

RESOLUTION NO. 2024 – 225

A RESOLUTION BY THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA, APPROVING AND AUTHORIZING THE COUNTY ADMINISTRATOR TO SUBMIT A SUBSTANTIAL AMENDMENT TO THE 2022-2023 ANNUAL ACTION PLAN TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) TO RE-ALLOCATE CERTAIN COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS TO THE DEBT SERVICE RESERVE FUND REQUIRED BY THE HUD SECTION 108 LOAN FOR THE HASTINGS COMMUNITY CENTER AND LIBRARY PROJECT; AUTHORIZING THE CHAIR TO EXECUTE A LETTER TO HUD DETAILING THE SUBSTANTIAL AMENDMENT; PROVIDING AN EFFECTIVE DATE.

RECITALS

WHEREAS, the County prepared a 2021-2025 Consolidated Plan and 2022-2023 Annual Action Plan to apply for Community Development Block Grant (CDBG) entitlement funding through the U.S. Department of Housing and Urban Development (HUD); and

WHEREAS, for 2022-2023, HUD awarded the County \$1,022,927 in CDBG funding to assist the County in providing benefits to low- and moderate-income residents consistent with the 2021-2025 Consolidated Plan and the 2022-2023 Annual Action Plan; and

WHEREAS, as part of the 2022-2023 Annual Action Plan, the County allocated \$347,091 for the Hastings Community Center and Library Project (the “Project”); and

WHEREAS, on February 24, 2024, the Board approved a HUD Section 108 loan for the construction of the Project, and intends to use existing and future CDBG entitlement funds for the repayment of the loan and funding the required Debt Service Reserve Fund; and

WHEREAS, to fund the Debt Service Reserve Fund the County is proposing a substantial amendment to the 2022-2023 Annual Action Plan; and

WHEREAS, the proposed substantial amendment will reallocate \$250,000 in unused funds from the Affordable Housing and Homeless Assistance Project (PY 2022), \$145,058.76 in unused funds from the Planning and Administration Project (PY 2022), and \$31,983.20 from completed projects with unexpended funds (PY 2018, 2020, and 2021), for a total of \$427,041.96; and

WHEREAS, in this circumstance, HUD regulations and the County's CDBG program Citizen Participation Plan require a substantial amendment to the annual action plan.

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 into the body of this Resolution and are adopted as findings of fact.

Section 2. The Board of County Commissioners hereby approves the substantial amendment to the County's 2022-2023 Annual Action Plan; authorizes the Chair to execute and deliver a letter to HUD detailing the substantial amendment; and authorizes the County Administrator, or designee, to submit the substantial amendment through HUD's Integrated Disbursement and Information System.

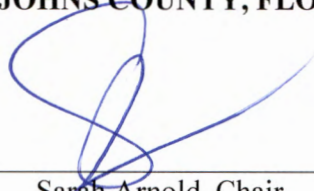
Section 3. To the extent there are typographical, administrative, or scrivener's errors that do not change the tone, tenor, or context of this Resolution, this Resolution may be revised without further action by the Board of County Commissioners.

Section 4. This Resolution shall become effective immediately upon adoption.

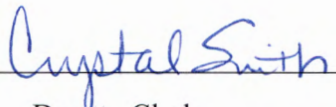
PASSED AND ADOPTED by the Board of County Commissioners of St. Johns County, State of Florida, this 21st day of May, 2024.

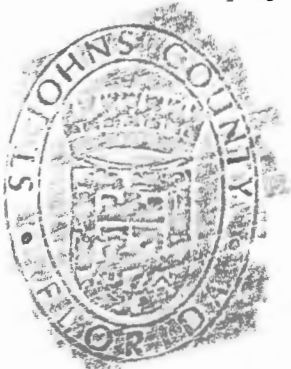
**BOARD OF COUNTY COMMISSIONERS OF
ST. JOHNS COUNTY, FLORIDA**

Rendition Date MAY 23 2024

By: 
Sarah Arnold, Chair

ATTEST: Brandon J. Patty,
Clerk of the Circuit Court and Comptroller

By: 
Deputy Clerk





Public Notice

Proposed Substantial Amendment to the 2022-2023 Annual Action Plan

The public hearing dated April 2, 2024, previously published on March 20, 2024, Publication # 9965488, has been moved to the Public Hearing at the Board of County Commissioners of May 21, 2024, from 9 am-3 pm. The Board of County Commissioners meets in the County Auditorium at 500 San Sebastian View, St. Augustine, FL 32084. Citizens may offer public comments at this meeting.

OBJECTIONS TO RELEASE OF FUNDS: Florida U.S. Department of Housing and Urban Development will accept objections to its release of fund and the St. Johns County's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of St Johns County; (b) St Johns County has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by Florida U.S. Department of Housing and Urban Development; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to Florida U.S. Department of Housing and Urban Development administration office at: Community Planning & Development Representative U.S. Dept. of Housing & Urban Development Office of Community Planning & Development ATTN: Anna O'Toole 400 W. Bay Street, Suite 1015 Jacksonville, Florida 32202 Phone: (904) 208-6074

In accordance with the Americans with Disabilities Act, persons needing a special accommodation to participate in the CDBG program or in public meetings should contact the ADA Coordinator at 904-209-0650. Deaf and/or hard-of hearing individuals may use Telecommunications Device for the Deaf (TDD): 904-209-0650, or the Florida Relay Service: 800-955-8770. CDBG information is provided in English; the Board of County Commissioners meeting will also be conducted in English. If you require a translator, please call 904-209-0650. To request services, please notify the County at least five business days prior to need for services.

Jennifer Harvey Housing and Community Service Manager
St. Johns County Health and Human Services
904-827-6894



Health & Human Services
200 San Sebastian View, Suite 2300, St. Augustine, FL 32084
904.209.6140 | sjcfl.us



March 14, 2024

**St. Johns County Community Development Block Grant (CDBG)
Proposed Substantial Amendment to the 2022-2023 Annual Action Plan**

Notice to Citizens: St. Johns County receives Community Development Block Grant (CDBG) funds as an entitlement community. This program is administered through the U.S. Department of Housing and Urban Development (HUD) to benefit low/moderate-income residents. St. Johns County uses CDBG funds within the unincorporated areas of the County and within the city limits of St. Augustine Beach. The County has prepared a 2021-2025 Consolidated Plan and a 2022-2023 Annual Action Plan as required by HUD to receive CDBG funding. The Consolidated Plan specifies priorities for the CDBG program. The Annual Action Plan establishes activities and projects for how the funds will be used for qualifying purposes. St. Johns County is now considering a Substantial Amendment to its 2022-2023 Annual Action Plan.

Consolidated Plan: The Five Year Consolidated Plan was prepared by St. Johns County and includes a discussion of needs and strategies to meet those needs. It was developed with participation from County staff, elected officials, affordable housing, social service providers, and local citizens. Various public hearings, meetings, and discussions were held to obtain citizen input on community needs. As a result of this process, the following priorities were developed:

Priority #1– Rehabilitation of Existing Housing- Focus on improving health and safety, code violations, accessibility, and sustainability for extremely low to moderate-income individuals (including but not limited to elderly, disabled, and veterans) below 50% AMI.

Priority #2 – Public Services- Public service provided will enhance the living environment of the targeted population by addressing basic needs that are not being met as well as the economic factors to adequately provide for themselves.

Priority #3– Public Facilities and Infrastructure- Provision of adequate infrastructure and public facility to ensure their operation at an efficient level of service and enhance the livability of low and moderate income neighborhoods.

Priority #4 – Homeless Assistance- Provide housing and support services to assist individuals and families who are homeless or at risk of becoming homeless.

Priority #5 – Affordable Housing- Increase the supply of affordable houses for sale and affordable rental housing available to very- low, low, moderate, and middle-income residents as well as veterans, elderly, disabled, and homeless persons through new construction or acquisition.

Health & Human Services

200 San Sebastian View, St. Augustine, FL 32084

904.209.6140 | sjcfl.us



Priority #6 – Economic Development- Promotion of Economic Development activities to respond to general needs as well as the impact of COVID-19.

Proposed change to the 2022-2023 Annual Action Plan: St. Johns County is proposing a substantial amendment to the **2022-2023 CDBG Action Plan**. The goal is to reallocate a total of \$427,041.96 in unused funds. The proposed reallocation derives from the following CDBG Program Years:

- **2018-2019 Public Infrastructure:** \$5,221.11
- **2020-2021 Public Infrastructure:** \$1,846.89
- **2020-2021 Planning and Administration:** \$200.75
- **2021-2022 Public Service:** \$279.03
- **2021-2022 Planning and Administration:** \$24,435.42
- **2022-2023 Planning and Administration:** \$145,058.76

Additionally, the County aims to remove \$250,000 in funding initially allocated for affordable housing property acquisition from the **PY 2022-2023 Annual Action Plan**. These funds will be reallocated to complete the required Debt Service Reserve for the project outlined in the **2022-2023 Annual Action Plan**. Specifically, this project involves a Section 108 Loan for the Hastings Community Center and Library

Public Comment Period: As required by HUD, the proposed Substantial Amendment to the 2022-2023 Annual Action Plan is available for review Monday – Friday, 8:00 AM – 5:00 PM at the Health and Human Services Department at 200 San Sebastian View, Suite 2300, St. Augustine, FL 32084. The document can also be viewed on the St. Johns County website: [Community Development Block Grant \(st-johns.fl.us\)](https://www.st-johns.fl.us/CommunityDevelopmentBlockGrant). A public hearing will be held at 3:00 pm. on March 19, 2024, in the Kingfisher Conference Room in the Health and Human Services building at 200 San Sebastian View, Augustine, FL 32084. Comments can also be provided by calling 904-827- 6890 or emailing housing@sjcfl.us. A written response will be offered to all written comments received within 30 days. For additional information, please call 904-827-6897.

Public Hearing: Final action will be taken on the proposed Substantial Amendment to the 2022-2023 Annual Action Plan at the regularly scheduled Board of County Commissioners meeting at 9:00 a.m. on April 2, 2024. Board of County Commissioners meets in the County Auditorium at 500 San Sebastian View, St. Augustine, FL 32084. Citizens may offer public comments at this meeting.

Health & Human Services
200 San Sebastian View, St. Augustine, FL 32084
904.209.6140 | [sjcfl.us](https://www.sjcfl.us)



OBJECTIONS TO RELEASE OF FUNDS: Florida U.S. Department of Housing and Urban Development will accept objections to its release of fund and the St. Johns County’s certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of St Johns County; (b) St Johns County has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by Florida U.S. Department of Housing and Urban Development; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to Florida U.S. Department of Housing and Urban Development administration office at:

Community Planning & Development Representative
U.S. Dept. of Housing & Urban Development
Office of Community Planning & Development
ATTN: Ana O’Toole
400 W. Bay Street, Suite 1015
Jacksonville, Florida 32202
Phone: (904) 208-6074

In accordance with the Americans with Disabilities Act, persons needing a special accommodation to participate in the CDBG program or in public meetings should contact the ADA Coordinator at 904-209-0650. Deaf and/or hard-of hearing individuals may use Telecommunications Device for the Deaf (TDD): 904-209-0650, or the Florida Relay Service: 800-955-8770. CDBG information is provided in English; the Board of County Commissioners meeting will also be conducted in English. If you require a translator, please call 904-209-0650. To request services, please notify the County at least five business days prior to need for services.

Jennifer Harvey
Housing and Community Service Manager
Housing and Community Development
St. Johns County Health and Human Services



Health & Human Services
200 San Sebastian View, St. Augustine, FL 32084
904.209.6140 | sjcfl.us



May 21, 2024

Anna O'Toole
 Community Planning & Development Representative
 U.S. Dept. of Housing & Urban Development
 Office of Community Planning & Development
 400 W. Bay Street, Suite 1015
 Jacksonville, Florida 32202

Dear: Ms. Anna O'Toole:

St. Johns County values the Community Development Block Grant (CDBG) for its benefits to its low to moderate-income residents. The County appreciates the guidance of the U.S. Department of Housing and Urban Development (HUD) as we implement our CDBG program. The County wishes to inform HUD of the need for a Substantial Amendment to the 2022-2023 Annual Action Plan. The need for this Substantial Amendment arose from allocating unused funds to the Debt Service Reserve for the Hastings Community Center and Library.

SUBSTANTIAL AMENDMENT: The County is proposing a substantial amendment to the 2022-2023 Action Plan to re-allocate \$427,041.96 in unused funds as follows:

Program Year	Project	Unused Funds	Reason
2018-2019	Public Infrastructure	\$5,221.11	Activity did not expend all their funds. Project completed
2020-2021	Public Infrastructure & Planning and Administration	\$2,047.64	Activities did not expend all their funds. Project completed.
2021-2022	Public Service & Planning & Administration	\$24,714.45	Activities did not expend all their funds. Project completed.
2022-2023	Planning and Administration	\$145,058.76	Activities did not expend all their funds. Project completed.
2022-2023	Public Infrastructure	\$250,000.00	Un-allocated/ unencumbered funds
	Total Unallocated Funds	\$427, 041.96	



The County also proposes eliminating the St. Johns Housing Partnership funding for acquisition, funded in the 2022-2023 Annual Action Plan at \$250,000. The reallocated funds will be utilized to complete the Debt Service Reserve for the project on the 2022-2023 Annual Action Plan for the Section 108 loan for the Hastings Community Center and Library.

CITIZEN PARTICIPATION AND FINAL ACTION: In accordance with 24 CFR 91.105(c)(3), the proposed Substantial Amendment to the 2022-2023 Action Plan has been available for public review and comment in accordance with the County’s Citizens Participation Plan and can also be viewed on the St. Johns County website:

<https://www.sjcfl.us/departments/housing-community-development/>

The Substantial Amendment to the 2022-2023 Action Plan was scheduled for Board action on May 21, 2024, at the regularly scheduled meeting of the Board of County Commissioners, at 9:00 a.m., in the County Commission Chambers, 500 San Sebastian View, St. Augustine, Florida 32084.

Thank you for reviewing the Substantial Amendment; upon your approval, the County will make the necessary changes to the 2022-2023 Annual Action Plan in HUD’s Integrated Disbursement and Information System.

Sincerely,

Sarah Arnold, Chair



FY 2022 Annual Action Plan

For the use of
Community Development Block Grant (CDBG)
U.S. Department of Housing and Urban Development



Annual Action Plan
2022

St. Johns County is proposing a substantial amendment to the 2022-2023 CDBG Action Plan. The goal is to reallocate a total of \$427,041.96 in unused funds. The proposed reallocation derives from the following CDBG Program Years:2018-2019 Public Infrastructure: \$5,221.11

- 2020-2021 Public Infrastructure: \$1,846.89
- 2020-2021 Planning and Administration: \$200.75
- 2021-2022 Public Service: \$279.03
- 2021-2022 Planning and Administration: \$24,435.42
- 2022-2023 Planning and Administration: \$145,058.76

Additionally, the County aims to remove \$250,000 in funding initially allocated for affordable housing property acquisition from the PY 2022-2023 Annual Action Plan. These funds will be reallocated to complete the required Debt Service Reserve for the project outlined in the 2022-2023 Annual Action Plan. Specifically, this project involves a Section 108 Loan for the Hastings Community Center and Library.

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

St. Johns County is rich in history and opportunity. Nestled between the St. Johns River and the Atlantic Coast it is a fast-growing community and is home to over 200,000 residents. There is growing diversity in population, arts, commerce, industries, and it is becoming a leading County to live, work, and play.

As an entitlement jurisdiction under the United State Department of Housing and Urban Development (HUD), St. Johns County receives federal funds from the Community Development Block Grant (CDBG) based on the in-population size, concentration of poverty, socioeconomic, and demographic data. Every year HUD requires entitlement communities like St. Johns County to develop and submit an Annual Action (AAP). St. Johns County's 2021-2025 Consolidated Plan is carried out through its Annual Action Plan, which provides a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used annually to address the priority needs and specific goals identified by the 2021-2025 Consolidated Plan.

The County's 2021-2025 Consolidated Plan as approved by HUD, identified and analyzed community, social, economic needs, especially within low to moderate income (LMI) communities and multi-year goals were established to address those needs. Goals and strategies were based on an assessment of housing and community development needs, and an analysis of housing and economic market conditions and available resources.

Like the 2021-2025 Consolidated Planning process, the Annual Action Plan process is collaborative in nature and through this collaboration with community members, nonprofit organizations, social service agencies, and other key stakeholders, it establishes comprehensive, strategic, and collaborative goals to improve, address, and encourage growth within the County.

Beyond a requirement to comply with federal regulation, the Annual Action Plan provides an opportunity for the County to engage with residents and key stakeholders to assess the needs of our community and shape community development, housing and economic development programs, and strategies to respond to the need.

As an entitlement community, St. Johns County is expected to receive an annual allocation of CDBG funds. While adhering to all applicable federal regulation, the County must utilize this funding opportunity to address community needs with regard to affordable housing, and community and economic development objectives over the next one-year period.

The Annual Action Plan as mandated by the U.S. Department of Housing and Urban Development (HUD), outlines the County's affordable housing and community development needs and identifies strategies for addressing them.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

St. Johns County deployed a comprehensive community engagement campaign along with data provided by American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS) Data, and Community Planning and Development Mapping Services to create the footprint for this Annual Action Plan. Federal regulations require that Community Development Block Grant funds primarily low- and moderate-income persons in accordance with the following HUD objectives:

1. Provide decent housing;
2. Establish and maintain a suitable living environment; and
3. Provide expanded economic opportunities.

These objectives are combined with three performance outcomes categories and measurement statements:

1. Accessibility;

2. Affordability, and
3. Sustainability.

St. Johns County has identified various activities they intend to utilize to achieve the objectives and associated outcomes required by HUD. The County intends to focus investments on the following eligible areas:

1. Public Facilities and Infrastructure
2. Public Services
3. Affordable Housing and Homeless Services
4. Home Repair

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

St. Johns County first became an entitlement community for the 2016-2020 Consolidated Plan cycle. Staff worked remarkably hard to build out the CDBG Program by developing policies and procedures, cultivating relationships with nonprofit organizations and social service agencies and other community partners, expending the funding on eligible activities which were reported on in the CAPERS, envisioning the possibilities of future investments, and responding to natural disasters and a global pandemic.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

St. Johns County has developed a Citizen Participation Plan (CPP) to guide the public process of developing the Annual Action Plan. Citizen participation was encouraged and solicited in the planning process through advertisements in the local newspaper and on the County website followed by a 30-day review and comment period. The CPP required no less than two public hearings to gather citizen input on housing and community development programs funded by the CDBG program. The County sought public participation and input as outlined in the CPP and as follows:

- Held public hearings in association with the regularly scheduled meeting of the Board of County Commissioners.
- Held four (4) public hearings during the planning process. The schedule of these meetings was published in the local newspaper and posted on the County website.
- An electronic survey was created to gather citizen and stakeholder input to help determine what programs/projects should be funded. The survey was published on the County website and

notice of the survey was published in the local newspaper. Paper copies of the survey were made available at various County locations and during community meetings.

- Staff met with stakeholders and community members and attended local meetings to educate citizens on the planning process and to encourage citizen participation and input.
- A draft copy of the Annual Action Plan was made available to the public for a 30-day review and comment period. It was introduced during an advertised public hearing.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Public comments were received at public hearings, and many of our residents and key stakeholders participated in our survey (all responses can be referenced in the attached document). A majority of the public comments received indicated that there is a substantial need for affordable housing, public services in underserved areas, and housing rehabilitation countywide. The surveys are attached for review, with key areas being supported for homelessness, after-school activities, home repairs for people with special needs, including the elderly, people with disabilities and veterans, improved public safety, cost of living, support for disabled veterans, roadways in poor repair, upgrades to parks and recreational facilities, and public transportation.

6. Summary of comments or views not accepted and the reasons for not accepting them

All public comments were accepted and considered consistent with the 5-year Consolidated Plan and activities that address social services, housing, and community-based infrastructures. The survey was made avail to all residents, internal and external social agencies, planning, transportation, parts and recreations, and other stakeholders.

7. Summary

St. Johns County values and encourages the input and participation of its citizens, stakeholders, and community members affected by, or involved with, any housing and community development projects. By utilizing the citizen participation process and by consulting with public service providers, advisory committees, other County departments, and community development corporations, the County was able to gather valuable feedback that helped identify the goals and objectives in the Plan. The County will leverage its CDBG funds with other federal, state, local, and private dollars to meet the goals and objectives discussed in the Annual Action Plan.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	ST. JOHNS COUNTY	Housing & Community Services Division

Table 1 – Responsible Agencies

Narrative (optional)

St. Johns County (SJC) Health and Human Services Department is funded by the SJC Board of County Commissioners to offer social support and general assistance to needy members of the community. Housing and Community Development is a division within Health and Human Services and is responsible for the promotion, development, preservation, and administration of affordable housing programs, initiatives, and policies in St. Johns County.

The Housing and Community Development Division is the lead agency for the CDBG entitlement program and is responsible for the administration of the program.

Consolidated Plan Public Contact Information

Roberto Ortiz, Housing and Community Development Manager

200 San Sebastian View, Suite 2300

St. Augustine, FL 32084

904-829-6890

housing@sjcfl.us

DRAFT

AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

St. Johns County is committed to taking resident input into consideration for the development of the PY2022 Annual Action Plan for the U.S. Department of Housing and Urban Development. Residents, especially low-income or potentially marginalized residents in LMI areas, were strongly encouraged to participate in the survey and public hearings. County staff, officials, and consultants met with many different groups, committees, departments, and organizations to encourage public participation to identify housing and community development needs.

The meeting details were published on our website and local media outlets for at least fifteen (15) days prior and the survey was published on our website via Survey Monkey and made available in paper form for over thirty (30) days.

Public comment is also encouraged when the document is in the draft stage. All public input is considered and made a part of the Plan. All comments received verbally or in writing will be accepted. The final document must be approved by the Board of County Commissioners prior to submitting the 5-year Consolidated Plan to HUD.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

The County coordinates with many different organizations and service providers, including but not limited to:

Email communications, interagency meetings (Zoom and in-person), conference calls and consultations with St. Johns County Social Services, Flagler Hospital office of Care Connect in St. Johns County, Salvation Army, Home Again (Non-profit agency serving the homeless in St. Johns County) and others. Staff also attended annual Fair Housing Trainings.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

At present, the Lead Agency is Flagler Health+. In our shared goal of ending homelessness within our community, County staff and elected officials have regular contact with the Continuum of Care (CoC) to ensure coordination of meaningful goals. Staff attend the CoC meetings, and one (1) staff member sits on the CoC Board.

One way we can coordinate efforts and share data is through the use of the Homeless Management Information System (HMIS), which provides a higher standard of collecting client-level data for the critical populations that are being served daily. The populations being affected cross race, color, nationality, sex, religion, and disability of individuals and families who are experiencing homelessness or at risk of becoming homeless.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

Substantial consultation with the St. Johns County area homeless service providers and clients is essential for collecting data and creating meaningful outcomes for individuals and families. To fully address the needs of the homeless members of our community, County staff have regular contact with the CoC. This involves ESG allocations performance standards, evaluation of outcomes, as well as the development of funding, policies, and procedures for the administration of HMIS. This ongoing communication and collaboration centered on strategic goals as part of the Annual Action Plan development process and will continue even upon the completion, submission, and approval of the PY2022 annual Action Plan.

The County does not receive a direct allocation of ESG from HUD, but rather applies for funding from the State. ESG is designed to support the first steps in homeless prevention and assisting people experiencing homelessness to transition toward safe and healthy living situations. ESG funds can be used by emergency shelter operators and other service providers for activities such as street outreach, homelessness prevention, rapid re-housing, and data collection.

The County believes housing is a human right and we envision a community where all people have access to safe, stable, and affordable housing.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	St. Johns County Board of County Commissioners
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing two-way communication with the BOCC via public meetings, public comment, and strategic meetings to align the goals and objectives for the County. It is anticipated that the program will remain focused with those objectives that are further complimented by the adopted 5-year Consolidated Plan.
2	Agency/Group/Organization	CITY OF ST. AUGUSTINE
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy CDBG Program
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	St. Johns County is committed to considering all input is received in a collaborative and cooperative manner for a fully comprehensive approach. The County seeks citizen engagement via community meetings, surveys, consultations, focus groups, and Public Notices according to our Citizen Participation Plan.

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

3	Agency/Group/Organization	Alpha-Omega Miracle Home, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Education Services-Employment Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	St. Johns County is committed to considering all input is received in a collaborative and cooperative manner for a fully comprehensive approach. The County seeks citizen engagement via community meetings, surveys, consultations, focus groups, and Public Notices according to our Citizen Participation Plan.

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

4	Agency/Group/Organization	Catholic Charities Bureau, Inc. - St. Augustine Regional Office
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Education Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	St. Johns County is committed to considering all input is received in a collaborative and cooperative manner for a fully comprehensive approach. The County seeks citizen engagement via community meetings, surveys, consultations, focus groups, and Public Notices according to our Citizen Participation Plan.

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

5	Agency/Group/Organization	Emergency Services and Homeless Coalition of St. Johns County
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	St. Johns County is committed to considering all input is received in a collaborative and cooperative manner for a fully comprehensive approach. The County seeks citizen engagement via community meetings, surveys, consultations, focus groups, and Public Notices according to our Citizen Participation Plan.

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

6	Agency/Group/Organization	St. Johns Housing Partnership
	Agency/Group/Organization Type	Housing Services - Housing Services-Education Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	St. Johns County is committed to considering all input is received in a collaborative and cooperative manner for a fully comprehensive approach. The County seeks citizen engagement via community meetings, surveys, consultations, focus groups, and Public Notices according to our Citizen Participation Plan.
7	Agency/Group/Organization	West+Augustine+Historical+Community+Development+Corporation
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	St. Johns County is committed to considering all input is received in a collaborative and cooperative manner for a fully comprehensive approach. The County seeks citizen engagement via community meetings, surveys, consultations, focus groups, and Public Notices according to our Citizen Participation Plan.
--	--

Identify any Agency Types not consulted and provide rationale for not consulting

St. Johns County has been wholly inclusive of all agency feedback. No agencies or types of agencies were excluded from participating or providing input in the process of preparing the PY2022 Annual Action Plan.

Broadband wiring and connection agencies operating within SJC was consulted during the Consolidated Plan process as identified under MA-60; however, identifying the top two (2) local internet providers and two (2) satellite service providers:

1. Xfinity @ 97% availability and AT&T @100% availability
2. Earthlink @ 81% availability and HughesNet @ 99% availability

These four agencies were mistakenly absent from being clearly identified within the PR-10 as part of the consultation efforts.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Home Again St. Johns	Both have goals to end chronic homelessness
Comprehensive Plan	St. Johns County Board of County Commissioners	Both identify goals to improve public services in low-income areas

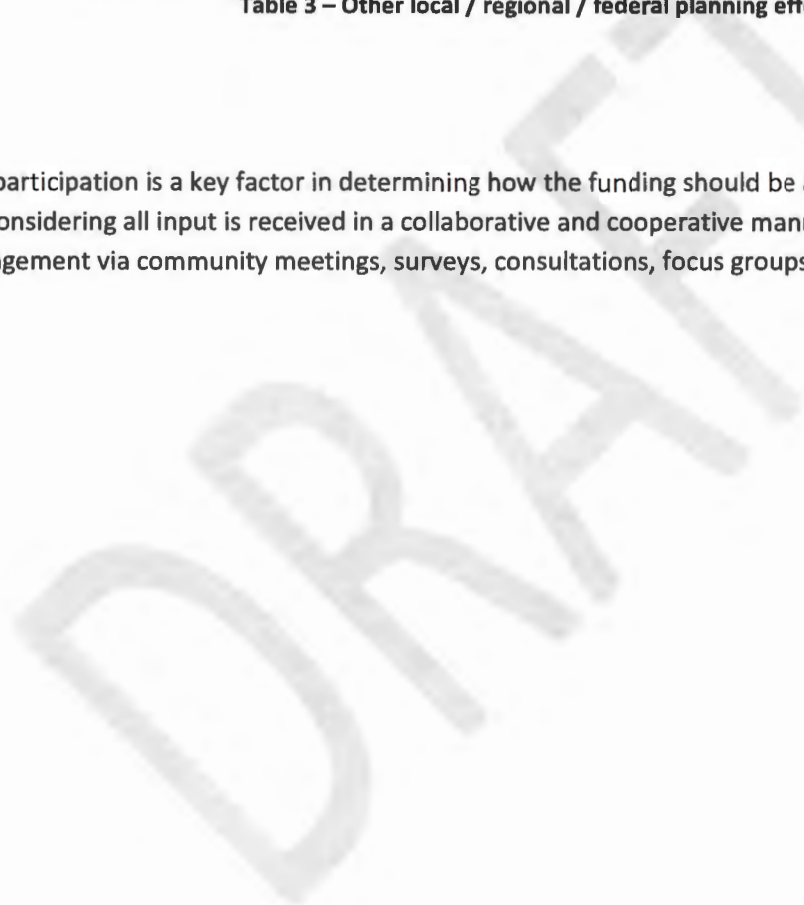
Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
LHAP - Local Housing Assistance	St. Johns County Housing and Community Development	Both recognize the severe shortage of affordable housing

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Citizen engagement and participation is a key factor in determining how the funding should be allocated within our community. St. Johns County is committed to considering all input is received in a collaborative and cooperative manner for a fully comprehensive approach. The County seeks citizen engagement via community meetings, surveys, consultations, focus groups, and Public Notices according to our Citizen Participation Plan.



AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

In accordance with the Citizen Participation Plan, St. Johns County actively engaged residents, community members, and key stakeholders to assist with the identification of community needs and influence goal setting. A summary of the activities for the development of the County's PY2022 Annual Action Plan include:

- **Four (4) Public Hearing were held in March and April 2022.** The hearings were publicized on the County's website and in the local newspaper. As per HUD Citizen Participation requirements, the County accepted comments up to 30 days after the date of the formal Public Hearing.
- **Surveys were solicited.** Citizens were invited to participate in a Survey to gain insight on priorities and Fair Housing issues. The Surveys were made available electronically and in paper form for 30 days.
- **2nd Public Hearing was held in June 2022.** The hearing was publicized through the resources mentioned above. The County will accept comments up to 30-days.

Drafts of the PY2022 Annual Action Plan were posted on the County's website for its 30-day comment period and hard copies were made available at County offices. Citizens, public agencies, or other interested parties wishing to comment were encouraged to submit comments verbally or in writing. Input from the community, including comments received from individual citizens as well as agencies, is highly valuable and contributed to the establishment of housing and community development goals.

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Five (5) public hearings were held for the Con Plan and AAP and one (1) presentation at St Johns County Board of County Commissioners meeting.	Survey responses received and attached in AD-25. No other comments were received.	All comments were accepted. See attached comments.	
2	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Two (2) newspaper advertisements.	Survey responses attached in AD-25. No additional comments were received specifically regarding the PY2022 Annual Action Plan.	All comments were accepted. See attached comments.	

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Survey responses are attached.	Survey responses are attached.	All comments were accepted. See attached comments.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

St. Johns County anticipates receiving \$1,022,927 in Community Development Block Grant funds from the U.S. Department of Housing and Urban Development for the second program year (October 1, 2022 – September 30, 2023) of the five-year consolidated plan cycle; these funds will be used to address priority needs, goals, and objectives. The County realizes that these funds alone are not sufficient to fulfill the jurisdiction’s housing and community development needs. To help address the gap, the County will be leveraging HUD funding to the maximum extent possible with other state, local and private alternative funding sources which may include a Section 108 Application. The County currently provides general revenue to operate the Housing and Community Development Division of Health and Human Services and has established a Housing Trust fund, which has the ability to be utilized to develop much warranted affordable and workforce housing. The County also funds homeless prevention and rapid re-housing activities through its Social Services Division. The Social Services Division receives and matches Emergency Solutions Grant (ESG), Temporary Assistance for Needy Families (TANF), and Challenge grant funds to aid in the prevention

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

of homelessness.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,022,927	0	0	1,022,927	3,068,781	This is the allocation for PY2022.
Other	public - state	Admin and Planning Housing	2,708,433	0	0	2,708,433	0	St Johns County will receive \$2,708,433 for the 2022/2023 fiscal year. Funds will compliment the CDBG in accomplishing the estimated goals.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

St. Johns County will receive \$2,708,433 in FY2022-2023 from the Florida Housing Finance Corporation for the State Housing Initiatives

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

Partnership (SHIP Program). There are not matching requirements for SHIP funding, however, leverage of funds is encouraged. The SHIP program provides funds to local governments as an incentive to create partnerships that produce and preserve affordable homeownership and multi-family housing. The program was designed to serve very low-, low-, and moderate-income families. SHIP dollars may be used to fund emergency repairs, new construction, rehabilitation, down payment and closing cost assistance, impact fees, construction financing, acquisition of property for affordable housing, matching dollars for federal housing grants and programs, and homeownership counseling.

In an effort to address the funding gap, the County applies for competitive federal, state, and foundation grants when the application criteria align with our goals and staffing capacity. These funds can be used to expand existing programs, develop new programs to address unmet needs in the community, or as leverage for other funding sources. Given that these additional funding sources are competitive, the amount and uses are unknown at this time.

DRAFT

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Florida Statutes at Title XI, Section 125.35 (County Authorized to Sell Real and Personal Property and to Lease Real Property), 125.38 (Sale of County Property to United States or State), 125.37 (Exchange of County Property), 125.379 (Disposition of County Property for Affordable Housing) and St Johns County Ordinance 2011-17 provide guidelines as to the distribution of land owned by the County. The disposition of any County owned land for purposes of addressing the needs identified in this Consolidated Plan are subject to Florida State Statute and County Ordinance.

The County maintains an inventory of County owned lots and properties. Land may be sold or donated to entities (non-profits and municipalities) for public and community interest purposes upon receipt of a request to the Board of County Commissioners (BCC) for the conveyance or lease of the property. Pending BCC satisfaction with the proposed use of the property, and provided that the land is not needed for county purposes, it can be conveyed or leased to the applying entity for a price named by the BCC, regardless of the actual value of the property.

St. Johns County will consider and encourage proposals that will redevelop publicly owned property to meet the needs of the community. The County maintains an inventory of County owned lots and properties. Upon receipt of a request to the Board of County Commissioners (BCC) for the conveyance or lease of property, these lots and properties may be sold or donated to entities (non-profits and municipalities) for public and community interest purposes. St. Johns County Ordinance 2011-17 provides guidelines as to the distribution of land owned by the County. The disposition of any County owned land for purposes of addressing the needs identified in this Consolidated Plan are subject to Florida State Statute and County Ordinance.

Discussion

Creativity, local funding, and collaborative partnerships and possibly Section 108 funding are all necessary if we are to achieve larger impact projects.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facility or Infrastructure Activities	2021	2025	Non-Housing Community Development	Elkton/Armstrong Flagler Estates Hastings Countywide	Public Facilities and Infrastructure	CDBG: \$347,091 State Housing Initiatives Partnership: \$0	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 8275 Households Assisted
2	Public Services	2021	2025	Non-Housing Community Development	Elkton/Armstrong Flagler Estates Hastings Countywide	Public Services	CDBG: \$101,250 State Housing Initiatives Partnership: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Affordable Housing & Homeless Services Prevention	2021	2025	Affordable Housing	Countywide	Affordable Housing & Homeless Services	CDBG: \$250,000 State Housing Initiatives Partnership: \$342,000	Rental units rehabilitated: 17 Household Housing Unit Homeowner Housing Rehabilitated: 17 Household Housing Unit Direct Financial Assistance to Homebuyers: 6 Households Assisted Homelessness Prevention: 4 Persons Assisted
4	Home Repair/Rehabilitation	2021	2025	Affordable Housing	Countywide	Rehabilitation of Existing Housing	CDBG: \$120,000 State Housing Initiatives Partnership: \$2,158,590	Homeowner Housing Rehabilitated: 53 Household Housing Unit

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Planning and Administration	2021	2025	Planning and Administration	Countywide	Affordable Housing & Homeless Services Public Facilities and Infrastructure Public Services Rehabilitation of Existing Housing	CDBG: \$204,586 State Housing Initiatives Partnership: \$207,843	Other: 0 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Public Facility or Infrastructure Activities
	Goal Description	Provision of adequate infrastructure and public facilities to enhance the livability of low- to-moderate income neighborhoods and assure efficient levels of service.
2	Goal Name	Public Services
	Goal Description	Enhance the living environment of the targeted area by addressing basic needs that are unmet due to economic disparity.

Proposed Substantial Amendment to 2022-2023 AAP- April 2, 2024

3	Goal Name	Affordable Housing & Homeless Services Prevention
	Goal Description	Increase the supply of affordable housing available to very low, low, and moderate income residents, as well as veterans, elderly, disabled, and homeless persons through new construction or acquisition; provide housing counseling and support services to assist individuals and families in crisis.
4	Goal Name	Home Repair/Rehabilitation
	Goal Description	Provide for emergency repair, spot or full house rehabilitation of existing housing for extremely low-to-moderate income residents below 50% AMI (including but not limited to residents who are elderly, disabled, and veterans).
6	Goal Name	Planning and Administration
	Goal Description	Provide grant administration structure for the planning, implementation, management, and HUD compliance oversight of the CDBG program.

DRAFT

Projects

AP-35 Projects – 91.220(d)

Introduction

The PY2022 Annual Action Plan identifies a total of four (4) projects to be funded by the CDBG program. These projects include public services, infrastructure, homeless activities, and home repairs/rehabilitation, as well as allowable administrative costs. The projects identified will be completed no later than September 30, 2023, the end of the jurisdiction's second program year of the 2021-2025 Consolidated Plan.

The priorities and allocations were established based on citizen and stakeholder participation in the Survey and the most recent Census data. St. Johns County will continue to support area non-profit agencies and participate with the Continuum of Care homeless providers to meet the needs of underserved residents within our community. Access to sufficient funding to meet the needs of our community's underserved remains a primary obstacle. Incoming funding from Federal, State, and local sources is not sufficient to meet all the needs identified by our residents and the data trends.

Pending approval by the County Commission, Staff has requested to fund a public service program for low-to moderate-income residents through the Girl Scouts of Gateway Council in the amount of \$101,250; emergency repair, spot or full house rehabilitation of existing housing for extremely low-to-moderate income veteran residents below 50% AMI through Operation Lifeline, Inc. in the amount of \$120,000; an affordable housing and homeless assistance program to increase the supply of affordable housing available to very low, low, and moderate income residents, as well as veterans, elderly, disabled, and homeless persons through acquisition through the St. Johns Housing Partnership in the amount of \$250,000; public infrastructure and public facilities to enhance the livability of low- to-moderate income neighborhoods and assure efficient levels of community services and safety through the proposed new construction Hastings Community Center and Library Project in the amount of \$347,091; and Planning and Administration expenses in the amount of \$204,585.

Projects

#	Project Name
1	Public Facility/Public Services
2	Public Services
3	Rehabilitation of Existing Housing
4	Affordable Housing & Homeless Assistance

#	Project Name
5	Planning & Administration

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The priorities and allocations were established based on citizen and stakeholder participation in the Survey and the most recent Census data. St. Johns County will continue to support area non-profit agencies and participate with the Continuum of Care homeless providers to meet the needs of underserved residents within our community. Access to sufficient funding to meet the needs of our community's underserved remains a primary obstacle. Incoming funding from Federal, State, and local sources is not sufficient to meet all the needs identified by our residents and the data trends.

Increase the supply of affordable rental housing available through acquisition and/or preservation by rehabilitation.

DRAFT

AP-38 Project Summary
Project Summary Information

DRAFT

1	Project Name	Public Facility/Public Services
	Target Area	Elkton/Armstrong Flagler Estates Hastings
	Goals Supported	Public Facility or Infrastructure Activities
	Needs Addressed	Public Facilities and Infrastructure Public Services
	Funding	CDBG: \$347,091
	Description	Public Infrastructure/Public Facilities to enhance the livability of low to moderate income neighborhoods and assure efficient levels of community service and safety. This proposed public facilities project will benefit surrounding households in the unincorporated area of Hastings and Flagler Estates. The project is based upon the priority needs in the Citizen Survey. It will serve an estimated 8,275 residents.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	This proposed public facilities project will benefit surrounding households in the unincorporated area of Hastings and Flagler Estates. The project is based upon the priority needs in the Citizen Survey. It will serve an estimated 8,275 residents.
	Location Description	On an undeveloped vacant lot in the center of the Unincorporated town of Hastings on Main Street.
	Planned Activities	Development of a Community Center and Library. Eligibility Citation: Section 101(c), Section 104(b), Section 105(c) §570.200(c), §570.208 National Objective: LMI Matrix Codes: 03E and 03F
2	Project Name	Public Services
	Target Area	Countywide
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$101,250
	Description	Social Services Program for low to moderate income residents.
	Target Date	9/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	Families and households participating in the Girl Scouts after school programs.
	Location Description	Countywide
	Planned Activities	The expansion of Community Development Troops in St. Johns County, serving girls within 5 Title I schools over a three-year period of time. Community Development Troops will build girls courage, confidence, and character and these girls will make the world a better place. Eligibility Citation: Section 105(a)(8) §570.201(e), §570.207 National Objective: LMC Matrix Codes: 05D
3	Project Name	Rehabilitation of Existing Housing
	Target Area	Countywide
	Goals Supported	Affordable Housing & Homeless Services Prevention Home Repair/Rehabilitation
	Needs Addressed	Rehabilitation of Existing Housing
	Funding	CDBG: \$250,000 State Housing Initiatives Partnership: \$342,000
	Description	Emergency Repair, Spot or Full House Rehabilitation or modification for accessibility of existing housing for extremely low to moderate income veteran residents below 50% AMI.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	4 veteran households at or below 50% AMI using CDBG and an estimated 23 using SHIP.
	Location Description	Countywide

	Planned Activities	Emergency Repair, Spot or Full House Rehabilitation or modification for accessibility of existing housing for renters, owners, and homeless. Purchase Assistance is also planned. Eligibility Citation: Section 105(a)(4) §570.202 National Objective: LMH Matrix Codes: 13B, 14A, & 14H
4	Project Name	Affordable Housing & Homeless Assistance
	Target Area	Countywide
	Goals Supported	Affordable Housing & Homeless Services Prevention Home Repair/Rehabilitation
	Needs Addressed	Affordable Housing & Homeless Services
	Funding	CDBG: \$120,000 State Housing Initiatives Partnership: \$2,158,590
	Description	Increase the supply of affordable rental housing available to very low-, low-, and moderate-income residents, as well as veterans, elderly, disabled, and homeless persons through acquisition.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Increase the supply of affordable rental housing available to very low, low, and moderate income residents by fifty-three (53) properties.
	Location Description	Countywide
	Planned Activities	Increase the supply of affordable rental housing available through acquisition and/or preservation by rehabilitation. Eligibility Citation: Section 105(a)(4) §570.202 National Objective: LMH Matrix Codes: 14A, 14B, and 14H
5	Project Name	Planning & Administration
	Target Area	Countywide
	Goals Supported	Planning and Administration
	Needs Addressed	Public Facilities and Infrastructure Public Services Affordable Housing & Homeless Services Rehabilitation of Existing Housing

Funding	CDBG: \$204,586 State Housing Initiatives Partnership: \$207,843
Description	For HUD-approved Planning & Administrative functions related to the operation of the CDBG program.
Target Date	9/30/2022
Estimate the number and type of families that will benefit from the proposed activities	Planning and administrative functions required to support the proposed projects in the AAP.
Location Description	n/a
Planned Activities	Planning and administrative functions required for the administration of the CDBG Program. Eligibility Citation: Section 105(a)(13), Section 105(a)(12) §570.201(p), §570.205, §570.206, §570.208 National Objective: N/A Matrix Code: 20 & 21A

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

St. Johns County has low- and moderate-income families and individuals residing throughout the County with minority concentrations and aging housing in the West Augustine area and infrastructure needs in the Hastings/Flagler Estates areas, in addition to needs county-wide. Funding will be distributed throughout the county for social service and housing programs. All proposed CDBG-eligible activities under the 2021-2025 Consolidated Plan are intended to serve low- to moderate income households and special needs populations.

Geographic Distribution

Target Area	Percentage of Funds
Elkton/Armstrong	15
West Augustine	14
Flagler Estates	0
Hastings	15
Countywide	56

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The County has established priorities and allocations based on citizen and stakeholder input as well as Census data trends. The County intends to invest the funds in communities identified as areas of greatest need with the potential for positive changes in the lives of our residents. To comply with CDBG program requirements, at least 70% of funds benefit low- and moderate-income households. The majority of funding will be used for infrastructure and public facilities that supports the expansion of public safety and the creation/preservation of existing housing units in LMI areas to address housing affordability for our most vulnerable households, and social services/public services to meet non-housing needs.

Discussion

St. Johns County has the benefit of serving urban, suburban, and rural areas within the county lines. Each of these different community types means our residents have a variety of choices in places to live, work, and play, but it also presents challenges when trying to address the diverse needs of our residents when there are varying non-financial resources in each of the areas. The citizen and stakeholder input were used to support prioritization of not only the different needs but also the different geographical areas.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The St. Johns County 2021-2025 Consolidated Plan identified the need of affordable housing for our very low to moderate income residents. The Plan also identified the need to repair the existing aging housing stock ensuring our residents have access to decent, safe, affordable housing options. The PY2021 Annual Action Plan provided funding for the rehabilitation of existing housing for residents at or below 50% AMI, including but not limited to residents who are elderly, disabled, and veterans. This PY2022 Annual Action Plan provides funding for the rehabilitation of existing housing for veteran residents at or below 50% AMI.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	34
Acquisition of Existing Units	0
Total	34

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

St. Johns County is committed to increasing the affordable housing available to our residents. In addition to the CDBG investment, the County will leverage resources from other sources to assist with the affordable housing goals, including indirect assistance from the General Fund to assist with affordable housing and rehabilitation of existing housing stock. The County also receives State Housing Initiative Program (SHIP) dollars, which may be used to fund emergency repairs, new construction, rehabilitation, down payment and closing cost assistance, impact fees, construction financing, acquisition of property for affordable housing, matching dollars for federal housing grants and programs, and homeownership counseling. However, it should be noted, even with these additional sources, the County is not able to meet all its affordable housing needs.

AP-60 Public Housing – 91.220(h)

Introduction

St. Johns County does not have a public housing authority or public housing. Residents wishing to apply for public housing must apply for a voucher through Jacksonville Housing Authority (JHA) in neighboring Duval County to the north. There has been no indication that the County will pursue acquiring public housing in the near future.

Actions planned during the next year to address the needs to public housing

St. Johns County does not have public housing, so this is not applicable to the jurisdiction.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

St. Johns County does not have public housing, so this is not applicable to the jurisdiction.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

St. Johns County does not have public housing, so this is not applicable to the jurisdiction.

Discussion

St. Johns County does not have public housing, so this is not applicable to the jurisdiction.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

St. Johns County is dedicated to improving the housing opportunities for all its residents, especially, the homeless population, special needs population, and people at risk of becoming homeless. The County, along with area non-profit agencies and organizations, will continue to provide services and funds to aid in the prevention of homelessness, provide funds for rapid re-housing programs to house the homeless, and provide funds for the rehabilitation of homes of low income and special needs persons.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

St. Johns County is a growing community with homeless needs; unfortunately, our population has not reached the level for a direct allocation of Emergency Shelter Grant (ESG) funds or HOME Investment Partnership funds. We will seek to receive ESG and other funding from the State of Florida and other sources, but our efforts are presently limited to the activities we can undertake solely with our Community Development Block Grant (CDBG) funding. The County's goals for the PY2022 Annual Action Plan continue to include a focus on affordable housing and supportive services to help vulnerable residents remain housed.

Through collaboration with the Continuum of Care, along with other organizations, St. Johns County will utilize many avenues to provide outreach and education to the homeless population, including those who are unsheltered. St Johns County CoC has identified "Street Outreach" as an important role in our county's plight to end homelessness. Currently, the Street Outreach Program is operated by St. Francis House and has been very successful since its implementation in 2016. The outreach efforts include initially assessing the homeless individual/family's needs to provide the appropriate housing and supportive services referrals.

In addition, the Street Outreach program will assist in the identification of unsheltered individuals and the areas in which they live. The objective of Street Outreach is to reduce the number of unsheltered homeless persons on the street by providing engagement and essential services, ensuring everyone has a path to permanent housing. The program can assess each individual by identifying their most critical needs and helping them to navigate to those resources in an expeditious manner. The outreach program will assist these individuals in accessing much needed support services in the areas of medical care, employment, assistance in applying for state, federal and local programs to help meet their needs and will assist with the rapid re-housing of these individuals.

Eligible clients will be served using a program model that brings services to the client. This

includes providing services in homeless encampments, parks, streets, libraries, and/or other frequented areas identified by Street Outreach workers. After an initial intake is completed, advocates will provide basic care services, including food, clothing, shelter, or connections to medical care if necessary. After attending to immediate basic needs, advocates will complete a service or goal plan with client input and participation.

Addressing the emergency shelter and transitional housing needs of homeless persons

The County will continue to provide funding, based on availability, for the operation and maintenance of the emergency shelter, transitional housing facilities, and program services provided by these facilities. These facilities provide shelter and supportive services to homeless veterans, homeless families with children, single men and women, including those recently released from incarceration, chronic homeless, and victims of domestic violence. St. Johns County CoC will continue to address the needs of emergency shelter and transitional housing in our community by continuing to increase the resources available for emergency case management, and by increased referrals and placements in permanent housing.

Although transitional housing is no longer a priority in our community, we continue to have programs that assist in the transitional housing for those victims of domestic violence, the elderly, and families with children who are homeless.

The County will continue to work with the CoC toward a goal of functional zero whereby every person wanting to exit homelessness will be offered appropriate housing within 30 days. By utilizing our Housing Crisis Center and other Crisis Housing resources for emergency shelter and service linkage, homeless persons will receive the support and services best matched to their circumstances. Transitional Housing will serve in the interim for those needing housing while permanent and affordable options are created and/or found.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

St. Johns County will assist homeless persons and families to transition into permanent supportive/independent housing by providing financial assistance and case management. The CoC is currently in the second year of a three-year funding contract with DCF. This funding provides rapid re-housing and prevention support to area agencies and organizations. Programs will provide financial

assistance to homeless individuals/families to regain stability in permanent housing.

The financial assistance may be used for rent and utility assistance, as well as assistance with rent and utility deposits.

In addition, the County will continue to provide prevention funding for emergency assistance for rent and utilities through its Social Services Division if funding remains available.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

When available, St. Johns County will utilize local, state, and federal funding to support prevention activities designed to help our low-income individuals and families that find themselves at risk of homelessness and needing a hand up.

The County will partner with area agencies to refer homeless individuals and families who find themselves stranded, to relocation assistance through the St. Augustine Police Department. This will allow these homeless individuals and families to return home to out of area relatives.

The County and other community stakeholders work closely with the St. Johns County CoC in retooling our homeless response system by transforming homeless services to crisis response systems that prevent homelessness, whereby creating a system that will quickly identify and prevent homelessness, quickly return those experiencing homelessness to stable housing by utilizing county-wide Coordinated Intake, Assessment and Prioritization, and create a By Name listing of all homeless individuals within the St. Johns County Continuum of Care. St. Johns County CoC will assess the needs for additional shelter capacity on an ongoing basis.

Discussion

As previously mentioned, St. Johns County does not receive a direct entitlement allocation of Emergency Shelter Grants (ESG). The County will continue to apply for funds from the State of Florida and support the Continuum of Care to the greatest extent possible.

The St. Johns County CoC is guided by the following vision and mission:

Vision: Believing housing is a human right, we envision a community where all people have access to

safe, stable, and affordable housing.

Mission: The Continuum of Care leads the effort to prevent and end homelessness, bringing together resources and partnerships to make homelessness rare, brief and one time.

Through the Continuum of Care strategic planning sessions, community stakeholders established four priorities and four strategies to address homelessness in St. Johns County. The Continuum of Care is working on the following priorities: ensuring that homelessness is rare, homelessness is brief, homelessness is one time, and sustaining an end to homelessness. The strategies and goals of the St Johns County CoC Strategic Plan provides a foundation for collective action.

The first strategy is to increase permanent housing options. Goals within this strategy include using a housing first philosophy, advocating for local, state, and federal policies which increase affordable housing, and prioritizing funding applications that offer permanent housing opportunities.

The second strategy is to strengthen the Coordinated Entry System. To do this, the CoC will need 100% participation by homeless services providers in coordinated entry. The CoC will also need to enhance coordinated entry to better serve households experiencing homelessness and improve the processes and performance of the Coordinated Entry System.

The third strategy is to improve overall performance of the Continuum of Care. There are four goals within this strategy. To improve the overall performance, the CoC needs to strengthen the Homeless Management Information System (HMIS), make data driven decisions, increase nonprofit capacity for agencies serving households experiencing homelessness, and identify and address gaps in service to strengthen the crisis response system.

The last strategy is to strengthen the leadership of the crisis response system. To do that, the CoC Lead Agency and Governance Board will need to increase capacity. The CoC will also need to implement a marketing and education plan.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

St. Johns County realizes that current housing market conditions present many barriers to affordable housing. The County continues to implement policies and strategies to maintain and provide affordable housing inventory for residents.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The St. Johns County Comprehensive Plan 2010-2025 Housing Element states that its purpose is to support the provision and maintenance of an adequate inventory of decent, safe, and sanitary housing in a variety of types, sizes, and locations throughout the County at affordable costs to meet the needs of the current and future residents of St Johns County. The Plan provides several objectives as listed below:

- Continuing the housing implementation policies such as density bonuses, infill housing and an expedited development review process for affordable workforce housing developments,
- Maintaining existing programs, investigating new programs, and identifying funding sources that will work toward the elimination of substandard housing, improve aesthetic qualities of existing houses, and encourage improvements that reduce energy and water consumption,
- Through its Future Land Use Map and its review of the County Land Development Code shall ensure that County zoning districts include areas for the location of housing for very low-, low- and moderate-income households, single family households, single family homes, mobile homes, manufactured homes, group homes, and foster care facilities adequate to meet the needs for these housing types during the planning period,
- Continue to implement its existing Land Development Code regulations which further the identification and protection of historically significant structures and districts,
- Review all existing codes and ordinances and adopt appropriate regulations which address conservation, rehabilitation, or demolition of housing,
- Provide for uniform and equitable treatment for persons and businesses displaced by state and local government programs consistent with Section 421.55 F.S., and
- Improve and maintain the quality and integrity of its residential communities. Strategies to achieve this include: encouraging the development of residential neighborhoods which are sustainable, which provide for networks of interconnected streets for both pedestrian and vehicular use, which address aesthetics, architecture, and urban design, and which discourage sprawl; coordinating with local law enforcement agencies to promote programs designed to improve the safety and security of neighborhoods; and encouraging the utilization of

environmental design strategies to reduce the potential of crime in neighborhoods.

Discussion:

The County staff and Board of County Commissioners realize that public policies can affect the supply and new construction of affordable housing in our community through the impacts on the cost and geographic location of these types of units. The County is dedicated to ensuring that consideration is given to affordable housing developments in areas with proximity to community resources such as transportation, employment opportunities, and public services that help ensure housing stability for our LMI residents. The County will continue its regular review of existing policies and adjust when needed and appropriate so that they are not an impediment to affordable housing provision. The County acknowledges new policies may be needed in the future as the affordable housing market changes over time.

AP-85 Other Actions – 91.220(k)

Introduction:

St. Johns County strives to address the needs of low- and moderate-income residents, homeless individuals and families, and underserved populations. Most of the strategies and actions taken by the County are done so in collaboration with non-profit agencies, municipalities, other organizations, and advisory boards/committees. The following sections outline how the County will address underserved needs, affordable housing, the reduction of lead-based paint hazards, reduction of the number of poverty level families in the County, and the development of an institutional structure to ensure the success of activities aimed at low- and moderate-income persons. It should be noted, however, that this Annual Action Plan is for Year 2 of a 5-year Consolidated Plan and not all will be fully addressed within the first year.

Actions planned to address obstacles to meeting underserved needs

St. Johns County has oriented our programs toward maintaining affordable housing and meeting the underserved needs of our most vulnerable residents. The largest obstacle is the lack of sufficient resources to fully meet the needs of our community. The County will take the following actions to address those obstacles:

- Promote cooperation between agencies by participating in different coordinating bodies in the county, such as but not limited to the Continuum of Care, the Affordable Housing Advisory Committee, Health and Human Services Advisory Council, and the Housing Finance Authority
- Provide assistance with the rehabilitation of existing homes, especially for extremely low-income households, elderly, disabled, and veterans
- Search and apply for new funding from federal and/or state sources
- Possibly address infrastructure deficiencies in low to moderate income areas through CDBG funding

Actions planned to foster and maintain affordable housing

The St. Johns County Affordable Housing Advisory Committee (AHAC) has the responsibility of reviewing and assessing established policies and procedures, ordinances, and land development regulations, as well as the local government comprehensive plan and recommending specific actions or initiatives to encourage and facilitate affordable housing. The AHAC prepares an annual report (formerly a triennial report) and its purpose is to include incentives that would encourage affordable housing for both rental and homeownership. The AHAC is currently working on the annual report for 2021. The most recent report contained 20 incentives, many of which are expected to remain in the 2021 report to promote

and encourage affordable housing in St. Johns County.

- The processing of approvals of development orders on permits, as defined in s. 163.3164 (7) and (8) for all affordable housing projects is expedited to a greater degree than other projects
- The modification of impact-fee requirements, including reduction or waiver of fees and alternative methods of fee payment for affordable housing.
- The allowance of flexibility in densities for affordable housing.
- The reservation of infrastructure capacity for housing for very low-income persons, low-income persons and moderate-income persons.
- The allowance of affordable accessory residential units in residential zoning districts.
- The reduction of parking and setback requirements for affordable housing.
- The allowance of flexible lot configurations, including zero-lot-line configurations for affordable housing.
- The modification of street requirements for affordable housing
- The establishment of a process by which a local government considers, before adoption, policies, procedures, ordinances, regulations, or plan provisions that increase the cost of housing.
- The preparation of a printed inventory of locally owned public lands suitable for affordable housing.
- The support of development near transportation hubs and major employment centers and mixed-use development.

Actions planned to reduce lead-based paint hazards

St. Johns County will continue to take steps to ensure the affordable housing stock for our residents is safe from lead hazards. Program partners distribute “Protecting Your Family from Lead” pamphlets and other actions to address lead-based paint hazards and to increase access to housing without lead-based paint hazards are supported by the Florida Department of Health (DOH) through integrated partnerships and programs administered by local county health departments. Public health programs administered by the DOH-St. Johns County Health Department include, but are not limited to, the following:

(1) Surveillance and Epidemiology: Tracking and follow-up of reportable conditions such as lead exposure, as well as case management, including risk screenings and home assessments, as needed.

(2) Environmental Public Health: Inspection of limited-use drinking water systems and timely water quality monitoring related to lead and other contaminants; environmental health education.

(3) Public Health Practice and Policy: One of our many community partnerships, the St. Johns County Health Leadership Council convenes the triennial Community Health Assessment (CHA) which uses a

formal method to identify key issues in our community (i.e., safe housing, transportation, etc.) and community health status data (i.e., lead poisoning rates, access to community water systems, etc.). DOH-St. Johns partners with the federally funded Head Start program by serving as a seasonal co-location site to allow for comprehensive screenings (i.e., child development and lead exposure) to children ages 3 to 5.

(4) Healthy Start (a Maternal and Child Health Program): Registered nurses review screenings of pregnant moms and infants and conduct home visits as needed, which include a safety assessment (i.e. for potential sources of lead exposure) and child developmental screenings. Through the Nurse Case Management Model, those clients living in housing with LBP hazards are provided guidance on how to reduce exposure, and are provided information on how to access safe housing, if needed.

(5) Community Linkages: Because many residents still associate DOH-St. Johns with primary care services/lab testing services, residents frequently contact our Nurse Triage Call Center for referrals/linkages to lead testing locations within the community.

Actions planned to reduce the number of poverty-level families

St. Johns County is dedicated to supporting a continuum of coordinated outreach efforts and services to enhance the lives of our residents, especially those living below the poverty line. The County works to strengthen neighborhoods and support families and individuals with social service programs, home repair, and provision of infrastructure and public facilities, as well as by collaborating with nonprofit partners and other state and local resources and service providers. The programs outlined in the Five-Year 2021-2025 Consolidated Plan are designed to meet the needs of our most vulnerable residents tailored to meet immediate, short-term, and long-term goals.

The St. Johns County Board of County Commissioners (BCC) governs and establishes the County's poverty-reducing goals and policies. Based on the direction provided by the BCC leadership, the County departments are responsible for collaborating and administering poverty-reducing programs. Coordination between departments is facilitated through collaborative planning efforts, participation by coordinating bodies, and program-specific partnerships. St Johns County has overall objectives and policies in the Comprehensive Plan that are geared toward poverty reduction.

Objective C.1.1 is for the "Creation and Preservation of Affordable Workforce and Special Needs Housing", Objective C.1.2 states that "The County shall maintain its existing programs, investigate new programs, and identify funding sources which will work toward the elimination of substandard housing and improve the aesthetic qualities of existing housing and encourage improvements that reduce energy and water consumption" which supports many of the needs identified in the community survey. Objective C.1.3 ensures "Adequate Areas for Very-Low-, Low- and Moderate-Income Households, Mobile Homes, Manufactured Homes, Group Homes and Foster Care Facilities". The BCC

has also made it a priority to incorporate energy efficient building practices through the permitting and approval process, which will ultimately reduce energy costs for LMI households living in these homes. In addition to the above the County will continue to:

- Upgrade the Community Redevelopment Area (CRA) Housing Stock, which predominantly provides for low-income persons, and continue its efforts to develop low to moderate income rental stock.
- Inventory all surplus County-owned land, foreclosed properties and in-fill opportunities that could be used to promote affordable housing provision and production.
- Strategically work with developers seeking to develop affordable housing projects close to major employment centers and available amenities.

The County will also continue its Ten-Year Plan to End Homelessness in St. Johns County

Actions planned to develop institutional structure

Leadership of St. Johns County begins with the Board of County Commissioners and filters through a variety of departments working collaboratively to meet the varied needs of our residents and businesses. There are a number of public and private agencies within the County that participate year-round in the provision of housing, public services, economic development services, homeless services, and other community development activities including: capital improvements, public facilities, and infrastructure. The County also has several groups that collaborate continually to lobby for resources to alleviate identified gaps within the community. These groups include but are not limited to: Health and Human Services Advisory Council (HHSAC), Health Leadership Council, Behavioral Health Consortium, Continuum of Care (CoC), Housing Finance Authority (HFA) and the Affordable Housing Advisory Committee (AHAC). Each of these groups has representatives from various agencies that provide services for the institutional delivery system within the county. As such, communication between agencies is frequent, goal oriented, and aimed at resolving needs and gaps identified within the County.

Actions planned to enhance coordination between public and private housing and social service agencies

St. Johns County will continue to strengthen its relationships with partnering public and private housing and social service agencies to address the housing and community development needs of low- and moderate-income residents. The County is an active participant in the CoC, the Health and Human Services Advisory Council, the Affordable Housing Advisory Committee, the Housing Finance Authority, and other committees that coordinate with service providers, private organizations, and other stakeholders. The County will also continue to fund non-profit organizations that provide social services

and housing facilities to residents in need.

Discussion:

St. Johns County is committed to meeting the needs of our underserved residents and making our County a great place to live, work and play. This includes efforts to affirmatively further fair housing in our community, so that all residents feel they are welcome and valued members of our community.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

St. Johns County expects to receive \$1,022,927 in CDBG funding for Program Year 2022.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

St. Johns County will meet or exceed the minimum overall benefit of 70% of CDBG funds to be used to benefit persons of low and moderate income. There is no program income to report.

