

Addendum 1 – CDBG-CV

City of Jackson Citizen Participation Plan

History

On December 31, 2019, China reported a cluster of pneumonia cases in Wuhan, Hubei Province which led to the eventual identification of a novel coronavirus later dubbed COVID-19. Less than one (1) month later, the United States announced its first confirmed coronavirus case in Washington state. By the end of January 2020, the World Health Organization (WHO) declared the outbreak a global health emergency (pandemic) and the White House banned entry for most foreign nationals who had traveled to China within the prior 14 days. On March 13, 2020, President Donald Trump declared a national state of emergency due to the COVID-19 pandemic.

In Michigan, the first two (2) cases of COVID-19 were confirmed on March 10, 2020, prompting Governor Gretchen Whitmer to declare a state of emergency. By March 13, Governor Whitmer banned gatherings of more than 250 people and requested public bodies postpone their meetings or conduct them remotely. Two (2) weeks later, Governor Whitmer issued Executive Order 2020-21 requiring all individuals living in Michigan to stay at home and for businesses to suspend normal operations except to the extent workers were necessary to sustain or protect life or to conduct minimum basic operations. This initial “stay-at-home” order was in effect until April 13, 2020, but was subsequently extended to April 30, 2020 through Executive Order 2020-42, and extended again to May 15, 2020 through Executive Order 2020-59. The states of emergency and disaster were extended to May 28, 2020 through Executive Order 2020-68.

On March 27, 2020, President Trump signed the *Coronavirus Aid, Relief, and Economic Security (CARES) Act*, a \$2 trillion economic relief package to protect the American people from the public health and economic impacts of COVID-19. The package specifically set aside \$5 billion in supplemental Community Development Block Grant (CDBG) funding for grants to prevent, prepare for, and respond to coronavirus (CDBG-CV).

To expedite the use of CDBG-CV funds, the CARES Act permits the U.S. Department of Housing and Urban Development (HUD) to waive, or specify alternative requirements for, any provision of any statute or regulation in connection with CDBG-CV, Program Year 2019 CDBG, and Program Year 2020 CDBG funds. Excluded from the waiver authority are requirements related to fair housing, non-discrimination, labor standards, and the environment.

Substantial Amendments

To access CDBG-CV funds, the City of Jackson must prepare a substantial amendment to its 2015-2019 Five-Year Consolidated Plan and 2019 Annual Action Plan. The City will take advantage of the following waivers to accelerate the normal substantial amendment requirements contained in its 2014 Citizen Participation Plan:

24 CFR 91.105(c)(2) and (k) – Public Comment Period

Given the need to expedite actions to respond to COVID-19, HUD has waived 24 CFR 91.105(c)(2) and (k) in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments. The 30-day minimum

public comment period is waived for substantial amendments, provided that no less than five (5) days are provided for public comments on each substantial amendment.

The City of Jackson will provide no less than five (5) days for public comment on each substantial amendment needed for the release of CDBG-CV funds. The five (5) day period will run concurrently for comments on the action plan and citizen participation plan amendments.

24 CFR 91.105(c)(2) and (k) – Reasonable Notice and Opportunity to Comment

HUD recognizes the efforts to contain COVID-19 requires limiting public gatherings, such as those often used to obtain citizen participation, and that there is a need to respond quickly to the growing spread and effect of COVID-19. Grantees are allowed to determine what constitutes reasonable notice and opportunity to comment given their circumstances.

The City of Jackson will utilize its website and social media outlets to the greatest extent feasible to provide notice to its citizens. Each notice will contain the means available for the public to provide comment. In-person public hearings are not required if national or local health authorities recommend social distancing and limiting public gatherings for public health reasons. Virtual hearings may be used if they provide reasonable notification and access for citizens, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.