

RESOLUTION NO. 2013- 186

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA AMENDING THE TERMS, PROVISIONS, CONDITIONS AND REQUIREMENTS OF A MEMORANDUM OF UNDERSTANDING BETWEEN ST. JOHNS COUNTY, FLORIDA AND JACKSONVILLE AREA LEGAL AID, INC. IN THE DEVELOPMENT OF THE FAIR HOUSING ELEMENT OF THE CONSOLIDATED PLAN, AND AUTHORIZING THE COUNTY ADMINISTRATOR, OR HIS DESIGNEE, TO EXECUTE THE AGREEMENT ON BEHALF OF ST. JOHNS COUNTY

WHEREAS, in December 2012, the County and JALA executed a Memorandum of Understanding (“MOU”) regarding the parties’ collaboration of efforts in completing the Fair Housing Component of the County’s Consolidated Plan as required by the United States Department of Housing and Urban Development (“HUD”); and

WHEREAS, as provided in the MOU, JALA provided it expertise and services to the County at no cost; and

WHEREAS, while the project is approximately 80% complete, the grant funding which facilitated JALA’s services to the County at no cost has been exhausted; and

WHEREAS, the County has identified approximately twenty thousand dollars (\$20,000) of unobligated administrative grant funds and program income funds for Fair Housing activity available through the Neighborhood Stabilization Program (“NSP”) that may be used to facilitate JALA’s continuation of the services in completing the project; and

WHEREAS, both HUD and the Florida Department of Economic Opportunity have each independently determined that use of the NSP funds to complete the Fair Housing Component of the County’s Consolidated Plan is permissible; and

WHEREAS, the County and JALA mutually seek to amend the MOU to reflect the County’s use of the funds to facilitate JALA’s services in completing the project; and

WHEREAS, amending the MOU as described above serves the interests of the citizens of St. Johns County.

NOW THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA, as follows:

Section 1. The above Recitals are incorporated by reference into the body of this Resolution and such Recitals are adopted as findings of fact.

Section 2. The Board of County Commissioners hereby approves the terms, provisions, conditions, and requirements of the Memorandum of Understanding (as amended) between St. Johns County, Florida and Jacksonville Area Legal Aid, Inc. for the purpose of participating in the collaborative development of the Fair Housing component of the Consolidated Plan as required by HUD for future federal and state funding opportunities.

Section 3. The Board hereby authorizes the County Administrator, or his designee, to execute the Agreement on behalf of the County.

Section 4. To the extent that there are typographical and/or administrative errors contained herein that do not change the tone, tenor or concept of this Resolution, then this Resolution may be revised without subsequent approval by the Board of County Commissioners.

PASSED AND ADOPTED this 20th day of August 2013.

**BOARD OF COUNTY COMMISSIONERS
ST. JOHNS COUNTY, FLORIDA**

By: _____

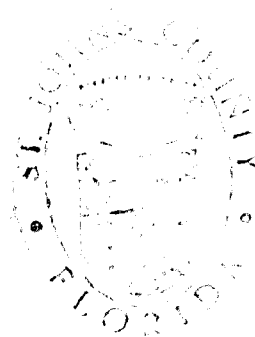
John H. Morris
John H. Morris, Chair

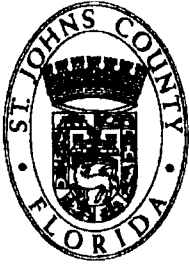
ATTEST: Cheryl Strickland, Clerk

By: _____

Rain Helton
Deputy Clerk

RENDITION DATE 8/22/13





ST. JOHNS COUNTY
HOUSING & COMMUNITY DEVELOPMENT
1955 U.S. 1 South
St. Augustine, Florida 32084

I N T E R O F F I C E M E M O R A N D U M

TO: Regina Ross, Assistant County Attorney
FROM: Dana Froberg, Homeownership Programs Administrator
SUBJECT: Use of NSP Administrative Funds to Complete Consolidated Plan Fair Housing Component
DATE: July 18, 2013

HUD requires that a Consolidated Plan (CP) be developed as required of entitlement jurisdictions, those with populations exceeding 200,000, which St. Johns County is on the cusp of becoming. A portion of the CP is the Fair Housing Element/Analysis of Impediments to Fair Housing.

Jacksonville Area Legal Aid (JALA) Fair Housing Unit lead attorney, David Cronin, has offered the services of his office in conjunction with a grant they had received, at no cost to the County, in working with us to develop the Fair Housing component of our CP. A Memorandum of Understanding, Resolution 2012-342 (attached), between JALA and the County was executed which outlines the specific components of the Fair Housing element. There was no competition or RFP for this project as the grant project had already been awarded to JALA.

Unfortunately, at approximately 80% completion the grant funding awarded to JALA was pulled back leaving them unable to complete the project. The customary cost to commission the development of a Fair Housing Element can be upward of \$100,000. The funds needed to complete the project currently being produced by JALA is \$20,000. In an effort to assist the County in enjoy the savings that would be realized by having the report completed by JALA, administrative program income funds have been identified in the Neighborhood Stabilization Program (NSP) that have been deemed a permissible use of NSP grant funding by DEO and HUD (see letter from DEO attached).

The NSP administrative grant funds are not St. Johns County general funds money and would have to be returned to the State as excess administrative program income funds if not expended on completion of the Fair Housing Element/Analysis of Impediments.

As mentioned earlier, use of the NSP administrative funds for the purpose of completing the Fair Housing Element/Analysis of Impediments is a HUD and DEO approved use of the funds. It is also a benefit to County residents and public purpose as it serves in the capacity of providing additional protection of their Fair Housing rights, saves money that would be expended by commissioning a Fair Housing Element/Analysis of Impediments at full cost as a part of the required production of the Consolidated Plan as well as reducing the County's exposure in the event of an allocation of Fair Housing violation.

With all the forgoing practical matters considered, we request consent to submit a request for \$20,000 from the NSP program grant budget for payment to JALA for completion of the Fair Housing Element/Analysis of Impediments.

Please call me should you have any questions regarding this request.

Thank you,
Dana

Memorandum of Understanding (MOU)

Between

St. Johns County, FL

and

Jacksonville Area Legal Aid (JALA)

Res 2012-342

THIS MEMORANDUM OF UNDERSTANDING –herein referred to as (MOU) is being entered into between the Housing and Community Development Division of St. Johns County, Florida located at 500 San Sebastian View, St. Augustine, Florida 32084 and Jacksonville Area Legal Aid-herein referred to as (JALA), located at 126 W. Adams Street, Jacksonville, Florida 32202.

Purpose:

The purpose of this MOU is to specify the cooperation, collaboration, provision of professional expertise and guidance between JALA Fair Housing Unit and St. Johns County Housing and Community Development Division staff in the development of the Fair Housing Element of the Consolidated Plan required by HUD for the formation of HOME consortiums and/or transition to federally funded participating jurisdictions.

Jacksonville Area Legal Aid will:

JALA will assist St. Johns County Housing and Community Development staff to the best of its ability in the development of the Fair Housing component of the Consolidated Plan required certifying to HUD's satisfaction that St. Johns County, as a HUD or State-funded grant recipient, has met the requirements of the Housing & Community Development Act of 1974, as amended. Requirements in developing the Fair Housing component of the Consolidated Plan may include, but are not limited to:

- Certification of Affirmatively Furthering Fair Housing;
- Analysis of Impediments to Fair Housing Choice (AI)
 - o An extensive review of State or Entitlement jurisdiction's laws, regulations, and administrative policies, procedures and practices;
 - o An assessment of how those laws affect the location, availability, and accessibility of housing;
 - o An evaluation of conditions, both public and private, affecting fair housing choice for all protected classes; and
 - o An assessment of the availability of affordable, accessible housing in a range of unit sizes.

JALA, in good faith as a service of benefit to the public, offers its assistance to St. Johns County Housing & Community Development staff in the above referenced activities and has done so with the full understanding that no payment, monetary or otherwise, will be rendered to JALA by St. Johns County for these services. JALA will provide said services as long as its staff and resources allow for such assistance.

St. Johns County will:

St. Johns County Housing & Community Development staff understands and appreciates the opportunity and benefit JALA's topical knowledge, professional acumen and staff involvement will provide in developing the Fair Housing element of its Consolidated Plan. St. Johns County Housing & Community Development staff will work with JALA to provide:

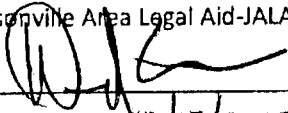
- Information, input, documents
- Collaboration, cooperation via teleconference, meeting attendance, e-mail, etc.
- Outreach, research, testing
- Administrative assistance

St. Johns County and Jacksonville Area Legal Aid, in mutual understanding and without any expectation of payment, monetary or otherwise, by either party;

In witness thereof, the parties listed below both agree to this MOU to be executed as stated above.

Jacksonville Area Legal Aid-JALA

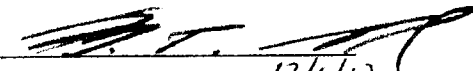
BY:


12/17/2012
David Cronin

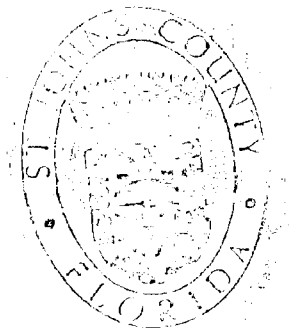
Title: Lead Attorney, JALA-Fair Housing Unit

St. Johns County, Florida

BY:


12/6/12

Title: County Administrator, or his designee



LEGALLY SUFFICIENT


Name
Date 12/19/2012

RESOLUTION NO. 2012-342

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA APPROVING THE TERMS, PROVISIONS, CONDITIONS AND REQUIREMENTS OF A MEMORANDUM OF UNDERSTANDING BETWEEN ST. JOHNS COUNTY, FLORIDA AND JACKSONVILLE AREA LEGAL AID, INC. IN THE DEVELOPMENT OF THE FAIR HOUSING ELEMENT OF THE CONSOLIDATED PLAN, AND AUTHORIZING THE COUNTY ADMINISTRATOR, OR HIS DESIGNEE, TO EXECUTE THE AGREEMENT ON BEHALF OF ST. JOHNS COUNTY

WHEREAS, St. Johns County, Florida is nearing the population threshold of 200,000 required for direct housing program funding from Housing and Urban Development (HUD); and

WHEREAS, HUD requires jurisdictions receiving direct funding or seeking HOME consortium formation to have an approved Consolidated Plan; and

WHEREAS, the Consolidated Plan as required by HUD has a Fair Housing Element; and

WHEREAS, Jacksonville Area Legal Aid, Inc. has agreed to assist St. Johns County, Florida in the development of the Fair Housing Element of the Consolidated Plan; and

WHEREAS, St. Johns County desires to enter into an agreement with Jacksonville Area Legal Aid, Inc. for the purpose of obtaining guidance and professional expertise in the collaborative development of the Fair Housing Element of the Consolidated Plan; and

WHEREAS, St. Johns County and Jacksonville Area Legal Aid, Inc. have drafted a Memorandum of Understanding (attached hereto, and incorporated herein), which sets forth the terms, conditions, provisions and requirements associated with this collaborative effort; and

WHEREAS, St. Johns County and Jacksonville Area Legal Aid, Inc. has reviewed the terms, conditions, provisions and requirements of the Memorandum of Understanding and have determined that the provisions of said services, set forth by the Memorandum of Understanding is a proper public purpose and is in the best overall interests of the citizens of St. Johns County.

NOW THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA, as follows:

Section 1. The above Recitals are incorporated by reference into the body of this Resolution and such Recitals are adopted as findings of fact.

Section 2. The Board of County Commissioners hereby approves the terms, provisions, conditions, and requirements of the Memorandum of Understanding between St. Johns County, Florida and Jacksonville Area Legal Aid, Inc. for the purpose of participating in the collaborative

development of the Fair Housing component of the Consolidated Plan as required by HUD for future federal and state funding opportunities.

Section 3. The Board hereby authorizes the County Administrator, or his designee, to execute the Agreement on behalf of the County.

PASSED AND ADOPTED this 4th day of December 2012.

**BOARD OF COUNTY COMMISSIONERS
ST. JOHNS COUNTY, FLORIDA**

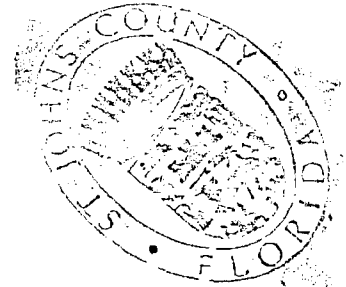
By: _____

J. Morris
Jay Morris, Chair

ATTEST: Cheryl Strickland, Clerk

By: _____

Pam Halterman
Deputy Clerk



RENDITION DATE 12/6/12

Rick Scott
GOVERNOR



Jesse Panuccio
EXECUTIVE DIRECTOR

July 1, 2013

Mr. Benjamin Coney, Manager
St. Johns County Housing & Community Development
1955 U.S. 1 South, Suite B-1
St. Augustine, FL 32086

Re: Use of St. Johns County NSP-1 Funding in the administrative line item to review and update the County's Fair Housing Policy – (NSP-1) Grant #10DB-4X-04-65-01-F 22

Dear Mr. Coney:

Our Department has evaluated your inquiry regarding the use of a portion of the remaining administrative grant funds from the Neighborhood Stabilization Program (NSP-1). We understand your purpose is to carry out a review of the County's existing Fair Housing Policy, develop a Limited English Proficiency Plan and fund the development of a new Fair Housing Ordinance. Your request in the amount of \$20,000.00 has been approved.

It is our understanding, based upon the information provided by the County, the County has been working in partnership with Jacksonville Area Legal Aid (JALA) in conjunction with grant funds secured by JALA to prepare your Analysis of Impediments to Fair Housing and that the estimated cost to complete these fair housing activities as outlined above is twenty thousand dollars (\$20,000.00).

The Department finds the expenditure of the unobligated NSP-1 administrative grant and program income funds for the Fair Housing Activity described above as an allowable expense. If you have any further questions, please don't hesitate to contact me at (850) 717-8407 or email garry.thomas@deo.myflorida.com.

Sincerely,

Garry Thomas
Government Operations Consultant

gt

cc: Fred Fox, President, Fred Fox Enterprises, Inc.

Jacksonville Area Legal Aid, Inc.

☐ 222 San Marco Avenue
St. Augustine, FL 32084
1999
(904) 827-9921
FAX: (904) 827-9978

✓ 126 W. Adams Street
Jacksonville, FL 32202-3849
(904) 356-8371, ext 327
FAX: (904) 356-8780

☐ P.O. Box 1999
Green Cove Springs, FL 32043-
(904) 284-8410
FAX: (904) 284-8485

May 2, 2013

Benjamin Coney
St. Johns County Housing Partnership Program
1955 U.S. 1 South, Suite B-1
St. Augustine, Florida 32086

Re: St. Johns County Fair and Housing Project
JALA Case No. 13-0333953

Dear Mr. Coney:

It is Jacksonville Area Legal Aid's position that expending funds on an Analysis of Impediments to Fair Housing Choice is an eligible use of administrative funds from St. Johns County's Neighborhood Stabilization Program (NSP) grant. The analysis supporting this opinion is explained below.

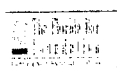
Federal Support:

HUD addresses the eligible uses of NSP administrative funds in its frequently asked questions for NSP grants in question ID 1395.¹ In its answer, HUD states that **24 CFR 570.206²** authorizes administrative costs to be paid from NSP grant funds. Specifically related to the purpose of this project, 24 CFR 570.206 states that reasonable administrative costs related to the planning and execution of community development activities may be paid from NSP funds. Additionally, an example of an eligible administration cost as described by HUD in question ID 1395 includes administrative services performed under third party contracts, such as general legal and audit services. More directly on point to the work to be performed by Jacksonville Area Legal Aid on the Fair Housing Project, including the Analysis of Impediments (AI) for St. Johns County, **24 CFR 570.206(c)** provides for administrative costs as they apply to "Fair Housing Activities." This subsection allows for the allocation of administrative funds to be used in a manner "designed to *further the fair housing objectives of the Fair Housing Act*," to include "activities to make individuals protected by the FHA "aware of the range of housing opportunities available to them; other fair housing enforcement, *education, and outreach activities*; and other activities designed to further the housing objective of avoiding undue concentrations of assisted persons in areas containing a high proportion of low and moderate income persons."

After reviewing 24 CFR 570.206, it is JALA's opinion that an Analysis of Impediments to Fair Housing Choice fits the description of an eligible use of administration funds for NSP grants. An AI is designed to evaluate the current housing practices exercised by and within a jurisdiction, such as St. Johns County, and *how these practices impact fair housing choice for individuals protected by the FHA*. Preparing an AI includes research

¹<https://hudnsphelp.info/index.cfm?do=faqview&faqID=1395&cv=t2&prevqoq=&keywords=&toptopicid=15^Eligible%20Costs&audienceid=0&topresourcetypeid=0&datefrom=&dateto=&sessionid=C3DF92AEC3E84EACF07C2982FE973040&searchID=1319506&refererType=findAnAnswer>

² <http://www.gpo.gov/fdsys/pkg/CFR-2012-title24-vol3/pdf/CFR-2012-title24-vol3-sec570-206.pdf>



A *Wealth of Justice* for Those Who Have Neither



on the racial and ethnic distribution of residents throughout the County, along with an evaluation of several other characteristics such as residents' income levels and the percentage of income they spend on housing. The data compiled from this research is used to *determine if there are concentrations of protected class members* and/or whether there are any indications of unfair housing practices. There are also elements of the AI that require *outreach* to individuals that are protected under the FHA and to community groups that work with these individuals. These efforts certainly *further the fair housing objectives of the Fair Housing Act*, thus the production of the AI and the work needed to prepare it fit within the parameters of the eligible uses for NSP administrative funds described in 24 CFR 570.206.

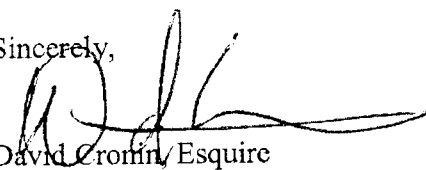
Additionally, HUD has released the **Guide to Neighborhood Stabilization Program Eligible Uses**³ which addresses the eligible uses of NSP administrative funds on page 11, section 6 labeled "Administration and Planning Costs." This section states that "an amount up to 10% of an NSP grant provided to a jurisdiction and up to 10% of program income earned may be used for general administration and planning activities as defined at 24 CFR 570.205 and 206." 24 CFR 570.206 was discussed above. **24 CFR 570.205**⁴ addresses eligible planning, urban environmental design, and policy-planning-management-capacity building activities. More plainly, this regulation states that "planning activities which consist of all costs of data gathering, studies, analysis, and preparation of plans and the identification of actions that will implement such plans, including but not limited to . . . (4) Other plans and studies such as . . . (vii) *analysis of impediments to fair housing choice.*" Thus, Section 205 specifically allows for NSP administrative funds to be used for an Analysis of Impediments.

State Support:

The Florida Department of Community Affairs and now the Florida Department of Economic Opportunity stated in both the **2010 substantial amendment to the NSP**⁵ and the **2013 revised draft**⁶ that 24 CFR 570.205 and 206 define what are considered general administration and planning activities.

Again, it is JALA's position that St. Johns County may use administrative funds for an Analysis of Impediments to Fair Housing Choice. Please contact us if you have any additional questions. David Cronin is the project manager and can be reached by phone at 904-356-8371 x. 327 or by email at David.Cronin@JaxLegalAid.org.

Sincerely,



David Cronin, Esquire
Fair Housing Unit

³ <http://www.neighborhoodrevitalization.org/Documents/HUD-GuideToEligibleUses101508.pdf>

⁴ <http://www.gpo.gov/fdsys/pkg/CFR-2010-title24-vol3/pdf/CFR-2010-title24-vol3-sec570-206.pdf>

⁵ <http://www.floridajobs.org/fhcd/cdbg/Files/NSP/NSPSubstantialAmendment.pdf>

⁶ <http://www.floridajobs.org/fhcd/cdbg/Files/NSP/FinalExecuted3rdRevisionofSubAmend.pdf>

Jacksonville Area Legal Aid, Inc.

☐ 222 San Marco Avenue
St. Augustine, FL 32084
(904) 827-9921
FAX: (904) 827-9978

✓ 126 W. Adams Street
Jacksonville, FL 32202-3849
(904) 356-8371, ext 327
FAX: (904) 356-8780

☐ P.O. Box 1999
Green Cove Springs, FL 32043-1999
(904) 284-8410
FAX: (904) 284-8485

May 2, 2013

Benjamin Coney
St. Johns County Housing Partnership Program
1955 U.S. 1 South, Suite B-1
St. Augustine, Florida 32086

Re: St. Johns County Fair and Housing Project
JALA Case No. 13-0333953

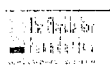
Dear Mr. Coney:

In response to concerns regarding other agencies working with us on the project referenced above, all work by other groups or agencies will be conducted on a charitable basis. No agencies other than Jacksonville Area Legal Aid (JALA) will receive funds granted by St. Johns County to complete the Fair Housing Project, should our request be approved. Additionally, JALA will provide back-up documentation used to prepare this project to all requesting parties. JALA's projected cost allocation is provided below.

Analysis of Impediments Projected Cost Allocations

Administrative Costs – amount requested: \$20,000

- Salaries
 - Research
 - Drafting
 - Analysis of Impediments
 - Limited English Proficiency Plan (LEP)
 - Fair Housing Ordinance
 - Attendance at town meetings and community group meetings
 - Communication and grant management
 - Survey(s) preparation and analysis
- Mileage
 - To and from town meetings
 - To and from meetings with community groups
- Advertising
 - Ads will appear in the newspapers listed below (and possibly others) to advertise the times and locations of our town meetings and will include a link to our Fair Housing survey(s)



A Wealth of Justice for Those Who Have Neither



Three Rivers Legal Services, Inc.

Newspaper	Ad Size	Ad Cost
Anastasia Island Community Journal	1/4 page	\$180.00
St. Augustine Record	1/4 page	\$284.00
Creek Line	1/4 page	\$390.00
Ponte Vedra Recorder	1/4 page	\$325.00

Please contact us if you have any additional questions. David Cronin is the project manager and can be reached by phone at 904-356-8371 x. 327 or by email at David.Cronin@JaxLegalAid.org.

Sincerely,



David Cronin, Esquire
Fair Housing Unit

Jacksonville Area Legal Aid, Inc.

222 San Marco Avenue
St. Augustine, FL 32084
1999
(904) 827-9921
FAX: (904) 827-9978

126 W. Adams Street
Jacksonville, FL 32202-3849
(904) 356-8371, ext 327
FAX: (904) 356-8780

P.O. Box 1999
Green Cove Springs, FL 32043-
(904) 284-8410
FAX: (904) 284-8485

June 10, 2013

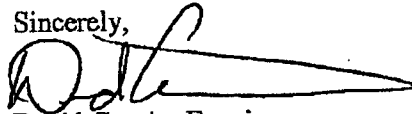
Benjamin Coney
St. Johns County Housing Partnership Program
1955 U.S. 1 South, Suite B-1
St. Augustine, Florida 32086

Re: St. Johns County Fair Housing Project
JALA Case No. 13-0333953

Dear Mr. Coney:

Enclosed please find a copy of the invoice for the St. Johns County Fair Housing Project. The invoice includes the various activities associated with completing this project, along with an extensive breakdown of the subject areas that we will research and include in our final draft of the Analysis of Impediments. Upon completion of the project, Jacksonville Area Legal Aid will present the St. Johns County Housing Partnership Program with an Analysis of Impediments to Fair Housing Choice, a Limited English Proficiency Plan (LEP Plan), and suggested revisions to local Fair Housing laws. If you have any questions regarding the invoice, please contact me at 904-356-8371 x. 327 or by email at David.Cronin@JaxLegalAid.org. If I am unavailable, please contact Alicia Magazu, managing attorney, at 904-356-8371 x. 277 or by email at Alicia.Magazu@JaxLegalAid.org.

Sincerely,


David Cronin, Esquire
Fair Housing Unit



A *Wealth* of Justice for Those Who Have Neither



Jacksonville Area Legal Aid, Inc.

222 San Marco Avenue
St. Augustine, FL 32084
1999
(904) 827-9921
FAX: (904) 827-9978

126 W. Adams Street
Jacksonville, FL 32202-3849
(904) 356-8371, ext 327
FAX: (904) 356-8780

P.O. Box 1999
Green Cove Springs, FL 32043-
(904) 284-8410
FAX: (904) 284-8485

St. Johns County: Fair Housing Project Invoice

Benjamin Coney
St. Johns County Housing Partnership Program
1955 U.S. 1 South, Suite B-1
St. Augustine, Florida 32086

Re: St. Johns County Fair Housing Project
JALA Case No. 13-0333953

Date Submitted: June 7, 2013
Amount Requested: \$20,000.00

Allocation of Funds:

Salary Expenditures:

- Research
 - Estimated** 100 hours at \$50/hour
 - \$5,000.00
- Drafting/Document Preparation (Analysis of Impediments)
 - Estimated** 80 hours at \$150/hour
 - \$12,000.00
 - Research and Drafting Preparation (not limited to the following subjects):
 - Introduction and Purpose
 - Historical Overlook of St. Johns County
 - Executive Summary
 - Basic County Facts
 - Current Fair Housing Legislation/Regulation Discussion
 - Overview
 - Impediments
 - Suggestions
 - Housing
 - Overview
 - Rental and Mortgage Costs/Expenditures
 - Affordable Housing Availability
 - Public Housing
 - Section 8 Voucher Program
 - Low-income Housing
 - Impediments
 - Suggestions
 - Poverty/Income
 - Overview



A *Wealth of Justice* for Those Who Have Neither



- Impediments
 - Suggestions
 - Education
 - Overview
 - Impediments
 - Suggestions
 - Transportation
 - Overview
 - Impediments
 - Suggestions
 - Employment
 - Overview
 - Impediments
 - Suggestions
 - Zoning
 - Overview
 - Impediments
 - Suggestions
 - Lending
 - Overview
 - Impediments
 - Suggestions
 - Advertising
 - Overview
 - Impediments
 - Suggestions
 - Community Discussion
 - Survey Results
 - Town Hall Meeting Synopsis
 - Appendix
- Editing
 - Estimated** 14 hours at \$25/hour
 - \$350.00
- Phone Conferences**
- Staff Meetings**
 - Bi-weekly meetings
- Meetings with Organizations and Individuals**
- Town Hall Meetings**
- Travel Time**
- LEP Plan
 - Estimated** 5 hours at \$150/hour
 - \$750.00
- Revision of Fair Housing Ordinances
 - Estimated** 5 hours at \$150/hour
 - \$750.00

Jacksonville Area Legal Aid, Inc.

222 San Marco Avenue
St. Augustine, FL 32084
1999
(904) 827-9921
FAX: (904) 827-9978

126 W. Adams Street
Jacksonville, FL 32202-3849

(904) 356-8371, ext 327
FAX: (904) 356-8780

P.O. Box 1999
Green Cove Springs, FL 32043-

(904) 284-8410
FAX: (904) 284-8485

Non-Salary Expenditures

- Mileage (\$0.565/mile)
 - Estimated** \$400.00
- Advertisements for Town Hall Meetings (some combination of the list below)
 - Estimated** approximately \$750.00

Newspaper	Ad Size	Ad Cost
Anastasia Island Community Journal	1/4 page	\$180.00
St. Augustine Record	1/4 page	\$451.50
Creek Line	1/4 page	\$390.00
Ponte Vedra Recorder	1/4 page	\$237.50

**Please remit funds to the main Jacksonville Area Legal Aid branch office at the address indicated above.
Funds are due and payable upon receipt of this invoice.**

*The above is not a complete and final representation of expenditures associated with this project but is a thorough representation of expected expenditures.

**All additional work will be conducted at no additional charge to St. Johns County. Funds may be allocated differently than represented.



A Wealth of Justice for Those Who Have Neither

