

21**AGENDA ITEM
ST. JOHNS COUNTY BOARD OF COUNTY COMMISSIONERS***Deadline for Submission - Wednesday 9 a.m. – Thirteen Days Prior to BCC Meeting***2/6/2024****BCC MEETING DATE****TO:** Joy Andrews, County Administrator**DATE:** January 16, 2024**FROM:** Shawna Novak, HHS Director**PHONE:** 904 209-6089**SUBJECT OR TITLE:** A proposed Substantial Amendment to the U.S. Department of Housing and Urban Development (HUD) approved 2021-2022 St. Johns County Community Development Block Grant (CDBG) Annual Action Plan.**AGENDA TYPE:** Consent Agenda, Grant, Public Hearing, Resolution**BACKGROUND INFORMATION:**

For the 2021-2022 Fiscal Year, HUD allocated St. Johns County a federal CDBG grant, in the amount of \$1,030,151, to assist the County in providing benefits to low- and moderate-income residents in accordance with the 2021 – 2025 Consolidated Plan and the 2021–2022 Annual Action Plan. A Substantial Amendment is needed to re-allocate unused funds from a Planning and Administration Project, in the amount of \$33,405.25, to establish a Public Service Project. The amendment will establish a Public Service Project activity which will allow for the continued CDBG funding of Kids Safe Zone in West Augustine so that the organization may continue to provide free after-school mentoring, tutoring, and homework assistance to low- and moderate- (L/M) income families. The program offers a benefit to parents by providing affordable, quality, after-school educational services for children.

1. IS FUNDING REQUIRED? Yes**2. IF YES, INDICATE IF BUDGETED.** Yes**IF FUNDING IS REQUIRED, MANDATORY OMB REVIEW IS REQUIRED:****INDICATE FUNDING SOURCE:** 0094-55304-1631-5xxxx (Housing-Federal Grant Expense-CDBG FY21-22--various)**SUGGESTED MOTION/RECOMMENDATION/ACTION:**

Motion to adopt Resolution 2024-_____, approving the substantial amendment to the County's 2021-2022 Annual Action Plan and authorizing the Chair to execute and deliver a letter to HUD, in substantially the same form as attached hereto, detailing the substantial amendment; and authorizing the County Administrator, or designee, to submit the substantial amendment through HUD's Integrated Disbursement and Information System.

For Administration Use Only:**Legal:** Kealey West 1/25/2024**OMB:** JN 1/24/2024**Admin:** Brad Bradley 1/29/2024

RESOLUTION NO. 2024 - _____

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 2021-2022 ANNUAL ACTION PLAN TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) TO RE-ALLOCATE \$33,405.25 IN UNUSED COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM FUNDS TO ESTABLISH A PUBLIC SERVICE 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 a 2021-2022 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 the fiscal year 2021-2022, HUD awarded the County \$1,030,151 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 2021-2022 Action Plan; and

WHEREAS, the County is proposing a substantial amendment to the 2021-2022 Action Plan to re-allocate \$33,405.25 in unused funds from the Planning Administration Project to establish a Public Service Project; and

WHEREAS, the Public Service Project added to the 2021-2022 Action Plan will provide free after-school mentoring, tutoring, and homework assistance to low- and moderate-income families in the West Augustine Community Redevelopment Area; and

WHEREAS, HUD regulations specify that in the circumstance of reallocating unused funds from one eligible activity to another eligible activity, the Board must approve and authorize 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 2021-2022 Annual Action Plan and authorizes the Chair to execute and deliver a letter to HUD, in substantially the same form as attached hereto, which provides details of 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 ____ day of February 2024.

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

By: _____
Sarah Arnold, Chair

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

By: _____
Deputy Clerk



January 16, 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 program (CDBG) for the benefits it provides to the County's 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. At this time, the County wishes to inform HUD of the need to make a Substantial Amendment to the 2021-2022 Annual Action Plan.

The need for this Substantial Amendment arose from a Subrecipient requesting funds as they await the funding approval of funding year 2023-2024, as well as the need to re-allocate unused 2021-2022 Planning and Administration funds.

SUBSTANTIAL AMENDMENT: The Substantial Amendment to the 2021-2022 Action Plan will re-allocate \$33,405.25 from the Planning and Administration Project activity and add a Public Service Project activity. The Public Service Project, Kids Safe Zone Afterschool Mentoring and Tutoring Program has requested funds to continue to provide free after-school mentoring, tutoring, and homework assistance to low- and moderate- (L/M) income families in the West Augustine corridor Community Redevelopment Area. The program is beneficial to those parents who may have issues affording quality after-school educational care and services.

CITIZEN PARTICIPATION AND FINAL ACTION: In accordance with 24 CFR 91.105(c)(3), the proposed Substantial Amendment to the 2021-2022 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: <http://www.co.st-johns.fl.us/Housing/CDBG.aspx>. The Substantial Amendment to the 2021-2022

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Action Plan is scheduled for Board action on February 6, 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 2021-2022 Annual Action Plan in HUD's Integrated Disbursement and Information System (IDIS).

Sincerely,

Sarah S. Arnold, Chair
St. Johns County Board of County Commissioners



St. Johns County Community Development Block Grant (CDBG) Proposed Substantial Amendment to the 2021-2022 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) for the benefit of 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 2021-2022 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 2021-2022 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 and elected officials, affordable housing, and 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 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 #3 – 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 #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

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residents as well as veterans, elderly, disabled, and homeless persons through new construction or acquisition.

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 2021-2022 Annual Action Plan: The Public Service Project Kids Safe Zone has requested funds to continue to provide free after-school mentoring, tutoring, and homework assistance to low- and moderate- (L/M) income families in the West Augustine Community Redevelopment Area. The program benefits parents who have issues affording quality after-school educational opportunities and care. Therefore, it is proposed to re-allocate \$33,405.25 in funding from the Planning and Administration Activity, which are unused funds, and apply it to the Public Service Project-Kids Safe Zone.

Public Comment Period: As required by HUD, the proposed Substantial Amendment to the 2021-2022 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: <http://www.sjcfl.us/Housing/index.aspx>. The public review and comment period are January 17, 2024 through February 2nd, 2024. Comments from the public are encouraged and will be accepted during this comment period at the Health and Human Services Department at 200 San Sebastian View, Suite 2300, St. Augustine, FL 32084. Comments can also be provided by calling 904-827- 6890, or emailing to housing@sjcfl.us. A written response will be offered within fifteen (15) days, to all written comments received. For additional information, please call 904-827-6897.

Public Hearing: Final action will be taken on the proposed Substantial Amendment to the 2021-2022 Annual Action Plan, at the regularly scheduled meeting of the Board of County Commissioners to be held at 9:00 a.m. on February 6, 2024.

Meetings of the Board of County Commissioners take place in the County Auditorium, located at 500 San Sebastian View, St. Augustine, FL 32084. Citizens may offer public comments at this meeting.

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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.



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2021-2025 Consolidated Plan FY 2021 Annual Action Plan

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



Proposed Substantial Amendment to 2021-2022 AAP – February 6, 2024

This Substantial Amendment 2021-2022 Action Plan will re-allocate \$33,405.25 from the Planning and Administration Project and add a Public Service Project. The Public Service Project Kids Safe Zone has requested funds to continue to provide free after-school mentoring, tutoring and homework assistance to low- and moderate- (L/M) families in the West Augustine corridor is very beneficial to those parents who while work every day still cannot afford quality after-school care.

Expected Resources

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

Introduction

St. Johns County anticipates receiving \$1,030,151 in Community Development Block Grant funds from the U.S. Department of Housing and Urban Development for the first program year (October 1, 2021 – September 30, 2022) 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

Proposed Substantial Amendment to 2021-2022 AAP – February 6, 2024

funds to aid in the prevention 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	1,030,151	0	0	1,030,151	4,120,604	This is the allocation for FY 21-22
Other	public - state	Housing	1,739,459	0	0	1,739,459	6,826,388	State funding for the SHIP Program

Table 1 - 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 \$1,739,459 in FY2021-2022 from the Florida Housing Finance Corporation for the State Housing Initiatives 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 aligns with our goals and staffing capacity. These funds can be used to expand existing programs, develop new programs to address unmet needs in the

Proposed Substantial Amendment to 2021-2022 AAP – February 6, 2024

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.

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Proposed Substantial Amendment to 2021-2022 AAP – February 6, 2024

If appropriate, describe publicly 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.

Proposed Substantial Amendment to 2021-2022 AAP – February 6, 2024

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	2016	2020	Non-Housing Community Development	Flagler Estates Hastings Countywide	Public Facilities and Infrastructure	CDBG: \$500,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 8275 Persons Assisted
2	Public Services	2016	2020	Non-Housing Community Development	Countywide	Public Services	CDBG: \$33,750	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted
2	Public Services	2016	2020	Non-Housing Community Development	Countywide	Public Services	Proposed: \$33,405.25	Public service activities other than Low/Moderate Income Housing Benefit: 35 Persons Assisted
4	Home Repair/Rehabilitation	2016	2020	Affordable Housing	Countywide	Rehabilitation of Existing Housing	CDBG: \$290,374	Homeowner Housing Rehabilitated: 8 Household Housing Unit

Proposed Substantial Amendment to 2021-2022 AAP – February 6, 2024

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Planning and Administration	2016	2020	Planning and Administration	Countywide	Public Facilities and Infrastructure Public Services Rehabilitation of Existing Housing	CDBG: \$206,030	Other: 0 Other

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Public Facility or Infrastructure Activities
	Goal Description	Public infrastructure and public facilities to enhance the livability of low- and moderate-income neighborhoods and assure efficient levels of community services and safety.
2	Goal Name	Public Services
	Goal Description	Social programs for low- to moderate-income households.
4	Goal Name	Home Repair/Rehabilitation
	Goal Description	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.

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Projects

AP-35 Projects – 91.220(d)

Introduction

The Annual Action Plan identifies a total of five 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 within the jurisdiction's first program year, no later than September 30, 2017.

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 of the needs identified by our residents and the data trends.

Pending approval the County would like to fund a social/transportation program for low-to moderate-income residents through the Girl Scouts in the amount of \$33,750; 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) through the St. Johns Housing Partnership Rehab Program in the amount of \$290,374; 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 \$500,000; and administration expenses in the amount of \$206,030.

Projects

#	Project Name
1	Public Facility/Public Services
2	Public Services
3	Affordable Housing
4	Planning & Administration

Table 3 - Project Information

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

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AP-38 Project Summary

Project Summary Information

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1	Project Name	Public Facility/Public Services
	Target Area	Hastings
	Goals Supported	Public Facility or Infrastructure Activities
	Needs Addressed	Public Facilities and Infrastructure
	Funding	CDBG: \$500,000
	Description	Public Infrastructure/Public Facilities to enhance the livability of low to moderate income neighborhoods and assure efficient levels of community service and safety.
	Target Date	4/30/2023
	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
2	Project Name	Public Services
	Target Area	Countywide
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$33,750
	Description	Social/Transportation Program for low to moderate income residents.
	Target Date	
	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	Social/transportation services for low-to-moderate-income residents participating in the Girl Scouts after school programs
3	Project Name	Affordable Housing
	Target Area	Countywide

	Goals Supported	Home Repair/Rehabilitation
	Needs Addressed	Rehabilitation of Existing Housing
	Funding	CDBG: \$290,374
	Description	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, or veterans.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Serve approximately 8 households at or below 50% AMI including but not limited to elderly, disabled, and veteran residents
	Location Description	Countywide
	Planned Activities	Rehabilitation activities
4	Project Name	Planning & Administration
	Target Area	Countywide
	Goals Supported	Planning and Administration
	Needs Addressed	
	Funding	CDBG: \$206,030
	Description	Planning & Administrative functions related to the operation of the CDBG program.
	Target Date	
	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

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 with targeted infrastructure and public facilities. All proposed CDBG-eligible activities under the Consolidated Plan are intended to serve low- to moderate income households and special needs populations.

Geographic Distribution

Target Area	Percentage of Funds
Elkton/Armstrong	0
West Augustine	4
Flagler Estates	0
Hastings	49
Countywide	47

Table 4 - 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 to promote livability and public safety, the rehabilitation of the existing housing stock 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 was 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 identifies 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 2021 Action Plan provides 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.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	8,425
Special-Needs	8
Total	8,433

Table 5 - 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	8
Acquisition of Existing Units	0
Total	8

Table 6 - 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

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

Introduction

St. Johns County is dedicated to improving the housing opportunities for all of 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. Our goals for this year 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 in order 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 is able to 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 St. Francis House operates the only emergency shelter in St. Johns County, providing 24 beds for individuals, 5 family units. They have an additional 8 overflow beds for access by local law enforcement.

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, increase 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 session in February 2020, 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.
- 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 close 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. The majority 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 the how the County will address underserved needs, affordable housing, reduce lead-based paint hazards, reduce the number of poverty level families in the County, and develop 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 1 of a 5-year Strategic and 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 defines 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 community 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 then, as needed, conduct home visits 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 if needed, are provided information on how to access safe housing.

(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 infrastructure and public facilities, as well as collaborating with nonprofit partners and other state and local resources and service providers. The programs outlined in the five (5) year 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 received 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 on 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 housing 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

The 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 welcome and valued members of our community.

Program Specific Requirements

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

Introduction:

St. Johns County expects to receive \$1,030,151 in CDBG funding for Fiscal Year 2021.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(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%

Housing Trust Fund (HTF)
Reference 24 CFR 91.220(I)(5)

1. Distribution of Funds

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).
- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.
- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.
- d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.
- e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. Performance Goals and Benchmarks. The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. Rehabilitation Standards. The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The

jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter “N/A”.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

6. Resale or Recapture Guidelines. Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter “N/A”.

7. HTF Affordable Homeownership Limits. If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter “N/A”.

8. Limited Beneficiaries or Preferences. Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

9. Refinancing of Existing Debt. Enter or attach the jurisdiction’s refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a

minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter "N/A."

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Discussion:

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.