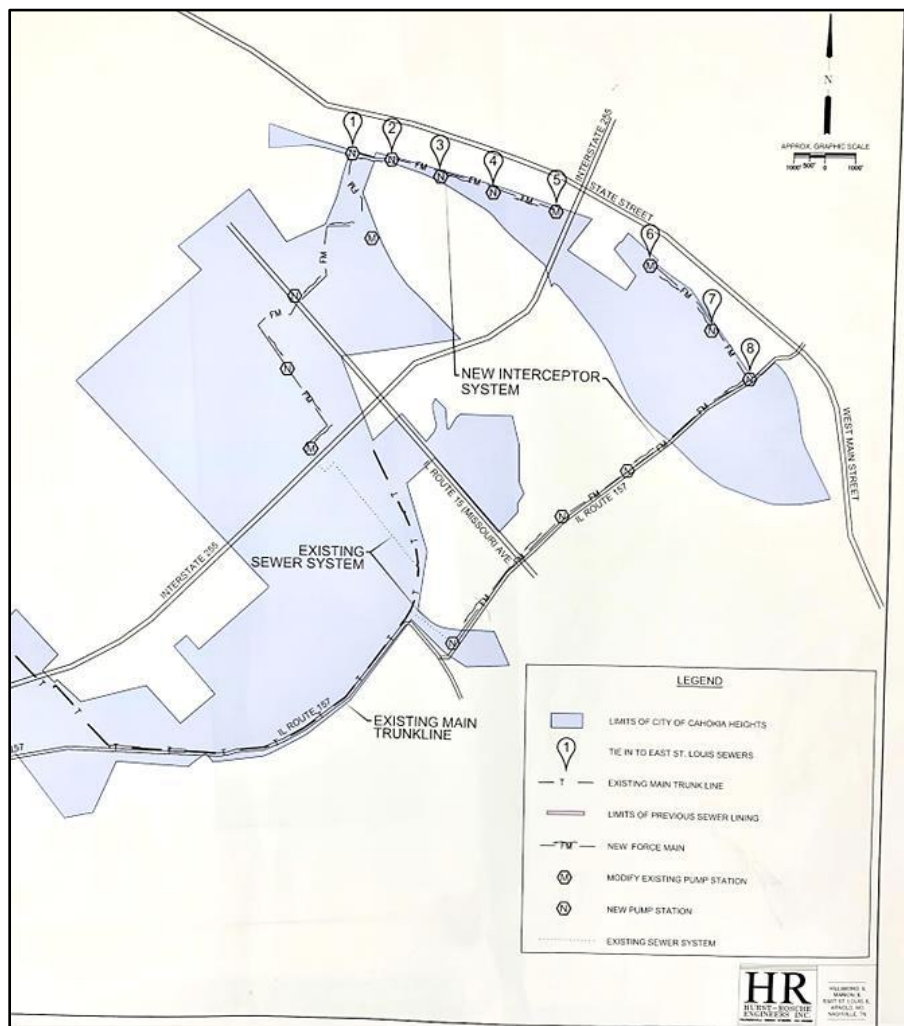
- USACE Flood Hazard Analysis—Cahokia Heights and East St. Louis
 - The following link provides access to the Flood Hazard Analysis completed September 2023.
<https://www.mvs.usace.army.mil/Portals/54/docs/pm/Cahokia%20Heights/CahokiaHeightsandESTL%20Final%20Report.pdf>
 - The study area is approximately 2.5 square miles with a population of about 6,500 residents according to the United States Census Bureau (United States Census Bureau, 2020).
 - There are 691 structures that receive some level of flooding at any Annual Exceedance Probability event, with the majority being residential structures.
 - Engineering Measures to mitigate flooding is included in the report.
 - A summary of the cost for each of the alternatives combined is below:

	Construction	E&D	CM	Total Cost
Limited	\$3,545,000	\$640,000	\$360,000	\$4,545,000
Intermediate	\$74,807,000	\$13,460,000	\$7,480,000	\$95,747,000
Maximum	\$89,743,000	\$16,160,000	\$8,970,000	\$114,873,000

³⁴ <https://www.usace.army.mil/About/Mission-and-Vision/>

- USACE Flood Hazard Analysis—Piat Subwatershed
 - Anticipate completion of final report in March 2025.
 - The project area locally referred to as Piat Place neighborhood is bordered by 59th Street, Interstate 255, Summit Avenue, and Lake Drive in East St. Louis, Illinois. The Piat Place study area is highlighted in red in Figure 1. The study will also include Harding Ditch hydraulic analysis from Schoenberger Creek (near State Street) downstream to the MESD South pump station. The extents of the hydraulic model will cover most of Harding Ditch and its larger tributaries.
 - This is an economically disadvantaged community facing two threats: 1) failed and failing sanitary sewer collection and transport system, and 2) storm water flooding that contributes to sanitary sewer overflows and mixes with those overflows impacting public health.
 - This flood mitigation plan will benefit multiple homes and will require grant funding assistance for project implementation.
 - **Financial:**
Estimated Federal cost: \$225,000 (anticipated in FY24*)
Estimated non-Federal cost: \$0
Total estimated cost: \$225,000
Total Federal funding to date: \$135,000
- East and West Sanitary Inceptor Projects—Cahokia Heights and East St. Louis
 - Design and construction of a new sanitary sewer system component to intercept northward flows between Cahokia Heights and East St. Louis, located at the north end of the city of Cahokia Heights at its border with the city of East St. Louis, including sanitary sewer flows from the adjacent neighborhoods of Ping Pong, South Parkside, East Parkside, and Piat Place in Cahokia Heights, and also affecting flows from Edgemont and Parkside in East St. Louis.
 - New sewers and pump stations serving the area in northern Cahokia Heights are needed to replace aged, outdated, and poorly functioning or non-functioning systems, and also to separate the flows between Cahokia Heights system and East St. Louis's system. These combined systems have resulted in numerous operating issues for the City of Cahokia Heights and residents, including sewer backups, overflows, and service interruption. These issues and locations have been inspected and included in recent compliance orders and agreements between the City and USEPA to address and ensure compliance with the Clean Water Act. The City is home to many historically disadvantaged and poor residents, and is predominantly African American in racial composition. The City does not have the financial resources to fund the corrective actions needed and proposed by this project.

- Construction of interceptor sewers will:
 - Reduce infiltration of groundwater,
 - Reduce backups and overflows impacting Cahokia Heights residents and the environment,
 - Increase reliability of Cahokia Heights sewer service,
 - Increase capacity in the East St. Louis system,
 - Increase system useful life,
 - Reduce operating and maintenance costs, and
 - Enhance compliance with Clean Water Act.
- **Total estimated project cost is \$14,000,000**
- The following image identifies some of the specific infrastructure components involved in this project. The document provided by the USACE is included as an attachment to this plan.



- USGS Hydrologic and Hydraulic Characteristics of the Lower Silver Creek Watershed—Scott Airforce Base area:³⁵
 - Report analyzes flood mitigation scenarios with conceptual detention basins on Silver Creek tributaries to address historical flooding along Silver Creek.
 - The total Scott AFB community, on- and off-base, comprises approximately 39,952 military and civilian personnel and their families (Buchanan and others, 2018) with an economic impact approaching 2 billion dollars (SAFB, 2020a). Flooding impacts have been well documented within the installation as identified in the Lower Silver Creek Watershed Plan (Buchanan and others, 2018), historical flood insurance studies (FEMA, 2003), as well as Environmental Assessments for installation development conducted in 2007 and 2009 (SAIC, 2007, HDR, 2009).
 - Partners are coordinating at a regional scale to work toward management of stormwater and flooding. The map below was provided by the USACE and is provided to show the study area only as the study is ongoing.
 - The USACE Information Paper has been added as a supporting document to this plan.

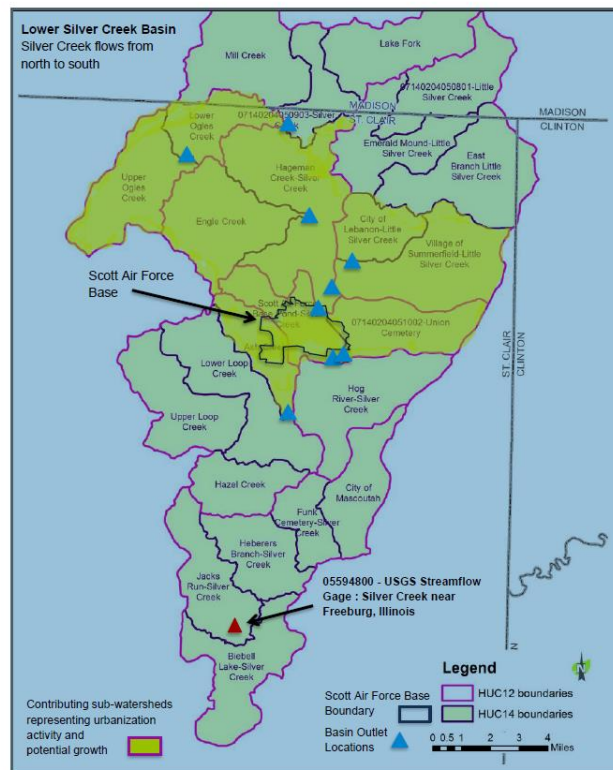


Figure 3. Contributing 12 and 14-digit Hydrologic Unit Code (HUC) sub-watersheds experiencing substantial urbanization activity and potential growth within the Lower Silver Creek Watershed.

³⁵ <https://pubs.usgs.gov/sir/2024/5117/sir20245117.pdf>

Together, just these studies and identified infrastructure **projects total over \$130,000,000 in unmet infrastructure need and all contemplated mitigation measures as part of the scope.** Further, these projects all include mitigation and resiliency measures, developed with the expertise and technical assistance of Federal partners with a mission to address ongoing flood events as well as prepare for a future of increasingly severe events resulting from climate change. By working closely with the USACE, St. Clair County will select projects that meet the shared mission of producing a noticeable reduction in storm sewer surcharges and sanitary sewer backups in historically underserved and disadvantaged communities that lack local resources to solve these problems. Indeed, carrying out infrastructure projects of this scale will require robust partnerships and multiple funding sources. St. Clair County's proposed CDBG-DR Infrastructure Program will be instrumental in the regional collaboration needed to mitigate the severity of flood events in St. Clair County. However, at this time there is no defined timeline for these projects and St. Clair County has not committed CDBG-DR funds from the 2024 Disaster Events to these projects; these projects are detailed to illustrate the unmet infrastructure need, estimate a cost for unmet infrastructure needs, and identify the types of projects that St. Clair County intends to fund with CDBG-DR funds.

Disaster Damage and Impacts

FEMA's Public Assistance Program (PA) provides supplemental grants to State, tribal, territorial, and local governments, and certain types of private nonprofits so that communities can quickly respond to and recover from major disasters or emergencies. FEMA also encourages the protection of these damaged facilities from future events by providing assistance for hazard mitigation measures during the recovery process. St. Clair County was deemed ineligible for this assistance for DR-4819.³⁶

Economic Revitalization Unmet Need

Pre-Disaster Economic Conditions

St. Clair County is centrally located in the Midwestern portion of the United States. The Region is bordered on the west by the Mississippi River and the City of St. Louis. St. Clair County is included in the Illinois portion of the St. Louis Metropolitan Statistical Area (SMSA). The county is characterized by a mix of suburban, urban, and rural communities, as well as notable landscapes like the American Bottoms Floodplain and Bluffs along the Mississippi River in the western portion of the area and large areas of agricultural land to the east.

According to the draft of the Southwestern Illinois Metropolitan Comprehensive Economic

³⁶ <https://www.fema.gov/disaster/4819/designated-areas>

Development Strategy (CEDs)³⁷ currently issued for public comment, the per capita income of St. Clair County is \$37,824 and the poverty rate is 13.4%. Coupled with an unemployment rate of 4%, the county experiences considerable economic strain.

Disaster Damage and Impacts

All disasters result in economic impacts, from business disruption to disaster related unemployment. Businesses and private industry structures, including restaurants, shops, grocery stores, gas stations and other businesses, were destroyed, threatening the ability for communities to have access to the services needed for residents to come back. The impact varied from community to community.

Unemployment Rates

Prior to the July 2024 disaster, the County was continuing to experience significant economic impacts resulting from the COVID-19 pandemic and subsequent economic climate of inflation, rising interest rates, and decreasing employment. According to the U. S. Bureau of Labor Statistics, the unemployment rate in St. Clair County jumped from around 3.4 in February 2020 to 16.2 in April 2020, the highest in 20 years (the previous peak being 11.9 in 2009). While some recovery is evident, the rate was still raised to around 5.3 in July of 2024.³⁸

Small Business Administration (SBA) Commercial Losses

The SBA offers Economic Injury Disaster Loans (EIDL) and Business Disaster Loans to businesses to repair or replace disaster-damaged property owned by the business, including real estate, inventories, supplies, machinery, equipment, and working capital until normal operations resume. Businesses of all sizes are eligible. Private, nonprofit organizations, such as public service, faith-based, and private universities, also are eligible. The law limits business loans to \$2 million and the amount cannot exceed the verified uninsured disaster loss.

St. Clair County continues to work with the local governments, chambers of commerce, state agencies, and impacted areas to further refine the economic impact and unmet economic recovery needs.

³⁷ <https://www.simapc.org/bettertogether>

³⁸ <https://fred.stlouisfed.org/series/ILSTURN>

Total Business Loans Approved by the SBA

Table 27: Total Business Loans Approved by the SBA

County	Total Business/EIDL Loan Applications	Total Approved
St. Clair County	2,352	375

SBA Business Loan Data

Table 28: SBA Disaster Loan Data

Damaged Property County Name	Total Verified Loss	Total Approved Loan Amount	Total Unmet Need
St. Clair County	\$29,627,533	\$31,538,300	\$13,595,571

Note: The total unmet need isn't derived by simply subtracting the total approved loan amount from the total verified loss, because verified losses and loan amounts don't have a 1:1 correspondence. For example, the total verified losses for the entities with approved loans was just \$13,375,262 while the total approved loan amount was \$31,538,300. Hence, the total unmet need is derived by totaling the verified losses of all "non-approved" business loans.

Unmet Needs Summary

This section includes a summary of the total impacts from the 2024 disaster, the total resources available, and the total unmet recovery needs. St. Clair County will continue to monitor the data available and continue its consultations with impacted areas and residents to ensure it collects the most current data available. Infrastructure unmet need is not included in the table below because FEMA PA was not made available for this disaster. However, addressing critical infrastructure failures will increase housing and business resiliency from future flooding disasters, which are occurring with greater frequency and impacting the same areas over and over. While no data was made available in the Universal Notice regarding infrastructure unmet need, an extensive amount of consultation with members of the public, impacted individuals and households, local agencies and organizations, and municipalities overwhelmingly supports dedicating a large portion of CDBG-DR funds to repairing and upgrading infrastructure in order to mitigate the impacts of future flood disaster events.

Table 29: Unmet Needs and Proposed Allocations

Category	Total Verified Loss	Remaining Unmet Need	% of Need Unmet	FEMA/SBA/Other Program Allocation Amount	CDBG-DR Proposed Program Allocation Amount)
Infrastructure	Unknown	\$130,000,000	100%	Unknown	\$80,056,350
Housing (FEMA IA)	\$28,674,112	\$5,118,269	17.8%	\$17,270,936	\$4,000,000
Housing (SBA Home)	\$90,855,065	\$58,656,124	64.6%	\$26,714,200*	
Economic (SBA Business/EIDL)	\$29,627,533	\$13,595,571	45.9%	\$34,195,000*	\$1,000,000
Administration	Unknown	Unknown	Unknown	Unknown	\$4,476,650
Total	\$149,156,710	\$77,369,964	51.9%	\$78,180,136.39	\$89,533,000

* Sum of all loan amounts

Mitigation Needs Assessment

The Multi-Hazard Mitigation Plan is a risk-based assessment that consists of three components: hazard identification, vulnerability assessment, and risk analysis. The plan was completed in 2009 and updated in 2024 and will inform the use of the 15% CDBG-MIT set-aside and help build resilience and mitigation measures into recovery programs and projects.

Importantly, this assessment looks at any natural hazard likely to affect St. Clair County, including flooding, extreme heat, severe winter weather, tornado, and severe thunderstorms. These hazards were identified in Illinois's FEMA-approved Hazard Mitigation Plan (HMP) as

well as the plan for St. Clair County.

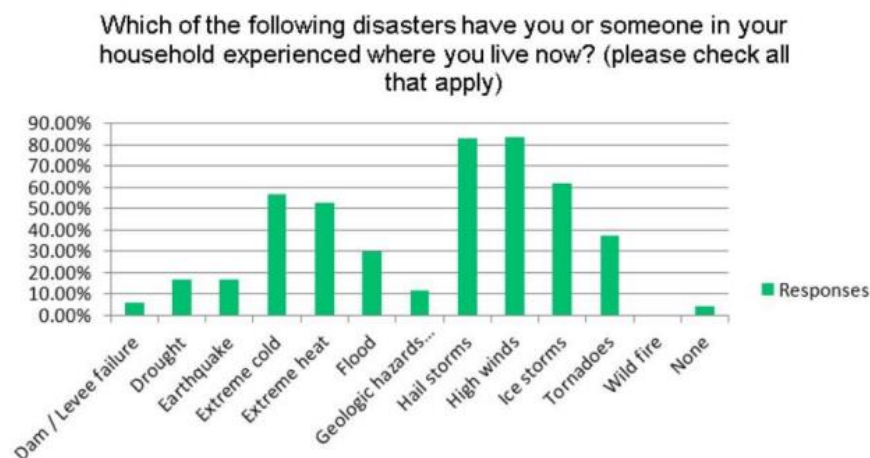
This assessment will provide a basis upon which to propose programs and projects as part of this plan that will mitigate current and future hazards. In addition, it will inform all projects undertaken through CDBG-DR such that, at a minimum, they do not exacerbate natural hazard threats and make use of scarce resources for recovery and mitigation.

As part of this assessment, the county also sought to identify and address risks to indispensable services, or those services that enable continuous operation of critical business and government functions and/or are critical to human health and safety, and economic security.

To promote sound, sustainable, long-term recovery planning informed by a post-disaster evaluation of hazard risk, including climate-related natural hazards, the St. Clair County Emergency Management Agency updated the Multi-Hazard Mitigation Plan (MHMP) in 2024³⁹. The plan includes long-term recovery plans along with the documentation of the recently formed Long-Term Recovery Committee in St. Clair County. This committee was formed during the Flood response of 2022 and focuses on these exact efforts. Twenty-six jurisdictions participated in the development of the MHMP.

As part of the St. Clair County MHMP development, a 17-question online public survey was developed. The County chose to focus on online outreach efforts due to experience with poor to no turn out at public meetings. The online survey, which was also promoted by the County's many civic, religious, and social partners, was a surprising success given the freshman effort had a limited, three-week time frame. There were 240 respondents, representing 31 zip codes throughout the county. When asked which natural disasters they or someone they know have experienced, over 80 percent reported experiencing hailstorms and high winds, just over 60 percent reported experiencing ice storms, over 50 percent have experienced extreme cold and/or heat, and almost 40 percent have experienced tornadoes.

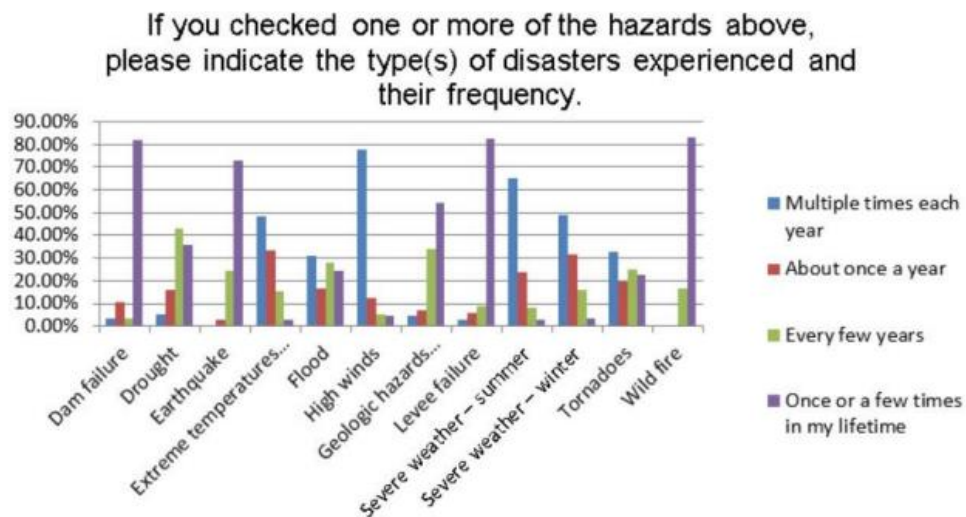
Figure 13: St. Clair County MHMP Survey Response: Disasters Experienced



³⁹ <https://www.co.st-clair.il.us/webdocuments/departments/ema/Forms/St.%20Clair%20County%20MHMP%20Final.pdf>

Based on the severity and frequency of their occurrence, the respondents were asked to select the top three hazards they believed to be the greatest threat to their community. Tornadoes and high winds tied as the greatest perceived threat. Severe winter weather was the second most selected response, closely followed by severe summer weather. Of the 240 respondents, 78 percent feel they are adequately informed about the risks of natural hazards. Most of the respondents said that their street, home, or business does not regularly flood during periods of heavy rainfall, while 20 percent said they do have regular flooding. When asked if their property is located within a flood plain, 162 people said they did not know, 21 said they did know, and the remaining said they were not sure. This survey provided the opportunity to select what mitigation project types they believe should be focused on to help minimize or even eliminate the impacts caused by natural disasters. **The top three answers were: fixing infrastructure, such as improving drainage systems; ensuring facilities such as fire, police, and medical services are protected from natural disasters; and working to protect utilities such as electricity and communications.**

Figure 14: St. Clair County MHMP Survey Response: Disasters Experienced & Frequency



Climate effects are a requirement of inclusion along with mitigation strategies to combat them and will inform St. Clair County's CDBG-DR Infrastructure Program and selection of projects under the program.

State Hazard Mitigation Plan

The Illinois Natural Hazard Mitigation Plan (INHMP) provides the framework for hazard mitigation not only during the recovery and reconstruction process, but on a year-round basis to identify current and proposed mitigation projects that will reduce the potential for future losses and decrease the costs to taxpayers. The INHMP is used to increase awareness and initiate development of long-range, interagency, multi-hazard mitigation activities to be administered by the Illinois Emergency Management Agency (IEMA) and the Interagency Mitigation Advisory Group (IMAG) for the State of Illinois. The INHMP shall address those

natural hazards that have resulted in claims for Federal assistance, as well as other major natural hazards identified as presenting substantial risk to human life and private and public property. Importantly, the INHMP is required by FEMA for states to access Hazard Mitigation Assistance funds.

The INHMP identifies 7 natural hazards that have occurred in the past and in all probability will continue to impact Illinois at various levels of severity and frequency, including:

- Severe Storms
- Tornadoes
- Floods
- Drought
- Extreme Heat
- Severe Winter Storms
- Earthquake

Illinois lies midway between the Continental Divide and the Atlantic Ocean, and the state's southern tip is 500 miles north of the Gulf of Mexico. Illinois' climate is typically continental with cold winters; warm, humid summers; and frequent short fluctuations in temperature, precipitation, humidity, cloudiness, and winds. Illinois received 22 federal disaster declarations (17 major disaster declarations and five emergency declarations) between 2000 and 2017, and 31 gubernatorial disaster proclamations between 2010 and 2018 (IEMA).

Severe Storms

All Illinois counties are susceptible to severe storms. At any one time, it has been determined that over 25% of the county population might experience severe storms. This determination is supported by Mr. Chris Miller, Warning Coordination Meteorologist, National Weather Service (NWS), Lincoln, Illinois, as follows: "Damage from severe thunderstorms is usually on a much broader spatial scale in the state of Illinois. Illinois averages more than 500 reports of wind damage and nearly 375 reports of large hail annually. Approximately 80% of the severe thunderstorms are multicellular or a supercell hybrid, which are capable of producing damaging wind and/or large hail over approximately a 400 to 500 square mile area. The remainder of severe thunderstorms are squall lines, which can produce damage over 100% of the affected counties. Thus, the vulnerability to severe thunderstorms should be high (greater than 25% of the population affected) in each county across Illinois.

In Illinois, thunderstorms occur when there is a collision of moist, warm air moving north from the Gulf of Mexico with colder fronts moving east from the Rocky Mountains resulting in cold air overriding a layer of warm air causing the warm air to rise rapidly. Thunderstorms may occur singly, in clusters, or in lines. In the course of a few hours, it is possible for several thunderstorms to affect one location or a single thunderstorm to affect one location for an

extended time. Thunderstorms typically are 15 miles in diameter and produce heavy rain anywhere from 30 minutes to an hour. Of the estimated 100,000 thunderstorms each year, approximately 10 percent are classified severe. Severe storms either produce hail at least one inch in diameter, have winds of 58 miles per hour or higher, or produce a tornado. In Illinois, severe thunderstorms frequently occur in the late afternoon or evening. Thunderstorms can bring heavy rain, strong winds, hail, lightning, and tornadoes. Thunderstorms can cause several types of damaging wind. The public is not as familiar with the extent of damage that may accompany a downburst or straight-line winds as they are with tornadoes. In thunderstorms, straight-line winds are winds without any rotation. This classification differentiates them from tornadic winds. In severe thunderstorms, downbursts are created by falling rain and associated sinking air, resulting in winds that can reach speeds of 125 mph.

Tornados

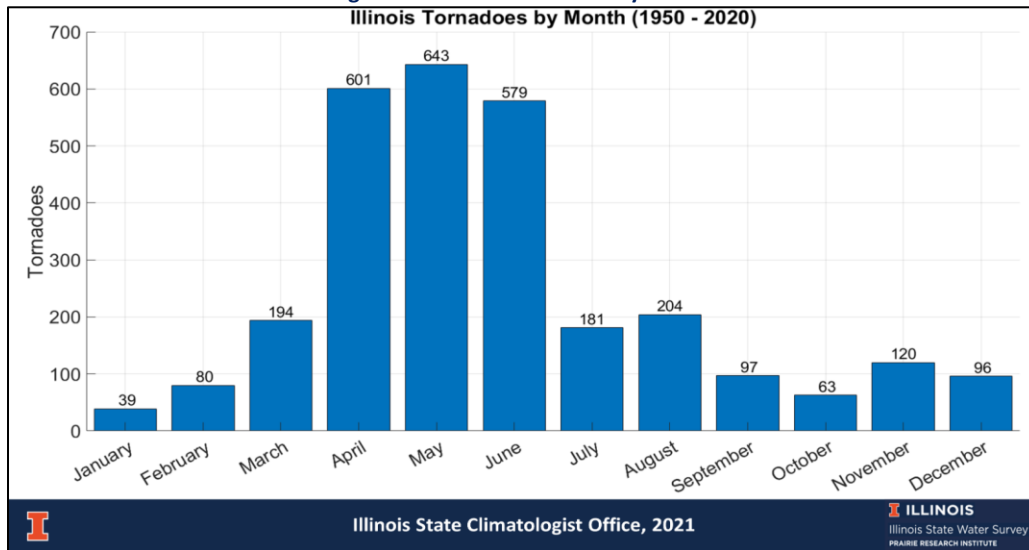
Illinois is situated on the northeast edge of "tornado alley," the tornado-prone area that extends approximately 400 miles on either side of a line from Fort Worth, Texas, to Detroit, Michigan. This area is the battleground of warm, moist air from the Gulf of Mexico and cold air from Canada, resulting in the world's leading breeding area for twisters. The greatest frequency of tornadoes in Illinois occurs in a wide band from Madison and St. Clair counties northeastward to Lake and Cook counties.⁴⁰ Illinois ranks fourth in the United States for the most tornadoes per square mile. The majority of Illinois tornadoes have occurred between April 1 and June 30 and between the hours of 3 p.m. and 10 p.m. However, tornadoes have occurred every month of the year at all hours of the day. On average, 53 tornadoes occur each year in Illinois. There were 63 tornadoes reported in Illinois during 2020, which resulted in 2 injuries and nearly \$2 million in property damage.⁴¹ Most tornado damage paths are less than 100 yards wide and a couple of miles long but can be up to a mile wide and 50 miles long, resulting in the potential for severe damages.⁴²

⁴⁰ State of Illinois Natural Hazard Mitigation Plan

⁴¹ <https://iemaohs.illinois.gov/content/dam/soi/en/web/iemaohs/preparedness/documents/severeweatherpreparedness.pdf>
(<https://iemaohs.illinois.gov/content/dam/soi/en/web/iema/preparedness/documents/severeweatherpreparedness.pdf>)

⁴² Illinois Water Survey (https://www.isws.illinois.edu/statecli/tornado/04_svrprep_info.pdf)

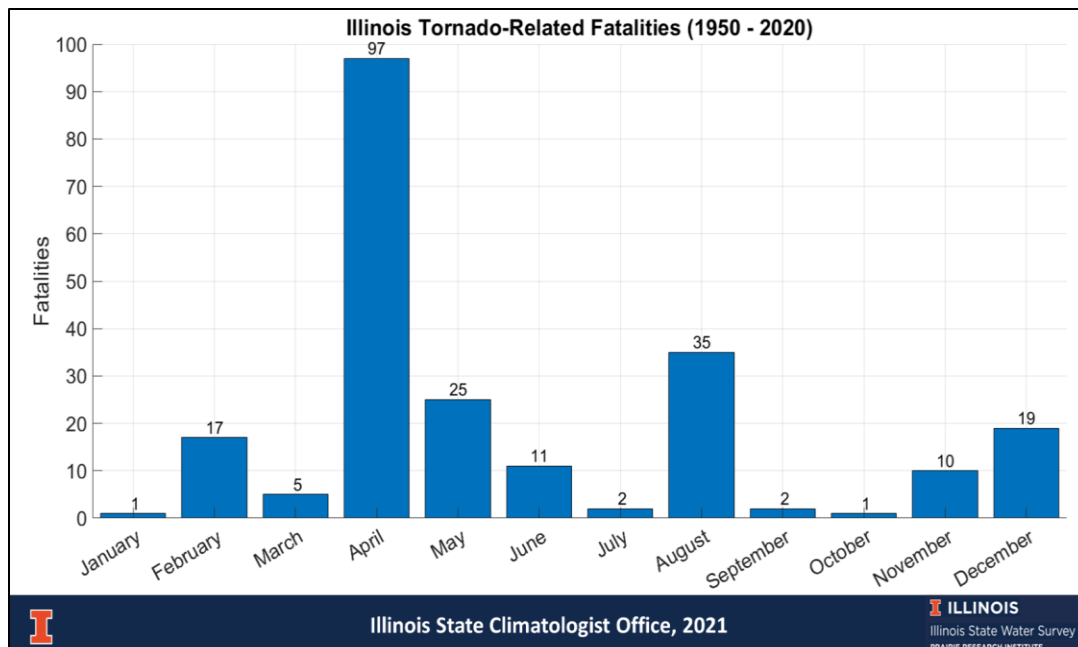
Figure 15: Illinois Tornadoes by Month



This chart shows the number of tornado-related fatalities by month for Illinois. April is the deadliest month with 97 reported deaths, mostly due to the 58 deaths associated with the 1967 Oak Lawn tornado outbreak. The second deadliest month was August, mostly due to the 29 deaths associated with the August 28, 1990, Plainfield event.

Importantly, December and February are the 4th and 5th deadliest months in Illinois despite having the 4th and 5th fewest tornadoes, respectively.⁴³

Figure 16: Illinois Tornado-Related Fatalities

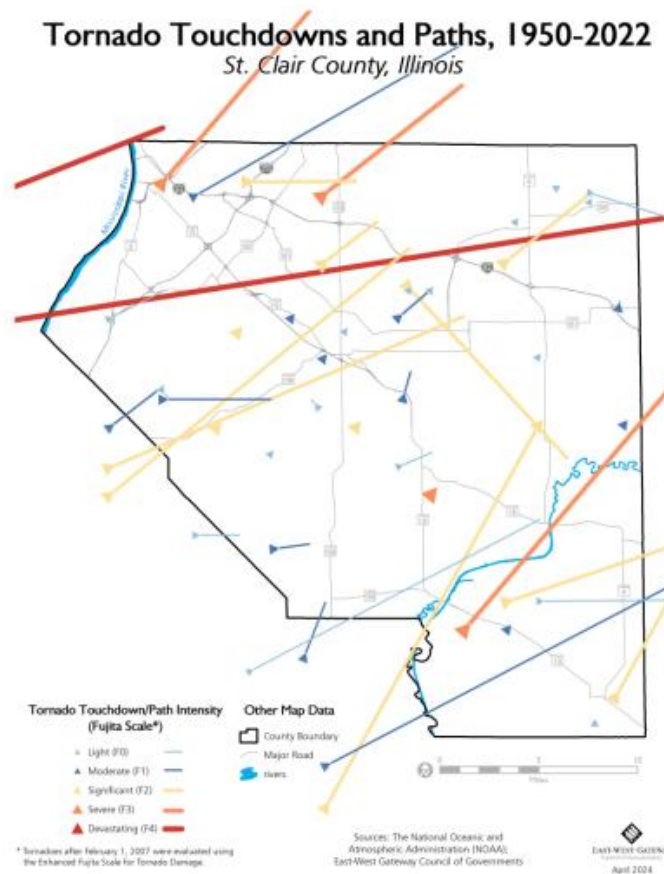


⁴³ Illinois State Climatologist (<https://stateclimatologist.web.illinois.edu/climate-of-illinois/tornadoes-in-illinois/>)

According to the National Oceanic and Atmospheric Administration, there is no known way to predict whether or how climate change is affecting tornado frequency or severity. Some studies predict that climate change could produce more severe thunderstorms known as super cells. As global temperatures rise, the hotter atmosphere can hold more moisture. This increases atmospheric instability, an ingredient to supercell formation. On the other hand, as the planet warms, wind shear (another vital ingredient) is likely to decrease. These two forces work against each other, and it is difficult to anticipate which might have a greater impact on tornado formation. Furthermore, more frequent, or severe thunderstorms do not necessarily mean that more tornadoes will occur, especially since only about 20 percent of supercell thunderstorms produce tornadoes.

There is also evidence to suggest that climate change has shifted tornado patterns geographically east due to its impact on the jet stream. The number of tornadoes in the states that make up Tornado Alley are falling, while tornado events have been on the rise in the states of Mississippi, Alabama, Arkansas, Missouri, Illinois, Indiana, Tennessee, and Kentucky. St. Clair County has experienced numerous tornadoes, as shown in the image below from the St. Clair County MHMP.

Figure 17: St. Clair County Tornado Touchdowns and Paths



The fourth National Climate Assessment summarizes the complicated relationship between tornadoes and climate change: “Some types of extreme weather (e.g., rainfall and extreme heat) can be directly attributed to global warming. Other types of extreme weather, such as Tornadoes, are also exhibiting changes which may be linked to climate change, but scientific understanding isn’t detailed enough to project direction and magnitude of future change.”⁴⁴

Floods

A flood or flooding refers to the general or temporary conditions of partial or complete inundation of normally dry land areas from the overflow of inland or tidal water and surface water runoff from any source. Floodplains are defined as any land areas susceptible to being inundated by water from any flooding source.

A riverine flood is a temporary condition of partial or complete inundation of normally dry land areas from the overflow of stream banks. Flooding results when the flow of water is greater than the normal carrying capacity of the stream channel. Floods can be slow or fast-rising but generally develop over a period of days. Flooding is a natural and expected phenomenon that occurs annually, usually restricted to specific streams, rivers, or watershed areas.

Floods can damage or destroy property, make roads and bridges impassable, disable utilities, destroy agricultural lands, cause disruption to emergency services, and result in fatalities. People may be stranded in their homes, or they may be unable to reach their homes at all. Long-term collateral dangers include widespread animal death, the outbreak of disease, broken utility lines, fires, and the release of hazardous materials.

According to the Illinois Department of Natural Resources/Office of Water Resources (IDNR/OWR), Illinois has one of the largest inland systems of rivers, lakes and streams in the United States. Nearly 15% of our total land area (or 7,400 square miles) is subject to flooding. Floods are an inevitable natural event. Floods are by far the most common natural disaster in Illinois, accounting for well over 90% of the declared disasters. It is estimated that over 250,000 buildings are located in floodplains of Illinois. Since 1965 all but one county in Illinois had been declared at least once by the President as major disaster areas due to flooding. FEMA 4116-DR in 2013 resulted in the sole remaining county becoming declared. Three counties (Cass, St. Clair and Monroe) have been declared in each of the four years from 1993 to 1996. Ten counties were declared in both the 1993 and 1995 floods. Calhoun County, less than ten miles wide and approximately 42 miles from north to south and located between the Mississippi and Illinois rivers, and Cass County which has the Illinois River as its western boundary has had 17 major flood declarations between 1965 and 2017. A summary list of Federal Flood Declarations in Illinois from 1985-2017 can be found in the INHMP.

⁴⁴ Fourth National Climate Assessment, Volume II: Impacts, Risks, and Adaptation in the United States:
<https://repository.library.noaa.gov/view/noaa/19487>

FEMA has identified and mapped areas of flood risk on Flood Insurance Rate Maps (FIRMs), with the highest risk zones, called the Special Flood Hazard Areas (SFHA). The 100-year floodplain is considered a high-risk area and is denoted as Zone A. The 500-year floodplain is shown by the notation Zone C or Zone X. The areas between the 100 and 500-year floodplains are shown using Zone B and Zone X.

This information is shown in the Table below:

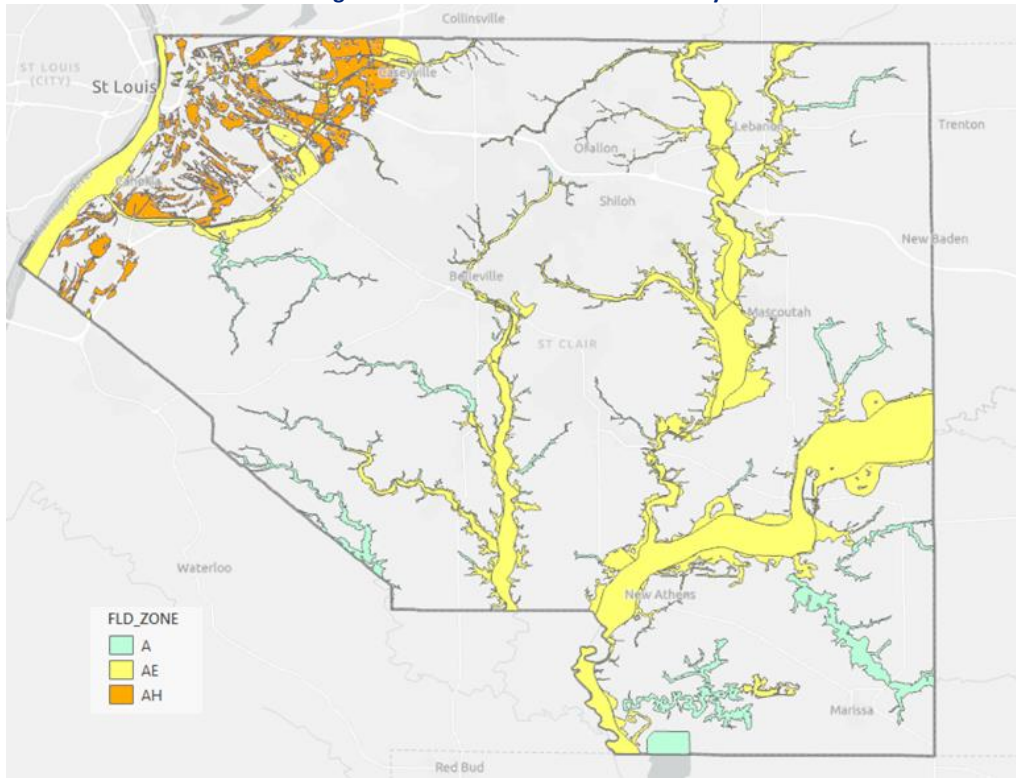
Table 30: FEMA-Designated Flood Zones

Zone	Description
Low to Moderate Risk Areas	
C and X (Unshaded)	Area of minimal flood hazard is usually depicted on FIRMs as above the 500-year flood level. Zone C may have ponding and local drainage problems that don't warrant a detailed study or designation as a base floodplain. Zone X is the area determined to be outside the 500-year flood and protected a by levee from the 100-year flood.
B and X (Unshaded)	Area of moderate flood hazard, usually the area between the limits of the 100-year and 500-year floods. B Zones are also used to designate base floodplains of lesser hazards, such as areas protected by levees from 100-year floods, or shallow flooding areas with average depths of less than one foot or drainage areas less than 1 square mile.
High-Risk Areas	
A	Areas with a 1% annual chance of flooding and a 26% chance of flooding over the life of a 20-year mortgage. Because detailed analyses are not performed for such areas; no depths or base flood elevations are shown within these zones.
AE	The base floodplain where base flood elevations are provided.
AH	Areas with a 1% annual chance of shallow flooding, usually in the form of a pond, with an average depth ranging from 1 to 3 feet. These areas have a 26% chance of flooding over the life of a 30-year mortgage. Base flood elevations derived from detailed analyses are shown at selected intervals within these zones.
AO	
High-Risk Coastal Areas	
V	Coastal areas with a 1% or greater chance of flooding and an additional hazard associated with storm waves. These areas have a 26% chance of flooding over the life of a 30-year mortgage. No base flood elevations are shown within these zones.
Undetermined Risk Areas	
D	Areas with possible but undetermined flood hazards. No flood hazard analysis has been conducted. Flood insurance rates are commensurate with the uncertainty of the flood risk.

Source: <https://msc.fema.gov/portal/home>

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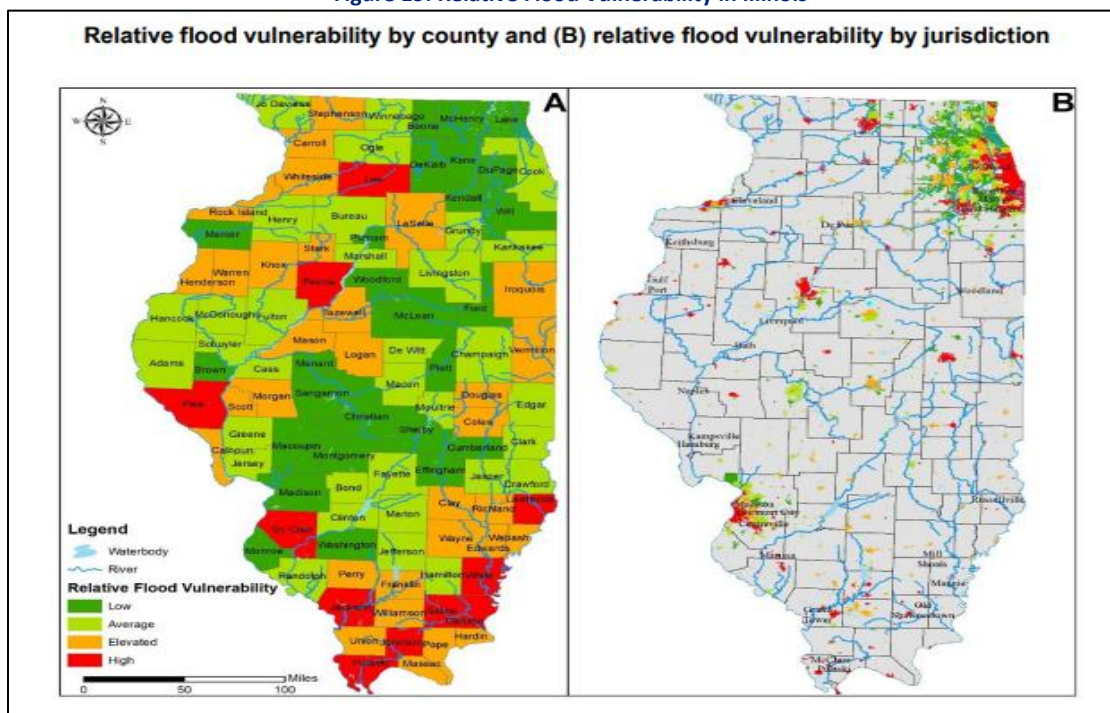
Figure 18: Flood Zones in St. Clair County



Source: FEMA preliminary data: <https://hazards.fema.gov/femaportal/prelimdownload/>

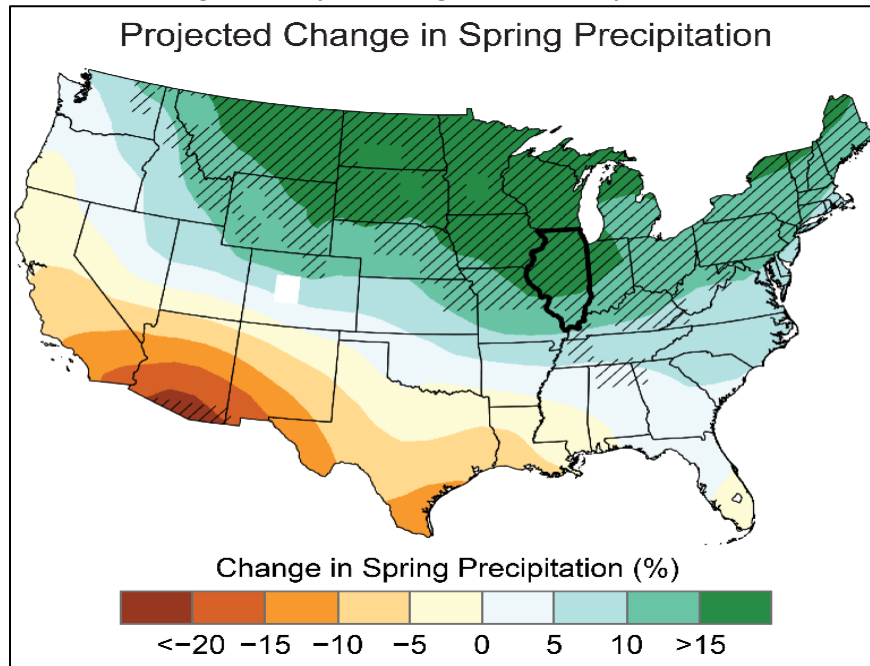
The following maps from the INHMP shows that St. Clair County is rated as having a high relative flood vulnerability.

Figure 19: Relative Flood Vulnerability in Illinois



Winter and spring precipitation and extreme precipitation events are projected to increase during the 21st century, and the hatching in the map below represents areas where the majority of climate models indicate a statistically significant change. Spring precipitation in Illinois is projected to increase in the range of 10% to greater than 15% by 2050 (see Figure 14 for precipitation map). The projections of increasing precipitation and heavy precipitation events are true for a large area of the Northern Hemisphere in the northern middle latitudes. This may result in inland flooding risks throughout the state.

Figure 20: Projected Change in Winter Precipitation⁴⁵



Drought

Numerous droughts have occurred in Illinois with the most significant occurring in the 1930s, 1950s, 1988, 2007, and in 2012. Following the Drought of 2007, the State Water Plan Task Force developed and published a report entitled “State of Illinois, Drought Preparedness and Response Plan” and includes recommendations for future preparations for drought. These recommendations have been partially implemented. In general, farmers are the first group to feel the impact of a drought. Besides causing stress to crops and livestock, many farmers rely on their own dug wells or wells drilled into shallow aquifers for their water supply. Both types of wells are very vulnerable to drought conditions. Public water supplies are typically more robust against drought but are not immune from long-term drought conditions. Public water supplies that rely on surface water supplies are historically more vulnerable to drought than those that rely on deep aquifers. The Illinois State Water

⁴⁵ [Illinois - State Climate Summaries 2022 \(ncics.org\)](#)

Survey has produced a document dealing with drought and drought planning. The reference is The Water Cycle and Water Budgets in Illinois: A Framework for Drought and Water-supply Planning (Illinois State Water Survey).

Droughts are classified within four different categories—meteorological, hydrologic, agricultural, and socioeconomic. A meteorological drought is based on the departure of precipitation from an expected average or normal amount based on monthly, seasonal, or annual time scales. A hydrologic drought involves the effects of precipitation shortfalls on stream flows and reservoir, lake, and groundwater levels. An agricultural drought involves deficiencies in soil moisture with respect to the water needs of plant life such as crops. A socioeconomic drought is when the effective demand for water exceeds the supply to the extent that costs begin to escalate, sometimes because of weather-related shortfalls.

Drought differs from other natural hazards in several ways. First, there is no exact beginning and end point that is obvious for a drought, whose effects may accumulate slowly and linger even after the event is generally thought of as being over. Second, the lack of clearly visible and universal standards to define a drought can make it difficult to confirm whether one exists, and its degree of severity. Third, drought impacts are often less obvious than other natural hazards, and they are typically spread over a large geographic area. Fourth, most communities do not have any contingency plans in place for addressing drought. This lack of pre-planning can hinder support for drought mitigation capabilities that would otherwise effectively increase awareness and reduce drought impacts.

Common effects of drought include crop failure, water supply shortages, wildlife mortality, and higher prices for water and agricultural goods. Substantial economic impacts can affect the agricultural and tourist sectors, which are very important for the county's economy. Droughts additionally threaten public health and safety by increasing the risk of illnesses and wildfires. Conflicts between water users can also arise, especially when a river or lake has competing uses among municipal, agricultural, industrial, and recreational users.

The Palmer Drought Severity Index (PDSI) is an attempt to compare weekly temperature and precipitation readings over a defined climatic region to identify periods of abnormally dry (or wet) weather. These PDSI readings reflect the relative disparity between moisture supply (precipitation and soil moisture) and demand (evapotranspiration, soil recharge and runoff needs) for a particular region based upon what is considered normal for the area. The index is used to evaluate scope, severity, and duration of abnormal weather.

Figure 21: Drought Severity in Illinois

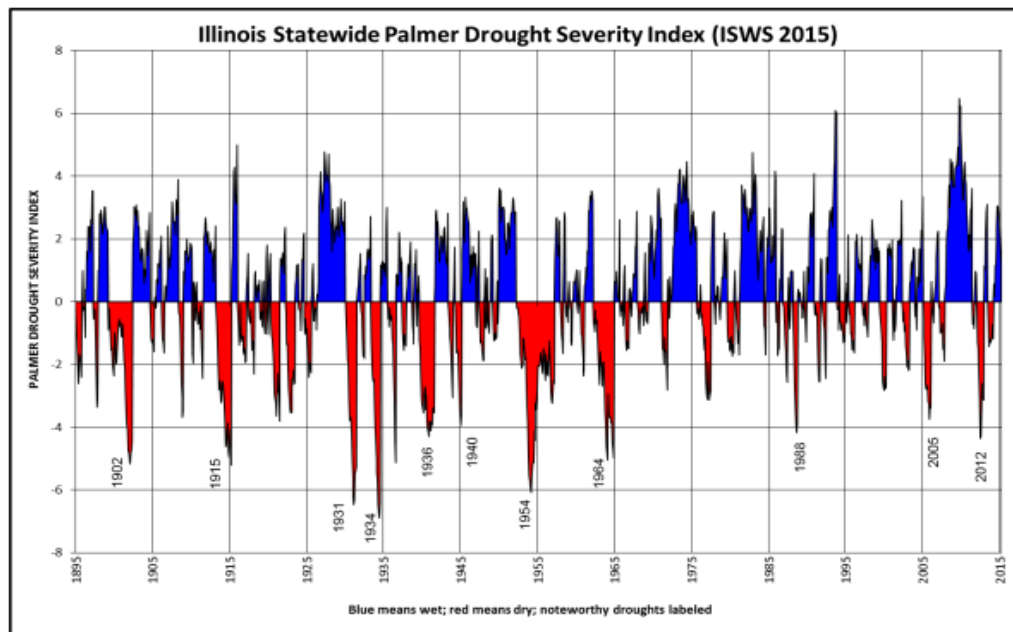


Figure: Time series of the state-wide monthly Palmer Drought Severity Index for Illinois from 1895 to 2015. Areas in blue represent wet periods while areas in red represent dry periods.

Since the effect of climate change on Illinois has involved an overall increase in precipitation, the severity of Illinois' droughts has generally been decreasing over the past half-century. Studies of climate have suggested that a gradual warming pattern has led to an increase in precipitation, since warmer air can carry more humidity. However, shorter duration seasonal droughts are expected to worsen during the warmer half of the year, even though the overall annual averages have been showing increases in precipitation. Therefore, there will still be drought events and dryer seasonal phases, especially in areas that are more susceptible locally.

Extreme Heat

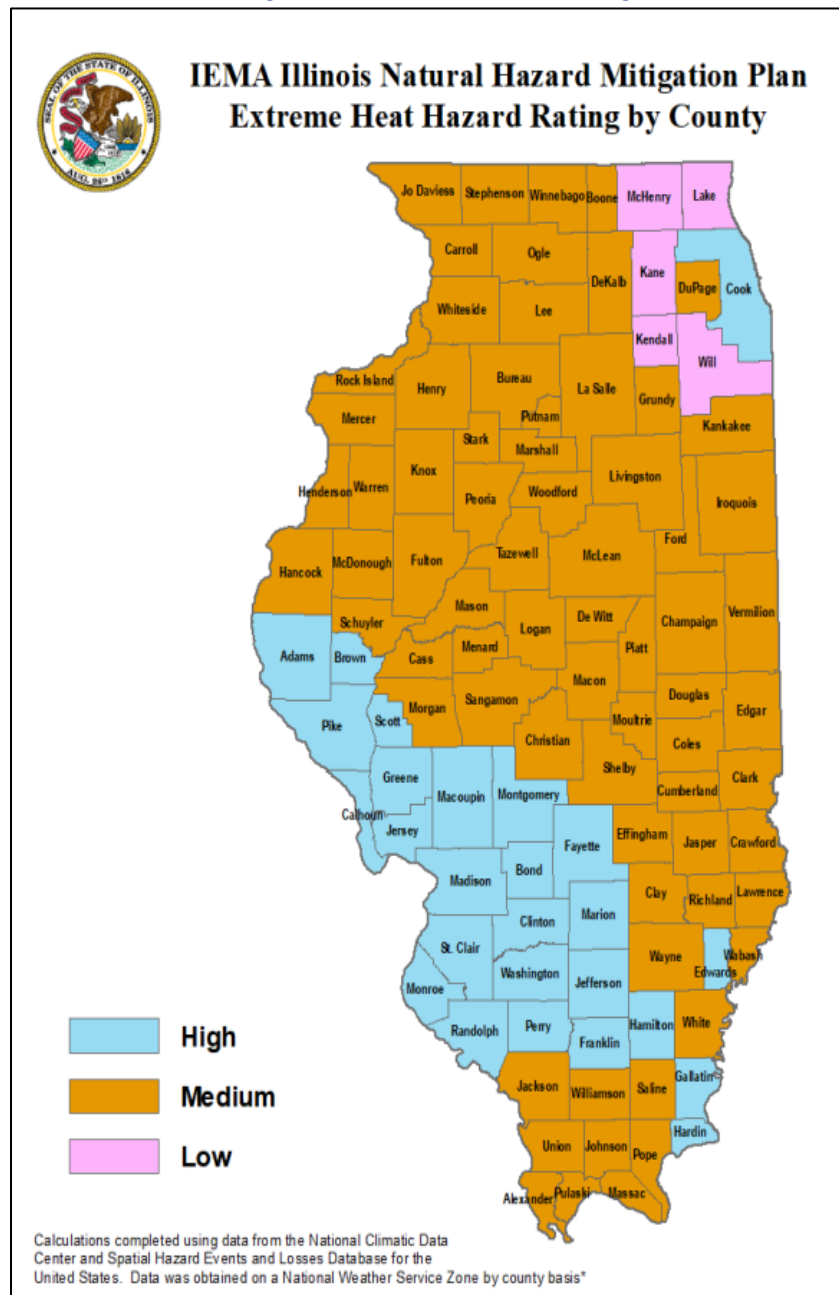
Extreme heat is defined as two to three days of heat and humidity with successive 90+ degree days. In July 1995, a heat wave contributed to more than 700 deaths in the Chicago area.

Illinois State Climatologists believe that typically over 300 people die from heat every year. Heat is responsible for the highest number of deaths every year from weather-related hazards in Illinois.⁴⁶

On the following IEMA INHP Extreme Heat Hazard rating by County map, St. Clair County is given a high ranking.

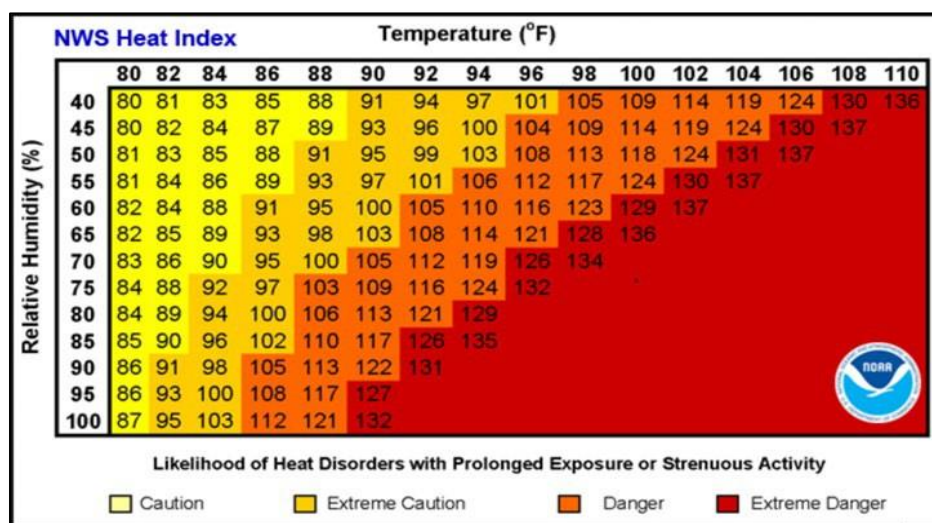
⁴⁶ State of Illinois Press Release (<https://www.illinois.gov/news/press-release.26689.html>)

Figure 22: Extreme Heat Hazard Rating



The heat index is a number in degrees Fahrenheit that tells how hot it feels when relative humidity is factored into actual air temperature. Exposure to full sunshine can increase the heat index by at least 15 degrees. Figure 17 shows the heat index values when both humidity and temperature are considered. It also shows the likelihood of heat disorders with prolonged exposure to or strenuous activity in such conditions.

Figure 23: NWS Heat Index



Under extreme heat conditions, the National Weather Service can issue either a heat advisory or an excessive heat warning. A heat advisory is issued when a heat index of 100 degrees Fahrenheit or higher is expected for three hours or more. An excessive heat warning is used when a heat index of 105 degrees Fahrenheit or higher is expected for three hours or more.

Extreme heat can impose stress on humans and animals. Exposure to heat can lead to a variety of adverse health impacts, ranging from cramps to death. Heat exhaustion is a relatively common reaction to excessive heat and can include symptoms such as headaches, dizziness, and fainting. If exposure is prolonged, heatstroke can occur. This reaction is more severe and requires medical attention. Deaths from heat exposure typically occur in individuals with pre-existing conditions, frequently those with heart conditions.

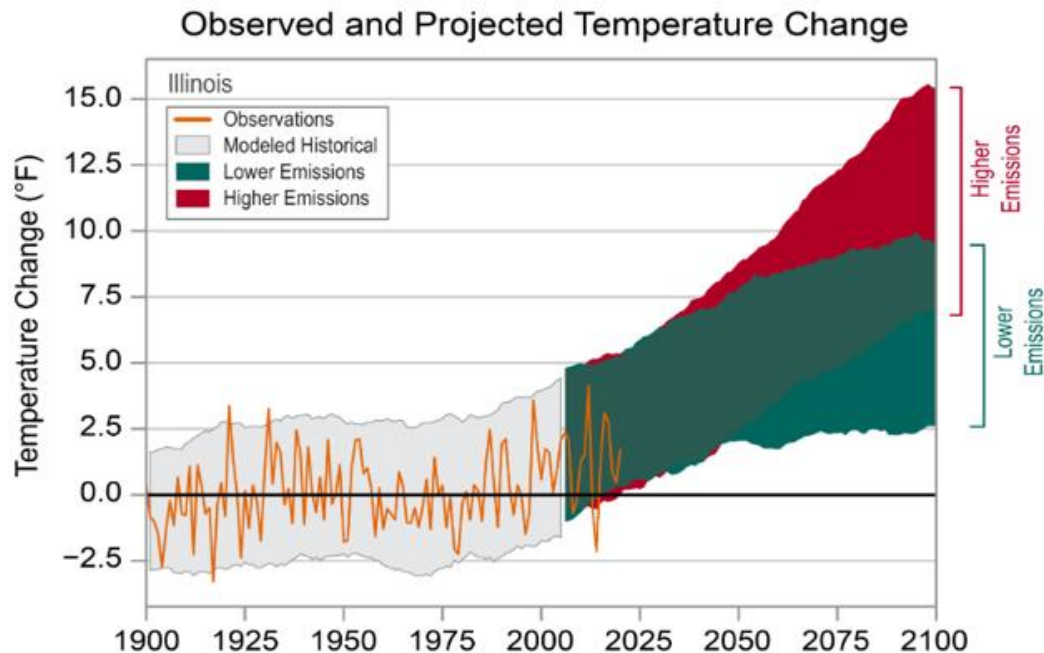
Certain demographic groups are particularly vulnerable to adverse health impacts from extreme heat events. Very young children, seniors, and populations with physical and psychiatric medical conditions are more vulnerable to health impacts from heat events than the general population. Additionally, people of color and low-income residents are at greater risk from adverse extreme heat health impacts.

Urban areas are also particularly at risk because of air stagnation and large quantities of heat-absorbing materials such as streets and buildings. Extreme heat can also result in distortion and failure of structures and surfaces such as roadways and railroad tracks.

Annual average temperatures in Illinois have risen about 1.5° F since the early 20th century and are predicted to increase in the coming decades. A higher emissions pathway could lead to unprecedented warming in the 21st century (see Figure 18). Historically unprecedented warming is projected during this century. Less warming is expected under a lower emissions future (the coldest end-of-century projections being about 2°F warmer than the historical

average; green shading) and more warming under a higher emissions future (the hottest end-of-century projections being about 11°F warmer than the hottest year in the historical record; red shading).

Figure 24: Predicted Temperature Change in Illinois Under Different Emissions Scenarios ⁴⁷



Severe winter storms

Severe winter storms are typically categorized by ice, sleet, and/or snowstorms. Winter storms usually occur when cold arctic air from Canada meets warmer, moist air from the Gulf of Mexico, producing heavy snow and sometimes blizzard conditions. Severe winter storms can be characterized by heavy and/or snow blowing snow, freezing rain, sleet, and extreme cold. Winter storms usually occur between October and April and can cause considerable damage, with heavy snow immobilizing transportation systems, downing trees and power lines, collapsing buildings, and resulting in crop and livestock losses.

As a result of proximity to the Great Lakes, Illinois experiences large differences in snowfall in relatively short distances. Average annual snowfall ranges from 37 inches of snow in Rockford and Chicago, to as little as 6 to 10 inches at the southern tip of Illinois.⁴⁸

Blizzards are winter storms lasting at least three hours with sustained wind speeds exceeding 35 mph, visibility of ¼ mile or less, and white-out conditions. When heavy snow or freezing rain accumulates in excess of six inches in a 12-hour period or ¼ inch, it can

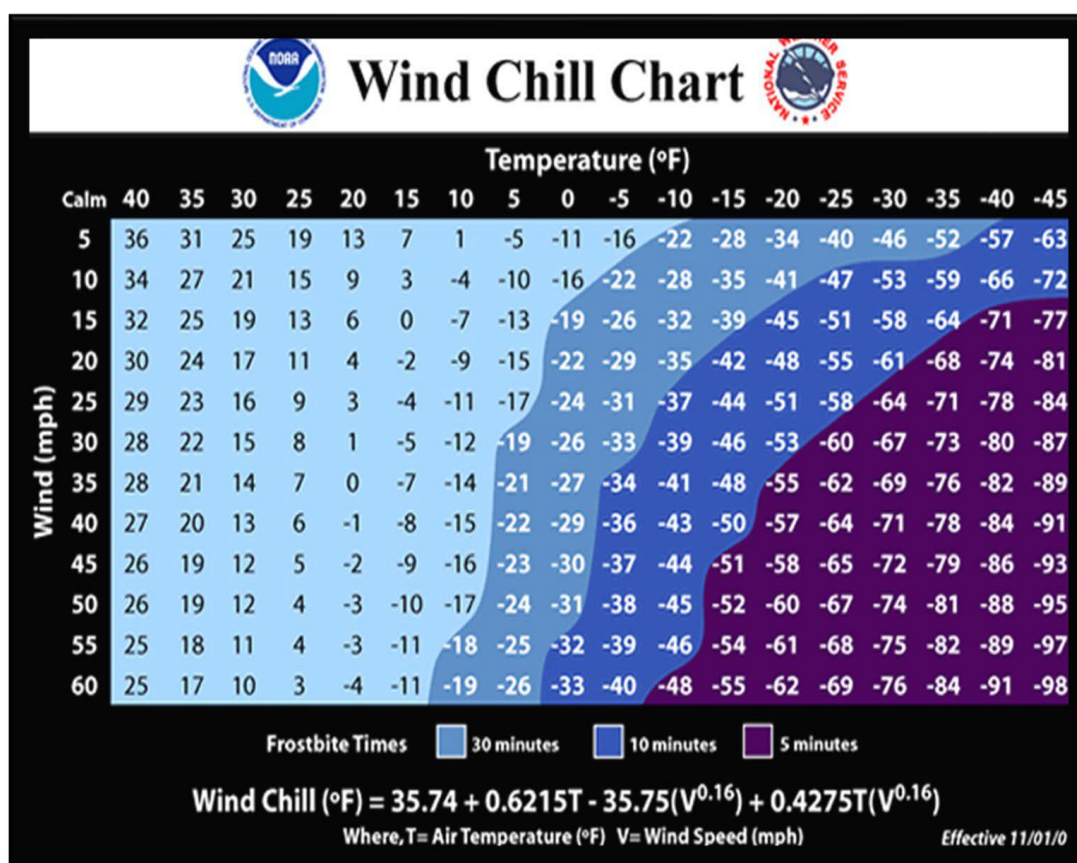
⁴⁷ Illinois - State Climate Summaries 2022 (ncics.org)

⁴⁸ State of Illinois Emergency Management Agency Winter Weather preparedness guide (<https://iemaohs.illinois.gov/content/dam/soi/en/web/iema/preparedness/documents/winter-storm-preparedness-guidebook.pdf>)

disrupt the flow of vital supplies as well as disrupt emergency and medical services. Severe ice storms can also result in electric power loss to large areas of the county, impede emergency assistance, and leave motorists stranded.

The frigid temperatures and wind chills associated with severe winter storms are also dangerous to people, particularly children and the elderly, sometimes resulting in hypothermia, frostbite, and in rare cases, death. Such temperatures can also freeze pipes and kill livestock, fish, wildlife, and pets. The figure below illustrates frostbite potential relative to the duration of bare skin exposure. The coldest temperature on record in the State of Illinois occurred on January 31, 2019, when the mercury dipped to minus 38 degrees near Mt. Carroll in Carroll County.⁴⁹

Figure 25: NOAA Wind Chill Chart



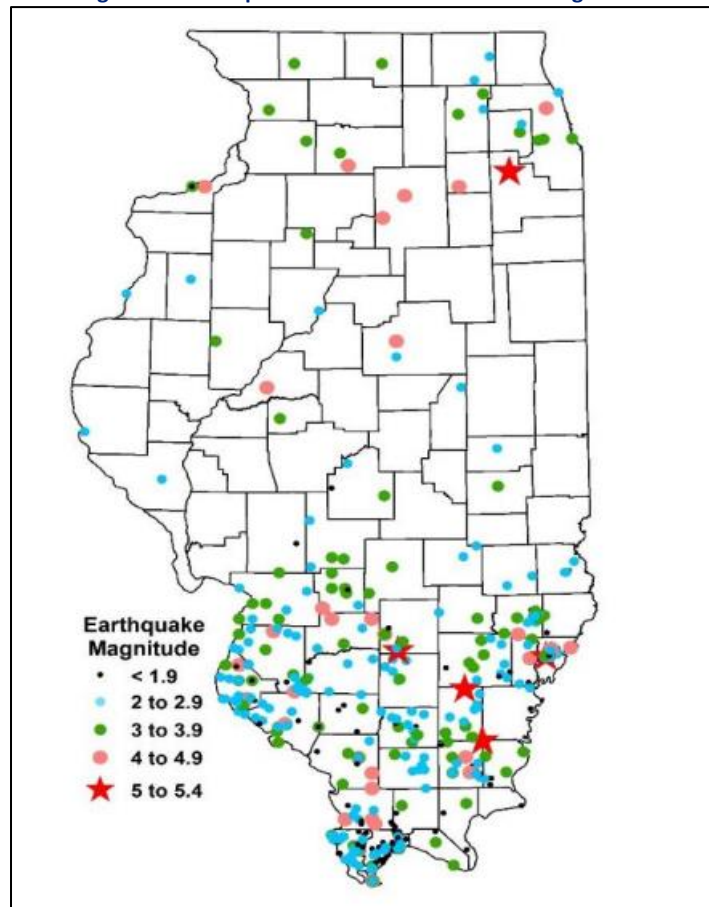
On Average, Illinois experiences five severe winter storms each year. From November 2020 through April 2021 there were eight (8) snow or ice storms that impacted Illinois. There has not been a winter in Illinois without at least one winter storm in the past century. Winter driving conditions contribute to an average of nearly 29,000 vehicle crashes, more than 4,500 injuries and 80 fatalities in Illinois each year.

⁴⁹ Ibid.

Earthquakes

Over 600 earthquakes have been reported or recorded in Illinois since 1795 through 2017. Four hundred and six have been estimated or recorded at magnitude 2 and greater; with magnitudes in the 2s being the level at which people start to feel earthquakes. Of these, 43 were magnitude 4 and higher, which is at the level to possibly cause some damage. Figure 20 shows the locations of earthquakes within the state and Table 30 lists magnitude 2 and greater earthquakes by county. Earthquakes occur when rocks forming the Earth's crust slip past each other along a fault. This slippage occurs when the buildup of stresses reach the point that they are greater than the strength of the locked up section of rocks along the fault plane. When faulting takes place, the sudden release of energy produces vibrations or seismic (shock) waves that radiate from the main fault movements. These waves cause the shaking or "quaking" that lasts tens of seconds to a few minutes, depending on the magnitude (energy released) of the event and what kinds of rocks the waves travel through and the stiffness or lack of stiffness of the soils at a site. Where the faulting starts, at some depth below the Earth's surface, is the hypocenter (focus) of an earthquake. The point on the surface directly above the hypocenter is the epicenter. Of the 605 earthquakes shown in Figure 20, 90% occur in the southern third of the state, south of latitude 39° N, which includes St. Clair County.

Figure 26: Earthquakes in Illinois from 1795 through 2017



ST. CLAIR COUNTY 2024 SEVERE STORMS, TORNADOES,
STRAIGHT-LINE WINDS, AND FLOODING EVENTS

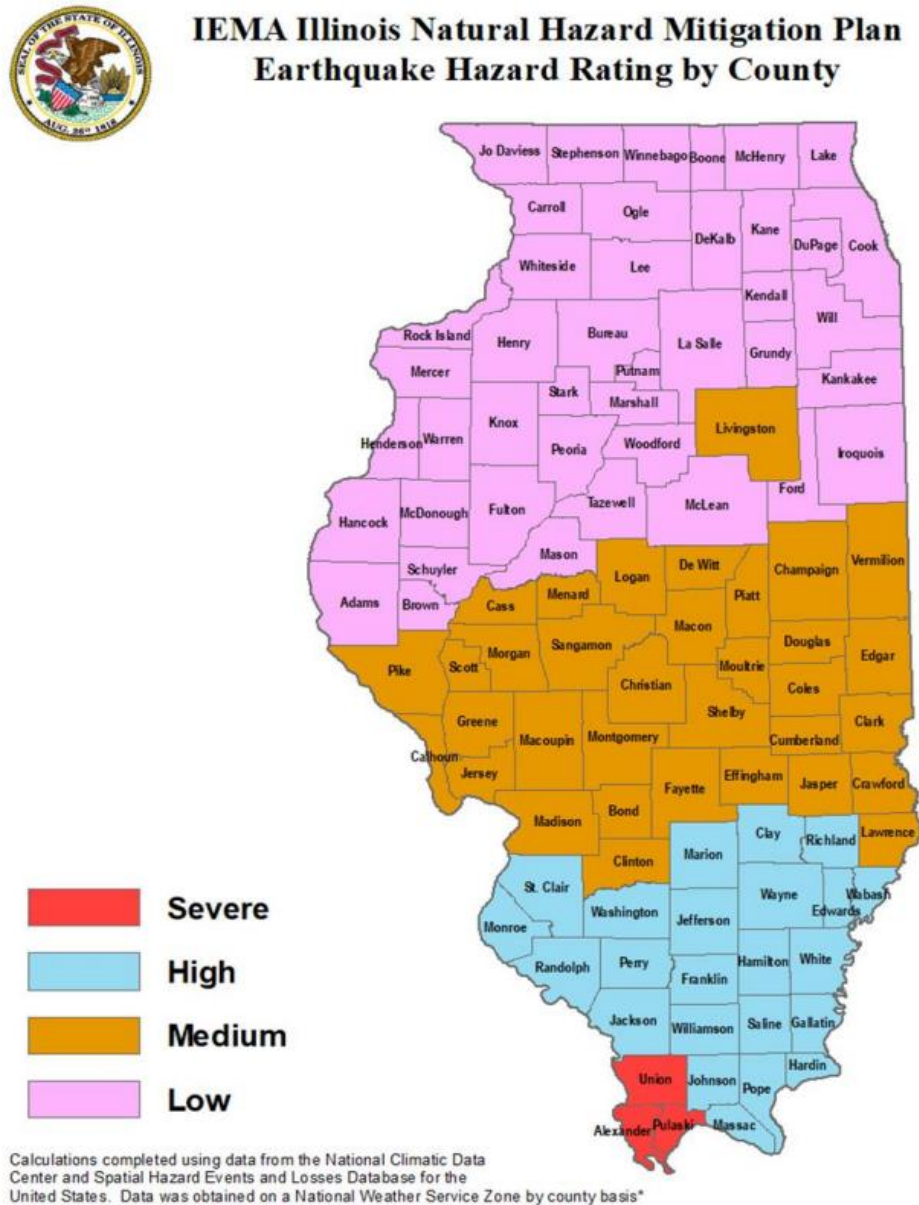
Although there have been over 600 earthquakes reported in Illinois during the last two+ centuries, very few of them have caused any damage (Modified Mercalli Intensity of VI or higher) or injuries. Larger earthquakes in the New Madrid region have caused more damage in Illinois than earthquakes originating in Illinois. The risk of probable damage from future earthquakes can be estimated based on the historical record of past earthquakes.

Table 30: Magnitude 2 and greater earthquakes by county from 1795 through 2017 (excluding aftershocks & swarms)

COUNTY	FELT		SOME DAMAGE	POSSIBLE DAMAGE	COUNTY	FELT		SOME DAMAGE	POSSIBLE DAMAGE
	Magnitudes					Magnitudes			
	2 to 2.9	3 to 3.9				4 to 4.9	5 to 5.4		
Adams	1				Marion	1	5		
Alexander	30	21	5		Mason			1	
Bond	2	6	1		Massac	1	2		
Carroll		1			McHenry	2			
Christian	1	1			McLean	1		1	
Clay	1	1			Menard		1		
Clinton	2	1	2		Monroe	11	6	2	
Coles		1			Montgomery	2	2		
Cook	1	3	1		Peoria	1			
Crawford	3				Perry	2	2		
Douglas	1				Piatt	1			
Du Page	2	1			Pike	1			
Edwards	2	1	1		Pope		1	1	
Effingham	2				Pulaski	35	5		
Fayette		3			Randolph	10	5	1	
Franklin	7	3			Richland	19	5	2	
Fulton		1			Rock Island		1	1	
Gallatin	1	3			Saline	6	5	2	
Hamilton	6	5		2	St. Clair	18	7	2	
Henderson	1				Stark		1		
Jackson	2	3	2		Stephenson		1		
Jasper	2				Union	4		4	
Jefferson	5	1			Wabash	16	6	4	1
Johnson	1	1			Warren	1			
Kane	1	2			Washington	6	1		
Kendall			1		Wayne	7	5		
LaSalle			2		White	2			
Lawrence		1			Whiteside		2		
Lee		1	1		Will				1
Macoupin		1			Williamson	7	1		
Madison	5	4			Winnebago		1		

On the following IEMA INHP Earthquake Hazard rating by County map, St. Clair County is given a high ranking.

Figure 27: Earthquake Hazard Rating



National Climate Assessment

The Fifth ***National Climate Assessment*** is the US Government's preeminent report on climate change impacts, risks, and responses. Chapter 24 of the assessment is focused on the risks and impacts of climate-change related severe weather events, including severe flooding at the level experienced by St. Clair County in the 2022 and 2024 Flood Disasters.

Under the Risk section, the assessments states “Midwest infrastructure, including dams, bridges, roads, wastewater facilities, and energy generation and distribution systems, need repair, with estimated costs for upgrading these systems totaling \$7,547 (in 2022 dollars) on average per capita across the Midwest. Projected changes in precipitation and temperatures increase the risk of failure and cost. Although the Midwest has had numerous state-level and federally declared flood disasters, the risk of loss due to recurrent, underreported inland and urban flooding events increases as the frequency of intense precipitation events rises.”⁵⁰ Per the U.S. Census Bureau, the population estimate for St. Clair County is 252,671 persons.⁵¹ Using the per capita multiplier of \$7,547 included in the Fifth National Climate Assessment, results in an estimated cost of \$1,906,908,037 in necessary infrastructure repairs. While this astronomical figure is for all forms of public infrastructure, its easy to infer the high cost associated with stormwater and sewer infrastructure repairs in St. Clair County.

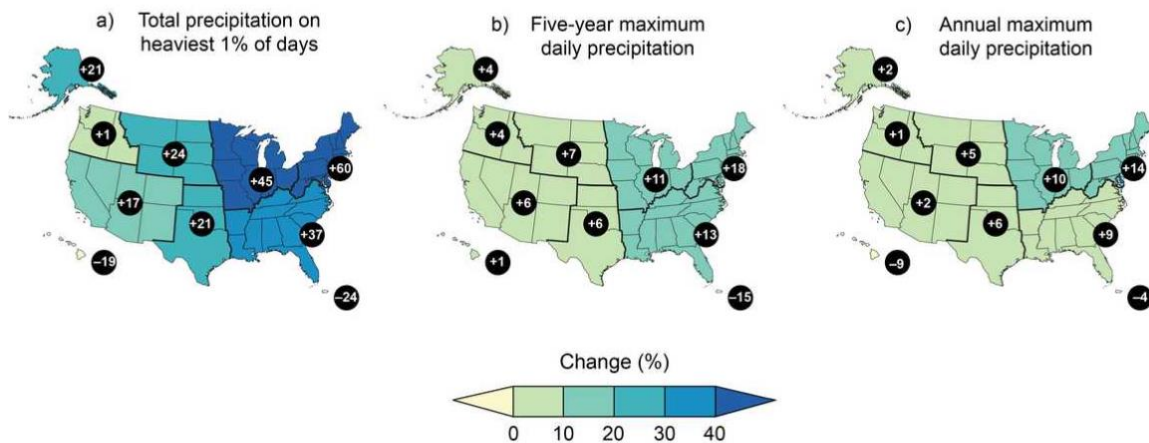
The assessment also details the severe impacts of extreme rainfall events in the Midwest, such as the events experienced by St. Clair in 2022 and 2024, stating “Increases in extreme rainfall events (Figure below) negatively impact property, public health and safety, and transportation systems. Urban and rural communities are at risk from projected increases in frequency and intensity of extreme rainfall events. Even when events are not categorized as state or federal disasters, communities and households experience property damage from basement flooding, health impacts from sewer overflows, and traffic disruptions from storm damage. Increases in state and federally declared disasters are expected to become more frequent. NOAA’s Billion-Dollar Weather and Climate Disasters tracking data now offer a detailed analysis of disasters reaching this cost impact, but smaller events are difficult to assess.”⁵²

⁵⁰ <https://nca2023.globalchange.gov/chapter/24/>

⁵¹ <https://www.census.gov/quickfacts/fact/table/stclaircountyvillinois/PST045222>

⁵² NCEI, 2022: U.S. Billion-Dollar Weather and Climate Disasters. National Oceanic and Atmospheric Administration, National Environmental Satellite, Data, and Information Service, National Centers for Environmental Information. <https://www.ncei.noaa.gov/access/billions/>

Observed Changes in the Frequency and Severity of Heavy Precipitation Events



Heavy precipitation events are becoming more frequent and intense across much of the country.

FIGURE 2.8. The frequency and intensity of heavy precipitation events have increased across much of the United States, particularly the eastern part of the continental US, with implications for flood risk and infrastructure planning. Maps show observed changes in three measures of extreme precipitation: (a) total precipitation falling on the heaviest 1% of days, (b) daily maximum precipitation in a 5-year period, and (c) the annual heaviest daily precipitation amount over 1958–2021. Numbers in black circles depict percent changes at the regional level. Data were not available for the US-Affiliated Pacific Islands and the US Virgin Islands. Figure credits: (a) adapted from Easterling et al. 2017;²⁸² (b, c) NOAA NCEI and CISSS NC.

The Fifth *National Climate Assessment* provides the following relevant definition of hazard mitigation:

Hazard mitigation: Any sustained action taken to reduce or eliminate the long-term risk to human life and property from hazards.⁵³

St. Clair County's proposed CDBG-DR Infrastructure, Housing, and Economic Development programs meet this definition of hazard mitigation in that the proposed repairs, improvements, replacements, and new construction of storm and sanitary infrastructure will certainly reduce and/or eliminate the risks to human life and property from increasingly severe rainfall and flood disaster events. These events directly result in the storm sewer surcharges and sanitary sewer overflows that are broadly understood and accepted to be the most damaging impacts of both the 2024 Severe Storms, Tornadoes, Straight-Line Winds, and Flooding Events Disaster and ongoing, regular heavy rainfall and flooding events. The costs and benefits of mitigating the long-term risks to human life and property that result from storm sewer surcharges and sanitary sewer overflows have been endorsed by the impacted persons and communities as well as local, state, and federal agencies charged with identifying and implementing solutions. Mitigation activities amounting to no less than 15% of the CDBG-DR award amount will be incorporated into the design of infrastructure projects that receive CDBG-DR funds.

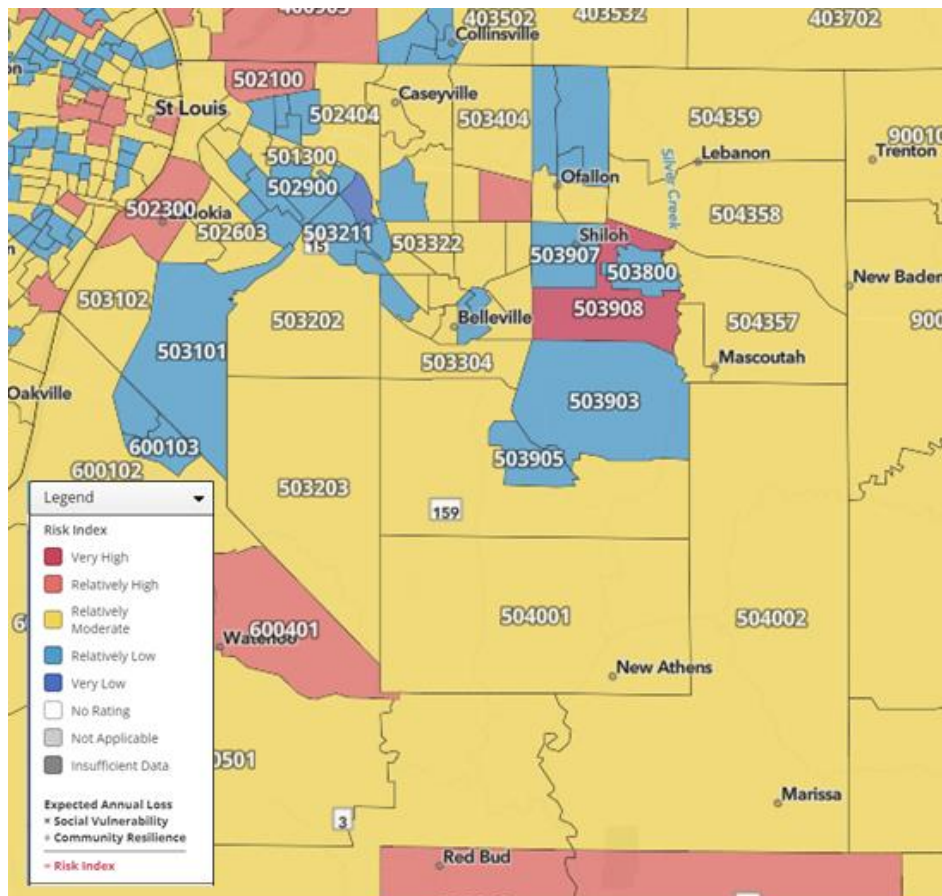
⁵³ <https://nca2023.globalchange.gov/chapter/32/>

Summary

Overall, St. Clair County has a relatively moderate natural hazard risk per the FEMA National Risk Index, the same as neighboring counties St. Louis City and Madison. While the counties *Expected Annual Loss* and *Social Vulnerability* are relatively moderate, the *Community Resilience* is scored as relatively high.

While the county scored *very high* risk for ice storms (96.3), and *relatively high* for natural disasters such as cold wave, hail, heat wave, tornado, and winter weather it scored as only relatively moderate for riverine flooding (91.4). This relatively moderate risk estimates an expected annual loss to the County of \$3.6M with a frequency of 1.8 events per year (<https://hazards.fema.gov/nri/map>).

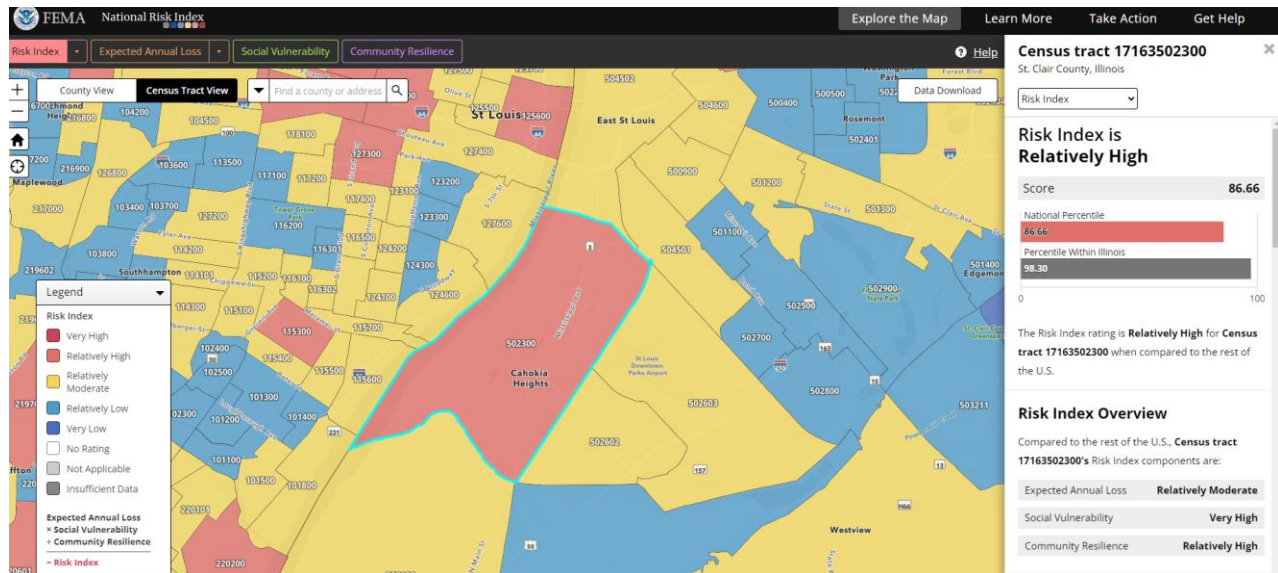
Figure 28: FEMA National Natural Hazard Risk Index by Census Tract



Source: FEMA National Risk Index Tool (<https://hazards.fema.gov/nri/map>)

The FEMA National Risk Index provides a comprehensive risk index assessment by Census Tract, and selecting an individual Census Tract in the overview map shown above results in the following detail view:

ST. CLAIR COUNTY 2024 SEVERE STORMS, TORNADOES, STRAIGHT-LINE WINDS, AND FLOODING EVENTS



Four census tracts stand out as more vulnerable than others:

Tract 5023 (East St. Louis, 62206) with *very high* social vulnerability marks as well as a *very high* risk score for hail and heat waves, and a *relatively high* score for ice storm, lightning, riverine flooding, tornado and winter weather.

Tract 5021 (East St. Louis, 62201) is scored as relatively moderate annual loss, but relatively high social vulnerability and community resilience. This area ranks *very high* in regard to hail, and *relatively high* for earthquake, heat wave, ice storm, tornado, and winter weather, but notably *relatively moderate* for riverine flooding.

Tract 5034 (largely O'Fallon, 62269) has *relatively high* community resilience, but also relatively high expected annual loss, while having only *relatively moderate* social vulnerability. This area is at *very high* risk for hail, heat wave, and *relatively high* risk for earthquake, ice storm, lightning, tornado, and winter weather. Notably this area has a relatively low risk of riverine flooding.

Lastly tract 5039 (62221, Belleville) which is located adjacent to Scott AFB and just south of Shiloh. Expected annual losses in this area are *very high*, while the social vulnerability is *relatively moderate*, and the community resilience is *relatively high*. The risk for hail, heat wave, ice storm, tornado, and winter weather hazards are *very high*, while risk for earthquake, lightning, and riverine flooding is *relatively high*.

Indispensable Services

Indispensable services are those that enable the continuous operation of critical business and government functions and/or are critical to human health and safety and economic security. In its local HMP, St. Clair County identifies the critical services listed below:

Table 31: Indispensable Services

Facility	Number of Facilities
Emergency Operations Centers	9
Fire Stations	65
Police Stations	38
Medical Care	9
Schools	153

St. Clair County places a high priority on the coordination and leveraging of resources and services with other public and private resources. The Intergovernmental Grants Department (IGD) has a Cooperation Agreement and a HOME Consortium Agreement with the City of Belleville and the City of East St. Louis, so the Community Development Group will continue to administer Belleville’s and East St. Louis’ CDBG and HOME funds. In addition, IGD administers the Community Services Block Grant (CSBG); Low Income Home Energy Assistance Program (LIHEAP); Weatherization Assistance Program; and HUD Continuum of Care grants in conjunction with the St. Clair County Homeless Action Council programs.

IGD’s Workforce Development Group coordinates the Workforce Innovation & Opportunity Act (WIOA) Program in St. Clair County. Local Workforce Area (LWA) #24 provides employment and training services through the Mid-America Workforce Investment Board, comprised of businesses, economic development, education, labor, and community-based organizations, and partners in local One-Stop Centers. The partners include, but are not limited to:

- St. Clair County Intergovernmental Grants Department
- St. Clair County Housing Authority
- St. Clair County Adult Education
- Local Community Colleges
- Programs and Services for Older Persons
- Illinois Department of Human Services (TANF)
- Illinois Department of Human Services (DHS)
- Illinois Department of Employment Security
- Members of local businesses that represent local hiring opportunities; which make up a majority of the Workforce Investment Board

IGD will continue to provide a meeting place and clerical services for the Community Action

Agency (CAA). The IGD Director serves as Executive Director of the 18-member board of directors. Through IGD's CS Group the CAA provides a range of services that assist low-income individuals to attain skills, knowledge and motivation necessary to achieve self-sufficiency. Services available through the CAA include emergency crisis intervention, scholarships, clothing assistance, family development, transportation, food vouchers, medical/dental vouchers, temporary emergency shelter, prescription vouchers, utility assistance, homeless/near homeless assistance, recreational activities, advocacy, case management, information, and referrals.

The CAA has developed partnerships with other social service providers and faith-based organizations to ensure that the needs of the low-income population are being addressed. Those partnerships include, but are not limited to:

- Illinois Department of Human Services
- Catholic Urban Program
- St. Clair County Housing Authority
- Call for Help
- Homeless Action Council
- Programs and Services for Older Persons
- Living Independently Now Center (LINC), Inc.
- American Red Cross
- Court Appointed Special Advocate (CASA)
- Division of Employment Security One-Stop Centers

IGD also provides staff for the Homeless Action Council (HAC) Planning Committee to assist the Continuum of Care (CoC) in the implementation of the ten-year plan to end homelessness. The Housing Resource Center (HRC) also operates under the IGD umbrella. It will continue to operate Continuum of Care Programs for the homeless and near homeless. IGD promotes housing counseling, education, and adherence with all HUD rules and regulations throughout St. Clair County and will continue to do, including as it relates to disaster preparedness and resources.

IGD did not find that any public services necessary to carry out the proposed Infrastructure, Housing, and Economic Development Programs are missing. St. Clair County is not proposing to fund any public services with CDBG-DR funds.

3

General Requirements

General Requirements

Citizen Participation

Outreach and Engagement

In the development of this Action Plan, St. Clair County consulted with disaster-affected residents, stakeholders, local governments, public housing authorities, State agencies, and other affected parties in the surrounding geographic area. In doing so, St. Clair County ensured that the Action Plan was consistent with the disaster impacts, comprehensive, inclusive, and reflective of input.

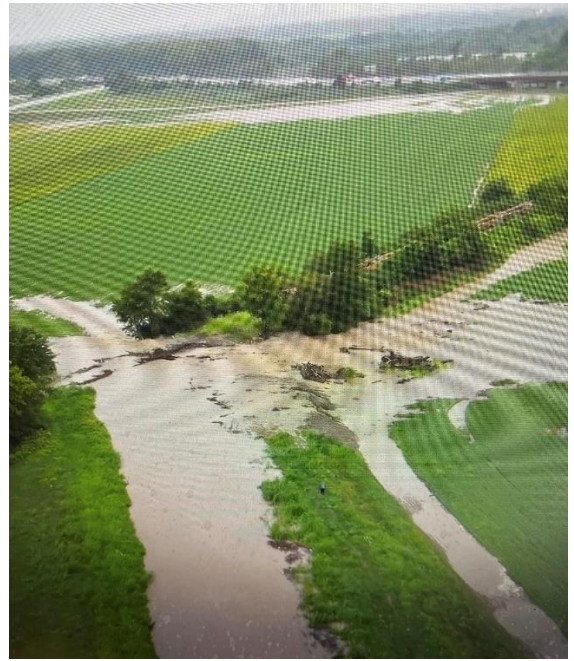
To further understand the impacts of the disaster, St. Clair County conducted outreach to impacted local governments and organizations working on recovery efforts in the most impacted areas of the County. The following provides a summary of the impacts as described by local officials, collected starting the week of the flooding event in 2024. The images of the damages were gathered from local media sources and Emergency Management officials in St. Clair County.

St. Clair County Overall

- St. Clair County declared a county-level disaster.
- At the peak there were approximately 5,000 without power. There were substantial impacts to sewer systems.
- Many people are dealing with mold issues related to the flood. Additionally, thousands were exposed to toxins from sewer contamination in their homes.
- First responders responded to more than 100 water rescues throughout this event. Additional resources were brought in from on duty agencies, and MABAS requests brought water rescue teams from other counties. Additionally, at the beginning of the event, St. Clair County responded multiple units to Washington County to assist with their water rescue efforts.
- This flood mimics and exceeds the flood of July 26, 2022. There are more than double the number of properties impacted and residents still struggle to receive assistance from that federal disaster declaration.

Photos provided the St. Clair County Emergency Management Department:

Caseyville Levee



St. Clair County Fairgrounds



Dupo



French Village



O'Fallon



Belleville



East St. Louis



Public Hearings

Per the Federal Register's approach for CDBG-DR grantees with allocations under \$500 million, at least one public hearing is required during the 30-day comment period. St. Clair County recognizes that affected stakeholders are the center of, and partners in, the development and implementation of this plan. Opportunities for citizen input were provided throughout the planning process through participation in outreach conducted by local governments and the public notification and comment period conducted as part of the development of this plan.

The following Public Hearings were held to hear from citizens to determine the needs to be addressed by the CDBG-DR Action Plan at the date, time and location listed below:

- Tuesday, July 29, 2025, 10:00 AM and 4:00 PM at St. Clair County IGD offices

A draft of the plan was made available for public review and comment for a 30-day period beginning July 29, 2025, and ending August 30, 2025. The availability of both the draft plan and the final plan is advertised in the local newspaper and the complete documents are available for review on the County's website at www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx and in print form at the offices of the St. Clair County Intergovernmental Grants Department (19 Public Square, Suite 200, Belleville, Illinois 62220-1624), various public libraries, senior/community centers, and village/city halls throughout the County. It is also made available in a form accessible to people with impaired vision upon request.

Citizens were notified through ads placed in the local newspaper of largest circulation, the Belleville News Democrat. St. Clair County will ensure that all citizens have equal access to information, including persons with disabilities (vision and hearing impaired). No members of the public attended either public hearing. No public comments were received.

Complaints

Complaints alleging violation of HUD rules and regulations will be directed to HUD for immediate review. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). St. Clair County will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse.

St. Clair County complies with all HUD rules and regulations. A variety of other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities. These civil rights laws include obligations such as taking reasonable steps to ensure effective communication with individuals with disabilities through the provision of appropriate auxiliary aids and services.

In addition, when St. Clair County passes funds through to subrecipients and/or local governments the same HUD rules and regulations are attached to the funds being distributed. Compliance with HUD rules and regulations will be monitored. St. Clair County will evaluate whether subrecipients demonstrate compliance with all HUD rules and regulations. Complaints alleging violation of HUD rules and regulations will be directed to HUD for immediate review. Direct complaints regarding the violation of HUD rules and regulations can be made by calling HUD's Region 5 office at 1 (800) 765-9372 or emailing them at complaintsoffice05@hud.gov, or on hud.gov. Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov). St. Clair County will make available to HUD detailed Fraud, Waste, and Abuse Policies and Procedures on <https://www.co.st-clair.il.us/departments/intergovernmental-grants/community-development> to demonstrate adequate procedures are in place to prevent fraud, waste, and abuse.

St. Clair County or its subrecipients shall provide a written response to each formal complaint within 15 working days of receipt of the complaint or will document why additional time for a response is needed.

- Formal complaints are written statements of grievance, including email, comments posted on the St. Clair County CDBG-DR website, and handwritten complaints. St. Clair County shall detail the process and contact information (through the website and email address) for submitting complaints within program guidelines, application documents, and on the St. Clair County CDBG-DR website. OHCS shall maintain a tracker for collecting and categorizing complaints through resolution.
- Informal complaints are verbal complaints. St. Clair County and its subrecipients will attempt to resolve informal complaints; however, they are not subject to the written response process described above.

Appeals

St. Clair County or its subrecipients shall include written appeals processes within each set of program guidelines. The appeals processes will include, but are not limited to the following:

- The process for submitting, tracking, and resolving a written appeal to the organization administering the program (St. Clair County or its subrecipient), to include whether an appeals committee will be established to review and/or rule on appeals.
- The documentation required when submitting an appeal.
- The timelines for reviewing and providing a response to the appeal.
- Clarification of what may or may not be appealed. Generally, policies that have been approved and adopted within program guidelines may not be appealed. St. Clair County and its subrecipients do not have the authority to grant an appeal to a regulatory or statutory or HUD-specified CDBG-DR requirement.

Public Website

St. Clair County will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, amendments, program policies and procedures, performance reports, citizen participation requirements, and activity and program information described in this plan, and details of all contracts and ongoing procurement processes.

These items are made available through

<https://www.co.st-clair.il.us/departments/intergovernmental-grants/community-development?subDirectory=DocDirWebDocuments\Departments\igd\communityDevelopment\CDBG%20DR%202024>

Specifically, St. Clair County will make the following items available:

- The action plan created using DRGR (including all amendments);
- Each performance report (as created using the DRGR system);
- Citizen participation plan;
- Procurement policies and procedures;
- All executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and
- A summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.).

Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, will not be posted on the website.

In addition, St. Clair County will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds.

The website will be available to the public and accessible to persons with disabilities. St. Clair County will take reasonable measures to ensure meaningful access to programs and activities for all individuals, members of protected classes, vulnerable populations, and individuals from underserved communities.

Reports and program information will be monitored frequently to ensure current information is displayed. At minimum, the website will be reviewed and updated monthly. Changes to the website may only be authorized by designated personnel. The designated personnel will be responsible for testing the website to ensure all uploads are working properly and that the data is displayed correctly.

Amendments

Over time, recovery needs will change. Thus, St. Clair County will amend the disaster recovery action plan as often as necessary to best address our long-term recovery needs and goals. This plan describes proposed programs and activities developed over time: an amendment may not be triggered if the program or activity is consistent with the plan.

When there are changes to the sections of this action plan that rise to the level of requiring an amendment, the County will do the following:

- Ensure the current version of the Action Plan is accessible for viewing as a single document, with all amendments;
- Identify the amendments by highlighting added or changed content;
- Include tables that clearly illustrate where funds are being moved;
- Include a revised budget table that reflects all funds applicable to the amendment.

Substantial Amendment

Substantial amendments to the CDBG-DR action plan for both will require at least 30-days of public comment. St. Clair County has defined Substantial Amendments to the Action Plan as those proposed changes that require the following decisions:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- A proposed reduction in the overall benefit requirement
- A reallocation which constitutes a change of 25 percent or greater of a program budget

Those amendments which meet the definition of a Substantial Amendment are subject to public notification and public comment procedures. Citizens and units of local government will be provided with reasonable notice and an opportunity to comment on proposed Substantial Amendments to the Action Plan. A notice and copy of the proposed Substantial Amendment will be posted on the County's official website in adherence with the Americans with Disabilities Act. St. Clair County will identify and consider potential barriers that limit or prohibit equitable participation and will undertake reasonable measures to increase coordination, communication, affirmative marketing, targeted outreach and engagement with underserved communities and individuals, including persons with disabilities. Copies will be provided upon request at St. Clair County, if otherwise not accessible for review by any residents.

Citizens will be provided with no less than thirty (30) days to review and comment on the proposed substantial amendment. Written comments may be submitted to:

St. Clair County Intergovernmental Grants Department
19 Public Square, Suite 200
Belleville, IL 62220-1624
Christina.Anderson@co.st-clair.il.us

618-825-3218

A summary of all comments received responses will be included in the Substantial Amendment that is submitted to HUD for approval and posted to the St. Clair County's official website.

When St. Clair County pursues the substantial amendment process, the amendment will be posted here at

<https://www.co.st-clair.il.us/departments/intergovernmental-grants/communitydevelopment?subDirectory=DocDirWebDocuments\Departments\igd\communityDevelopment\CDBG%20DR>

for a 30-day public comment period. The amendment will be posted in adherence with ADA requirements. St. Clair County will review and respond to all public comments received and submit to HUD for approval.

Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments, and thus do not need public comment. St. Clair County will notify HUD five (5) business days before the change is effective.

All amendments (substantial and non-substantial) will be numbered sequentially and posted to the website into one final, consolidated plan.

Displacement of Persons and Other Entities

To address the displacement of persons and other entities that may be affected by the activities outlined in this action plan, St. Clair County will coordinate with municipalities, impacted businesses and nonprofits, and the St. Clair County and East St. Louis Public Housing Authorities to minimize or prevent displacement. St. Clair County does not anticipate that any proposed projects or activities will cause the displacement of people but acknowledges that the requirements of Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended are applicable to any relocation or displacement of persons. As relocation is not anticipated, St. Clair County has not budgeted for this activity.

Protection of People and Property

St. Clair County will leverage CDBG-DR funds to build economic and disaster resilience into all recovery programs and activities. The Action Plan, as written, intends to promote mitigation, rehabilitation and elevation of existing infrastructure and properties, and implement best practices. St. Clair County and its subrecipients will ensure that all newly constructed projects meet all locally adopted building codes, standards, and ordinances.

Elevation standards

For new construction, repair of substantially damaged, or substantial improvement structures principally for residential use and located in the 1 percent annual (or 100-year) floodplain must be elevated with the lowest flood, including the basement, at least two feet above the 1 percent annual floodplain elevation.

Mixed-use structures with no dwelling units and no residents must be elevated or floodproofed up to at least two feet above base flood elevation.

If a structure is located in a 500-year floodplain, the structure must be elevated three feet above the 100-year floodplain.

Due to the nature of the proposed infrastructure program, St. Clair County does not currently anticipate any cost associated with elevating structures in accordance with the above requirements.

Flood Insurance Requirements

Assisted property owners must comply with all flood insurance requirements. HUD-assisted homeowners for a property located in a Special Flood Hazard Area must obtain and maintain flood insurance in the amount and duration prescribed by FEMA's National Flood Insurance Program (NFIP). St. Clair County may not provide disaster assistance for the repair, replacement or restoration of a property to a person who has received Federal flood disaster assistance that was conditioned on obtaining flood insurance and then that person failed to obtain or allowed their flood insurance to lapse for the property. St. Clair County is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

- The combined household income is greater than 120% AMI or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.

To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance may receive CDBG-DR assistance if:

- The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
- The household earns less than 120% AMI or the national median and has unmet recovery needs.

Construction Standards

St. Clair County will require quality inspections and code compliance inspections on all projects and places an emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. Site inspections will be required on all projects to ensure quality and compliance with building codes.

All rehabilitation, reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- Energy STAR (Certified Homes or Multifamily High Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development)
- ICC- 700 National Green Building Standards
- EPA Indoor AirPlus

- Any other equivalent comprehensive green building standard program acceptable to HUD

St. Clair County will use the St. Clair County Housing Maintenance Standard and/or HUD's INSPIRE standards upon implementation for the proposed programs or activities.

For rehabilitation of non-substantially damaged residential buildings, St. Clair County will follow the guidelines to the extent applicable as specified in the HUD CPD Green Building Retrofit Checklist. When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designed products and appliances.

For infrastructure projects, St. Clair County will encourage, to the extent practicable, implementation of best practices. Infrastructure projects will be built in accordance with the requirements of any agency with jurisdictional rights over the project, including but not limited to the Illinois Department of Transportation (IDOT), the Metropolitan Sewer District (MSD), and the Illinois Department of Natural Resources (IDNR).

Contractors Standards

Contractors selected under St. Clair County will make every effort to provide opportunities to low and very-low-income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community. As part of its CDBG program, St. Clair County engages in the following Section 3 qualitative efforts:

- Outreach efforts to generate job applicants who are Public Housing Targeted Workers
- Outreach efforts to generate job applicants who are Other Funding Targeted Workers
- Direct, on-the job training (including apprenticeships)
- Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching)
- Outreach efforts to identify and secure bids from Section 3 business concerns
- Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services
- Held one or more job fairs
- Provided or connected residents with supportive services that can provide direct services or referrals
- Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation

- Assisted residents with finding child care
- Assisted residents to apply for, or attend community college or a four year educational institution
- Assisted residents to apply for, or attend vocational/technical training
- Assisted residents to obtain financial literacy training and/or coaching
- Provided or connected residents with training on computer use or online technologies
- Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses
- Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act

St. Clair County will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system.

Duplication of Benefits

The St. Clair County Intergovernmental Grants Department (IGD) is in receipt of Community Development Block Grant Disaster Recovery (CDBG-DR) funds from the Department of Housing and Urban Development (HUD). IGD will use these funds to carry out activities to address the long-term recovery needs resulting from the 2024 disaster event. These activities include projects and programs that may provide housing, infrastructure, economic development and planning resources to households, governments and businesses impacted by the disaster. These activities are carried out in partnership with other state/local agencies through the implementation of a number of CDBGDR funded programs. Sec. 312 of the Stafford Act (42 U.S.C. 5155) requires all Stafford Act funded programs to ensure that entities in receipt of federal disaster recovery dollars are not compensated for the same damages through multiple sources. HUD provides specific guidance for CDBG-DR funding through “Clarification of Duplication of Benefits Requirements” under the Stafford Act for CDBG-DR Grantees.

The full Duplication of Benefits Policy is published on the St. Clair County Intergovernmental Grants Department's website:

<https://www.co.st-clair.il.us/WebDocuments/Departments/igd/communityDevelopment/CDBG%20DR/DOB%20Policy-St.%20Clair%20County.pdf?12:06%20PM>

CDBG-DR Policies and Procedures Manual

St. Clair County has implemented a CDBG-DR Policies and Procedures Manual to provide guidance for the St. Clair County Intergovernmental Grants Department that will assist in

carrying out its financial and programmatic responsibilities under Community Development Block Grant Disaster Recovery Grants (CDBG-DR). The manual is attached as an appendix to this plan and ensures that the detailed administrative requirements of the Office of Management and Budget 29 CFR Part 97, Uniform Administrative Requirements for Grants and Agreements, 2 CFR Part 200 (as applicable), and 24 CFR Part 570 are adhered to.

4

Grantee Proposed Use of Funds

Grantee Proposed Use of Funds

Overview

St. Clair County is the lead agency and responsible entity for administering \$89,533,000 in CDBG-DR funds allocated for disaster recovery. St. Clair County will use a competitive process for all programs to invest funds in projects that best meet the goals of this Action Plan and are in alignment with HUD's overall intent of recovery for local communities. St. Clair County

intends to implement and carry out programs for infrastructure and public facilities, housing, and economic revitalization.

Program Details

Program Budget –Disaster Recovery

Table 32: Program Budget

Program Category	Program	Budget	15% Mitigation Set-Aside	HUD identified MID Budget	% of Allocation	Max. Award	National Objective	Estimated Outcome
1	Infrastructure and Public Facilities	\$69,128,350	\$11,078,000	\$80,056,350	89.4%	\$15,000,000	LMA	5
2	Housing	\$3,400,000	\$600,000	\$4,000,000	4.5%	\$1,000,000	LowMod Clientele	5
3	Economic Revitalization	\$1,000,000	N/A	\$1,000,000	1.1%	\$250,000	LMI Persons— Job Creation or Retention Activities	5
4	Administration	\$4,476,650	N/A	\$4,476,650	5%	N/A	N/A	N/A
Total		\$77,855,000	\$11,678,000	\$89,533,000	100%			

Table 33: Unmet Needs and Proposed Allocations

Category	Total Verified Loss	Remaining Unmet Need	% of Need Unmet	FEMA/SBA Program Allocation Amount
Housing (FEMA IA)	\$28,674,112	\$5,118,269	17.8%	\$17,270,936
Housing (SBA Home)	\$90,855,065	\$58,656,124	64.6%	\$26,714,200*
Economic (SBA Business/EIDL)	\$29,627,533	\$13,595,571	45.9%	\$34,195,000*
Total	\$149,156,710	\$77,369,964	51.9%	\$78,180,136

*Allocation Amount includes project delivery costs and does not include administration and planning costs.

1.2.1.1 Expenditure and Compliance Requirements

Program Administration Costs: Limited to 5%—or \$4,476,650—of the total allocation.

Planning Costs: Limited to 15%—or \$13,429,950—of the total allocation. No funds are proposed in this plan for planning activities.

Mitigation Activities: At least 15%—or \$11,678,000—must be used for mitigation activities and/or the incorporation of mitigation measures into recovery activities. The County plans on incorporating resilience and mitigation measures into all construction programs. The County will define mitigation activities and establish mitigation measures within each program.

HUD-Identified Most Impacted and Distressed (MID) Areas: 100% of the total allocation must benefit the HUD-identified areas.

Benefits for Low- to Moderate-Income (LMI) Persons: At least 70%—or \$62,673,100—of the allocation (less planning and administration costs) must be used for activities that benefit LMI persons.

Connection to Unmet Needs

CDBG-DR applicable notice, FR-6512-N-01, require a grantee to allocate 100% of the funds to address unmet needs in the HUD- identified “most impacted and distressed” (MID) areas of St. Clair County.

In considering the unmet, mitigation and local needs, and the limited amount of CDBG-DR funds, this Action Plan proposes to use the funds to address the needs of infrastructure and public facilities, housing, economic revitalization, mitigation and resiliency planning activities and incorporates mitigation activities into all programs. In consultation with local communities, it was clear to St. Clair County that with a limited amount of funds and in looking at how they can assist an entire community, infrastructure needs will be prioritized and receive a greater allocation which is reflected in the proposed programs below.

In consultation with affected municipalities about the best solution and given that the disaster was a flooding event which aligns with flooding being identified as a top priority in hazard mitigation plans, the County has made a conscious decision to fund infrastructure replacement and upgrades to provide the most benefit to the most persons with relatively small funding allocation. Specifically addressing unmet needs and resiliency relating to sewer and storm water drainage will be funded with the Community Development Block Grant Disaster Recovery funds.

St. Clair County acknowledges that many homeowners experienced extreme flooding in their basements and incurred damage to their furnaces, hot water heaters and personal belongings due to inadequate storm water systems. However, given the limited amount of funding made available, making improvements to the sanitary sewer systems, storm water systems and other housing infrastructure needs will support the housing recovery for this area more effectively than repairing homes that will likely flood again without the

infrastructure improvements.

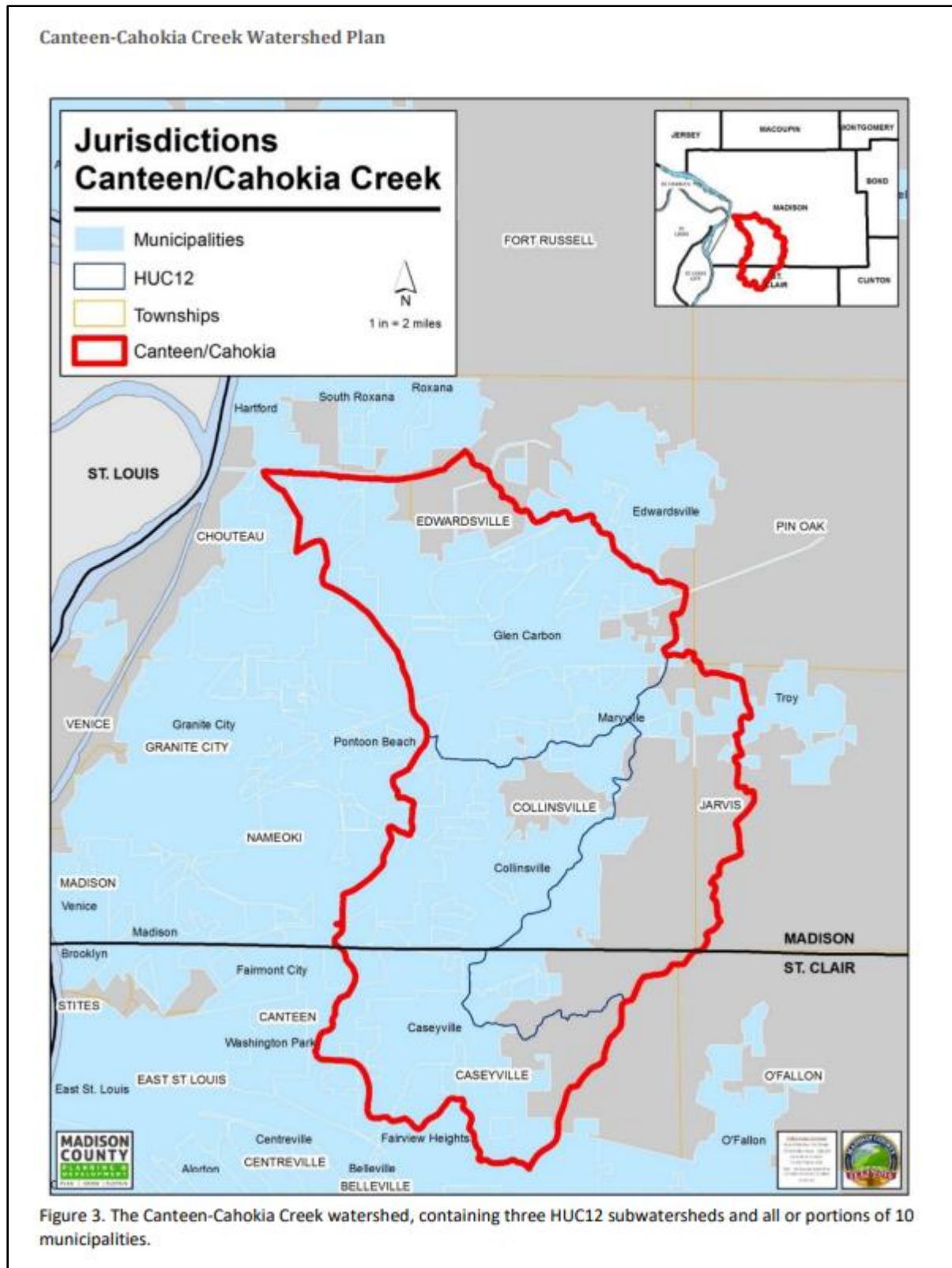
Allocating CDBG-DR funds to fix the root of the problem makes sense in the long term from a cost benefit basis and from a mitigation basis as well for entire communities. Infrastructure projects can give homeowners a sense that the structural problems that currently exist will be remedied to mitigate future disastrous flooding and basement back-up incidents. To ensure infrastructure and public facilities projects have the resources needed, this plan proposes allocating \$89,533,000 to the program for projects in the HUD-identified MID.

The need for infrastructure repairs and upgrades to mitigate the impacts of flooding caused by stormwater surcharge and sanitary sewer backups during heavy rain events has been heavily studied and documented by the news media as well as local, state, and federal agencies. For example, at the request of the Cities of East St. Louis and the City of Cahokia Heights the Illinois Department of Natural Resources conducted a survey of elements of the storm sewer system in the several neighborhoods that suffer repeated flooding. The storm sewer survey, which can be accessed through Heartland Conservancy's website (<https://heartlandsconservancy.org/prairie-du-pont-project-storm-sewer-survey/>) provides information on existing infrastructure conditions. The goal of this work is to empower the community to make informed decisions about how to fix the stormwater flooding problems.

The proposed infrastructure program is in alignment with two regional Watershed Plans that were developed by Heartland Conservancy. The first plan that was approved by the EPA in 2019 covers the Canteen-Cahokia Creek Watershed, which is located in both Madison and St. Clair counties, with 24% of the watershed falling in St. Clair County. Across the watershed, Respondents to the Flood Survey reported 697 flood events per year outside the 100-year floodplain, while only about 30 were within floodplains. This was attributed to undersized stormwater infrastructure amongst other things. Goal 1 within the plan is to “reduce flooding and mitigate damage” with Objective 1.6 under this goal being “promote ongoing improvement and maintenance of stormwater storage and conveyance infrastructure to maximize storage capacity.”

This planning effort was led by a “Technical Committee consisting of experts in stormwater management, water quality, stream and soil health, conservation, and urban planning guided data collection and analysis. The Technical Committee provided input to USACE on the Watershed Resources Inventory (Appendix A) and provided technical guidance on recommendations and subsequent drafts of the plan. Specifically, the committee reviewed the methodology of data collection, draft nutrient reduction targets and other targets, Flood Survey results, Best Management Practices (BMPs), and milestones for plan implementation.”

Further, the planning team engaged over 600 individuals from more than 70 entities, conducting interviews with stakeholders including townships, municipalities, and the County Boards. The general public was also engaged through five open house events and presentations regularly occurred at East-West Gateway Council of Government's Water Resources Committee.



The second plan, Prairie du Pont & Judy's Branch Watershed Plan, was released in final form on 12/23/2023 and may be accessed in full here: <https://heartlandsconservancy.org/pdp/>

As stated in the Overview section of the plan, "The purpose of this document is to describe and illustrate the community's vision for their watershed and communities within it; and to enable the communities, elected officials, and residents to make informed decisions about options and infrastructure repairs, enhancements over the next decade. The plan was developed to address the needs of residents in an equitable manner and to elevate their critical needs into action but concurrently shaping the solutions to fit their vision of their community." This plan focuses on the portion of the Judy's Branch Watershed that is located within St. Clair County, and which covers many of the most heavily impacted communities during the 2022 Flood Disaster, as shown in the following map. The plan lists specific priority locations and concerns, including flooding in Cahokia Heights, sanitary sewer overflows in Cahokia Heights and East St. Louis, and flooding in various stormwater conveyance areas, including the Steiger and Harding ditches, noting that "The project area's disadvantaged communities are often situated in flood-prone areas, making them more vulnerable to the impacts of flooding of all scales and infrastructure failure. These communities, as a whole or individually, may lack the resources to adapt or recover from flood/ storm events.... Changes in policy, personnel turnover, insufficient funds, and loss of expertise can impede the proper oversight, maintenance and upgrading of existing infrastructure. As a result, stormwater management facilities might not perform as they should, making flooding and water quality issues worse. Over time, as climate patterns change and development increases, infrastructure—like storm and sanitary sewer systems, roads, and buildings—may no longer be adequate. They can exacerbate flooding and lead to sanitary sewer overflows that can contribute to unhealthy conditions, poor water quality, and pollutant buildup in canals and streams. Flooding often occurs not as a result of rivers overtopping their banks or levees failing but from rainfall that pools and floods without adequate drainage."

Additionally, as part of this plan, a Community Flood Survey was conducted. Of the 63 respondents, 60% have experienced flooding in the last 10 years and more than half experienced basement flooding. Further, 35% of responded experienced sewage issues due to flooding in the last 10 years.

This plan also included a robust community engagement process that included both working committees and engagement with residents. The following excerpt from the plan highlights the extensive engagement process:

- "The initial community outreach and individual stakeholder interviews began in March 2021 and extended until August 2022 by engaging with residents, community leaders, faith-based leaders, grassroots organizers, municipal staff, legislators, neighbors, business owners, students, not-for-profit leaders, transportation districts, and on-the-ground local, state, and federal agency staff. In that period, the team members met with 83 individuals from 35 governmental and non-governmental organizations of all sizes. Some of these stakeholders were identified to be on the three committees that were forming as part of the process.

In an intensive series of outreach meetings, the team also participated in community

events such as East St. Louis' Juneteenth celebration 2021-2023 and Fairmont City's summer youth program at the community library in 2022. At these meetings and events, stakeholders were asked about water issues such as flooding, erosion, siltation, and water quality.

All stakeholders were invited to complete a survey about flooding and sewage issues. Paper copies were made available and distributed by community partners.

Understanding that not everyone receives information the same way, the team developed flyers, ads, social media, bilingual materials, and web/mobile access points for the planning process. Copies of materials were made available to committee members in print and digital formats. The team collaborated with Community Development Sustainable Solutions (CDSS) to pass out flyers and surveys at events and at key community gathering places and events."⁵⁴

The following summary chart of engagement events shows that many of these events were occurring in the months preceeding and following the July 2022 Flood Disaster events that led to the disaster declaration and subsequent CDBG-DR funding award to St. Clair County; the 2022 flood event shared many commonalities with the 2024 disaster event, highlighting the recurring flooding and sewage back up issues experienced within the MID.

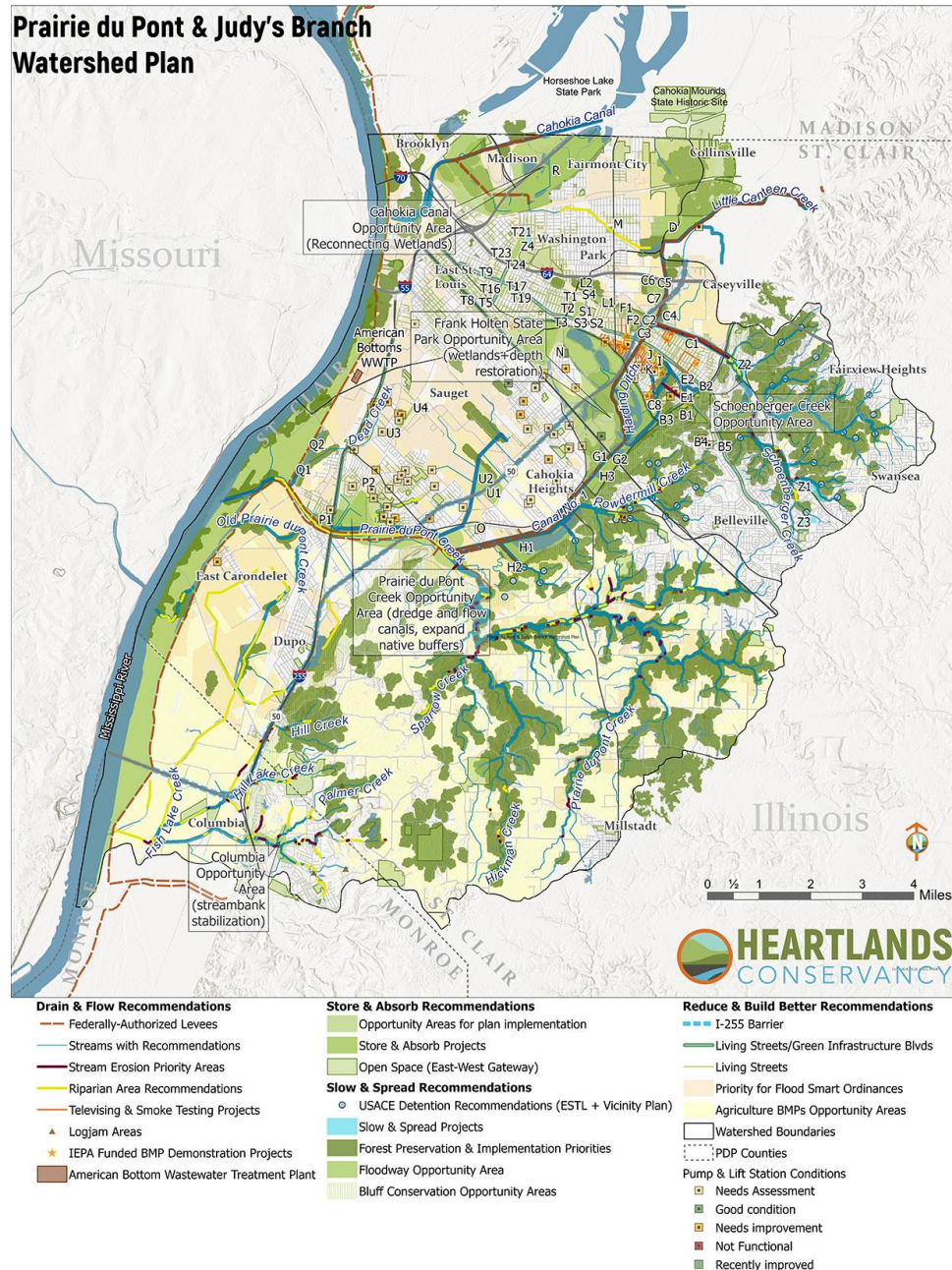
Meeting	Date	Attendees	Organizations
TAC #1	4/21/2022	63	46
TAC #2	6/16/2022	59	44
TAC #3	8/13/2022	55	30
TAC #4	3/07/2023	38	26
TAC #5	8/22/2023	27	12
BMP #1	5/05/2022	21	10
BMP #2	6/09/2022	24	14
BMP #3	7/14/2022	27	14
BMP #4	9/27/2022	30	16
WPC #1	5/19/2022	43	31
WPC #2	7/21/2022	52	28
WPC #3	4/25/2023	16	7
WPC #4	8/22/2023	WPC- none showed	0-canceled
WPC #5	9/19/2023	25	10
Open House #3	9/19/2023	16	7
Virtual Town Hall	11/16/2023	TBD	TBD

The plan reports the "significant outcome" from the public engagement "Stakeholders were asked about flooding, siltation and sedimentation, erosion, surface water quality issues, and groundwater quality issues in the watershed. **The biggest issue in the watershed is flooding - not necessarily caused by river flooding - which was mentioned in 16 out of 22 stakeholder interviews. Sewerage issues were mentioned in 9 out of 22 stakeholder interviews.** This flooding has led to erosion issues, sediment and siltation issues, and surface water quality issues. Some of the stakeholders also mentioned possible groundwater contamination issues in Sauget."

⁵⁴ <https://heartlandsconservancy.org/pdp/>

St. Clair County's proposed use of CDBG-DR funds for making infrastructure improvements, housing investments, and economic revitalization programs is supported by conclusions and recommendations of the Prairie du Pont & Judy's Branch Watershed Plan, which focus heavily on infrastructure projects aimed at reducing sanitary sewer overflows, repairing, replacing, and upgrading stormwater infrastructure, and prioritizing historically marginalized communities along with the impacts of frequently recurring flooding and backups on homes and businesses. Throughout the plans, residents repeatedly reported the negative impacts of these flood events—beyond even the major events, discussions with residents revealed that even relatively small rainfall events can lead to localized flooding causing sewer overflows, basement flooding, and road damage. Much of this particular flooding can be attributed to failing sanitary and storm sewer system infrastructure that leads to flow of rainwater into wastewater pipes that overflow, causing serious detriments to human health. In fact, sewer backups were mentioned in almost 50% of stakeholder interviews. Further, a community flood survey revealed that 60% of respondents have experienced flooding in the last 10 years and more than half of respondents had experienced a basement flood. Additionally, 35% of respondents have experienced sewerage issues due to flooding in the last 10 years. This includes sewage entering homes through basements, floors, floor drains, and toilets or other bathroom plumbing fixtures.

These plans, along with close collaboration with the U.S. Army Corps of Engineers, will continue to guide St. Clair County in development of its CDBG-DR infrastructure program and selection of projects.



Leveraging Funds

St. Clair County understands the importance of leveraging all available funds and resources to increase its ability to address and mitigate against major disasters. Further, the County recognizes that FEMA and other forms of assistance can fall short of the full cost of recovery, forcing residents to pay out of pocket or delay critical repairs. To support residents with unmet needs, the County is committed to pursuing any opportunities to obtain additional state or local funds to address ongoing needs for home repair and rehabilitation. The County anticipates leveraging CDBG- DR funds with other funding sources such as FEMA and other State and local funds, including annual HOME and CDBG allocations. However, it is important to note that St. Clair County did not receive a FEMA Public Assistance (PA) allocation for the federally declared disasters addressed in this Action Plan. Although the County was approved for FEMA Individual Assistance (IA) to support residents affected by each event, it

did not meet the eligibility threshold for FEMA PA, which typically provides funding for the repair and replacement of damaged public infrastructure, emergency protective measures, and debris removal. As a result, the County did not receive federal support to offset municipal recovery costs related to infrastructure damage or emergency response. This lack of FEMA PA funding has placed added pressure on local resources and highlights the importance of leveraging CDBG-DR funds to address unmet infrastructure needs, support long-term recovery, and enhance community resilience. CDBG-DR funds will be used to address critical unmet needs that remain after all other funding sources have been committed and exhausted to prevent any duplication of benefits.

Many non-profits, faith-based organizations, and other groups have resources (financial, volunteer, materials) available for residents in St. Clair County whose primary residences were impacted by the flood. Disaster case managers coordinate recovery including providing owner-occupied housing recovery assistance with local funds. By leveraging these funds that focus on individual assistance and not duplicating the assistance, St. Clair County is able to focus on using the CDBG-DR funds that protect people and property as a community.

Program Partners

St. Clair County will partner with local governments, quasi-government entities and other agencies through subrecipient agreements or interagency agreements to carry out the programs and coordinate funding and activities to ensure that information, program updates, and data are shared when necessary and utilize methods to reach vulnerable populations, protected classes, persons experiencing homelessness, and those historically underserved. In collaboration with program partners, St. Clair County will continue its effort to increase awareness of flooding and other natural hazards across its communities, with a particular focus on historically underserved communities and those with concentrations of vulnerable persons. Each selected CDBG-DR project will present an opportunity for the County to engage with impacted communities and residents around both the anticipated project results as well as the remaining hazards.

Distribution of Funds

Each of the program descriptions below include information on how St. Clair County will distribute CDBG-DR funds and whether St. Clair County will carry out the activities directly or through subrecipients.

The proposed Infrastructure program description includes the following sections:

- Program Budget and Amount for LMI and HUD MIDs
- Program Description
- Program Tieback to Disaster/Unmet Needs
- Program National Objective(s)
- Program Eligibility

- Program Responsible Entity
- Program Maximum Assistance
- Program Estimated Begin and End Dates
- Other Program Details
- Program Competitive Application Overview (if applicable)
- Program Method of Distribution Description/Overview
- How Mitigation Set-Aside Activities will Meet the Definition of Mitigation
- How Mitigation Set-Aside Activities will Address Current and Future Risks
- How Program will Advance Long-Term Resilience (Infrastructure)
- How Program will Address Disaster-Related Storm Water Management/Other Systems (Infrastructure)
- How Program will Reduce Barriers for Assistance (Housing & Economic Revitalization)

Program Income

St. Clair County does not anticipate any program income to be generated by CDBG-DR funded activities. Program income is defined as the gross income received by St. Clair County or any of its subrecipients that is directly generated from the use of CDBG-DR funds. Information regarding how program income may be generated and used is available at 24 C.F.R. §570.489 and 24 C.F.R. §570.504, as well as on HUD's website. St. Clair County allows for the following uses of program income, should any unanticipated program income be generated:

- Program income is tracked and maintained by St. Clair County.
- Up to 5% of the program income generated by CDBG-DR funds may be used for administrative costs by St. Clair County, units of local government, or other subrecipients.
- Program Income shall be used or distributed before additional withdrawals from the U.S. Department of Treasury are made.
- St. Clair County shall treat program income as additional CDBG-DR funds subject to the requirements of the Consolidated Notice and shall use it in accordance with the approved CDBG-DR Action Plan.
- St. Clair County may transfer program income to its annual CDBG program before close-out of the grant.

Resale or Recapture

As per the Federal Register Notice (87 FR 6364), St. Clair County shall establish resale or recapture requirements for housing programs funded and shall outline those requirements in the program guidelines for the activity. The resale and recapture provisions must clearly describe the terms of the resale and recapture provisions, the specific circumstances under

which these provisions will be used, and how the provisions will be enforced (whether by recorded deed restrictions, covenants, or other similar mechanisms). The affordability restrictions, including the affordability period requirements, do not apply to housing units newly constructed or reconstructed for an owner-occupant to replace the owner-occupant's home that was damaged by the disaster. Grantees must establish affordability restrictions on all newly constructed single-family housing (defined as four units or less), to be purchased and occupied by LMI homeowners. The minimum affordability period acceptable for compliance are the HOME requirements at 24 CFR 92.254(a)(4).

Resale or recapture is not applicable to the proposed programs below.

General Program Details

Program Timeline

The estimated launch date for programs is Quarter 3 of 2026 and will end when all eligible participants have completed project closeout, all budgeted funds have been expended, or 6 years after execution of the grant agreement with HUD.

Program Tieback to Disaster

Projects funded through these programs will be required to address remaining direct and indirect impacts in HUD-identified MID. Projects may also address risks from future potential disasters with integration of mitigation measures and strategies included in project activities.

How Mitigation Set-Aside Activities will Meet Definition of Mitigation

All mitigation activities funded for infrastructure, housing, and economic development projects will increase resilience to disasters or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters.

How Mitigation and Resilience Measures will Address Current & Future Risks

Adding mitigation measures resilience to future natural disasters and reduce the long-term risk of loss of life, injury, damage to and loss of property, and lessen suffering and hardship and impact of future natural disasters.

To ensure that the infrastructure, housing, and economic development projects undertaken with CDBG-DR funds enhance resiliency during future flood events, engineering design and mitigation measures will be integrated, requiring that each project incorporates forward-thinking resiliency concepts that align with regional priorities around capacity building, adoption of building and zoning codes in response to climate change, and provide the opportunity for historically underinvested communities to secure protective measures that alleviate longstanding flooding issues for the foreseeable future.

Program National Objective

St. Clair County will comply with the overall benefit requirements in the Housing and Community Development Act of 1973 (HCDA) and 24 CFR 570.484, 24 CFR 570.200(a)(3), and 24 CFR 1003.208, which require that 70 percent of funds be used for activities that benefit LMI persons. For purposes of a CDBG–DR grant, HUD is establishing an alternative requirement that the overall benefit test shall apply only to the grant of CDBG–DR funds described in the Allocation Announcement Notice and related program income. A grantee may seek to reduce the overall benefit requirement below 70 percent of the total grant, but must submit a substantial amendment as provided in section III.C.6.a. in the Consolidated Notice, and provide a justification that, at a minimum: (a) identifies the planned activities that meet the needs of its LMI population; (b) describes proposed activities and programs that will be affected by the alternative requirement, including their proposed location(s) and role(s) in the grantee’s long-term disaster recovery plan; (c) describes how the activities/programs identified in (b) prevent the grantee from meeting the 70 percent requirement; (d) demonstrates that LMI persons’ disaster related needs have been sufficiently met and that the needs of non-LMI persons or areas are disproportionately greater, and that the jurisdiction lacks other resources to serve non-LMI persons; and (e) demonstrates a compelling need for HUD to lower the percentage of the grant that must benefit low and moderate-income persons.

As, detailed in the Universal Notice⁵⁵, HUD waived the urgent need national objective criteria in section 104(b)(3) of the HCDA and established the following alternative requirement that for any CDBG–DR grantee using the urgent need national objective may use it for a period of 36 months after the applicability date of the grantee’s Allocation Announcement Notice.

Pursuant to this alternative requirement, grantees that use the urgent need national objective must: (1) describe in the impact and unmet needs assessment why specific needs have a particular urgency, including how the existing conditions pose a serious and immediate threat to the health or welfare of the community; (2) identify each program or activity in the action plan that will use the urgent need national objective—either through its initial action plan submission or through a substantial amendment submitted by the grantee within 36 months of the applicability date of the grantee’s Allocation Announcement Notice; and (3) document how each program and/or activity funded under the urgent need national objective in the action plan responds to the urgency, type, scale, and location of the disaster-related impact as described in the grantee’s impact and unmet needs assessment. The grantee’s action plan must address all three criteria described above to use the alternative urgent need national objective for the program and/or activity. This alternative urgent need national objective is in effect for a period of 36 months following the applicability date of the grantee’s Allocation Announcement Notice. After 36 months, the grantee will be required to follow the criteria established in section 104(b)(3) of the HCDA and its implementing regulations in 24 CFR part 570 when using the urgent need national objective for any new programs and/or activities added to an action plan.

St. Clair County will not use the urgent need national objective.

⁵⁵ <https://www.govinfo.gov/content/pkg/FR-2025-01-08/pdf/2024-31621.pdf>

Program Cost Controls and Warranties

All projects will be subject to cost reasonableness standards as outlined in 2 CFR 200.404 and 2 CFR Part 200 Subpart D - Procurement Standards. IGD Staff and/or their Engineering Consultant will compare scopes of work and actual construction cost against location-specific indexes informed by historical construction costs for the region. Infrastructure projects are typically subject to the sealed-bid procurement requirements set forth in 2 CFR 200 Subpart D, defined as “A procurement method in which bids are publicly solicited and a firm fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bids method is the preferred method for procuring construction.” (<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR45ddd4419ad436d>)

CFR 200 Subpart D also requires a cost estimate process, described as follows:

- The non-Federal entity must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, the non-Federal entity must make independent estimates before receiving bids or proposals. (<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR45ddd4419ad436d>)

Table 34: St. Clair County CDBG-DR Programs

Program	Budget	HUD-Identified MID Budget
Infrastructure and Public Facilities	\$80,056,350	\$80,056,350
Housing	\$4,000,000	\$4,000,000
Economic Revitalization	\$1,000,000	\$1,000,000

Table 35: Eligible Activities by Program

CDBG-DR Eligible Activity per the Universal Notice Federal Register 1786:	
Infrastructure and Public Facilities Program	CDBG–DR funds represent a significant opportunity for grantees to carry out strategic, high-impact, and innovative infrastructure activities to recover from the applicable disaster, mitigate disaster risks, and reduce future losses. Infrastructure activities assist in the development of physical assets that are designed to provide or support services to the general public. These infrastructure activities often offer unique benefits for the general public and underserved communities following a disaster due to the activities’ scale and intersection with other key recovery and mitigation outcomes.
Housing	Grantees may use CDBG–DR funds for activities that may include new construction of single-family or multifamily housing. Within the Universal Notice, the broadening of eligible CDBG–DR activities related to housing under the HCDA is necessary following major disasters in which housing, including large numbers of affordable housing units, have been damaged or destroyed.
Economic Revitalization	CDBG–DR funds may be used for CDBG–DR eligible activities related to economic revitalization. The attraction, retention, and return of businesses and jobs to a disaster-impacted area is critical to long-term recovery. Accordingly, for CDBG–DR purposes, economic revitalization may include any CDBG–DR eligible activity that demonstrably restores and improves the local economy through job creation and retention or by expanding access to goods and services. The most common CDBG–DR eligible activities to support economic revitalization are outlined in 24 CFR 570.203 and 570.204 and sections 105(a)(14), (15), and (17) of the HCDA (42 U.S.C. 5

Infrastructure and Public Facilities Program

Table 36: Infrastructure and Public Facilities Program

Program	Budget	HUD-Identified MID Budget
Infrastructure and Public Facilities	\$80,056,350	\$80,056,350

Program Description

This program will award funds to eligible projects within the identified HUD MID county to address unmet recovery and mitigation needs associated with general infrastructure and public facilities. The grant funds will allow recipients to design and construct infrastructure and public facilities activities that will directly benefit individuals and the larger community.

The program allows for a wide range of CDBG-DR eligible infrastructure and public facilities activities, and each activity must revitalize disaster impacted communities by directly or indirectly supporting the mitigation of loss of life or property in the face of current and future natural hazards.

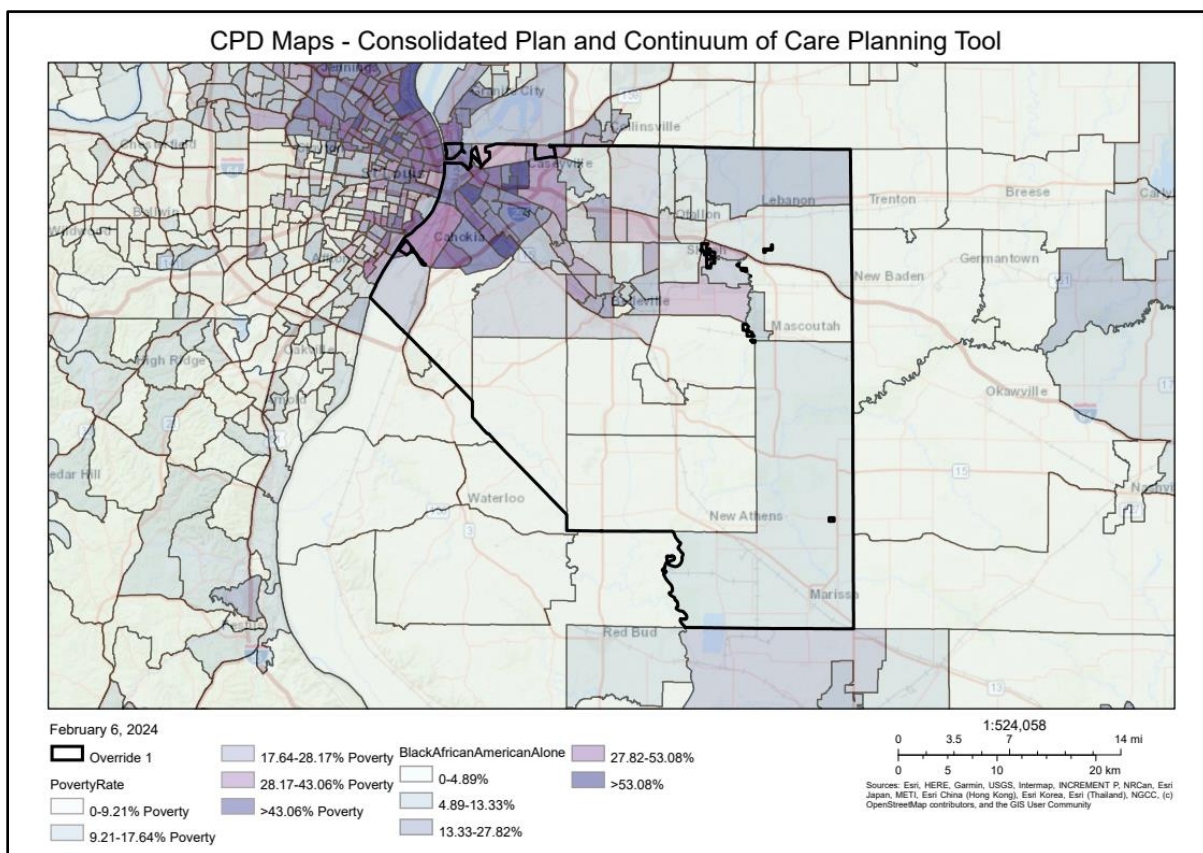
The Infrastructure and Public Facilities program identifies infrastructure as including, but not limited to, the following types of projects: streets, water and sewer facilities, underground utilities, generator installation, and flood and drainage measures. The program defines public facilities as projects that improve hospitals, schools, libraries, police stations, fire stations, and buildings owned by non-profits that are open to the public. Funding and Program guidelines will further define eligible projects for applicants. Selected projects will demonstrate both feasibility and cost-effectiveness in reducing future natural hazard risk, making communities more resilient against future disasters.

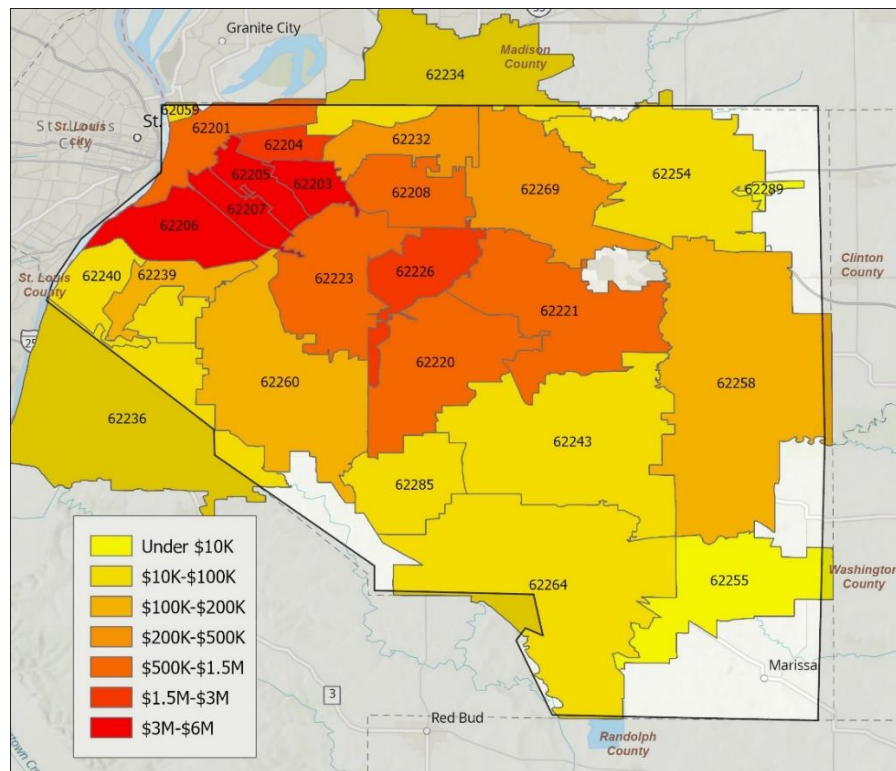
To ensure that the infrastructure and public facilities projects undertaken with CDBG-DR funds enhance resiliency during future flood events, engineering design and mitigation measures will be integrated, requiring that each project incorporates forward-thinking resiliency concepts that align with regional priorities around capacity building, adoption of building and zoning codes in response to climate change, and provide the opportunity for historically underinvested communities to secure protective measures that alleviate longstanding flooding issues for the foreseeable future.

How the Program Promotes Equity and Housing for Vulnerable Populations

The program focuses on projects that benefit the community as a whole and will protect life and property. The program includes public facilities that can serve as emergency centers during a disaster event. These types of projects help preserve the current housing inventory such as affordable housing for low-income households, including members of protected classes, HUD- identified vulnerable populations, and historically underserved communities. Assistance provided under this program will meet the national objectives of benefiting low- and moderate-income areas (LMA). St. Clair County will comply with the overall benefit requirements in the Housing and Community Development Act of 1973 (HCDA) and 24 CFR

570.484, 24 CFR 570.200(a)(3), and 24 CFR 1003.208, which require that 70 percent of funds be used for activities that benefit LMI persons. An LMA area benefit activity is one that benefits all residents in a particular area, where at least 51 percent of the residents are LMI persons. An area is considered to meet the test of being LMI if there is a sufficiently large percentage (51 percent) of LMI persons residing in the service area. Improvements to public infrastructure benefit all LMI residents in a service area and thus are the type of activities that typically qualify under the LMI area benefit category for the purposes of meeting a national objective. As shown on the following maps, the densest concentration of poverty overlaps with the demographic concentration of the County's Black or African American population. These communities also experienced some of the most severe impacts of the 2024 Severe Storms, Tornadoes, Straight-line Winds, and Flooding Events Disaster, as evidenced by the FEMA IHP applications by zip code presented in the following map. In order to meet the national objective, address current infrastructure failures that occurred during the 2024 Severe Storms, Tornadoes, Straight-line Winds, and Flooding Events Disaster, , mitigate future infrastructure failures during severe flood events, and invest in the long-term recovery needs within historically underserved communities,





How the Program will Advance Long-Term Resilience

Eligible projects include those that mitigate, eliminate, or reduce the loss of life or property in the face of current and future natural hazards. Project applications will be required to demonstrate how the projects will be operated and maintained beyond the life of the CDBG-DR grant and how adaptable and reliable technologies are being used to prevent premature failure.

This program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, land use restrictions, urban growth boundaries, underserved communities, and disaster impacts within St. Clair County's impacted communities. Project applications will be required to describe the data and/or planning analysis they will use in their evaluation of hazard risk, including climate-related natural hazards.

To ensure that the infrastructure projects undertaken with CDBG-DR funds enhance resiliency during future flood events, engineering design and mitigation measures will be integrated, requiring that each project incorporates forward-thinking resiliency concepts that align with regional priorities around capacity building, adoption of building and zoning codes in response to climate change, and provide the opportunity for historically underinvested communities to secure protective measures that alleviate longstanding flooding issues for the foreseeable future.

Program National Objective

Assistance provided under this program will meet the national objectives of benefiting low- and moderate-income areas (LMA).

Geographic Eligibility

Eligible locations include jurisdictions within the HUD-identified MID county: St. Clair County

Eligible Activities

Activities may include acquisition; construction or reconstruction; installation; infrastructure improvements for flood protection, drainage improvement, emergency power, evacuation routes and hazard mitigation; and public facility improvements for shelters, community centers, police and fire stations, and hospitals, new construction of single-family or multi-family housing, and the attraction, retention, and return of businesses and jobs to the MID.

Ineligible activities

- Buildings for government use
- Purchase of construction equipment
- Maintenance and Operation

Program Responsible Entity

St. Clair County and Subrecipients

Program Eligible Applicants

Units of local governments, quasi-government entities and non-profit organizations

Program Maximum Assistance

The estimated minimum program assistance available is \$250,000 and the maximum assistance available is \$15,000,000 for the Infrastructure and Public Facilities Program. Adjustments may be made to the minimum and maximum amounts to ensure completion of projects and implementation of resiliency and mitigation measures. Exceptions to the maximum assistance amount may be made on a case-by-case basis to comply with federal accessibility standards and/or to reasonably accommodate a person with disabilities. Notice of this provision and the process for requesting an exception will be included in the Notice of Funding Availability (NOFA) released for each competitive funding round.

Program Method of Distribution

St. Clair County will use competitive funding rounds to award funds to eligible projects being completed by eligible local governments and/or entities. The County will post the Notice of Funding Availability and publish the awards on: <https://www.co.st-clair.il.us/departments/intergovernmental-grants/communitydevelopment?subDirectory=DocDirWebDocuments\Departments\igd\communityDevelopment\CDBG%20DR>.

The Notice of Funding Availability (NOFA) released for each competitive funding round will include evaluation and scoring criteria for proposed activities. The Notice of Funding

Availability (NOFA) released for each competitive funding round will include evaluation and scoring criteria for proposed activities. The NOFA will establish the process that will be utilized to make exceptions to the maximum amount of assistance when necessary, to comply with federal accessibility standards or to reasonably accommodate a person with disabilities.

Program Application Overview

The application process will require applicants to demonstrate how their projects address unmet and/or mitigation needs and how funds will be used equitably in their communities.

Applications for funding may be evaluated on, but not limited to, the following project components:

- Amount of project detail provided and tieback to the disaster and community need
- Project schedule and timeliness of expenditures
- LMI percentage of a project's service area
- Cost reasonableness of the project
- Other funding leveraged for the project
- Project's impact on recovery or mitigation of future disasters
- Project's expanse of benefit that is demonstrated through number of residents and/or coverage area

How Mitigation Set-Aside Activities Will Meet Definition of Mitigation

All mitigation activities funded for infrastructure and public facilities will increase resilience to disasters or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters.

How Mitigation and Resilience Measures will Address Current & Future Risks

The program is focusing on projects that will mitigate flood damage by improving sewer and water systems and projects that will make the communities more resilient. To ensure that the infrastructure projects undertaken with CDBG-DR funds enhance resiliency during future flood events, engineering design and mitigation measures will be integrated, requiring that each project incorporates forward-thinking resiliency concepts that align with regional priorities around capacity building, adoption of building and zoning codes in response to climate change, and provide the opportunity for historically underinvested communities to secure protective measures that alleviate longstanding flooding issues for the foreseeable future.

How Program will Address Disaster-Related Storm Water Management/Other Systems

The program includes eligible activities to address disaster-related storm water management and other systems for local communities to apply for. St. Clair County anticipates coordinating with local and regional governments to identify and mitigate barriers to providing assistance and to encourage the participation of disaster impacted persons within the MID.

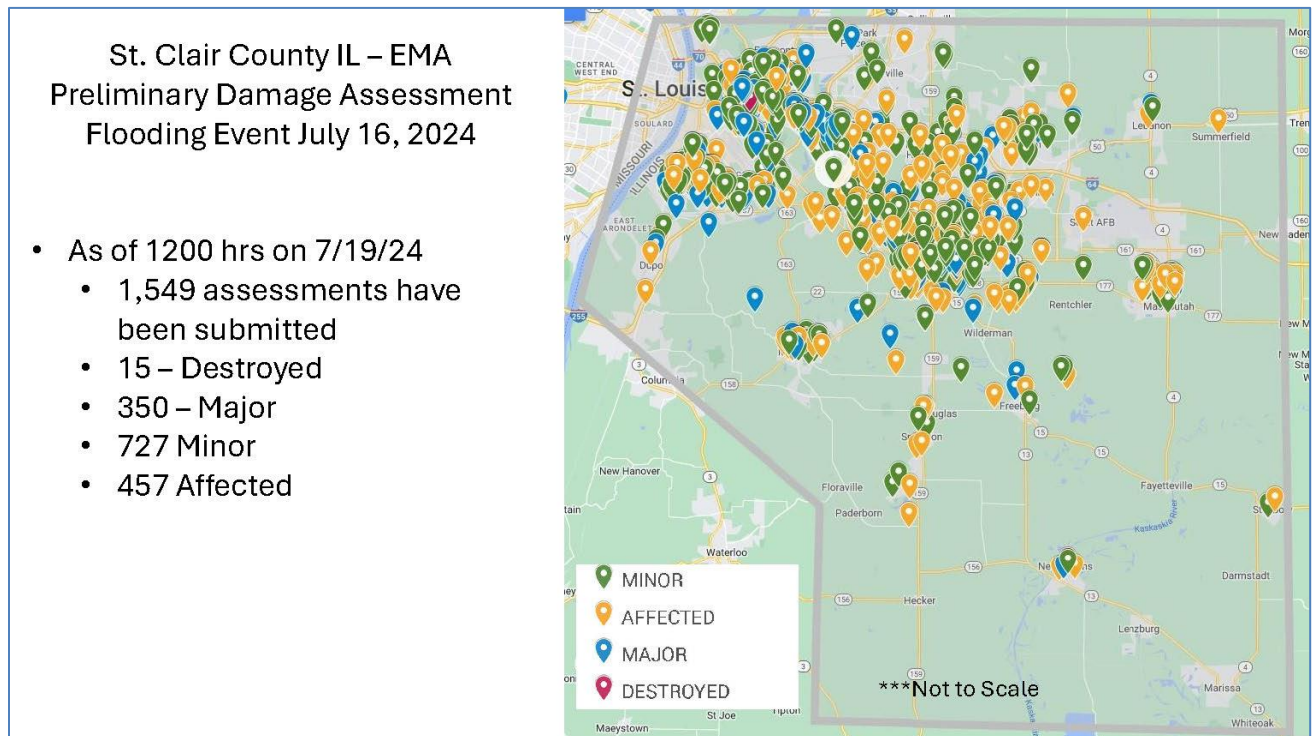
Housing Program

Table 37: Housing Program

Program	Budget	HUD-Identified MID Budget
Housing	\$4,000,000	\$4,000,000

Program Description

The Housing program will primarily focus on construction of new single-family or multi-family homes that are more resilient to flooding and sewer backups, as well as energy efficient and designed to mitigate damage from future climate and disaster events that commonly occur within the MID. The program is designed to meet the housing needs identified in the unmet needs assessment. CDBG-DR will fund activities designed to improve the living conditions for those affected by the disaster event by providing safe, disaster resistant housing to the most vulnerable residents in their recovery efforts. This program is critical to the long-term recovery strategies of the eligible areas. In order to promote long-term recovery and limit damage from future disasters, this program will include mitigation measures. The map below shows the extensive damage across the county as reported in the Preliminary Damage Assessment conducted the the St. Clair County Emergency Management Agency.



Geographic Eligibility

Eligible locations include jurisdictions within the HUD-identified MID county: St. Clair County

Eligible Activities

The St. Clair County CDBG-DR Housing Recovery Program aims to restore and improve housing stock in areas affected by the disaster event. Eligible Activities include but are not limited to:

- Construction of new single- and/or multi-family homes

Program National Objective

Benefit to low- and moderate-income persons – Low Mod Housing Activities (LMH)

Program Responsible Entity

St. Clair County and Subrecipients

Program Method of Distribution

St. Clair County will use competitive funding rounds to award funds to eligible projects being completed by eligible local governments and/or entities. The County will post the Notice of Funding Availability and publish the awards on: <https://www.co.st-clair.il.us/departments/intergovernmental-grants/communitydevelopment?subDirectory=DocDirWebDocuments\Departments\igd\communityDevelopment\CDBG%20DR>.

The Notice of Funding Availability (NOFA) released for each competitive funding round will include evaluation and scoring criteria for proposed activities. The NOFA will establish the process that will be utilized to make exceptions to the maximum amount of assistance when necessary, to comply with federal accessibility standards or to reasonably accommodate a person with disabilities.

Program Application Overview

St. Clair County will allocate the CDBG-DR Housing Recovery Program through a competitive application process to select among eligible project applications submitted by units of local government and/or non-profit organizations in the HUD-identified MID.

Other Eligibility Criteria

Projects must not duplicate federal benefits.

Maximum Amount of Assistance Per Beneficiary

\$1,000,000 per development and \$250,000 per unit for substantial reconstruction or new construction.

Maximum Income of Beneficiary:

For a housing development project to be eligible to receive CDBG-DR funds, 100 percent of the beneficiaries of proposed activities must be from LMI households.

Mitigation Measures

St. Clair County's housing construction standards include provisions that will incorporate resilience and hazard mitigation measures, such as building outside of existing floodplains and at higher elevations. St. Clair County and local partners will ensure mitigation efforts provided will lessen the impact of future disasters through the use of existing best practices.

Reducing Barriers for Assistance

St. Clair County anticipates coordinating with local and regional governments to identify and mitigate barriers to providing assistance and to encourage the participation of disaster impacted persons within the MID.

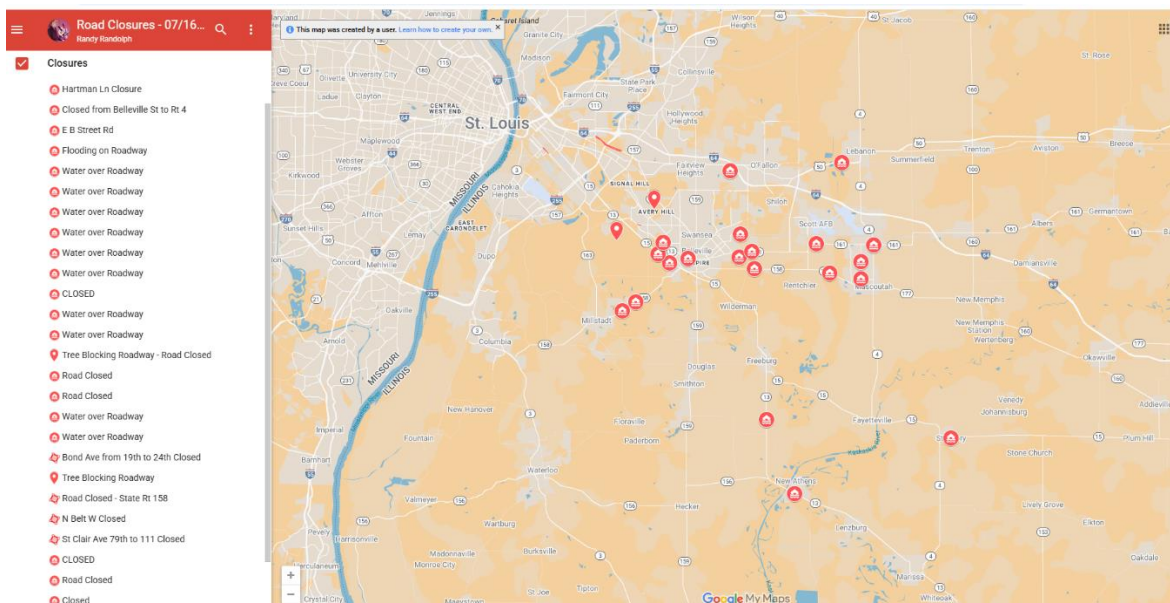
Economic Revitalization Program

Table 38: Economic Revitalization Program

Program	Budget	HUD-Identified MID Budget
Economic Revitalization	\$1,000,000	\$1,000,000

Program Description

The Economic Revitalization program will focus on the attraction, retention, and return of businesses and jobs to a disaster-impacted area which is critical to long-term recovery. Accordingly, for CDBG-DR purposes, economic revitalization may include any CDBG-DR eligible activity that demonstrably restores and improves the local economy through job creation and retention or by expanding access to goods and services. Small businesses are the lifeblood of local economies throughout the county. This can include typical small shops and restaurants in communities' commercial districts, often the central hub of small and rural communities. Wind and flood events can damage structures, destroying physical locations and causing significant financial loss. Impacts on specific businesses may filter throughout the commercial area, as a few businesses unable to reopen after the disaster may reduce visitors to the commercial district, which then impacts the viability of the remaining businesses. Supporting the recovery of commercial areas is essential to ensuring that commercial tenants, customers, and jobs are restored. By facilitating the return of commercial districts and businesses to profitability, jobs will be created or retained within the community and residents will continue to have access to the products and services they need within their local community. As seen in the map below, the disaster events resulted in road closures across the county, forcing many employers to close until the floodwaters receded.



Geographic Eligibility

Eligible locations include jurisdictions within the HUD-identified MID county: St. Clair County

Eligible Activities

The CDBG-DR Economic Revitalization Recovery Program will focus on creating economic opportunities for those impacted by the disaster. Eligible activities under the Economic Revitalization Program include but are not limited to:

- Development Readiness – Activities that will result in the creation of business and job opportunities primarily benefiting low- and moderate-income persons
- Façade Improvements – Activities that will remove physical and economic blight to improve downtown facades and restore business districts.
- Site Redevelopment – Activities will target and develop sites which have been rendered unmarketable or unusable due to the disaster impacts with the goal of improving economic value and increased investment in the area.
- Job Creation, Retention, and Training – Create programs aimed at creating and retaining jobs for community members affected by the disaster event.

National Objective(s):

- Benefit to low- and moderate-income persons – Job Creation or Retention Activities
- Benefit to low- and moderate- income persons – Area Benefit Activities

Program Responsible Entity

St. Clair County and Subrecipients

Program Eligible Applicants

Units of local governments, quasi-government entities, local businesses, and non-profit organizations

Maximum Amount of Assistance Per Project

The maximum award will be \$250,000.

Maximum Income of Beneficiary

For a project to be eligible to receive CDBG-DR funds, at least 70 percent of the beneficiaries of proposed activities must be from LMI households.

Program Method of Distribution

St. Clair County will use competitive funding rounds to award funds to eligible projects being completed by eligible local governments and/or entities. The County will post the Notice of Funding Availability and publish the awards on: <https://www.co.st-clair.il.us/departments/intergovernmental->

[grants/communitydevelopment?subDirectory=DocDirWebDocuments\Departments\igd\communityDevelopment\CDBG%20DR.](#)

The Notice of Funding Availability (NOFA) released for each competitive funding round will include evaluation and scoring criteria for proposed activities. The NOFA will establish the process that will be utilized to make exceptions to the maximum amount of assistance when necessary, to comply with federal accessibility standards or to reasonably accommodate a person with disabilities.

Program Application Overview

The application process will require applicants to demonstrate how their projects address unmet and/or mitigation needs and how funds will be used equitably in their communities.

Applications for funding may be evaluated on, but not limited to, the following project components:

- Amount of project detail provided and tieback to the disaster and community need
- Project schedule and timeliness of expenditures
- LMI percentage of a project's service area
- Cost reasonableness of the project
- Other funding leveraged for the project
- Project's impact on recovery or mitigation of future disasters
- Project's expanse of benefit that is demonstrated through number of residents and/or coverage area

Mitigation Measures

This activity will not incorporate any mitigation measures.

Reducing Barriers for Assistance

St. Clair County anticipates coordinating with local and regional governments to identify and mitigate barriers to providing assistance and to encourage the participation of disaster impacted persons within the MID.

Administration

Table 39: Budget

Program	Budget	HUD-Identified MID Budget
Administration	\$4,476,650	\$4,476,650

Program Description

Administration costs are necessary to support expenses related to administrative activities that include, but not limited to financial transactions, contract development, staff time administering programs; compliance and monitoring of the County’s subrecipients, vendors, other recipients of funding; and other costs specified as eligible administrative expenses in 24 CFR 570.206. Up to 5% of the overall grant and any program income may be used for administration of the grant, inclusive of administrative costs incurred by St. Clair County.

Program Eligibility

Table 40: Administration Eligible Activities

CDBG-DR Eligible Activity:	Program administrative costs, defined at 24 CFR 570.205 and 570.206, and any applicable waivers or alternative requirements
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5

Appendix

Appendix

Summary and Response of Public Comments

Comments and responses shall be posted in the final Action Plan submitted to HUD.

Public Comments and Responses

The following provides a summary of public comments received for the St. Clair County 2024 Severe Storms, Tornadoes, Straight-line Winds, and Flooding Events Disaster CDBG-DR Plan in response to the 2024 Severe Storms, Tornadoes, Straight-line Winds, and Flooding Events Disaster during the public comment period of July 29, 2025, through August 29, 2025. St. Clair County received a total of 0 comments during the 30 calendar days.

Data Sources

Are marked throughout the document in the form of footnotes and table notations.

The following data was provided by HUD:

Owner Occupied Households:

- Minor-Low:
 - Less than \$3,000 of FEMA inspected real property damage
- Minor-High:
 - \$3,000 to \$7,999 of FEMA inspected real property damage
- Major-Low:
 - \$8,000 to \$14,999 of FEMA inspected real property damage
- Major-High:
 - \$15,000 to \$28,800 of FEMA inspected real property damage
- Severe:
 - Greater than \$28,800 of FEMA inspected real property damage

Renter Occupied Households:

- Minor-Low:
 - Less than \$1,000 of FEMA inspected personal property damage
- Minor-High:

- \$1,000 to \$1,999 of FEMA inspected personal property damage
- Major-Low:
 - \$3,500 to \$4,999 of FEMA inspected personal property damage
- Major-High:
 - \$5,000 to \$8,999 of FEMA inspected personal property damage
- Severe:
 - Greater than \$9,000 of FEMA inspected personal property damage

Important Definitions and Terms

- **AMI:** Area Median Income
- **CBD0:** Community Based Development Organization
- **CDBG:** Community Development Block Grant
- **CDBG-DR:** Community Development Block Grant- Disaster Recovery
- **CFR:** Code of Federal Regulations
- **CO:** Certifying Officer CP: Participation
- **DOB:** Duplication of Benefits
- **DRGR:** Disaster Recovery and Grant Reporting System
- **FEMA:** Federal Emergency Management Agency
- **HCD Act:** Housing and Community Development Act of 1974, as amended
- **HMGP:** Hazard Mitigation Grant Program
- **IA:** (FEMA) Individual Assistance
- **LIHTC:** Low-Income Housing Tax Credit
- **LMI:** Low and moderate-income
- **NFIP:** National Flood Insurance Program
- **PA:** (FEMA) Public Assistance
- **RE:** Responsible Entity
- **RFP:** Request for Proposals
- **SBA:** U.S. Small Business Administration
- **SFHA:** Special Flood Hazard Area
- **UGLG:** Unit of general local government
- **URA:** Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended
- **USACE:** U.S. Army Corps of Engineers

Public Notices

Public notices are attached.

St. Clair County CDBG-DR Policies & Procedures Manual

The St. Clair County CDBG-DR Policies & Procedures Manual is attached.

Certifications

Certifications are attached.

Standard Form 424

The SF 424 Forms executed by an authorized official are attached.



St. Clair County

INTERGOVERNMENTAL GRANTS DEPARTMENT

PUBLIC MEETING NOTICE

St. Clair County Intergovernmental Grants Department, Community Development Group is in the process of preparing its **CDBG-DR24 Action Plan**. The plan is for the Community Development Block Grant Disaster Recovery (CDBG-DR) program. The purpose of the meeting is to inform the public and HUD of the intended use of the funds within their community and how this plan connects to the community's remaining unmet needs and mitigation needs associated with the qualifying disasters.

WE WANT YOU TO TELL US ABOUT YOUR NEEDS AND PROVIDE COMMENT.

Meetings Location

St. Clair County IGD Building - July 29, 2025 - 10:00 a.m. & 4:00 p.m.

Note: English translation assistance/ auxiliary aids are available with 5 days advance notice.

For more information, please call 618.825.3218.

All comments on the plan must be received no later than August 29, 2025. Public hearings will be held and copies of the plan placed at the above location.

CONNECT WITH US:
@ StClairCountyIGD www.facebook.com/StClairCountyIGD
@ SCCEconDev www.twitter.com/SCCEconDev

19 Public Square, Suite 200 • Belleville, Illinois 62220 • (618) 277-6790 • Fax (618) 236-1190

An Equal Opportunity Employer. Auxiliary Aids and services are available upon request.

AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Cols	Depth
52807	IPL0252794	Legal Ad - IPL0252794		1.0	87.0L

ATTENTION: ST CLAIR CO INTERGOVERNMENTAL GRANTS IP
19 PUBLIC SQ #200
BELLEVILLE, IL 62220
Brandon.Lybarger@co.st-clair.il.us

NOTICE OF PUBLIC MEETING
FOR ST. CLAIR COUNTY'S
COMMUNITY DEVELOPMENT
BLOCK GRANT DISASTER
RECOVERY (CDBG-DR) ACTION
PLAN FOR FLOOD DISASTERS
OF 2024

St. Clair County Intergovernmental Grants Department, Community Development Group will hold a Public Hearing for its draft of the **Disaster Recovery Action Plan** for the flooding disaster that occurred in July of 2024. We are seeking citizens' review and comment on the proposed Plan.

The St. Clair County CDBG -DR Action Plan is designed for grantees to inform the public and HUD of the intended use of the funds within their community and how this plan connects to the community's remaining unmet needs and mitigation needs associated with the qualifying disasters.

The overall goal of the Disaster Recovery Action Plan is to identify the use of all CDBG-DR funding, including eligibility criteria for accessing the funds and how the proposed uses will address long-term recovery needs and cover the impacts of the qualifying disaster, restoration of housing, infrastructure, economic revitalization, and mitigation in the impacted areas.

We would also appreciate your input as we determine the needs of low and low-moderate income people and communities, and plan how to best meet these goals with the funds available. Help us to better serve you and your community.

St. Clair County will hold public meetings:

July 29, 2025
10:00AM & 4:00PM
Saint Clair County IGD
19 Public Square Suite 200
Belleville, IL 62220

PLEASE NOTE: The draft will also be available on The County website at: www.co.st-clair.il.us/departments/intergovernmental-grants/community-development Located within the CDBG DR 2024 Subfolder

All are welcome to attend the Public Meeting. Please contact us at: St. Clair County IGD, 19 Public Square, Suite 200, Belleville, IL 62220. Attn: Brandon Lybarger, or Brandon.Lybarger@co.st-clair.il.us, or 618-825-3217 for the following:

- If you cannot attend the meeting, but wish to comment, please do so by **August 29, 2025**.
- If you need special accommodations to participate in this meeting or access to the information that is being presented (5 days in advance, please).
- If you need English translation assistance (5 days in advance, please).

MARK A. KERN
CHAIRMAN,
ST. CLAIR COUNTY BOARD
IPL0252794
Jul 13 2025

STATE OF ILLINOIS)
COUNTIES OF
MADISON, MONROE & ST. CLAIR) .SS
the undersigned,
make oath and swear that

CYPRESS MEDIA, LLC, publishers of the Belleville News-Democrat, in MADISON, MONROE & ST. CLAIR COUNTIES a public and English secular newspaper of general circulation, which has been regularly published daily in the cities of Belleville, Waterloo, Collinsville & Highland, Counties of Madison, Monroe & St. Clair, State of Illinois, for at least one year prior to the first publication of the notice hereinafter mentioned, and that a notice of which the annexed is a true printed copy, has been published in said newspaper, issues of:

1.0 insertion(s) published on:
07/13/25 Print

[Print Tearsheet Link](#)

[Marketplace Link](#)

Sworn to and subscribed before
me on



**NOTICE OF PUBLIC MEETING
FOR ST. CLAIR COUNTY'S
COMMUNITY DEVELOPMENT
BLOCK GRANT DISASTER
RECOVERY (CDBG-DR) ACTION
PLAN FOR FLOOD DISASTERS
OF 2024**

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Located within the CDBG DR 2024 Subfolder

All are welcome to attend the Public Meeting. Please contact us at: St. Clair County IGD, 19 Public Square, Suite 200, Belleville, IL 62220. Attn: Brandon Lybarger, or Brandon.Lybarger@co.st-clair.il.us, or 618-825-3217 for the following:

- If you cannot attend the meeting, but wish to comment, please do so by **August 29, 2025.**
- If you need special accommodations to participate in this meeting or access to the information that is being presented (5 days in advance, please).
- If you need English translation assistance (5 days in advance, please).

**MARK A. KERN
CHAIRMAN,**

ST. CLAIR COUNTY BOARD

IPL0252794
Jul 13 2025

Public Hearing Minutes for July 29, 2025

July 29, 2025

Public Hearing at St Clair County IGD at 10:00 A.M.

A Public Hearing for the PY2024 CDBG-DR grant was held on July 29, 2025, at St. Clair County Intergovernmental Grants Office at, 19 Public Square, Suite 200, Belleville, IL 62220 St. Clair County IGD staff present included: Chris Anderson, Lisa Ludwig, Brandon Lybarger, and Karen Latta.

CDBG staff provided power point handouts, program flyers and staff business cards prior to the start of the meeting. Two employees from the grants office attended: Becky Rose and Mercedes Collado.

With no one from the public in attendance, the public hearing concluded at 11:30am.

July 29, 2025

Public Hearing at St Clair County IGD at 4:00 P.M.

A Public Hearing for the PY2024 CDBG-DR grant was held on July 29, 2025, at St. Clair County Intergovernmental Grants Office at, 19 Public Square, Suite 200, Belleville, IL 62220 St. Clair County IGD staff present included: Chris Anderson, Lisa Ludwig, Brandon Lybarger, and Karen Latta.

CDBG staff provided power point handouts, program flyers and staff business cards prior to the start of the meeting. No one was in attendance.

With no one from the public in attendance, the public hearing concluded at 4:30pm.

SIGN IN SHEET

SIGN IN SHEET



ST. CLAIR COUNTY, ILLINOIS

COMMUNITY DEVELOPMENT BLOCK GRANT

DISASTER RECOVERY

POLICIES & PROCEDURES MANUAL

FINANCIAL ADMINISTRATION AND MANAGEMENT

OF THE

HUD DISASTER RECOVERY COMMUNITY DEVELOPMENT BLOCK GRANT

SECTION 1: INTRODUCTION

This document is to provide guidance for the St. Clair County Intergovernmental Grants Department that will assist in carrying out its financial and programmatic responsibilities under Community Development Block Grant Disaster Recovery Grants (CDBG-DR).

The detailed administrative requirements of the Office of Management and Budget 29 CFR Part 95, Uniform Administrative Requirements for Grants and Agreements, 2 CFR Part 200 (as applicable), and 24 CFR Part 570 are adhered to.

SECTION 2: FINANCIAL MANAGEMENT SYSTEM

The following parts detail financial management systems that will be utilized to maximize compliance and efficiency. Please refer to St. Clair County Intergovernmental Grants Department Financial Policies and Procedures.

SECTION 3: DOCUMENT CONTROL, WEBSITE AND REPORTING

All documents used by staff will be standardized, properly documented, recorded, and auditable. Documents will be placed on the St. Clair County Intergovernmental Grants website under the CDBG-DR file. Records, applications, and support documents related to the grant shall be retained for the greater of seven years from close-out of DR grant award, final audit acceptance, or the period required by other applicable laws and regulations. Files will consist of source documentation, including contracts and sub grant awards and will be maintained in hard copy files. The County's MIP system will also retain all source documentation and accounting records for the same period.

A quarterly performance report will be submitted to HUD no later than 30 days following the end of each quarter after grant award and continuing until all funds have been expended and all accomplishments have been reported. Each quarterly report will include information about the uses of funds during the applicable quarter including (but not limited to) the project name, activity, location, and national objective; funds budgeted, obligated, drawn down and expended; the funding source and total amount of any non-CDBG-DR funds to be expended on each activity; beginning and completion dates of activities; achieved performance outcomes; status of quarterly spending estimates and completion targets for each project; and the race and ethnic status of persons assisted under direct-benefit activities. Quarterly reports to HUD will be submitted using the DRGR system and within 3 days the County will post the submitted report to its official website.

The County will maintain on its website critical information on project scope, budget and delivery status. The website, <https://www.co.st-clair.il.us/departments/intergovernmental-grants/communitydevelopment?subDirectory=DocDirWebDocuments\Departments\igd\communityDevelopment\CDBG DR>, will provide access to CDBG-DR plans, project reports the citizen participation plan, procurement policies and procedures, executed contracts paid with CDBG-funds and any request for proposals. All critical information will be updated at least quarterly.

Action Plans, Amendments, Performance Reports including all activities as described in the CDBG-DR Action Plan, and Quarterly Reports will be available on this site.

SECTION 4: OVERALL BENEFIT OF LOW/MOD INCOME PEOPLE

The overall benefit in the Federal Register Notice Vol. 88 No. 96 dated May 18, 2023 provides that 70% of total CDBG-DR funds awarded must benefit low- and moderate-income persons.

SECTION 5: PROGRAM ADMINISTRATION COSTS LIMITATION

In accordance with Federal Notice Vol. 88 No. 96 dated May 18, 2023, Public Law 117-328 no more than 5% of total CDBG-DR grant awards will be used for program administrative costs.

SECTION 6: PUBLIC SERVICE CAP

In accordance with 24 CFR 570.201 no more than 15% of the total amount of CDBG-DR funds will be utilized for Public Services.

SECTION 7: PREVENTING FRAUD, ABUSE OF FUNDS AND DUPLICATION BENEFITS

In order to ensure the proper disbursement of grant funds, the County plans to remain in compliance with applicable CDBG rules and regulations, as well as other applicable federal regulations such as Office of Management and Budget 2 CFR Part 200. The County will particularly emphasize mitigation of fraud, abuse and mismanagement related to accounting, procurement and accountability which may also be investigated. The County will monitor the compliance of applicants and HUD will monitor the County's Disaster Recovery Program.

As provided by the Stafford Act 42 U.S.C. 5121-5207 Section 312 duplication of benefits is prohibited. The Staff will continuously monitor, or cause to be monitored, for compliance with this requirement. FEMA, National Flood Insurance Program, private insurers, the U. S. Army Corps of Engineers, SBA and other agencies will be contacted, and data sharing agreements put into place to ensure that there is no duplication of benefits occurring within the various programs.

CDBG-DR funds will not be used for activities for which funds have been received (or will be received) from FEMA, National Flood Insurance Program, private insurers, the U. S. Army Corps of Engineers, SBA and other agencies. CDBG-DR funds may be used to provide assistance to the extent that a disaster recovery need has not been met by other sources. Applicants for assistance will be required to disclose all sources of assistance applied for, received or to be received on a Duplication of Benefits Form (see DOB policies and procedures). All applicants will sign an application and a contract verifying all sources and an agreement to pay back any or all of the CDBG-DR assistance if additional funding is made available to them during the term of the contract or after the contract expires.

The County will be responsible for verifying the application information before an award is made or a contract is executed. The County will use data from FEMA, SBA, private insurance,

etc., to verify Duplication of Benefits. Unique budget codes will be established for all projects and expenditures will be tracked using MIP software. Any findings of duplicated benefits will be reported by Staff to the Director and Finance who will immediately notify the County's Law department and HUD. Appropriate actions will be taken to reclaim benefits following a full review. The County will be executing agreements with recipients of CDBG-DR funds that will guide recapture of funds if a Duplication of Benefits is discovered after the disbursement of funds.

Steps to Avoid Mismanagement and Abuse of Funds

The County will assess all program policies and procedures from an anti-fraud, waste, and abuse perspective. The County provides anti-fraud training to program staff annually. Anyone with information regarding known or suspected misappropriation of funds or resources is encouraged to report the information to the County by sending a written report via U.S. mail to the following address: St. Clair County Intergovernmental Grants Department, 19 Public Square, Suite 200, Belleville, IL 62220 or contact the HUD OIG Fraud Hotline at 1-800-347-3735 or email hotline@hudoig.gov.

Conflict of Interest

The County does not permit individuals having functions or responsibilities with respect to activities assisted with CDBG, CDBG-DR, COC or HOME funds, or who are in a position to participate in a decision-making process, or gain inside information with regard to these activities, from obtaining a financial interest or benefit from a CDBG, CDBG-DR, CDBG-CV, COC or HOME- assisted activity or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds thereunder, either for themselves or those with whom they have family or business-ties, during their tenure or for one year thereafter. This provision applies to employees, agents, consultants, officers, or elected/appointed official of the County. Exceptions to this policy can only be approved by HUD upon submission of a written request for an exception.

Applicants having any of the aforementioned positions, relationships or associations that may or could influence the decision-making process or outcome of a request for assistance in any manner, shape or form, must disclose the nature of their association, in order that the appropriate procedure for facilitating assistance may be followed. Failure to disclose this information may cause immediate termination of the application or a return of program funds after the fact.

SECTION 8: FEDERAL DEBARMENT/SUSPENDED LIST

HUD regulations at 24 CFR Part 24 and 24 CFR Part 85.35, prohibit the use of HUD financial assistance to directly or indirectly employ, award contracts to, or otherwise engage the services of, or fund any contractor or developer during any period of debarment, suspension, or placement in ineligibility status.

As part of property-specific CDBG-DR grant or loan agreements, developers and other contractors are required to provide certification that neither the developer/contractor nor its principals are currently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in the covered transaction.

The System for Award Management (SAM) (<https://www.sam.gov/portal/SAM/#1>) is an electronic, web-based system that identifies those parties excluded from receiving Federal contracts, certain subcontracts, and certain types of Federal financial and non-financial assistance and benefits.

SECTION 9: MONITORING

The County will continuously monitor awardees which will provide quality assurance. The County will determine the areas to be monitored, the number of monitoring visits, and their frequency. Any entity administering CDBG-DR funding will be monitored not less than once during the contract period. The monitoring will address program compliance with contract provisions, including national objectives, financial management, and the requirements of 24 CFR Part 58 environmental reviews.

The County through the Intergovernmental Grants Department will oversee all activities and expenditures of the CDBG-DR funds. Existing County employees will be utilized, and additional personnel and contractors may be hired to aid in the administration of, and to carry out, recovery programs. Not only will these personnel remain involved in ensuring that there are layers of financial control, they also will provide technical assistance to the County, and will undertake administrative and monitoring activities to better assure compliance with applicable requirements, including, but not limited to, meeting the disaster threshold, eligibility, national objective compliance, fair housing, nondiscrimination, labor standards, environmental regulations, and procurement regulations at 24 CFR Part 85 and 2 CFR Part 200.

Each activity funded will meet the disaster threshold and one of HUD's three national objectives, with emphasis on achieving the primary national objective of benefiting low- and moderate-income persons and will be an eligible activity. The County will perform the monitoring in accordance with a CDBG-DR monitoring plan.

The County will further maintain a high level of transparency and accountability by using a combination of risk analysis of programs and activities, desk reviews, site visits, and checklists.

The County will determine appropriate monitoring of grants, considering prior grant administration performance, audit findings, as well as factors such as the complexity of the project. The primary purpose of the County's monitoring strategy is to ensure that all projects comply with applicable federal regulations and are effectively meeting their stated goals. The frequency and areas monitored will be determined by a risk analysis. All projects will be monitored at least once on-site during the life of the activity.

The County will determine the areas to be monitored, the number of monitoring visits, and their frequency. The County will continue to follow all guidelines it uses to monitor projects funded under the regular CDBG program. The monitoring will address program compliance with contract provisions, including, but not limited to environmental reviews, fair housing, Section 3 compliance, compliance with the Davis-Bacon Act as well as other labor standard provisions, procurement regulations, fair housing and equal opportunity requirements, and compliance with the 2CFR 200, program income, and other CDBG financial requirements.

The County has an established a monitoring plan in the St. Clair County Financial Procedures document.

Monitoring Objectives

The County's Intergovernmental Grants Department will be knowledgeable about the content and operation of the County's compliance and ethics guidelines. The County CDBG/HOME programs normally do not contract with a sub-recipient but in the event they would the County will exercise reasonable oversight for the implementation and effectiveness of any sub-recipient programs, through the following objectives:

- Assuring that sub-recipients with operational responsibility are monitored through regular ongoing risk assessment; regularly performing and reviewing risk assessments; and recommending and assuring that appropriate steps are taken to design, implement, or modify compliance activities to reduce the compliance risks identified by risk assessments.
- Assuring that compliance roles and responsibilities are clearly established across the sub- recipient's system and that due care is taken in delegating substantial authority.
- Assuring that sub-recipients implement standards of conduct, policies, procedures and internal control systems reasonably capable of ensuring compliance and reducing misconduct within their organization.
- Exercising reasonable oversight over compliance activities, to include requesting and receiving information on the implementation and effectiveness of the compliance and ethics program from individuals with day-to-day operational responsibility.
- Assuring that the sub-recipients compliance standards, procedures and expectations, are effectively communicated through technical assistance and other appropriate means.
- Assuring that reasonable steps have been taken to achieve compliance with regulations, policies, and procedures throughout the sub-recipient's organization using reasonably designed auditing and monitoring systems as well as periodic evaluation of the compliance program's effectiveness.
- Assuring that sub-recipients maintain an effective mechanism for employees to report or seek guidance regarding potential or actual wrongdoing, including mechanisms to allow

for anonymous reporting, and appropriate safeguards to protect against potential retaliation.

- Assuring that compliance is promoted and enforced consistently throughout the sub-recipient agency.
- Reporting on the implementation and effectiveness of the compliance program.
- Taking such other actions, or making such other recommendations, as are necessary to promote an ethical organizational culture.

Team Members

Monitoring will be carried out primarily by the CDBG-DR staff, Project Coordinator and the Fiscal Manager. The Director will oversee all monitoring activities. The Project Coordinator will report directly to the Director on all monitoring issues.

Monitoring Activities

The monitoring activities will consist of comprehensive and thorough procedures to meet the monitoring objectives above. These procedures and monitoring activities will be documented through the project life cycle and will vary according to their need. The CDBG-DR staff, Project Coordinator and the Fiscal staff will conduct reviews, monitoring, and internal audits of sub-recipients at the Intergovernmental Grants Department Office and onsite if necessary.

SECTION 10: TIMELINESS OF EXPENDITURES

The County uses regular monitoring and reporting to ensure that timeliness standards are met. The CDBG-DR Action Plan in DRGR will provide quarterly spending estimates and completion targets for each project. The CDBG-DR staff/Project Coordinator will track expenditure and completion targets on a monthly basis. At the time of each quarterly report in DRGR, the CDBG-DR staff/Project Coordinator will compare the actual expenditures and completion rates against the projected expenditures and completion rates within DRGR. The CDBG-DR staff/Project Coordinator will identify any discrepancies. Where there are discrepancies, the CDBG-DR staff and the Project Coordinator will work with sub-recipients to create a plan to return to the anticipated schedule or revise the schedule as necessary. Adjustments and revisions will be submitted to the CDBG-DR staff and Project Coordinator for pre-approval before moving forward to the Executive Director for final approval. Once approved, the adjustments and revisions will be entered into DRGR. Where projects become stalled and will be unable to be completed timely, the Project Coordinator/ Fiscal Manager will reprogram funds to a different activity within the current Action Plan. All revisions will be entered into DRGR by the Community Development Specialist in the next quarter after the project/activity has been cancelled and funds have been identified. The County does not anticipate receiving program income however, should program income be received the County will utilize CDBG-DR program income prior to drawing additional grant funds from the line of credit.

The County requires that each recipient/sub-recipient performs all projects in a timely manner meeting all reporting and compliance measures. The County requires recipient/sub-recipients to demonstrate capabilities and capacity to perform all duties required by contract with the County.

SECTION 11: AUDITS

Please refer to St. Clair County Financial procedures.

Audit Requirements

Audits are required for non-Federal entities that expend more than \$750,000 or more in a year of Federal awards. The County undertakes an annual outside audit performed according to the standards of 2 CFR Part 200.501. An outside audit pursuant to 2 CFR Part 200.501 is required for all sub-recipients expending \$750,000 or more a year. This requirement is included in all agreements. Audits must be undertaken annually.

Uniform Administration Requirements

The County complies with requirements set forth in the following: 2 CFR Part 200. This guidance establishes uniform administrative requirements, cost and audit requirements for Federal awards to all non-Federal entities. Nonprofit sub-recipients must comply with these requirements as well.

SECTION 12: FAIR HOUSING & EQUAL OPPORTUNITY EMPLOYMENT

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).

The County is committed to the spirit and intent of these various laws, rules and regulations in the administration and operation of this program and will strive to ensure that all applicants receive fair access and treatment in the receipt and review of all applications in response to request for assistance and in the distribution of its funding resources for programs and services based on availability. The County will make every effort to ensure access to programs/projects by all clients including members of protected classes, vulnerable populations and individuals from underserved communities.

SECTION 13: UNIFORM RELOCATION REQUIREMENTS

The County shall ensure that it has taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, non-profit organizations, and farms) as a result of CDBG activities pursuant to 24 CFR 570.606.

When contemplating any project or program, the County shall:

- Gather complete information identifying all tenants and owners who might be affected.
- Immediately inform any tenant or owner that they are entitled to information and counseling and they should not move unless specifically required to do so until they have received formal notices. Inform them that moving before that has occurred may cause them to give up rights.

Generally, a displaced person under the URA is an individual, family, partnership, association, corporation, or organization which moves from their home, business, or farm or move their personal property, as a direct result of acquisition, demolition, or rehabilitation for a federally funded project. Relocation of displaced persons shall be in conformance with Section 104(d) of the Housing and Community Development Act and the Uniform Relocation Assistance and Real Property Acquisition Act of 1970 as amended, except for the waivers granted in the Federal Register Notice Vol. 88 No. 96 dated May 18, 2023.

SECTION 14: FEDERAL LABOR STANDARDS & DAVIS-BACON WAGE RATES

Federal labor standards provisions are applicable to construction work financed in whole or in part with CDBG-DR funds, except that construction work involving residential property with less than 8 units is exempt. Federal labor standards provisions involve 3 key requirements:

1. Payment of not less than prevailing (Davis-Bacon) wage rates to all laborers and mechanics employed by contractors and subcontractors;
2. Compensation for overtime hours (hours worked over 40 in a workweek at the site of the covered work) at no less than 1 ½ the regular basic rate of pay;
3. The certification and submission of weekly payroll reports for each week work is performed at the site of the covered work.

Both Federal and State Labor Standards and Prevailing Wages are included in all CDBG-DR bids and contracts distributed by the County. Contractors are required to submit weekly certified payroll forms throughout the duration of work performed that document prevailing wages paid to all eligible employees. Certified payroll forms are reviewed by the Project Manager for compliance with both federal and state prevailing wage requirements. Original certified payroll documents are retained by the County.

SECTION 15: INSURANCE REQUIREMENTS

All Contractors/Vendors/Developers/Sub-recipients, with the exclusion of internal County Departments, that will be receiving and/or administering CDBG-DR funds shall provide certificates of such insurance at the time of execution of contract:

- 1) Worker's compensation and employer's liability insurance as required by St. Clair County providing coverage for all claims.

- 2) Comprehensive automobile and vehicle liability insurance covering claims based on personal injuries, including death, and/or damages to property arising from use of motor vehicles, including onsite and offsite operations, and owned, non-owned, or hired vehicles, with not less than \$1,000,000.00 single limits and \$2,000,000.00 aggregate limits.
- 3) Commercial general liability insurance covering claims based on personal injuries, including death, or damage to property arising out of any act or omission of the Contractor/Vendor/Developer/Sub-recipient or of any of its employees, agents, or subcontractors, with not less than \$1,000,000.00 single limits and \$2,000,000.00 aggregate limits.
- 4) The St. Clair County shall be named as an additional insured and the Contractor/Vendor/Developer/Sub-recipient waives subrogation against the County as to said policies. The policies will provide that they will not be cancelled without 30 days prior notice to the County. The insurers will be authorized to do business in Illinois.

The Contractor/Vendor/Developer/Sub-recipient shall require the same insurances from its Sub-contractors. Title Insurance Developers of CDBG-DR funded projects that include acquisition and development shall provide the County with title abstracts as requested. In addition, the Developer shall provide and maintain title insurance on the property to the County in an amount equal to 100% of the grant amount.

SECTION 16: ENVIRONMENTAL REVIEW

CDBG-DR requires that an environmental review be completed for every activity before funds (even non-CDBG-DR funds associated with the activity) are committed or expended. Such environmental reviews must comply with the National Environmental Policy Act of 1969 (NEPA) and the related authorities listed at 24 CFR Part 58. An environmental review must be conducted considering federal laws, authorities, and regulations.

In accordance with 24 CFR Part 58, recipients, owners, developers, sponsors or any other third-party partners cannot take any physical actions on a site, begin construction, commit, expend, or enter into any legally binding agreements that constitute choice limiting actions for any HUD or non-HUD funds before the environmental review process has been completed and the jurisdiction has received a Release of Funds approval. Refer to St. Clair County IGD environmental policies and procedures for further guidance.

SECTION 17: FEMA IDENTIFIED FLOOD ZONES & NATIONAL FLOOD INSURANCE

The County will be including a review of FEMA Flood Hazard Zone maps during the environmental review process. Each construction/rehabilitation/repair project will be individually evaluated for flood risk.

If a project is identified to be located within a FEMA Flood Zone, the County will ensure that any residential, commercial and/or infrastructure projects account for increased flood risk resulting from a variety of factors by elevating and/or otherwise flood proofing to one foot above the elevation recommended by the most recent available federal flood guidance.

The specific steps that these types of structures will need to take include:

- Elevating- the standard would require structures to elevate their bottom floor one foot higher than the most recent flood risk guidance provided by FEMA;
- Flood-Proofing - In situations where elevation is not possible, the standard will require structures to prepare for flooding a foot higher than the most recent flood risk guidance provided by FEMA - for example, by relocating or sealing boilers or other utilities located below the standard of elevation.

Funding will not be approved for acquisition or construction for use in any area that has been identified as having special flood hazards and is not participating in the National Flood Insurance program.

SECTION 18: LEAD-BASED PAINT AND LEAD HAZARDS

The County does not intend to utilize CDBG-DR funds for housing projects, however, should the plan be modified the lead paint procedures will be in effect. Projects that involve the acquisition or renovation of a property built prior to 1978 must be tested for lead based paint. Interim controls and safe work practices are required during construction. In addition, housing assisted with federal funds is subject to the:

- Prohibition of lead-based paint
- Testing all painted surfaces with a HUD approved XRF of any areas that will be disturbed in the renovation of houses built before 1978.
- Elimination of immediate lead-based paint hazards in residential structures
- Notification of the lead hazards of lead-based paint poisoning to purchasers and tenants of residential structures constructed prior to 1978

Paid renovators and multi-family housing maintenance workers who work in pre-1978 housing and child-occupied facilities will be required to meet the training and certification requirements of both HUD - Lead Safe Housing Rule (LSHR) and EPA - Renovation, Repair and Painting Rule (RRP). Paid renovators include renovation contractors, painters and other specialty trades.

Lead Based Paint and Homeowner Repair Program

The County will require that All eligible households requesting assistance through CDBG-DR undergo lead inspection and/or risk assessment for properties built prior to 1978, and where there are children residing in the home under the age of six (6). Inspections shall be conducted by a certified lead-based paint inspector, or a qualified Risk Assessor. The homeowner will be

required to have the unit(s) abated if it is determined that lead or lead-based paint hazard conditions are present in the home. The County will not proceed with requests for assistance without a "Letter of Compliance" issued by a state-licensed lead inspector. Visual assessment alone will not be sufficient in meeting inspection requirements. The cost of lead inspections will be included as part of the rehabilitation cost and an inspection will be required when the Rehabilitation Specialist suspects or presumes the presence of lead has been determined for the property.

The County will allow exception to policy regarding lead-inspection and de-leading requirements when:

- A. Circumstances prove to be of an urgent nature. Emergency repairs needed to remove threats considered to be an imminent danger to human life, health or safety, or to protect the property from further structural damage are examples of these types of situations; or
- B. If the rehabilitation will not disturb any painted surface, the exception also applies.

The County will implement and operate its CDBG-DR program under the auspices of federal, state, and local laws, ordinances and systems that address lead poisoning prevention and/or abatement. The County will, as far as practicable, address the elimination of lead-based paint hazards in residential properties that receive federal rehabilitation assistance. Applicants must receive all required and appropriate notices and pamphlets regarding lead hazard information, as well as notices concerning evaluation and lead hazard reduction activities. Acknowledgement forms, documenting all such notifications, shall be kept in each applicant's file.

Evaluation and hazard reduction requirements for homeowner rehabilitation will be determined among three categories based on the level of assistance and shall require paint testing on the painted surfaces to be disturbed or replaced during rehabilitation activities, or presume that all painted surfaces are coated with lead -based paint:

- Assistance of up to and including \$5,000 per unit;
- Assistance of more than \$5,000 per unit and up to \$25,000 per unit; and
- Assistance of more than \$25,000 per unit.

This level of assistance is determined by taking the **lower** of:

- Per unit rehabilitation hard costs (regardless of the source of funds); or
- Per unit Federal assistance (regardless of the use of funds)

Assistance of up to and including \$5,000 per unit

Projects where the level of rehabilitation assistance is less than or equal to \$5,000 per unit must meet the following requirements:

The goal is to "do no harm." Therefore, all work must be conducted using lead safe work practices. Workers must be trained in lead safe work practices.

Lead Hazard Inspection/ Evaluation. A lead inspection must be performed, by a lead-certified inspector, if determined there is lead presents, paint testing must be conducted to identify lead-based paint on painted surfaces that will be disturbed or replaced. Alternatively, the County may presume that these surfaces contain lead-based paint.

Lead Hazard Reduction. The County must repair all paint that will be disturbed during rehabilitation, unless such paint is found not to be lead-based paint.

If lead-based paint is detected or presumed, safe work practices must be used during rehabilitation.

Clearance is required by a certified clearance examiner.

Notices that must be provided to owners and tenants:

- The Lead Hazard Information pamphlet;
- The Notice of Evaluation (if paint testing is performed) or Notice of Presumption (if paint testing is not performed); and
- The Notice of Lead Hazard Reduction.

In short, for rehabilitation projects where the level of assistance is less than or equal to \$5,000 per unit, workers must be trained in safe work practices, notices must be provided to owners and tenants, and clearance must be achieved.

Assistance of more than \$5,000 per unit and up to \$25,000 per unit

Projects where the level of rehabilitation assistance is between \$5,000 and \$25,000 per unit must meet the following requirements:

The goal is to "identify and address lead hazards." A risk assessment is required to identify lead hazards and identified hazards must be addressed by interim controls.

Lead Hazard Evaluation. A risk assessment must be conducted by a qualified professional prior to rehabilitation to find lead-based paint hazards in assisted units, in common areas that service those units, and on exterior surfaces. The risk assessment must include paint testing of any surfaces to be disturbed by the rehabilitation.

Lead Hazard Reduction. If the risk assessment identifies lead-based paint hazards, interim controls must be implemented to address lead-based paint hazards.

Interim controls must be performed by qualified professionals using safe work practices.

Clearance, conducted by a qualified clearance examiner, is required when lead hazard reduction activities are complete.

Options. There are two options, as follows:

- a.) The County is permitted to presume that lead-based paint is present and that lead-based paint hazards exist. In such cases, evaluation is not required. The County must perform standard treatments in lieu of interim controls on all applicable painted surfaces and presumed lead-based paint hazards.
- b.) The County is also permitted to conduct a lead hazard screen instead of a risk assessment. The lead hazard screen has more stringent requirements and is only recommended in units in good condition. If the lead hazard screen indicates that there is no lead contamination, no lead hazard reduction is required. If the lead hazard screen indicates the presence of lead hazards, the County must then conduct a risk assessment. (Note: Passing a lead hazard screen, or a risk assessment, does not eliminate the requirement to perform interim controls on lead-based paint hazards created as a result of the rehabilitation work.)

Notices that must be provided to owners and tenants:

- The Lead Hazard Information pamphlet;
- The Notice of Evaluation (if paint testing is performed) or Notice of Presumption (if paint testing is not performed); and
- The Notice of Lead Hazard Reduction.

In short, compliance with the Lead Safe Housing Rule for such rehabilitation projects will affect the project planning, timeline, scope of work, contracting and budget.

Assistance of more than \$25,000 per unit

Projects where the level of rehabilitation assistance is over \$25,000 per unit must meet the following requirements:

The goal is to "identify and eliminate lead hazards." A risk assessment is required to identify hazards and any identified hazards must be abated by a certified abatement professional.

Lead Hazard Evaluation. A risk assessment must be conducted prior to rehabilitation to find lead-based paint hazards in assisted units, in common areas that service those units, and on exterior surfaces. The risk assessment must include paint testing of any surfaces to be disturbed by the rehabilitation.

Lead Hazard Reduction. To address hazards identified:

Abatement must be conducted to reduce all identified lead-based paint hazards except those described below. Abatement must be conducted by a certified abatement contractor.

If lead-based paint hazards are detected during the risk assessment on the exterior surfaces that are not to be disturbed by rehabilitation, interim controls may be completed instead of abatement to reduce these hazards.

Clearance is required when lead hazard reduction activities are complete.

Options. There are two options, as follows:

- a.) The County is permitted to presume that lead-based paint hazards exist. In such cases, a risk assessment is not required. The County must abate all applicable painted surfaces that will be disturbed during rehabilitation and all presumed lead hazards.
- b.) The County is permitted to conduct a lead hazard screen instead of a risk assessment. The lead hazard screen has more stringent requirements and is only recommended in units in good condition. If the lead hazard screen indicates that there is no lead contamination, no lead hazard reduction is required. If the lead hazard screen indicates the presence of lead hazards, the County must then conduct a risk assessment. (Note: Passing a lead hazard screen, or a risk assessment, does not eliminate the requirement to perform abatement on lead-based paint hazards created as a result of the rehabilitation work.)

Notices that must be provided to owners and tenants:

- The Lead Hazard Information pamphlet;
- The Notice of Evaluation (if paint testing is performed) or Notice of Presumption (if paint testing is not performed); and
- The Notice of Lead Hazard Reduction.

In short, compliance with the Lead Safe Housing Rule for such rehabilitation projects will affect the project planning, timeline, scope of work, contracting, and budget. It involves the engagement of a certified abatement contractor.

SECTION 19: Income Eligibility

Annual household income is the anticipated total income from all sources received by the Family head and spouse (even if temporarily absent) and by each additional member of the Family (other than children under the age of 18 years), including all net income derived from assets for the 12-month period following the effective date of certification of income. Annual Income specifically includes and excludes certain types of income as set forth in, and shall be determined in accordance with HUD guidebook determining income.

Documenting Income Eligibility and County Approval

The staff must document income eligibility using source documents. Source documents include but are not limited to items such as wage statements, interest statements, and unemployment compensation statements. Eligibility determinations are based on anticipated income; last year's tax return does not reflect next year's earning (nor does it constitute adequate source documentation). Calculations and copies of source documents must be forwarded to the County for approval of income eligibility of a purchaser prior to sale.

Term Affordability/Continued Affordability

The County does not intend to utilize CDBG-DR for housing activities, however, should the County modify the plan the term affordability procedures will be in effect. The County requires that assisted units remain affordable for at least a minimum period. The County's minimum affordability periods are based on what is required in the federal HOME.

Investment Partnership Program, 24 CFR 92.252(a), (c), (e) and (f), and 92.254, and are as follows:

- Up to \$15,000 - 5 Years
- \$15,001 to \$40,000 - 10 Years
- Over \$40,000-15 years
- New Construction - 20 years

Under HUD rules, the County has three options for ensuring continued affordability of assisted houses:

- **Resale** of the home to the grantee or to another income-eligible buyer;
- **Recapture** all or part of the initial subsidy, via full repayment of the loan, forgiveness of a portion of the principal, or equity-sharing. With recapture, the subsidy funds can be used for another home. Such recaptured funds become Program Income to the CDBG-DR Program;
- **Presumed affordability** of homes in affected neighborhoods. Using analysis of market conditions, the grantee may show that houses will continue to be affordable to LMMI purchasers with conventional mortgage financing.

Initially, the County will use RECAPTURE as the means of ensuring continued affordability.

Affordability: Recapture

If applicable, The County will enforce affordability restrictions on CDBG-DR properties through recapture. The County elects to use recapture, rather than resale, as the means of affordability restriction, because the recapture option is more suited to stabilizing a market where values are declining, and there are challenges to attracting purchasers to move into the neighborhood. Some of the factors that the County considered in choosing to use recapture are the following:

- The homebuyer may sell the property to any willing buyer.
- The recapture option provides grantees and homebuyers with maximum flexibility.

- The homebuyer can resell the property on the open market to any willing buyer at whatever price the market will bear.
- Lenders are generally comfortable with the recapture option, since it does not restrict or affect the resale transaction until the lender's loan has been repaid.
- The grantee can tailor the level of the homebuyer's risk to market conditions.

With Recapture, the sale of the property during the affordability period triggers repayment of the direct HOME subsidy that the buyer received when he or she originally purchased the home, provided that this amount may not exceed the net proceeds from the sale of the property.

Direct subsidy

A direct subsidy consists of any financial assistance that reduces the purchase price from fair market value to an affordable price, or otherwise subsidizes the purchase (e. g., down payment or closing cost assistance, subordinate financing, price below market value).

Net proceeds

The net proceeds of a sale are the sales price minus closing costs and any superior loan repayments.

Principal Residence

Purchasers of CDBG-DR-developed homes must occupy the properties as their principal residence. These stipulations apply for a principal residence:

- A deed restriction or covenant running with the land should incorporate this requirement.
- The loan documents between the purchaser and the program administrator should also incorporate this requirement.

Disclosure Statement

Prospective purchasers must be given hard copies of preliminary disclosure documents that provide the following:

- An explanation of the CDBG-DR program in general terms and its benefits to buyers and the community.
- Applicant's household size and estimate of monthly income, with a statement that the income amount must be verified prior to the Applicant being approved for CDBG- DR assistance.

- A good faith estimate of the amount (or range of amounts) and terms of Homeowner Financial Assistance that Applicant may qualify for, based on an analysis of Applicant's financial and other data provided.
- A general description of a CDBG-DR buyer's obligations for repayment of subsidies, and recapture controls on homes.

During the intake interview or subsequent face-to-face meeting, a representative of the County will review these disclosures with the Applicant and be available to answer questions about them. No purchase will be approved unless disclosures have been made as required.

Deed Restrictions: Principal Residence

In properties that are produced with CDBG-DR funds for homeownership, the County shall require that purchasers maintain the home as their principal place of residence. In order to enforce these requirements, the County shall require that a deed restriction be placed upon all properties produced with CDBG-DR funds.

Proceeds from Sale of CDBG-DR-Developed Properties

Proceeds from the sale of the Project Property shall be returned to the County at the time of transfer of the property to the qualified purchaser. Proceeds from the sale of the property shall mean: (a) the sale price, plus (b) the sum of all CDBG-DR grants and forgivable loans to the property, minus:

- the development costs and developer's fee set forth in the individual project budget attached to the property-specific grant agreement

Depending on the project, there may be no proceeds.

Funds returned to the County after sale of a project property become Program Income to the County for use in another eligible Project.

SECTION 20: REMOVAL OF BLIGHT

The County does not intend to utilize CDBG-DR funds for the stated purpose below, however, should the plan be modified the procedures for demolition and/or removal of structures will take effect. The removal of blight is a CDBG-DR eligible activity under 24 CFR 570.201(d) and meets the national objective of low/moderate income housing. Record keeping guidance for CDBG activities are set forth in 24 CFR 570.506. Geographic Area Demolition and/or removal of demolition debris must take place within disaster impacted areas.

Eligible Properties

Properties that are vacant, blighted, deteriorated beyond repair and necessary to the long-term recovery of the disaster impact zone, may be targeted for demolition. Properties will be owned by the County.

General Program Administration

Respective responsibilities of the Contractor are as follows:

- Removal and abatement of all hazardous materials at each project site, in accordance with local, state and federal environmental requirements.
- Removal and disposal of all demolition, construction debris from each project site in accordance with local, state and federal requirements.
- Restoration of site, including the filling of foundations, installation of loam, seed and fencing as required by contract.
- Fulfilling all contract terms and submitting all required paper work to the County, including the following documents:
 - Payment and Performance Bonds
 - Proof of insurance
 - Certified payroll statements in accordance with State Division of Labor and Federal Davis Bacon wage rates
 - Permits
 - Proof of Utility Disconnects
 - Close-out packages
 - Hazardous waste manifests
 - Demolition dump slips
- Submitting Section 3 reporting requirements to the County.
- Obtaining all necessary permits, ensuring and obtaining documentation of utility terminations, coordinating hazardous material removal with the County's environmental consultant, meeting all labor standard and OSHA requirements.

Respective responsibilities of the Environmental Consultant are as follows:

- Fulfilling all contract terms including submitting testing results, reports, air monitoring results to the County.
- All pre-demolition hazardous testing and reporting and submitting copies to the County.
- All monitoring and oversight of contractor's removal of hazardous material and asbestos contaminated waste and advising the County if there are concerns regarding contractor performance regarding these areas.

Respective responsibilities of the County are as follows:

- Selecting projects and ensuring that projects meet CDBG national objectives and eligibility requirements and appropriately documenting files.
- Assuming all responsibility for the environmental review process in accordance with policies and procedures in Section 23 and compliance with environmental requirements in accordance with Policies and Procedures in Sections 23 and 24.

- Ensuring no Duplication of Benefits occurs in accordance with Duplication of Benefits.
- Ensuring Contractor(s) and Environmental Consultant(s) are not on the Federal Debarment list in accordance with Policies and Procedures in Section 14.
- Reviewing certified payroll statements to ensure compliance with both State and Federal prevailing wage rates in accordance with Policies and Procedures in Section 21.
- Maintaining all file records for projects and ensuring all appropriate documentation is in the file.
- Appropriately bidding the jobs in accordance with applicable local, state and federal requirements.
- Drafting, approval, execution and monitoring of contracts.
- Monitoring both contractor and environmental consultant and ensuring compliance with contract requirements.
- Reviewing all payment requests and ensuring that all costs are necessary, reasonable and in accordance with the contract.
- Filing liens against privately owned properties for work completed at the sites.

Change Orders

The Contractor must submit all change orders to the County for review and approval before work proceeds. These change orders will be amended into the contract upon the County's approval.

Invoices

Invoices must contain specific items accomplished. Back-up documentation must be included with invoices, which verify all costs and ensure that work was completed as required.

Contractor and Environmental Consultant will submit project invoices and the County will review all invoices to ensure all costs are necessary, reasonable and comply with contract. Invoices will be paid within thirty (30) days of completion of review.

Liens

Liens will not be filed against County owned properties.

Procurement/Contractor Selection Process

St. Clair County follows St. Clair County financial procedures requirements regarding procurement.

SECTION 21: HOME REPAIR

The County does not intend to utilize CDBG-DR for funds for Home repair, however, if the plan should be modified this policy will take effect. This policy has been developed as a reference

guide for the administration and processing of applicants for the CDBG-DR Homeowner Rehabilitation Grant Program (CDBG-DR). It has been designed to ensure, as much as practicable, a fair and consistent approach in soliciting, selecting, evaluating and determining the eligibility of participating households. The policy further establishes a formal operating format that is intended to be consistent with Community Development Block Grant - Disaster Recovery (CDBG-DR) rules and regulations that govern this program as an eligible activity.

The County, through the St. Clair County Intergovernmental Grants Department, has created the CDBG-DR procedures using standards set by the Department of Housing and Urban Development. The CDBG-DR program would offer 0% forgivable/deferred loans to assist eligible low and moderate- income households within St. Clair County. It is designed to help those St. Clair County homeowners directly impacted by the 2022 flooding make needed repairs to their homes.

To be considered for the CDBG-DR assistance, households must first meet preliminary requirements as outlined:

- The property must be located within the disaster-impacted neighborhoods.
- The home must have been the owner's principal residence on the date of the disaster.
- Total household income cannot be more than 50% of Area Median Income, adjusted for the number of persons residing in the home.
- All property taxes, fees, fines or municipal liens must be current with St. Clair County.
- The property must meet all state and local codes, ordinances and zoning requirements upon completion of project.
- Most importantly, there must be disaster related damage to the property and any unmet need without any duplication of benefits.
- Applicants will be required to submit and certify evidence of any and all assistance received (or lack thereof) at time of applicant including, but no limited to, any FEMA assistance, SBA loans, insurance proceeds etc.

Eligible Repairs

The County's Rehabilitation Inspector shall inspect the housing unit to develop a priority list of health and safety hazards and required repairs. All health and safety issues must be cured with the rehabilitation loan and/or other funds available to the homeowner as a condition of this grant program. Any replacement items shall be of similar size, quality, and shape unless noted otherwise. Medium grade and/or construction grade materials shall be utilized only. If the owner chooses an item which increases the cost due to, but not limited to materials, quality, energy conservation, etc., the difference between the specified cost and the owner's request shall be the responsibility of the owner.

The CDBG-DR will provide funds to perform rehabilitation activities and provide materials to achieve minimum compliance with all federal, state and local laws. The maximum grant or loan

amount to be awarded to an eligible homeowner will be capped at \$24,000. All substitutions or changes in materials must be submitted in writing and receive approval from the County.

Ineligible Repairs

The general physical guidelines for the rehabilitation of existing residential properties through regular CDBG funding provides minimum design and construction criteria. Therefore, the County has determined the following as ineligible for repair:

- Additional bathrooms/bedrooms
- Landscaping
- All items of a luxury nature

Eligible Costs

In administering the CDBG-DR program, the County acknowledges that there are expenses necessary in helping qualified homeowners meet established housing rehabilitation standards and will endeavor to ensure that all costs are customary and reasonable in providing this service. Reasonableness of eligible rehabilitation costs will be determined by the Rehabilitation Specialist and approved by the County's Project Coordinator.

Allowable Contractors

The County will not directly or indirectly employ, award contracts, or engage the services of any contractor or sub-recipient during any period of debarment, suspension or placement on ineligibility status. Program staff will review federal and state lists of debarred, suspended and ineligible contractors before any CDBG-DR funds are committed.

Contractors chosen, directly or indirectly, must meet all state licensure requirements and have all necessary insurance coverage for the types of work to be performed on behalf of the homeowner. The information provided by such contractors will be kept on file.

The minimum requirements for contractors are as follows:

- A. Illinois Contractor's license or trade license; or
- B. Registration as an Illinois Home Improvement Contractor;

Additionally, all contractors must have proof of:

- A. Workman's compensation insurance at statutorily required limits; and
- B. Property, Auto and liability insurance; and
- C. Demonstrated experience in the appropriate trade(s).

The certificate of insurance shall include property damage and liability insurance with appropriate limits and amounts that indemnify St. Clair County, the property owner, and any sub-contractor against claims for injury and damage which may occur or result from work performed pursuant to a contract agreement.

Marketing & Outreach

The County is committed to ensuring that its programs and services are available and accessible to all income eligible households. The County will operate this program within the context of fairness in order to promote awareness of available programs and services. The County affirmatively strives to encourage and further fair housing initiatives, whether acting on its own, or with and/or through, other public and private-sector organizations.

The CDBG-DR will be marketed through a variety of print and broadcast media outlets. Program availability and information will be conveyed through direct mailings, informational meetings, press releases, newspaper ads, public notices to local agencies serving low and moderate-income households, religious establishments and on the County's official website.

Selection Process

The County will receive, review and process applications on a first-come, first-served basis. However, to ensure program funds address housing rehabilitation with more critical needs, applications involving emergencies, the elderly, and those seeking to address accommodations for those with disabilities will take priority over applications received that are not of an urgent nature. County staff reserves the right to assign priority status to any emergency application as necessary.

Eligible Applicants

The program is available to owner-occupants of the St. Clair County only and is reserved for homeowners who maintained the property as their primary place of residence on the date of the disaster. Proof of homeownership is required and shall be evidence by a copy of a deed indicating the name(s) of the applicant(s), length of ownership, and the property having a physical location within the designated areas.

Dwellings that are investor-owned and unoccupied by the owner will not be eligible to participate in this program.

Ownership and Residency

Ownership status in the property is supported by documentation of physical evidence that the owner(s) of record reside in the property under consideration for assistance.

Documentation that meets these criteria will consist of the following:

- A. Copy of Deed;
- B. Leasehold Agreement;
- C. Trust Agreement;
- D. Copy of most recent mortgage billing statement; and
- E. Copy of most recent utility billing statements to including service for cable or phone.

Further, sufficient source documentation showing that the home was the owner's principal place of residence on the date of disaster will be required.

Income

HUD establishes income guidelines for CDBG-DR program participation. HUD calculates these income levels annually and sets forth the maximum limit at 50% of Area Median Income (AMI), adjusted for family household size. Consequently, these amounts may change without notice during the program year. St. Clair County staff should refer to the HUD web site at: www.hud.gov for updates.

THE COUNTY WILL USE THE "ADJUSTED GROSS INCOME" DEFINITION OF ANNUAL INCOME IN DETERMINING THE ELIGIBILITY OF PROGRAM PARTICIPANTS.

- The County limits participation in this program for existing homeowners earning no more than 50% of Area Median Income, as defined by the Department of Housing and Urban Development (HUD).
- Household income may not exceed the income limits in effect at the time of application.
- Income is defined as the income earned from all household members age 18 years and above.
- Adult members, 18 to 23 years of age, who are attending school away from home on a full-time basis, require that the first \$480.00 in earned income be included in the calculation of household income.
- Income includes earnings from employment, unemployment, government benefits, investments, other cash-generating activities, etc.
- Refer to The Technical Guide for Determining Income and Allowances for a complete list of acceptable types of income and whose income to count.
- Income from employment for full-time employees will be calculated from the applicant's most recent current consecutive two months' pay, and projected forward at the same level of earnings for the next 12 consecutive months;
- For part-time hourly employees, Disaster Recovery staff will calculate the year-to-date income from the most recent pay stub and divide the earnings by the number of weeks covered through the year, in order to find the average amount of weekly earnings. The weekly earnings will then be multiplied by 52 and divided by 12 to calculate monthly gross income. If the year-to-date income covers less than three months in the current year, staff may include the average year-to-date earnings from the prior calendar year in addition to the current year;
- Income from overtime, commissions, ongoing stipends, shift differential pay, and other sources will be averaged (using year-to-date earnings) and included in the applicant's gross monthly income. Exceptions may be considered for applicant's receiving one-time, non-recurring bonuses or relocation benefits; Interest income from investments such as savings, money market, certificates of deposit, dividend

- income from mutual fund accounts and other income- generating assets will be included in the applicant's household income;
- Current monthly income payments from retirement accounts (including social security and pensions), alimony, and other steady, ongoing sources will be included in the applicant's gross monthly household income calculation; and
- All forms of income from non-applicant spouses and other adult household members will be included in the gross monthly income calculation, regardless of the taxability of such income;
- Income from seasonal and part-time jobs such as coaching, lecturing, test proctoring, etc., will be included in the definition of household income, when the work can reasonably be expected to continue;
- Current two years of tax returns.

Self Employed Borrowers

For self-employed borrowers, the following documents may be required:

- A year-to-date profit and loss statement prepared and signed by a Certified Public Fiscal Manager, with information covered through the last quarter;
- A year-to-date-balance sheet, prepared to reflect the financial position of the business at a specific point in time; and/or
- A signed letter of explanation regarding the applicant's anticipated gross annual income from earnings covering the next 12 months.

Verification of income must be completed before assistance is provided.

Income will need to be re-certified if more than six (6) months has elapsed beyond the initial time funding was approved.

Property Standards

All dwelling units that require rehabilitation must meet all applicable state and local building codes, zoning ordinance requirements and federal HQS. The County will require home rehabilitation to meet or exceed current Illinois State Building Code, and the State Sanitary Code that stipulates the minimum standards for human habitation.

The County encourages the incorporation of "Green" building improvements when economically feasible to provide long-term affordability, increased sustainability through lower fuel costs, and attractiveness of housing and neighborhoods. Rehabilitated residential units are also encouraged to meet "Energy Star" certification, which provides added benefits to homeowners through improved standards for energy efficiency that ultimately lead to greater long-term affordability. Properties found to be in gross states of disrepair will not be considered economically viable for funding under the CDBG-DR HRGP. Program applicants seeking financial assistance for rehabilitation work beyond the economic means and scope of work of the program must consider private financing sources for loan arrangements that may be able to

address that level of need. The amount of assistance is limited to a one-time occurrence per property and is subject to availability.

Structure of CDBG-DR Homeowner Repair Assistance

The County will administer the CDBG-DR as 0% deferred payment forgivable loan over the established affordability period.

SECTION 22: INFRASTRUCTURE

St. Clair County's CDBG-DR Action Plan allocate funds Infrastructure Projects. HUD has approved these Action Plan and entered into a grant agreement with the County. Infrastructure Projects are a CDBG-DR eligible activity under 24 CFR 570 part 200 and meets the national objective of low/moderate income area benefit.

General Program Information

The County will simultaneously implement several separate Infrastructure Projects within the flood disaster impact zone.

These are a combination of projects that are a direct result of the disaster and that are part of the long-term recovery of the neighborhood that will leave the community sustainably positioned to meet the needs of the post-disaster population and will assist in furthering prospects for growth.

The County will have a full-time CDBG-DR staff who will operate out of the Intergovernmental Grants Department and report on DR projects to the Project Coordinator and the Executive Director.

The CDBG-DR staff and Project Coordinator will be responsible for coordinating the planning, development, design, construction, monitoring, reporting and completion of all infrastructure CDBG-DR projects.

Construction of public infrastructure will consist of projects as defined in the CDBG-DR action plan.

Applications will be received from communities requesting assistance and required to document necessary to document the need.

The 2022 flood disaster caused millions of dollars of damage in St. Clair County and will continue to do so until infrastructure is addressed.

Public infrastructure projects will require a licensed architect/engineer (depending on project), which will be procured by Request for Proposals (RFP) to design the facilities in accordance with HUD/FEMA/local standards, as well assist in bidding the project and construction management.

**St. Clair County, Illinois Request for
Proposals for Engineer Services
ENGINEER EVALUATION CRITERIA**

The Selection Committee will screen and rank all proposals. Interviews may be conducted as part of the ranking process. Proposals received in reply to this request will be evaluated using the following criteria and scored based on a maximum of 120 points. Price will not be a part of the Selection Committee's selection criteria in the procurement of engineer services; rather, qualifications will be evaluated, and the most qualified competitor will be selected, subject to negotiations of fair and reasonable compensation.

Qualifications	Total Points
1. Cover letter addressing understanding of CDBG-DR & ADA	20
2. Executive Summary	20
3. Statement of Qualifications	20
4. Previous Experience with Sidewalk Projects	20
5. Previous Experience with CDBG-DR/ADA	20
6. Certifications	20
7. Total	120

FIRM:	Total Points
1. Cover letter addressing understanding of CDBG-DR & ADA	
2. Executive Summary	
3. Statement of Qualifications	
4. Previous Experience with Sidewalk Projects	
5. Previous Experience with CDBG-DR/ADA	
6. Certifications	
7. Total	

Printed Name of Scorer: _____

Signature: _____ Date: _____

TERMS

- A. **Legal Compliance:** Work performed, and plans produced shall comply with all state, environmental, statutory, legal process, OSHA, Davis Bacon and the Fair Labor Standards Act.
- B. **Acceptance of Proposal:** The County reserves the right to reject any and all proposals and to waive informalities, if, at its discretion, the interests of the county will be best served thereby.
 - a) The County reserves the right to negotiate the specified dollar amount, or any portion of that amount. The County reserves the right to negotiate contract changes following the award.
 - b) If there is any conflict between these documents and the proposal, these documents shall control.
 - c) The County reserves the right to cancel this RFP in writing or postpone the date and time for submitting proposals at any time prior to the proposal due date. The County reserves the right to stop the project if it is in the best interest of the County.
 - d) No proposer shall have a right to make a claim against the County in the event the County accepts a proposal or does not accept any proposals.
- C. **Validity of Proposals:** Proposals must be valid for at least 60 days.
- D. **Insurance:** The Contract shall be effective only upon approval by the County of acceptable evidence of insurance required below, issued by insurers admitted within the State of Illinois. Such insurance shall be in force on the date of execution of this contract and shall remain continuously in force for the duration of the contract. The Engineer shall provide evidence of workers' compensation insurance covering its employees, and evidence of general liability insurance naming the County, its officers and employees as additional insureds under the policy, as follows:
 - a) Workers' Compensation insurance that meets the statutory obligations.
 - b) Commercial General Liability insurance with limits of at least \$1,000,000 general aggregate, \$1,000,000 products - completed operations, \$1,000,000 personal and advertising injury, \$1,000,000 each occurrence, \$50,000 fire damage and \$5,000 medical expense any one person. The policy shall be on an occurrence basis, shall include contractual liability coverage and the County shall be named an additional insured. This coverage shall be maintained for one year after final completion and acceptance of the Project by the City.

- E. **Addenda to RFP:** Any changes, additions or clarifications to the RFP will be made by written Proposal addenda.
- a) Such addenda will be sent to all proposers receiving the original RFP and will become part of the Proposal package, having the same binding effect as provisions of the original proposal.
 - b) All addenda, amendments and interpretations of this solicitation shall be in writing. The County shall not be legally bound by any amendment or interpretation that is not in writing. Only information supplied by the County in writing or in this RFP should be used in preparing Proposal responses. All contact that a proposer may have had before or after receipt of this RFP with any individuals, employees, or representatives of the County, and any information that may have been read in any news media or seen or heard in any communication facility regarding this proposal should be disregarded in preparing proposal responses.
 - c) The County does not assume responsibility for receipt of any addendum sent to proposers.
 - d) A copy of all addenda issued must be signed and returned with your proposal.
- F. **Contract and Conditions:** The selected firm or individual will be required to enter into a contract with the County. Additional contract conditions may be required, depending upon the nature and extent of the services to be provided. The County reserves the right to negotiate a change or modification to any of the proposed contractual conditions.

APPENDIX B. Certifications Waiver and Alternative Requirement for Action Plan Submission.

Sections 104(b)(4), (c), and (m) of the HCDA (42 U.S.C. 5304(b)(4), (c) and (m)), sections 106(d)(2)(C) and (D) of the HCDA (42 U.S.C. 5306(d)(2)(C) and (D)), and section 106 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12706), and regulations at 24 CFR 91.225 and 91.325 are waived and replaced with the following alternative.

Each grantee receiving an allocation under an AAN must make the following certifications with its action plan:

a. Compliance with Anti-discrimination Laws- The grantee certifies that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

b. Affirmatively Further Fair Housing- The grantee certifies it will affirmatively further fair housing.

c. Uniform Relocation Act and Residential Anti-displacement and Relocation Plan – The grantee certifies that it: (1) will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements; 160 (2) has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.

d. Anti-Lobbying: The grantee certifies its compliance with the restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.

e. Authority of Grantee: The grantee certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.

f. Consistency with the Action Plan - The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.

g. Section 3 - The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.

h. Citizen Participation-The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen 161 participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).

i. Use of Funds-The grantee certifies that it is complying with each of the following criteria:

- (1) Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.).
- (2) Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
- (3) Overall benefit. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent 162 (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.
- (4) Special Assessment. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

j. Excessive Force- The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing: (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and 163 (2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

k. Grant Timeliness- The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.

l. Lead-Based Paint- The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.

m. Environmental Requirements- The grantee certifies that it will comply with environmental requirements at 24 CFR part 55 (as applicable) and 24 CFR part 58.

n. Compliance with Laws- The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

o. Order of Assistance- The grantee certifies that it will comply with the statutory order of assistance listed in Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG-DR assistance for the costs of carrying out the same activity.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

Signature of Certifying Official



(Date)

9/18/25

Mark A. Kern

Printed Name of Certifying Official

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

09/19/2025

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** St. Clair County Intergovernmental Grants Department

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

37-6001924

*** c. UEI:**

LVFLAFNTPFN9

d. Address:

*** Street1:** 19 Public Square, Suite 200

Street2:

*** City:** Belleville

County/Parish:

*** State:** IL: Illinois

Province:

*** Country:** USA: UNITED STATES

*** Zip / Postal Code:** 62220-1695

e. Organizational Unit:

Department Name:

Intergovernmental Grants

Division Name:

Community Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: MS.

*** First Name:** Christina

Middle Name: R.

*** Last Name:** Anderson

Suffix:

Title: Community Development Program Coordinator

Organizational Affiliation:

St. Clair County Intergovernmental Grants Department

*** Telephone Number:** 618-825-3218

Fax Number: 618-825-3214

*** Email:** Christina.Anderson@co.st-clair.il.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Assistance Listing Number:

14.218

Assistance Listing Title:

CDBG Development Block Grants

*** 12. Funding Opportunity Number:**

B-UU-17-0002 CDBG-DR

* Title:

Federal Program: Community Development Block Grant Program - Disaster Recovery

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

St. Clair County CDBG-DR Admin Action Plan

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

12

* b. Program/Project

12

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

10/01/2025

* b. End Date:

10/01/2031

18. Estimated Funding (\$):

* a. Federal

89,533,000.00

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL

89,533,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☒ a. This application was made available to the State under the Executive Order 12372 Process for review on

09/19/2025

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☐ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

Mr.

* First Name:

Mark

Middle Name:

A.

* Last Name:

Kern

Suffix:

* Title:

Chairman, St. Clair County Board

* Telephone Number:

618-277-6790

Fax Number:

618-236-1190

* Email:

Richard.Stubblefield@co.st-clair.il.us

* Signature of Authorized Representative:

* Date Signed:

9/18/25

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009

Expiration Date: 06/30/2028

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

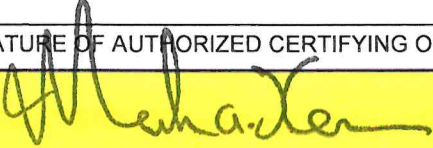
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure nondiscrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Chairman, St. Clair County Board
APPLICANT ORGANIZATION St. Clair County Intergovernmental Grants Department	DATE SUBMITTED 9/18/25

**Applicant and Recipient
Assurances and Certifications**

**U.S. Department of Housing
and Urban Development**

OMB Number: 2501-0044
Expiration Date: 2/28/2027

Instructions for the HUD 424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant: [Insert below the Name and title of the Authorized Representative, name of Organization and the date of signature]:

*Authorized Representative Name:

Mark A. Kern

*Title: Chairman, St. Clair County Board

*Applicant/Recipient Organization:

St. Clair County

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant

will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

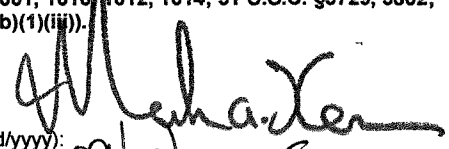
8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

* Signature:

* Date: (mm/dd/yyyy):


09/18/2025

Public Reporting Burden Statement: The public reporting burden for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7th St SW, Room 4176, Washington, DC 20410-5000. **Do not send completed HUD 424-B forms to this address.** This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. The Department of Housing and Urban Development is authorized to collect this information under the authority cited in the Notice of Funding Opportunity for this grant program. The information collected provides assurances and certifications for legal requirements related to the administration of this grant program. HUD will use this information to ensure compliance of its grantees. This information is required to obtain the benefit sought in the grant program. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552).
