



COUNTY OF SANTA BARBARA

Citizen Participation Plan

Draft – May 2025

Executive Summary

As required by the U.S. Department of Housing and Urban Development (HUD), the Citizen Participation Plan (CPP) sets forth the County of Santa Barbara's ("County" or "Santa Barbara") policies and procedures for providing community members with opportunities to participate in an advisory role in the planning and evaluation of the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs.

The County of Santa Barbara's Division of Housing and Community Development (HCD) serves as the lead agency for the CDBG Urban County Partnership and HOME Consortium. The CDBG Urban County Partnership is comprised of the County and the cities of Buellton, Carpinteria, and Solvang. The HOME Consortium includes all members of the Urban County, along with the cities of Goleta, Lompoc, and Santa Maria. As a condition of receiving CDBG and HOME funds, the County is required to develop, publish, and implement the following key planning documents:

1. **Citizen Participation Plan (CPP):** the County's policies and procedures that enable and encourage input from all residents throughout the consolidated planning process.
2. **Consolidated Plan:** a five-year plan that details the County's housing and community development needs, planned uses of program funds to address those needs, and proposed program accomplishments.
3. **Action Plan:** an annual plan that describes the specific projects and activities that will be implemented during the program year (July 1 to June 30) to address the priority needs and goals established in the Consolidated Plan.
4. **Consolidated Annual Performance and Evaluation Report (CAPER):** an annual report that evaluates the progress the County has made toward accomplishing the goals established in the Consolidated Plan.
5. **Analysis of Impediments to Fair Housing Choice or Assessment of Fair Housing (AI or AFH):** a five-year plan that examines local housing conditions, policies, and practices and the extent to which these factors impact the range of housing choices and opportunities available to all residents in an environment free from discrimination.

Santa Barbara provides for and encourages all community members to participate in the development of or amendment to the CPP, Consolidated Plan, Action Plan, CAPER, and AI or AFH. The County actively seeks involvement from low- and moderate-income persons, particularly those residing in areas where CDBG and HOME funds are proposed to be used, as well as residents of public and assisted housing developments, and by those living in predominantly low- and moderate-income neighborhoods¹. The County also seeks input from Continuum of Care (CoC) program participants and representatives of special needs

¹ Predominately low- and moderate-income neighborhoods are defined as those in which a minimum of 51% of the residents have incomes at or below 80% of Area Median Income (AMI).

populations such as elderly individuals, migrant workers, survivors of domestic violence, residents with disabilities, and persons with HIV/AIDS.

The County will make a concerted effort to notify and encourage the participation of local and regional institutions, the CoC addressing homelessness within the jurisdiction, public agencies, and private entities including businesses, developers, non-profit organizations, philanthropic organizations, community groups, and faith-based organizations, internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land, or water resources, emergency management agencies, state and local health service providers, social service providers, fair housing organizations, Public Housing Agencies (PHAs), and other stakeholders in the development of or amendment to the CPP, Consolidated Plan, Action Plan, CAPER, and AI or AFH.

Additionally, the County is required to make reasonable efforts to provide language assistance to ensure meaningful access for Limited English Proficiency (LEP) persons to the County's federally funded programs and activities. To ensure the appropriate targeting of resources, the County conducted a "Four Factor Analysis" in accordance with U.S. Department of Justice LEP Guidance. The analysis was conducted in the context of "safe harbor" thresholds provided by the U.S. Department of Housing and Urban Development (HUD). A Language Access Plan (LAP) was then developed to complement this CPP, focused on the provision of translation and interpretation services to LEP individuals.

Citizen Participation Plan

Plan Development

Public Review and Comment

The draft CPP shall be made available for public review and comment for a 30-day period. Electronic copies of the draft CPP shall be posted on the County's [website](#) and hard copies shall be made available at the County offices in Santa Barbara and Santa Maria.

The CPP shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to, providing oral, Braille, electronic, or large print versions of the plan to those visually impaired and delivering copies to those who are homebound.

The County will encourage comment and participation by minority and non-English speakers. Publication of the plan shall be advertised in non-English languages as specified in the County's LAP and translation services will be available upon request.

Written comments will be accepted by HCD during the public review period. A summary of all written comments, those received during the public hearing, as well as the County's responses, shall be attached to the CPP upon adoption.

Public Hearing

The County shall conduct a public hearing to receive oral public comments on the draft CPP. Following the public hearing, the County Board of Supervisors will consider the proposed CPP and may approve it as presented, approve it with modifications, or reject it.

If an attendee at the public hearing needs special assistance beyond what is normally provided, the County will attempt to accommodate the attendee in every reasonable manner upon request. Efforts may include, but are not limited to, accessible seating, assistive listening devices, video recording for those that are homebound, sign language services, and production of written transcripts.

In accordance with the County's LAP, translation and interpretation services will be provided at public hearings when a significant number of non-English speaking residents are reasonably expected to participate, or upon request.

Adoption

The adopted CPP shall be posted on the County's [website](#), along with documentation of the community participation process.

Amendment

Amendment Considerations

The County shall amend the CPP, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to the programs and documents governed by [24 CFR Part 91](#). A Substantial Amendment of the CPP may be required should a provision of the CPP be found by the County to conflict with HUD regulations.

Minor edits to the CPP, such as updating contact information or technical details about schedules and publications, will not constitute a Substantial Amendment. Additionally, when authorized by HUD via waiver or statute to respond to an emergency situation, the County may modify the CPP to conform with the flexibilities granted by HUD. Such changes to the CPP will not require public review or a public hearing.

Public Review and Comment

Draft Substantial Amendments to the CPP shall be made available for public review and comment for a 30-day period. Electronic copies of the Substantial Amendment to the CPP shall be posted on the County's [website](#) and hard copies shall be made available at the County offices in Santa Barbara and Santa Maria.

The Amended CPP shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to, providing oral, Braille, electronic, or large print versions of the plan to those visually impaired and delivering copies to those who are homebound.

The County will encourage comment and participation by minority and non-English speakers. Publication of the amended plan shall be advertised in non-English languages as specified in the County's LAP and translation services will be available upon request.

Written comments will be accepted by HCD during the public review period. A summary of all written comments, those received during the public hearing, as well as the County's responses shall be attached to the CPP upon adoption.

Public Hearing

The County shall conduct a public hearing to receive oral public comments on the draft Substantial Amendment to the CPP. Following the public hearing, the County Board of Supervisors will consider the proposed Substantial Amendment to the CPP and may approve it as presented, approve it with modifications, or reject it.

If an attendee at the public hearing needs special assistance beyond what is normally provided, the County will attempt to accommodate the attendee in every reasonable manner upon request. Efforts may include, but are not limited to, accessible seating, assistive listening devices, video recording for those that are homebound, sign language services, and production of written transcripts.

In accordance with the County's LAP, translation and interpretation services will be provided at public hearings when a significant number of non-English speaking residents are reasonably expected to participate, or upon request.

Adoption

The adopted CPP, as amended, shall be posted on the County's [website](#), along with documentation of the community participation process.

Consolidated Plan

Plan Development

Plan Considerations

As soon as feasible after the start of the public participation process for the Consolidated Plan, the County shall make the HUD-provided data and any other supplemental information available to residents, public agencies, and other interested parties by posting the data on the County's [website](#). To facilitate this process, the County may include a link cross-referencing to the data on HUD's [website](#).

The draft Consolidated Plan for public review shall include the following information:

- The amount of assistance the County expects to receive (including grant funds and program income),
- The range of activities that may be undertaken, and
- The estimated amount of funding that will benefit low- and moderate-income persons.

Santa Barbara will make a concerted effort to notify and encourage the participation of:

Stakeholder Groups	Examples
Community	<ul style="list-style-type: none"> • Residents (especially low- and moderate-income) • Neighborhood groups • Faith-based organizations • Other interested stakeholders
Public Agencies	<ul style="list-style-type: none"> • Local and regional institutions • The Continuum of Care (CoC) • State and local health service providers • Emergency management agencies • Public Housing Agencies (PHAs) • Agencies managing flood-prone areas, public land, or water resources
Private Entities	<ul style="list-style-type: none"> • Businesses • Developers • Non-profit organizations • Philanthropic organizations • Internet service providers • Organizations engaged in narrowing the digital divide
Advocacy	<ul style="list-style-type: none"> • Fair housing organizations • Community-based organizations that represent protected class members • Civic leaders

A variety of mechanisms may be utilized to solicit input including email, interviews, focus groups, surveys, and community meetings.

The County will also consult with and provide information to the Housing Authority of the County of Santa Barbara regarding the consideration of public housing needs and planned projects and activities.

Public Review and Comment

The draft Consolidated Plan shall be made available for public review and comment for a 30-day period. Electronic copies of the draft Consolidated Plan shall be posted on the County's [website](#). Hard copies shall also be made available at the County offices and at the City Hall of each CDBG Urban County and HOME Consortium member jurisdiction.

The Consolidated Plan shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to providing oral, Braille, electronic, or large print versions of the plan to those visually impaired and delivering copies to those who are homebound.

The County will encourage comment and participation by minority and non-English speakers. Publication of the plan shall be advertised in non-English languages as specified in the County's LAP and translation services will be available upon request.

Santa Barbara will also encourage comment and participation from low- and moderate-income residents, particularly those living in predominantly low- and moderate-income neighborhoods, in areas where CDBG and HOME funds are proposed to be used, and by residents of public and assisted housing. Activities to encourage participation may include but are not limited to advertising publication of the Consolidated Plan in target areas and making copies of the plan available in these neighborhoods.

Written comments will be accepted by HCD during the public review period. A summary of all written comments, those received during the public hearing, as well as the County's responses, shall be attached to the Consolidated Plan prior to submission to HUD.

Public Hearing

The County shall conduct a public hearing to receive oral public comments on the draft Consolidated Plan. Following the public hearing, the County Board of Supervisors will consider the proposed Consolidated Plan and may approve it as presented, approve it with modifications, or reject it. Only upon approval by the Board will the Consolidated Plan be authorized for submission to HUD.

If an attendee at the public hearing needs special assistance beyond what is normally provided, the County will attempt to accommodate the attendee in every reasonable manner upon request. Efforts may include, but are not limited to, accessible seating, assistive listening devices, video recording for those that are homebound, sign language services, and production of written transcripts.

In accordance with the County's LAP, translation and interpretation services will be provided at public hearings when a significant number of non-English speaking residents are reasonably expected to participate, or upon request.

Submittal to HUD

The adopted Consolidated Plan shall be submitted to HUD at least 45 days before the start of the program year, unless otherwise directed by HUD. Documents related to the community participation process, including proof of public notice publication, a copy of the public hearing agenda, a summary of all public comments received, and the County's responses to said comments shall be attached to the Consolidated Plan submission.

Once approved by HUD, the final Consolidated Plan shall be posted on the County's [website](#), along with documentation related to the community participation process.

Amendment

Amendment Considerations

The County shall prepare a Substantial Amendment to the Consolidated Plan if a “substantial change” is proposed by County staff or the County Board of Supervisors. For the purpose of the Consolidated Plan, a “substantial change” is defined as:

- The addition of a new goal not previously identified in the Consolidated Plan
- The removal of an existing goal identified in the Consolidated Plan
- Changes to the allocation priorities or the method of distribution of funds meeting the following thresholds:

	Minor Amendment	Substantial Amendment
Net Increase	≤ 50% of the goal allocation	> 50% of the goal allocation
Net Decrease	< 50% of the goal allocation	= 100% of the goal allocation

NOTE: The goal allocation is the funding amount listed in SP-45 of the most recently adopted Consolidated Plan

The County may make minor changes to the Consolidated Plan, as needed, so long as they do not constitute a Substantial Amendment. Changes to numeric accomplishment goals within an existing Consolidated Plan goal shall not constitute a Substantial Amendment. Such changes to the Consolidated Plan will not require public review or a public hearing.

Public Review and Comment

Draft Substantial Amendments to the Consolidated Plan shall be made available for public review and comment for a 30-day period. Electronic copies of the draft Consolidated Plan shall be posted on the County’s [website](#). Hard copies shall also be made available at the County offices and at the City Hall of each CDBG Urban County and HOME Consortium member jurisdiction.

The Amended Consolidated Plan shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to, providing oral, Braille, electronic, or large print versions of the plan to those visually impaired and delivering copies to those who are homebound.

The County will encourage comment and participation by minority and non-English speakers. Publication of the amended plan shall be advertised in non-English languages as specified in the County’s LAP and translation services will be available upon request.

Santa Barbara will also encourage comment and participation from low- and moderate-income residents, particularly those living in predominantly low- and moderate-income neighborhoods, in areas where CDBG and HOME funds are proposed to be used, and by residents of public and assisted housing. Activities to encourage participation may include,

but are not limited to, advertising publication of the Amended Consolidated Plan in target areas and making copies of the plan available in these neighborhoods.

Written comments will be accepted by HCD during the public review period. A summary of all written comments, those received during the public hearing, as well as the County's response, shall be attached to the Amended Consolidated Plan prior to submission to HUD.

Public Hearing

The County shall conduct a public hearing to receive oral public comments on the draft Substantial Amendment to the Consolidated Plan. Following the public hearing, the County Board of Supervisors will consider the proposed Substantial Amendment to the Consolidated Plan and may approve it as presented, approve it with modifications, or reject it. Only Board-approved amendments will be authorized for submission to HUD.

If an attendee at the public hearing needs special assistance beyond what is normally provided, the County will attempt to accommodate the attendee in every reasonable manner upon request. Efforts may include, but are not limited to, accessible seating, assistive listening devices, video recording for those that are homebound, sign language services, and production of written transcripts.

In accordance with the County's LAP, translation and interpretation services will be provided at public hearings when a significant number of non-English speaking residents are reasonably expected to participate, or upon request.

Submittal to HUD

The County may submit a copy of each amendment to HUD as it occurs, or submit all amendments jointly at the end of the program year. Documents related to the community participation process, including proof of public notice publication, a copy of the public hearing agenda, a summary of all public comments received, and the County's responses to said comments shall be attached to the Consolidated Plan Amendment submission.

The final Consolidated Plan, as amended, shall be posted on the County's [website](#), along with documentation related to the community participation process.

Annual Action Plan

Plan Development

Plan Considerations

Prior to developing the Annual Action Plan, the County shall issue a Notice of Funding Availability (NOFA) to inform potential applicants of available resources, funding priorities, program requirements, and application procedures. Public hearings shall be conducted with County Review Committees, as sanctioned by the Board of Supervisors, to solicit input on proposed projects and activities. These hearings will take place prior to the publication of the draft Action Plan to ensure funding decisions reflect community needs and priorities.

Public Review and Comment

The draft Action Plan shall be made available for public review and comment for a 30-day period. Electronic copies of the draft Action Plan shall be posted on the County's [website](#). Hard copies shall also be made available at the County offices and at the City Hall of each CDBG Urban County and HOME Consortium member jurisdiction.

The Action Plan shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to, providing oral, Braille, electronic, or large print versions of the plan to those visually impaired and delivering copies to those who are homebound.

The County will encourage comment and participation by minority and non-English speakers. Publication of the plan shall be advertised in non-English languages as specified in the County's LAP and translation services will be available upon request.

Santa Barbara will also encourage comment and participation from low- and moderate-income residents, particularly those living in predominantly low- and moderate-income neighborhoods, in areas where CDBG and HOME funds are proposed to be used, and by residents of public and assisted housing. Activities to encourage participation may include but are not limited to advertising publication of the Action Plan in target areas and making copies of the plan available in these neighborhoods.

Written comments will be accepted by HCD during the public review period. A summary of all written comments, those received during the public hearing, as well as the County's responses, shall be attached to the Action Plan prior to submission to HUD.

Public Hearing

The County shall conduct a public hearing to receive oral public comments on the draft Action Plan. Following the public hearing, the County Board of Supervisors will consider the proposed Action Plan and may approve it as presented, approve it with modifications, or reject it. Only upon approval by the Board will the Action Plan be authorized for submission to HUD.

If an attendee at the public hearing needs special assistance beyond what is normally provided, the County will attempt to accommodate the attendee in every reasonable manner upon request. Efforts may include, but are not limited to, accessible seating, assistive listening devices, video recording for those that are homebound, sign language services, and production of written transcripts.

In accordance with the County's LAP, translation and interpretation services will be provided at public hearings when a significant number of non-English speaking residents are reasonably expected to participate, or upon request.

Submittal to HUD

The adopted Action Plan shall be submitted to HUD at least 45 days before the start of the program year, unless otherwise directed by HUD. Documents related to the community participation process, including proof of public notice publication, a copy of the public hearing agenda, a summary of all public comments received, and the County's responses to said comments shall be attached to the Action Plan submission.

Once approved by HUD, the final Action Plan shall be posted on the County's [website](#), along with documentation related to the community participation process.

Amendment

Amendment Considerations

The County shall prepare a Substantial Amendment to the Action Plan if a "substantial change" is proposed by County staff or the County Board of Supervisors. For the purpose of the Action Plan, a "substantial change" is defined as:

- The addition of a new activity not previously identified in the Action Plan, without regard to funding source;
- The cancellation of an existing activity identified in the Action Plan, without regard to funding source;
- A change in the purpose, scope, location, or beneficiaries of an activity to the extent that it would be considered a new activity, at the discretion of HCD;
- Changes in the use of CDBG funds from one eligible activity to another eligible activity meeting the following thresholds:

	Minor Amendment	Substantial Amendment
Net Increase	≤ 50% of the activity allocation	> 50% of the activity allocation
Net Decrease	≤ 50% of the activity allocation	> 50% of the activity allocation

NOTE: The activity allocation is the budget as listed in the most recently adopted Action Plan

The County may make minor changes to the Action Plan, as needed, so long as they do not constitute a Substantial Amendment. Such changes to the Action Plan will not require public review or a public hearing.

Public Review and Comment

Draft Substantial Amendments to the Action Plan shall be made available for public review and comment for a 30-day period. Electronic copies of the draft Substantial Amendment to the Action Plan shall be posted on the County's [website](#). Hard copies shall also be made available at the County offices and at the City Hall of each CDBG Urban County and HOME Consortium member jurisdiction.

The Amended Action Plan shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to, providing oral, Braille, electronic, or large print versions of the plan to those visually impaired and delivering copies to those who are homebound.

The County will encourage comment and participation by minority and non-English speakers. Publication of the amended plan shall be advertised in non-English languages as specified in the County's LAP and translation services will be available upon request.

Santa Barbara will also encourage comment and participation from low- and moderate-income residents, particularly those living in predominantly low- and moderate-income neighborhoods, in areas where CDBG and HOME funds are proposed to be used, and by residents of public and assisted housing. Activities to encourage participation may include, but are not limited to, advertising publication of the Amended Action Plan in target areas and making copies of the plan available in these neighborhoods.

Written comments will be accepted by HCD during the public review period. A summary of all written comments, those received during the public hearing, as well as the County's responses, shall be attached to the Amended Action Plan prior to submission to HUD.

Public Hearing

The County shall conduct a public hearing to receive oral public comments on the draft Substantial Amendment to the Action Plan. Following the public hearing, the County Board of Supervisors will consider the proposed Substantial Amendment to the Action Plan and may approve it as presented, approve it with modifications, or reject it. Only Board-approved amendments will be authorized for submission to HUD.

If an attendee at the public hearing needs special assistance beyond what is normally provided, the County will attempt to accommodate the attendee in every reasonable manner upon request. Efforts may include, but are not limited to, accessible seating, assistive listening devices, video recording for those that are homebound, sign language services, and production of written transcripts.

In accordance with the County's LAP, translation and interpretation services will be provided at public hearings when a significant number of non-English speaking residents are reasonably expected to participate, or upon request.

Submittal to HUD

The County may submit a copy of each amendment to HUD as it occurs, or submit all amendments jointly at the end of the program year. Documents related to the community participation process, including proof of public notice publication, a copy of the public hearing agenda, a summary of all public comments received, and the County's responses to said comments shall be attached to the Action Plan Amendment submission.

The final Action Plan, as amended, shall be posted on the County's [website](#), along with documentation related to the community participation process.

Consolidated Annual Performance and Evaluation Report

Report Development

Public Review and Comment

The draft CAPER shall be made available for public review and comment for a 15-day period. Electronic copies of the draft CAPER shall be posted on the County's [website](#). Hard copies shall also be made available at the County offices and at the City Hall of each CDBG Urban County and HOME Consortium member jurisdiction.

The CAPER shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to, providing oral, Braille, electronic, or large print versions of the report to those visually impaired and delivering copies to those who are homebound.

The County will encourage comment and participation by minority and non-English speakers. Publication of the report shall be advertised in non-English languages as specified in the County's LAP and translation services will be available upon request.

Santa Barbara will also encourage comment and participation from low- and moderate-income residents, particularly those living in predominantly low- and moderate-income neighborhoods, in areas where CDBG and HOME funds were used, and by residents of public and assisted housing. Activities to encourage participation may include but are not limited to advertising publication of the CAPER in target areas and making copies of the report available in these neighborhoods.

Written comments will be accepted by HCD during the public review period. A summary of all written comments, those received during the public hearing, as well as the County's responses, shall be attached to the CAPER prior to submission to HUD.

Public Hearing

The County shall conduct a public hearing to receive oral public comments on the draft CAPER. Following the public hearing, the County Board of Supervisors will consider the proposed CAPER and may approve it as presented, approve it with modifications, or reject it. Only upon approval by the Board will the CAPER be authorized for submission to HUD.

If an attendee at the public hearing needs special assistance beyond what is normally provided, the County will attempt to accommodate the attendee in every reasonable manner upon request. Efforts may include, but are not limited to, accessible seating, assistive listening devices, video recording for those that are homebound, sign language services, and production of written transcripts.

In accordance with the County's LAP, translation and interpretation services will be provided at public hearings when a significant number of non-English speaking residents are reasonably expected to participate, or upon request.

Submittal to HUD

The approved and adopted CAPER shall be submitted to HUD within 90 days following the end of the program year. Documents related to the community participation process, including proof of public notice publication, a copy of the public hearing agenda, a summary of all public comments received, and the County's responses to said comments shall be attached to the CAPER submission.

Once approved by HUD, the final CAPER shall be posted on the County's [website](#), along with documentation related to the community participation process.

Analysis of Impediments or Assessment of Fair Housing

Plan Development

Plan Considerations

The AI or AFH is a five-year plan completed by the County as part of a local consortium of other HUD grantees pursuant to HUD guidance for the evaluation of local housing conditions, policies, and practices and the extent to which these factors impact the range of housing choices and opportunities available to all residents in an environment free from discrimination. As of February 2025, HUD has suspended the AFH planning framework. The following describes the process and procedures related to the development of the AI or AFH in the event the rule is reinstated.

As soon as feasible after the start of the public participation process for the AI or AFH, the County will make the HUD-provided data and any other supplemental information available to residents, public agencies and other interested parties by posting the data on the County's [website](#). To facilitate this process, the County may include a link cross-referencing to the data on HUD's [website](#).

Santa Barbara will make a concerted effort to notify and encourage the participation of:

Stakeholder Groups	Examples
Community	<ul style="list-style-type: none"> Residents (especially low- and moderate-income) Neighborhood groups Faith-based organizations Other interested stakeholders
Public Agencies	<ul style="list-style-type: none"> Local and regional institutions The Continuum of Care (CoC) State and local health service providers Emergency management agencies Public Housing Agencies (PHAs) Agencies managing flood-prone areas, public land, or water resources

Private Entities	<ul style="list-style-type: none"> • Businesses • Developers • Non-profit organizations • Philanthropic organizations • Internet service providers • Organizations engaged in narrowing the digital divide
Advocacy	<ul style="list-style-type: none"> • Fair housing organizations • Community-based organizations that represent protected class members • Civic leaders

A variety of mechanisms may be utilized to solicit input including email, interviews, focus groups, surveys, and community meetings.

Public Review and Comment

The draft AI or AFH shall be made available for public review and comment for a 30-day period. Electronic copies of the draft AI or AFH shall be posted on the County's [website](#). Hard copies shall also be made available at the County offices and at the City Hall of each CDBG Urban County and HOME Consortium member jurisdiction.

The AI or AFH shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to, providing oral, Braille, electronic, or large print versions of the plan to those visually impaired and delivering copies to those who are homebound.

The County will encourage comment and participation by minority and non-English speakers. Publication of the plan shall be advertised in non-English languages as specified in the County's LAP and translation services will be available upon request.

Santa Barbara will also make a concerted effort to notify the PHA about its strategy to affirmatively further fair housing and encourage participation from residents of public and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations). Activities to encourage participation may include but are not limited to advertising publication of the AI or AFH and making copies of the plan available at public and assisted housing developments.

Written comments will be accepted by HCD during the public review period. A summary of all written comments, those received during the public hearing, as well as the County's responses, shall be attached to the AI or AFH upon adoption.

Public Hearing

The County shall conduct a public hearing to receive oral public comments on the draft AI or AFH. Following the public hearing, the County Board of Supervisors will consider the proposed AI or AFH and may approve it as presented, approve it with modifications, or reject it. Only upon approval by the Board will the AI or AFH be authorized for submission to HUD.

If an attendee at the public hearing needs special assistance beyond what is normally provided, the County will attempt to accommodate the attendee in every reasonable manner upon request. Efforts may include, but are not limited to, accessible seating, assistive listening devices, video recording for those that are homebound, sign language services, and production of written transcripts.

In accordance with the County's LAP, translation and interpretation services will be provided at public hearings when a significant number of non-English speaking residents are reasonably expected to participate, or upon request.

Submittal to HUD

The adopted AI or AFH shall be submitted to HUD for review and approval or rejection. Documents related to the community participation process, including proof of public notice publication, a copy of the public hearing agenda, a summary of all public comments received, and the County's responses to said comments shall be attached to the AI or AFH submission.

Once approved by HUD, the final AI or AFH shall be posted on the County's [website](#), along with documentation related to the community participation process. The goals of the AI or AFH shall be incorporated into the Consolidated Plan and the County shall annually report on the status of the Fair Housing Plan in the CAPER.

Amendment

Amendment Considerations

The County shall prepare a Substantial Amendment to the AI or AFH that was previously accepted by HUD if a "material change" occurs. For the purpose of the AI or AFH, a "material change" is defined as:

- A change in circumstances in the jurisdiction of a program participant that affects the information on which the AI or AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AI or AFH no longer reflect actual circumstances. Examples include Presidentially declared disasters, under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.), in the program participant's area that are of such a nature as to significantly impact the steps a program participant may need to take to affirmatively further fair housing; significant demographic changes; new significant contributing factors in the participant's jurisdiction; and civil rights

findings, determinations, settlements (including Voluntary Compliance Agreements), or court orders; or, upon HUD's written notification specifying a material change that requires the revision.

A Substantial Amendment to the AI or AFH consists of preparing and submitting amended analyses, assessments, priorities, and goals that take into account the material change, including any new fair housing issues and contributing factors that may arise as a result of the material change.

Public Review and Comment

Draft Substantial Amendments to the AI or AFH shall be made available for public review and comment for a 30-day period. Electronic copies of the draft Substantial Amendment to the AI or AFH shall be posted on the County's [website](#). Hard copies shall also be made available at the County offices and at the City Hall of each CDBG Urban County and HOME Consortium member jurisdiction.

The Amended AI or AFH shall be provided in a format accessible to persons with disabilities upon request. Such formats may include, but are not limited to, providing oral, Braille, electronic, or large print versions of the plan to those visually impaired and delivering copies to those who are homebound.

The County will encourage comment and participation by minority and non-English speakers. Publication of the amended plan shall be advertised in non-English languages as specified in the County's LAP and translation services will be available upon request.

Santa Barbara will also make a concerted effort to notify the PHA about its revised strategy to affirmatively further fair housing and encourage participation from residents of public and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations). Activities to encourage participation may include, but are not limited to, advertising publication of the Amended AI or AFH and making copies of the plan available at public and assisted housing developments.

Written comments will be accepted by HCD during the public review period. A summary of all written comments, those received during the public hearing, as well as the County's responses, shall be attached to the Amended AI or AFH prior to submission to HUD.

Public Hearing

The County shall conduct a public hearing to receive oral public comments on the draft Substantial Amendment to the AI or AFH. Following the public hearing, the County Board of Supervisors will consider the proposed Substantial Amendment to the AI or AFH and may approve it as presented, approve it with modifications, or reject it. Only Board-approved amendments will be authorized for submission to HUD.

If an attendee at the public hearing needs special assistance beyond what is normally provided, the County will attempt to accommodate the attendee in every reasonable manner upon request. Efforts may include, but are not limited to, accessible seating,

assistive listening devices, video recording for those that are homebound, sign language services, and production of written transcripts.

In accordance with the County's LAP, translation and interpretation services will be provided at public hearings when a significant number of non-English speaking residents are reasonably expected to participate, or upon request.

Submittal to HUD

A copy of the Amended AI or AFH shall be submitted to HUD within 12 months of the onset of a material change that triggers a Substantial Amendment, unless otherwise directed by HUD. Documents related to the community participation process, including proof of public notice publication, a copy of the public hearing agenda, a summary of all public comments received, and the County's responses to said comments shall be attached to the AI or AFH Amendment submission.

The final AI or AFH, as amended, shall be posted on the County's [website](#), along with documentation related to the community participation process.

Public Hearings, Notification, and Access

Public Hearings

Process

The County shall conduct at least two (2) public hearings per year to solicit input from community members. These meetings shall be held at different stages of the program year to gather public feedback on housing and community development needs, proposed activities, strategies for affirmatively furthering fair housing, and program performance. During the development of the Consolidated Plan and AI or AFH, at least one public hearing shall occur before the draft documents are released for public review and comment.

To ensure compliance with this requirement, the County shall conduct:

- The first public hearing in September, to provide the public with an opportunity to comment on community needs and program performance as reflected in the CAPER; and
- The second public hearing in late April or early May, to review and receive input on the proposed strategies and activities included in the Consolidated Plan and/or Annual Action Plan.

In addition to the baseline hearings above, the County shall also conduct public hearings for the adoption of the CPP and the AI or AFH. Any Substantial Amendments to the CPP, Consolidated Plan, Annual Action Plan, and AI or AFH will also be subject to a public hearing.

While in-person public hearings are the default format, the County may implement HUD-approved alternative participation methods in response to exigent circumstances, such as public health emergencies, natural disasters, and other events that pose a risk to public safety or hinder in-person participation. These may include virtual public hearings conducted via online platforms that allow for comments and answers in real time and are accessible to persons with disabilities and non-English speaking residents. Any such modifications will be made in accordance with HUD guidance and will be designed to maintain accessibility, transparency, and robust community engagement to the greatest extent possible under the circumstances.

Notification

A public notice shall be published at least 14 days prior to any scheduled public hearing (the public hearing will be held on or after the 15th day). Adequate noticing will include:

- Newspaper:** Publishing a public notice in the Santa Barbara Independent, Santa Maria Times, Santa Ynez Valley News, Lompoc Record, and possibly other newspapers of general circulation
- Public Places:** Posting notices at County offices in Santa Barbara and Santa Maria
- Online:** Displaying copies of notices on the County's [website](#)

Notices shall include the date, time, and location of the public hearing as well as information on the subject and topic of the meeting including summaries when possible and appropriate to properly inform the public of the meeting. Notices will be published in non-English languages in accordance with the County's LAP and will be accessible to those with disabilities. Additionally, each notice shall provide instructions for requesting special accommodations for individuals with disabilities and language assistance services for non-English speakers. Proof of publication (affidavit) shall be obtained from each newspaper and attached to the final version of the relevant planning document.

Access

Public hearings that require action from the County Board of Supervisors (Board) will be conducted in front of the Board at 9:00 am in either the County Administration Building (Board Hearing Room, Fourth Floor, 123 East Anapamu Street, Santa Barbara, CA 93101) or the Joseph Centeno Betteravia Government Administration Building (Board Hearing Room, 511 East Lakeside Parkway, Santa Maria, CA 93455).

For public hearings that do not require Board action, the County will make every reasonable effort to conduct such hearings at times and locations that are convenient for potential and actual beneficiaries. Efforts to ensure this may include, but are not limited to, scheduling meetings during the evening to accommodate work schedules, reserving accessible facilities, and arranging for them to take place in target neighborhoods.

Copies of agendas, meeting minutes, and staff reports along with any sign-in sheets circulated at public hearings shall be retained and attached to the final version of the relevant planning document.

Disability: It is the intention of the County to comply with the Americans with Disabilities Act (ADA) in all respects. If an attendee needs special assistance beyond what is normally provided, the County will attempt to accommodate the attendee in every reasonable manner. Efforts may include, but are not limited to, accessible seating, assistive listening devices, video recording for those that are homebound, sign language services, and production of written transcripts.

Language: In accordance with the County's LAP, translation and interpretation services will be provided at public hearings when a significant number of non-English speaking residents are reasonably expected to participate, or upon request.

Requests for reasonable accommodations and language assistance services must be made at least 48 hours prior to the public hearing to:

County of Santa Barbara Community Services Department
123 East Anapamu Street, Suite 202,
Santa Barbara, CA 93101
(805) 568-3520
HCD@countyofsb.org

Comments

Residents and stakeholders are encouraged to state their questions and comments during the development of the key planning documents and any amendments to said documents. All questions raised by attendees shall be answered by County staff, and all comments, suggestions, and proposals shall be recorded and considered in program planning. Verbal comments received at public hearings as well as responses to said comments will be summarized and included as an attachment to the final planning document.

Documents for Public Review

Process

The required public comment periods for each of the key planning documents and substantial amendments to said documents are as follows:

Document	Length of Public Comment Period
CPP	30 days
Consolidated Plan	30 days
Annual Action Plan	30 days
CAPER	15 days
AI or AFH	30 days

In the event of a federally declared disaster or emergency, the County may implement HUD-approved alternative participation methods. These may include shorter advanced notice timelines as well as reduced public comment periods. Any such modifications will be made in accordance with HUD guidance and will be designed to maintain accessibility, transparency, and robust community engagement to the greatest extent possible under the circumstances.

Notification

The County will ensure adequate advance notice of all public review and comment periods by publishing public notices before the review period begins. Adequate noticing will include:

- Newspaper:** Publishing a public notice in the Santa Barbara Independent, Santa Maria Times, Santa Ynez Valley News, Lompoc Record, and possibly other newspapers of general circulation
- Public Places:** Posting notices at County offices in Santa Barbara and Santa Maria
- Online:** Displaying copies of notices on the County's [website](#)

These notices shall clearly state the start and end date of the comment period, provide a summary of the document's purpose and content, while also specifying where the full document can be reviewed. Notices will be published in non-English languages in accordance with the County's LAP and will be accessible to those with disabilities. Each notice shall provide instructions for requesting special accommodations for individuals with disabilities and language assistance services for non-English speakers. Proof of publication (affidavit) shall be obtained from each newspaper and attached to the final planning document.

Access

The County will place an adequate supply of copies of each draft planning document and any substantial amendments subject to public review at the following locations:

- Online:** County [website](#)
- County Offices:** 123 East Anapamu Street, Suite 202, Santa Barbara, CA 93101
511 East Lakeside Parkway, Santa Maria, CA 93455

Disability: All reports and materials shall be made available in a format accessible to persons with disabilities, upon request. Such formats may include, but are not limited to, providing oral, Braille, electronic, or large print versions of the plan to those visually impaired, and delivering copies to those who are homebound.

Language: In accordance with the County's LAP, all documents shall be made available for non-English speaking residents upon request.

Comments

Residents and stakeholders are encouraged to provide written comments during the development of all key planning documents, including any proposed amendments. Written comments as well as requests for documents in alternative formats should be directed to:

County of Santa Barbara Community Services Department
123 East Anapamu Street, Suite 202,
Santa Barbara, CA 93101
(805) 568-3520
HCD@countyofsb.org

All written comments received during the public comment period, along with the County's responses, shall be attached to the final version of the relevant planning document.

Availability

The County is committed to providing timely and reasonable access to public information and records related to the development of key planning documents and the use of HUD funds from the preceding five years. Final versions of the CPP, Consolidated Plan, Annual Action Plans, CAPERs, and AI or AFH shall be made available on the County's [website](#) following approval by the Board of Supervisors and HUD.

Information to be made available shall also include budget and program performance data, meeting agendas and minutes, public comments received, and other relevant materials associated with the planning and implementation of HUD-funded programs.

Requests for public records must be submitted to the County in writing. Staff shall respond to such requests within 15 working days or as soon as possible thereafter. Hard copies may be obtained from HCD, subject to standard reproduction fees as established by the County Clerk's Office.

If a requested document contains Personally Identifiable Information (PII) or has been deemed confidential by County Counsel, it shall be withheld from public disclosure. In such cases, the requestor will be notified as part of the County's response.

Written requests should be addressed to:

County of Santa Barbara Community Services Department
123 East Anapamu Street, Suite 202,
Santa Barbara, CA 93101
HCD@countyofsb.org

Technical Assistance

Process

Upon request, staff shall provide technical assistance to groups representing low- and moderate-income persons to develop funding requests for CDBG and HOME eligible activities. Technical assistance will be provided as follows:

- Establish a Notice of Funding Availability (NOFA) that provides information and instructions to interested parties so that they can have reasonable access to the funding consideration process.
- Provide self-explanatory application forms designed to be easily understood and concise while still addressing all key items necessary to evaluate the proposed activity.
- Host a Pre-Application Workshop to provide advice and best practices to help applicants develop competitive funding requests.
- Schedule one-on-one meetings as needed to assist applicants in preparing eligible funding requests.

Complaints

Process

A complaint regarding the Consolidated Plan process, the development of any Substantial Amendments, and program performance must be submitted in writing to HCD. A timely and substantive written response will be made to complaints within 15 working days from the date of receipt (where practicable), acknowledging the letter and identifying a plan of action, if necessary. The County will accept written complaints provided they specify:

- The description of the objection, and supporting facts and data; and
- Provide name, address, telephone number, and a date of complaint.

Those making complaints are encouraged to propose alternatives and solutions for consideration in addressing the issue(s) brought forth.

Appeals

Appeals concerning the planning documents, statements, or recommendations of the staff should be made to the following persons, in the order presented:

- Deputy Director of Housing and Community Development
- Director of Community Services Department
- Assistant County Executive Officer for Municipal Services
- County Executive Officer
- HUD Field Office (if concerns are not answered)

Anti-Displacement and Relocation

Anti-Displacement Policy

The County's Anti-Displacement and Relocation Plan describes how Santa Barbara will assist persons who must be temporarily relocated or permanently displaced due to the use of HUD Community Planning and Development (CPD) program funds. This plan takes effect whenever the County funds activities that involve the following:

- Property acquisition,
- Potential displacement of people from their homes and the need to relocate people (either permanently or temporarily), and
- The demolition or conversion of low- and moderate-income housing units.

Santa Barbara will take reasonable steps to minimize displacement as a result of CDBG and HOME activities. This means that the County shall:

- Consider if displacement will occur as part of funding decisions and project feasibility determinations,
- Assure, whenever possible, that occupants of buildings to be rehabilitated are offered an opportunity to return,
- Plan substantial rehabilitation projects in "stages" to minimize displacement
- Meet all HUD notification requirements so that affected persons do not move because they have not been informed about project plans and their rights.

The County seeks to minimize, to the greatest extent feasible, the displacement, whether permanently or temporarily, of persons (families, individuals, businesses, nonprofit organizations, or farms) from projects funded with CDBG and HOME involving single- or multi-family rehabilitation, acquisition, commercial rehabilitation, demolition, economic development, or capital improvement activities.

Projects that Santa Barbara deems beneficial but that may cause displacement may be recommended and approved for funding only if Santa Barbara or its subrecipient demonstrates that such displacement is necessary and vital to the project and that they take efforts to reduce the number of persons displaced. Further, they must clearly demonstrate that the goals and anticipated accomplishments of a project outweigh the adverse effects of displacement imposed on persons who must relocate.

Displacement Assistance

Consistent with the goals and objectives of the CDBG and HOME programs, Santa Barbara will take all reasonable steps necessary to minimize displacement of persons, even temporarily. If displacement occurs, the County will provide relocation assistance to all persons directly, involuntarily, and permanently displaced according to HUD regulations.

If any CDBG or HOME funded project temporarily displaces a low- or moderate-income household, that household becomes eligible for certain relocation payments. The

assistance applies to those persons residing in the residence at the time the application is processed and is based on the following procedures:

- If the structure and its occupants are determined eligible for temporary relocation assistance, the owner-occupants and tenants are eligible for the actual reasonable cost (based on fair market rent) of temporary lodging facilities until the structure is determined habitable by Santa Barbara's housing inspector;
- Santa Barbara must approve housing and the Lessor and Lessee must sign a rent agreement before move-in. Housing must be comparable functionally to the displacement dwelling and decent, safe, and sanitary. This does not mean that the housing must be in comparable size. The term "functionally equivalent" means that it performs the same function, has the same principal features present, and can contribute to a comparable style of living. Approved lodging accommodations include apartments and houses. Santa Barbara does not reimburse "rental expenses" for living with a friend or family member;
- Either Santa Barbara will provide the owner-occupants and tenants a direct payment for moving expenses (to and from temporary housing) and storage costs, or Santa Barbara will arrange moving and storage of furniture with a moving company. If Santa Barbara makes a direct payment, complete documentation and receipts are necessary to process claims when storage costs exceed the amount assumed by the direct payment;
- Damage deposits, utility hookups, telephone hookups and insurance costs are not eligible for reimbursement; and
- The County may pay the cost of relocation assistance from Federal funds or funds available from other sources.