



Substantial Amendment

to the Snohomish County Urban County Consortium

Citizen Participation Plan – COVID-19 Substantial
Amendment

December 18, 2020

I. Citizen Participation Plan – Cares Act Amendments

The purpose of this proposed substantial amendment to the Snohomish County Consortium Citizen Participation Plan (CPP) is to add waivers and alternative requirements intended to expedite the substantial amendment process to prevent, prepare for, and respond to the Coronavirus (COVID-19) pandemic.

General Background

Snohomish County, in consortium with the cities and towns in Snohomish County, receives federal funding annually from the U.S. Department of Housing and Urban Development (HUD) under the following three programs:

- Community Development Block Grant (CDBG),
- HOME Investment Partnerships Program (HOME), and
- Emergency Solutions Grant (ESG).

Snohomish County is the lead agency for the Consortium. In this capacity, Snohomish County is responsible for the development of the plans and reports required to receive the funds and for encouraging citizen participation, including participation from low- and moderate-income citizens, in the planning and reporting process.

In response to the Coronavirus (COVID-19) pandemic Snohomish County Consortium is amending its Citizen Participation Plan (CPP) to expeditiously respond to the COVID-19 pandemic and effectively administer federal funding made available to respond.

The Coronavirus Aid, Relief and Economic Security Act (CARES Act) (Public Law 116-136) provides the United States Department of Housing and Urban Development (HUD) authority to issue grant regulatory waivers and alternative requirements to entitlement jurisdictions, to prevent, prepare for, and respond to the COVID-19 pandemic.

The Mega Waiver issued by HUD on April 1, 2020, provides a process to balance the need to respond quickly to the growing spread and effects of COVID-19 with the requirements to provide citizens with reasonable notice and opportunity to comment.

The proposed substantial amendments to the CPP applies to CDBG and ESG allocated under the CARES Act (CDBG-CV) and (ESG-CV), and any other prior year or current year of ESG, CDBG or HOME entitlement funds that may be used to address the COVID-19 pandemic.

Substantial Amendments

Substantial Amendments to the Citizen Participation Plan includes the following:

- A. **Reduction of 30-day Public Comment Period to 5-days:** The 30-day minimum public review and comment period required for substantial amendments to a Consolidated Plan, an Annual Action Plan, and the Citizen Participation Plan is waived, provided that no fewer than 5-days are provide for public comment on each substantial amendment.

- B. **Revised definition of Reasonable Notice of, and Opportunity to Comment on, Substantial Amendments:** The existing CPP describes the definition of reasonable notice of, and an opportunity to comment on, substantial amendments. The only change to the existing definition is removing the following sentence: “by making copies of the proposed amendment or revision available at libraries, government offices and public places.”

Due to the COVID–19 pandemic libraries are not accepting hard copies of any kind and hard copies of the substantial amendments will not be available at the Snohomish County administration building due to limited public access.

Snohomish County will use the following process to provide the public with reasonable notice of, and an opportunity to comment on, substantial amendments to prevent, prepare for, and respond to the COVID-19 pandemic:

1. A notice of intent to enact a substantial amendment will be published in summary in the Herald, the newspaper of general circulation.

2. The notice will include the County website address to access the substantial amendment, the time, date and access directions to the virtual public hearing, if required.

3. By sending an electronic copy of the notice, translated into Arabic, Marshallese, Russian, Spanish, and Vietnamese, Korean, and Chinese to:
 - a. The mailing list of interested agencies and persons maintained by the Office of Housing and Community Services,
 - b. The Everett/Snohomish Continuum of Care distribution list maintained by the Office of Community and Homeless Services (OCHS), and
 - c. The Housing Consortium of Everett and Snohomish County.

4. The notice will describe the contents and purpose of the substantial amendment.

5. The notice will be made available in a format accessible to persons with disabilities and non-English speaking persons, upon request.

6. A hard copy of the substantial amendment will be mailed to agencies or individuals, upon request.
 7. The final approved substantial amendment will be available to the public on the County webpage.
- C. **Virtual Public Hearings:** The existing CPP describes when and how public hearings will be required. HUD has waived the requirement for In-person public hearings. Snohomish County will meet public hearing requirements through virtual public hearings if national/local health authorities recommend social distancing and limiting public gatherings for public health reasons.

When virtual public hearings are required, the following process will apply:

1. Virtual public hearings will allow for real-time public comment and responses to questions;
2. Accommodation for persons with disabilities, and/or with limited English proficiency, will be made available to the greatest extent feasible;
3. The County will consider any comments or views of the public received in writing, or orally at a public hearing, if any, in preparing the substantial amendment; and
4. A summary of these comments or views and a summary of any comments or views not accepted and the reasons, therefore, will be included with the substantial amendment.