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**AGENDA ITEM  
ST. JOHNS COUNTY BOARD OF COUNTY COMMISSIONERS**

*Deadline for Submission - Wednesday 9 a.m. – Thirteen Days Prior to BCC Meeting*

**10/1/2024**

**BCC MEETING DATE**

**TO:** Joy Andrews, County Administrator **DATE:** September 9, 2024

**FROM:** Kristin Crane, Research Analyst **PHONE:** 904 209-2404

**SUBJECT OR TITLE:** Fiscal Year 2024 Pathways to Removing Obstacles to Housing Grant Application

**AGENDA TYPE:** Consent Agenda, Grant, Resolution

**BACKGROUND INFORMATION:**

The U.S. Department of Housing and Urban Development issued a Notice of Funding Opportunity for the Fiscal Year 2024 Pathways to Removing Obstacles to Housing (PRO Housing) grant program and staff have identified an eligible project to apply for funding. The grant program provides Federal funding to support projects and activities that reduce barriers to affordable housing in underserved communities. The West Augustine Affordable Housing project is an eligible project under the terms of the NOFO and staff is requesting authorization to submit an application to HUD. In accordance with the NOFO, applicants are required to publish their PRO Housing application for public comment for 15 days and provide ongoing public access to information about the use of grant funds. This item fulfills the requirements of the NOFO and the public is invited to submit comments to the staff in the Office of Intergovernmental Affairs. No match funding is required for the grant program.

**1. IS FUNDING REQUIRED?**   No   **2. IF YES, INDICATE IF BUDGETED.**   Yes    
**IF FUNDING IS REQUIRED, MANDATORY OMB REVIEW IS REQUIRED:**  
**INDICATE FUNDING SOURCE:**

**SUGGESTED MOTION/RECOMMENDATION/ACTION:**

Motion to adopt Resolution 2024-\_\_\_\_\_, authorizing the County Administrator, or designee to submit an application to the U.S. Department of Housing and Urban Development for the PRO Housing grant program, on behalf of the County, to support the West Augustine Affordable Housing project.

**For Administration Use Only:**  
**Legal:** Kealey West 9/18/2024 **OMB:** Christopher Thompson 9/19/2024 **Admin:** Brad Bradley 9/23/2024

RESOLUTION NO. 2024- \_\_\_\_\_

**A RESOLUTION BY THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA, AUTHORIZING THE COUNTY ADMINISTRATOR, OR DESIGNEE, TO SUBMIT AN APPLICATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR GRANT FUNDING THROUGH THE FISCAL YEAR 2024 PATHWAYS TO REMOVING OBSTACLES TO HOUSING GRANT PROGRAM.**

**RECITALS**

**WHEREAS**, the U.S. Department of Housing and Urban Development (“HUD”) has established the FY24 Pathways to Removing Obstacles to Housing grant (PRO Housing) to fund activities that reduce barriers to affordable housing; and

**WHEREAS**, staff have identified a project which meets the requirements of the grant; and

**WHEREAS**, the West Augustine Affordable Housing project is a priority of the Board of County Commissioners and the St. Johns County Community Redevelopment Agency; and

**WHEREAS**, the PRO Housing grant administered by HUD is a competitive grant program which requires applicants to publish their grant application prior to submission; and

**WHEREAS**, none of the requirements, restrictions, and/or obligations associated with the award of a grant under the Program, or the grant itself would negatively impact the interests of the County; and

**WHEREAS**, applying for a grant under HUD’s PRO Housing grant program serves the overall interest of the County.

**NOW, THEREFORE, BE IT RESOLVED** by the Board of County Commissioners of St. Johns County, Florida that:

**Section 1.** The above recitals are hereby incorporated into the body of this resolution and are adopted as findings of fact.

**Section 2.** The County Administrator, or designee, is authorized on behalf of the County to submit a grant application to HUD for the Fiscal Year 2024 PRO Housing grant program for the West Augustine Affordable Housing project.

**Section 3.** To the extent that there are typographical or administrative errors that do not change the tone, tenor, or concept of this resolution, this resolution may be revised without subsequent approval by the Board of County Commissioners.

**Section 4.** This resolution shall be effective upon adoption by the Board of County Commissioners.

**PASSED AND ADOPTED** by the Board of County Commissioners of St. Johns County, Florida, this \_\_\_\_\_ day of \_\_\_\_\_ 2024.

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

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

By: \_\_\_\_\_  
Deputy Clerk

By: \_\_\_\_\_  
Sarah Arnold, Chair

**FY24 Pathways to Removing Obstacles to Housing (PRO Housing)**

**ST. JOHNS COUNTY**



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**Attachment E** - Experience Promoting Racial Equity Narrative

**ST. JOHNS COUNTY**  
**EXHIBIT A – EXECUTIVE SUMMARY**

St. Johns County proposes removing several barriers to affordable housing production and preservation to encourage equity for low-income individuals and support community development in historically disadvantaged West Augustine. St. Johns County will improve affordable housing strategies, facilitate production, and develop, evaluate, and implement housing policies, plans, ordinances, and other requirements to expand the affordable housing inventory and preserve existing properties.

Housing market prices out many low-income African American families and individuals in St. Johns County. St. John's County has a shortage of affordable housing that disproportionately impacts people of color. We must also review and revise policy, procedure, ordinance, and plans that may deter or hinder developers from building affordable housing as part of our efforts to eliminate barriers to racial equity in housing.

Through our partnership with key stakeholders, St. Johns County is expanding our capacity to create and preserve affordable housing and remove barriers to success, as well as improving financial programs and incentives to bridge the gap in housing equity for African Americans. Providing residents with the tools and resources they need for long-term financial security is essential.

Affordable housing production and preservation is a multifaceted goal. In partnership with the West Augustine Community Redevelopment Area (WACRA) committee and other affordable housing advocates, St. Johns County has worked on identifying barriers and implementing solutions to support the community's success and well-being for the last several years. Our efforts to advance racial equity in housing will continue as we focus on building more affordable housing, enhancing programs, and providing better resources. Increasing incentives for builders and developers that encourage affordable housing projects is also a priority.

WACRA has successfully designated 20 pilot lots for the development of affordable housing. Together with St. Johns County, the WACRA committee identified and categorized properties from lowest to highest development needs. These properties will be developed in phases using this system. Phase 1 includes properties with paved roads but no utilities or sewer. Phase 2 includes properties that have no paved road or utilities. Several parcels in this plan were not suitable for development, and will be used for infrastructure requirements (drainage, right-of-way, mitigation) to support residential development.

We are targeting barriers that impact racial equity and community resilience by increasing the number of housing units available and increasing programs, incentives, and resources. Development of affordable housing will be made easier in St. Johns County.

Through affirmative marketing and outreach, St. Johns County will target marginalized populations, including people of color and low to moderate-income individuals. In compliance with State Housing Initiatives Partnership (SHIP) and included in St. Johns County Local Housing Assistance Plan (LHAP), we will continue efforts to meet the 20% Special Needs Set-Aside, which ensures units are allocated to prioritize special needs persons. ADA and accessibility home modifications are promoted through brochures, flyers, public awareness campaigns, and public information releases.

Several community partners are working together with St. Johns County to improve programs that promote racial equity, financial sustainability, and address sustainability needs in West Augustine. As part of the St. Johns County SHIP Local Housing Assistance Plan, deferred loan, loan, and grant programs assist with home purchase, rehabilitation, disaster assistance, impact fees, and other costs that have proven to be barriers to affordable housing production and preservation.

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**ST. JOHNS COUNTY**

**EXHIBIT B – THRESHOLD REQUIREMENTS AND OTHER SUBMISSION  
REQUIREMENTS**

**RESOLUTION OF CIVIL RIGHTS MATTERS**

St. Johns County confirms that it does not have any unresolved charges, lawsuits, letters of finding or cause determinations for matters reference in section III.D.1. of the PRO Housing NOFO.

**TIMEELY SUBMISSION OF APPLICATIONS**

St. Johns County confirms that this application will be submitted to HUD before October 15<sup>th</sup>, 2024, as established in the NOFO.

**ELIGIBLE APPLICANT**

St. Johns County is a government entity and thus meets the qualifications of an eligible applicant.

**NUMBER OF APPLICATIONS**

St. Johns County is submitting one application for PRO Housing funding.

**OTHER SUBMISSION REQUIREMENTS**

The application submitted to HUD will include the following required attachments:

1. Standard Form 424 (SF-424) Application for Federal Assistance
2. Assurances (HUD 424-B)
3. Applicant Disclosure Report Form 2880 (HUD 2880)
4. Code of Conduct
5. False Statements
6. Lobbying Activities
  - Certification Regarding Lobbying
  - Disclosure of Lobbying Activities (SF-LLL)
7. Detailed Budget Worksheet (424 CBW)

**ST. JOHNS COUNTY**  
**EXHIBIT C – NEED**

**OVERCOMING BARRIERS TO INCREASE AFFORDABLE HOUSING PRODUCTION AND PRESERVATION WITH IMPROVED LAWS AND REGULATIONS**

In 2023, Florida legislation passed the Live Local Act (SB 102) which aims to increase the amount of affordable housing available in the state. This act, effective July 1, 2023, supports our initiatives in St. Johns County by relaxing zoning ordinances that may have hindered the development of additional affordable housing units.

As a HUD-identified priority geography, St. Johns County is committed to utilizing state resources that support our local affordable housing initiatives. This includes actively leveraging private and public resources and utilizing cost-saving measures to increase the availability of residential units by reducing the cost of housing. We are currently using State Housing Initiatives Partnership (SHIP) funds to supplement other Florida Housing Finance Corporation programs and providing local match funds to secure other federal housing grants and programs.

Under SHIP, St. Johns County has worked to meet local housing needs for very low to moderate income households. Our 3-year comprehensive Local Housing Assistance Plan (LHAP) aims to expand production of affordable housing and advance local government plans specific to affordable housing. The LHAP addresses housing needs for low through moderate income households through the administration of several financial programs, which include:

- Owner Occupied Rehabilitation Deferred Loan Program
- Disaster Assistance Grant Program
- Rehabilitation, Land Acquisition, New Construction Loan Program
- Impact Fees Deferred Loan Program

In addition to financial programs, the LHAP outlines priority strategies that support incentives to expand affordable housing development in St. Johns County, including:

- Expedited permitting for affordable housing projects
- Ongoing review process for local policies, ordinances, and regulations
- Affordable Housing Economic Incentive Program

St. Johns County participates in Local Land Use Programs that encourage the development of affordable housing, including workforce housing zoning that increases the number of developable units per acre for residential use. Since 2021, seven developments were approved through Workforce Housing Rezoning efforts. Lots designated for affordable housing development are subject to a sales price cap of approximately \$274,000 which follows federal and state guidelines for affordable housing. Under SHIP, rental units designated as affordable

housing are subject to a rental cap that cannot exceed 70% of the Area Median Income (AMI) of a qualified occupant.

## **ACTIONS TO OVERCOME BARRIERS TO INCREASE AFFORDABLE HOUSING PRODUCTION AND PRESERVATION**

St. Johns County has initiated actions both past and present to overcome barriers impacting affordable housing development and preservation efforts. As a result of legislative changes surrounding affordable housing, St. Johns County has revised old policy and implemented new policy aimed at eliminating barriers to affordable housing production and preservation. These efforts include expediting permit approvals for affordable housing development projects, addressing financial need through programs for eligible individuals, and looking at recommendations that would reduce or eliminate barriers to affordable housing production and preservation. St. Johns County is actively working with several key stakeholders to facilitate affordable housing development and preservation efforts in our proposed geographical region of West Augustine.

### **Policy Reviews & Recommendations**

St. Johns County, in partnership with advisory and community groups, facilitates processes to review current policy, programs, ordinances, regulations, and plans that may hinder progress towards increasing affordable housing production and preservation. The Affordable Housing Advisory Committee reviews established policies and procedures, ordinances, and land development regulations, and it has adopted a comprehensive local government plan to recommend specific actions or initiatives to encourage or facilitate affordable housing while protecting the ability of the property to appreciate in value. The committee recently provided St. Johns County with several recommendations to reduce or eliminate specific barriers in the production and preservation of affordable housing, as well as access to affordable housing by low to moderate income individuals.

### **Expedited Permit Approvals**

In order to eliminate the long approval processes that hinder the building and preservation of affordable housing, St. Johns County will continue to utilize Income and Rent guidelines provided by the Florida Housing Finance Corporation when defining affordability and consider incentives and subsidies for projects that target lower income populations. Developers will also be assigned a designated Point of Contact to assist in the navigation of county development processes. Developers seeking permits for affordable housing projects, as defined using the Income and Rent guidelines, will be eligible for expedited approval of permits that prioritize affordable housing projects over others.



## **REMAINING ACUTE NEEDS FOR AFFORDABLE HOUSING**

Despite continued efforts to expand services and housing programs supporting low to moderate income households, St. Johns County recognizes the need to increase the amount of available affordable housing, both for purchase and rent. The need for affordable housing impacts tourist industry workers, who represent a high percentage of the African American population in St. Johns County. In 2022, tourism in the County accounted for over \$1.4 billion in visitor spending and supported over 21% of jobs in the region.

African American and minority employment in the service industry within St. Johns County plays a vital role in our growing economy. However, due to the rising cost of housing, the gap in access to affordable housing is especially wide for the African American community as they are priced out of their own local market. As of July 2024, the median selling price of a home in St. Johns County is \$525,000 while the median household income is \$100,020. Tourist industry workers are left with few housing options in St. Johns County, many being forced to move out of the County due to rising housing costs.

In order to guide future planning and inform government entities of the economic impact a lack of affordable housing has on a community, the St. Johns County Housing and Community Development department secured a consulting firm to conduct an Affordable Housing Study, which is in development and expected to be finalized by 2025. This community needs assessment will further support ongoing initiatives to produce and preserve affordable housing in St. Johns County.

## **KEY BARRIERS TO BE ADDRESSED TO PRODUCE AND PRESERVE MORE AFFORDABLE HOUSING**

Each year, the Affordable Housing Advisory Committee meets to review established policies, procedures, ordinances, and St. Johns County Land Development Code and Comprehensive Plan to make recommendations on strategies to encourage or facilitate the development of affordable housing. Based on the most recent committee review conducted in December 2023, we have proposed solutions that address the remaining barriers and needs that impact the production and preservation of affordable housing in St. Johns County.

### **Modification and Fees**

Recognizing the financial impact that fees and other costs have on the low to moderate income African American community is vital in addressing racial equity in housing. To address this barrier, St. Johns County is proposing policy changes that allow for the modification of impact fees that adjust payment terms or waive all or part of required fees.

### **Public Land Inventory**

To promote the development of affordable housing, it is vital that potential developers and builders have access to the public land inventory listing public land available for the construction

of affordable housing. St. Johns County staff will continue to distribute materials highlighting public land inventory for affordable housing.

### **Negative Economic Impact**

To support strategic planning for affordable housing in St. Johns County, County staff should analyze the negative economic impact that a lack of affordable housing can have on a community. To accomplish this, the Housing and Community Development Department secured a consultant firm to conduct an Affordable Housing Study for St. Johns County. This study will provide vital and essential data on the affordable housing needs in St. Johns County.

It is also important to recognize other barriers that have significant economic impact on affordable housing development, such as parking requirements and zoning ordinances. While parking requirements are necessary for compatibility between community developments and to ensure transportation needs are met, excessive parking requirements can increase the cost of affordable housing development. St. Johns County will evaluate parking requirements to monitor the economic impact on affordable housing projects.

The Affordable Housing Advisory Committee will present an ordinance to the Board of County Commissioners regarding a new zoning category that supports initiatives addressing affordable housing. One initiative within this new zone may allow for flexibility in street requirements to address both design and affordability.

### **Corporate Incentive**

The data collected through the Affordable Housing Assessment will also support the development of policy and procedure involving corporations who seek to build or relocate to St. Johns County. Such a policy would ensure that large corporations receiving incentives would be required to pay a specified amount into the Affordable Housing Fund. Eligible employees of these corporations can be prioritized for affordable housing placement once units are built.

### **Impact Fee Credit Transfer**

To expand on current affordable housing incentives for developers and builders, St. Johns County will allow holders of impact fee credits to transfer or sell at a discount, impact credits to other developments in the same impact fee zone for the development of affordable housing that is for sale or rent. These impact credits reflect dollars previously invested by a developer in a county or school district and are recognized as being usable against impact fees.

### **Expedited Permitting**

In order to eliminate the long approval processes that hinder the building and preservation of affordable housing, St. Johns County will continue to utilize Income and Rent guidelines provided by the Florida Housing Finance Corporation when defining affordability and consider incentives and subsidies for projects that target lower income populations. Developers will also be assigned a designated Point of Contact to assist in the navigation of county development

processes. Developers seeking permits for affordable housing projects, as defined using the Income and Rent guidelines, will be eligible for expedited approval of permits that prioritize affordable housing projects over others.

### **Lower Interest Rate Enticements**

St. Johns County will evaluate options and consider utilizing other private funds, such as DRI contributions, for lower interest rate enticements, which supports low to moderate income homebuyers.

### **Flexible Lot Configurations**

St. Johns County will encourage developers to include some percentage of affordable housing as part of their developments or make contributions to the housing fund when requesting variances or waivers to the existing codes. The County will work with the Housing Finance Authority to determine how to utilize the lot inventory and encourage the development of “missing middle housing,” such as tiny homes or duplex units.

### **Reservation of Infrastructure Capacity**

In order to reduce infrastructure costs, which remains a barrier to the development of affordable housing, St. Johns County and St. Augustine utility and road departments must work more closely with affordable development efforts. Rather than requiring a developer to construct a new storm water retention ponds and lift-stations, allow the developer to utilize existing infrastructure to reduce costs when the site is adjacent to county or city-owned properties, whenever feasible. This would allow for additional units to be constructed on that property instead of space being utilized to satisfy infrastructure requirements.

St. Johns County and St. Augustine will encourage utility, road, and bridge departments to attend monthly Affordable Housing Advisory Committee meetings. Additionally, St. Johns County will work with utility partners to determine if portions of lift station construction costs can be incorporated into their capital improvement plans or if financing can be provided to make infrastructure construction more affordable for developers.

### **Support Development of Transportation Hubs**

County departments and the Affordable Housing Advisory Committee must meet periodically to discuss long-term planning efforts that will incorporate plans utilizing affordable developments and emphasize differing modes of transportation. Multimodal transportation hubs play an important role in economic development, especially as St. Johns County addresses barriers in racial equity impacting disadvantaged communities in the area.

St. Johns County is the recipient of public transportation funding from federal, state, and local sources. As a recipient of these funds, St. Johns County is responsible for maintaining compliance with Title 49 Code of Federal Regulations Chapter 53. The funding is solely for the operation of services within the County. The County contracts with the St. Johns County Council

on Aging for the day-to-day operation of the public transportation system. As the recipient of the funding, St. Johns County is obligated to ensure that all funds are expended in accordance with state and federal regulations. While this responsibility is passed through to the COA by contract, the County is responsible for oversight and monitoring the COA.

Presently, The St. Johns County Sunshine Bus Company provides two distinct modes of transportation; a Fixed-Route system, with an established schedule that operates within the St. Augustine Urbanized Area, and a Demand Response door-to-door service, or paratransit service that operates by reservation and is available to those qualified as Transportation Disadvantaged, as well as those who qualify for Medicaid non-emergency transportation.

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**ST. JOHNS COUNTY**  
**EXHIBIT D – SOUNDNESS OF APPROACH**

**VISION**

With this proposal, St. Johns County seeks to remove several barriers to the production and preservation of affordable housing in order to promote equity for low to moderate-income individuals and support community development needs for the historically disadvantaged West Augustine community. To expand the affordable housing inventory and preserve existing properties, St. Johns County will improve affordable housing strategies, facilitate production, and further develop, evaluate, and implement housing policies, plans, ordinances, and other requirements.

St. Johns County is the 3<sup>rd</sup> most expensive county in Florida, with the housing market pricing out many low-income individuals and families from the African American community. The lack of affordable housing disproportionately impacts people of color and other minorities who live and work in St. Johns County. While working to eliminate barriers that hinder racial equity in housing, it is necessary we also review and revise policy, procedure, ordinance, and plan that would deter or hinder developers from building affordable housing projects.

Partnering with several key stakeholders, St. Johns County is actively working to expand our capacity to build and preserve affordable housing and eliminate barriers that impact success, as well as improve financial programs and incentives that bridge the gap in housing equity for our African American communities. We recognize the need to equip residents with the tools and resources needed for long term financial security and home ownership.

Our vision to remove barriers to affordable housing production and preservation is multifaceted. For the last several years, St. Johns County has been working in partnership with the West Augustine Community Redevelopment Area (WACRA) committee, St. Johns County Affordable Housing Advisory Committee, and other affordable housing advocates to identify barriers and implement solutions that support the success and well-being of the West Augustine community. These efforts will remain ongoing as we focus on increasing the number of affordable housing builds, enhancing programs, and providing better resources aimed at advancing racial equity in housing. Addressing policy needs and improving incentives for developers and builders that encourage affordable housing projects within the County is also an ongoing priority.

Within the boundaries of the West Augustine Community Redevelopment Area (WACRA), 20 pilot lots have been successfully designated for the development of affordable housing. The WACRA committee, working collaboratively with St. Johns County, identified and categorized properties based on lowest to highest development needs. Using this system, the development of these properties will be completed in phases. Phase 1 includes properties with paved roads but no utilities or sewer. Phase 2 includes properties that have no paved road or utilities. Some parcels

included in this plan were found to not be suitable for development and will be utilized for infrastructure requirements or accessory uses, such as drainage, additional right of way, and mitigation) that support the development of residential structures.

By increasing the supply of housing units available and expanding programs, incentives, and resources for affordable housing access and development in St. Johns County, we are addressing barriers that impact racial equity and community resiliency. St. Johns County will eliminate present barriers to affordable housing development including:

- Expediting the processing of permits and development orders for affordable housing, prioritizing these projects over others.
- Reducing, waiving, or providing alternative payment arrangements for impact fees, as well as fees for utility connection.
- Allowing flexibility in densities for affordable housing.
- Reserving infrastructure capacity for individuals within the low to moderate income category.
- Reducing limitations for parking and other setback requirements for affordable housing.
- Allowing flexible lot arrangements for affordable housing.
- Implementing processes that require government entities to review policies, procedures, ordinances, regulations, and plan provisions prior to adopting changes that would increase housing costs.
- Supporting development efforts for affordable housing near transportation hubs and employment centers.
- Provide materials for public land inventory distribution that includes the inventory of land for affordable housing development.
- Complete Affordable Housing Studies to assess the negative economic impact a lack of affordable housing can have on a community.
- Implement policy that incentivizes corporations to build or relocate to St. Johns County, which includes a percentage of cost going into an Affordable Housing Fund, as well as prioritizing eligible employees for affordable housing placement.

Utilizing affirmative marketing and outreach, St. Johns County will target eligible individuals from marginalized populations, including the Black community and low to moderate income persons. In compliance with SHIP and included in St. Johns County Local Housing Assistance Plan (LHAP), we will continue efforts to meet the 20% Special Needs Set-Aside, which ensures allocation of units expended to prioritize special needs persons to assist with developmental disabilities. Targeted marketing emphasizing rehabilitation for ADA and accessibility home modifications is achieved through brochures and flyers, public awareness campaigns, public information releases, and advertisement at local community events.

St. Johns County, in collaboration with several community partners, is enhancing programs that promote racial equity, financial sustainability, and address sustainability needs for the historically

disadvantaged community of West Augustine. The St. Johns County SHIP Local Housing Assistance Plan also includes provisions for deferred loan, loan, and grant programs that help with the costs associated with purchasing a home, rehabilitation, disaster assistance, impact fees, and other costs that have proven to be a barrier to affordable housing production and preservation. In addition to loan and grant programs, St. Johns County supports the following programs and counseling services:

- Homeownership Counseling
- Credit Counseling
- Tenant Counseling
- Financial Literacy
- Transportation
- Foreclosure Counseling
- Down Payment Assistance
- Rent and Utility Assistance
- Grants for agencies that address housing for homeless populations

#### **KEY BARRIERS TO AFFORDABLE HOUSING PRODUCTION AND PRESERVATION**

St. Johns County will be directly increasing the supply of affordable housing by increasing housing production in the marginalized community of West Augustine. In addition, to eliminate other barriers to home ownership, we will be expanding our current programs to ensure all eligible individuals are given access to resources that will support long-term home ownership within our minority population. These programs include down payment assistance and resources to avoid foreclosure. St. Johns County will continue to utilize recommendations from the Affordable Housing Advisory Committee and other key stakeholders to stay abreast of barriers impacting affordable housing and develop strategic plans to address current and future needs.

The Affordable Housing Advisory Committee will continue to meet with members from St. Johns County's Growth Management Department, Housing and Community Development Division, local developers, and the St. Johns County Chamber of Commerce in order to continue flexible density round table discussions that will produce effective solutions to be recommended to the Board of County Commissioners.

Recognizing the financial impact that fees and other costs have on low to moderate income African American communities is vital in addressing racial equity in housing. To address this barrier, St. Johns County is proposing policy changes that allow for the modification of impact fees that adjust payment terms or waive all or part of required fees.

To promote the development of affordable housing, it is vital that potential developers and builders have access to the public land inventory listing public land available for the construction of affordable housing. St. Johns County staff will continue to distribute materials showing public

land inventory for affordable housing.

To support strategic planning for affordable housing in St. Johns County, the county staff should analyze the adverse economic impact of insufficient affordable housing on a community. To achieve this, the Housing and Community Development Department has enlisted a consulting firm to carry out an Affordable Housing Study for St. Johns County. This study will offer crucial data on the affordable housing requirements in St. Johns County.

It is also important to recognize other barriers that have significant economic impact on affordable housing development, such as parking requirements and zoning ordinances. While parking requirements are necessary for compatibility between community developments and to ensure transportation needs are met, excessive parking requirements can increase the cost of affordable housing development. St. Johns County will evaluate parking requirements to monitor the economic impact on affordable housing projects.

The data collected through the Affordable Housing Assessment will also support the development of policy and procedure involving corporations who seek to build or relocate to St. Johns County. Such a policy would ensure that large corporations receiving incentives would be required to pay a specified amount into the Affordable Housing Fund. Eligible employees of these corporations can be prioritized for affordable housing placement once units are built. To expand on current affordable housing incentives for developers and builders, St. Johns County will allow holders of impact fee credits to transfer or sell at a discount, impact credits to other developments in the same impact fee zone for the development of affordable housing that is for sale or rent. These impact credits reflect dollars previously invested by a developer in a county or school district and are recognized as being usable against impact fees.

In order to eliminate the long approval processes that hinder the building and preservation of affordable housing, St. Johns County will continue to utilize Income and Rent guidelines provided by the Florida Housing Finance Corporation when defining affordability and consider incentives and subsidies for projects that target lower income populations. Developers will also be assigned a designated Point of Contact to assist in the navigation of county development processes. Developers seeking permits for affordable housing projects, as defined using the Income and Rent guidelines, will be eligible for expedited approval of permits that prioritize affordable housing projects over others.

St. Johns County will evaluate options and consider utilizing other private funds, such as DRI contributions, for lower interest rate enticements, which supports low to moderate income homebuyers. St. Johns County will also encourage developers to include some percentage of affordable housing as part of their developments or make contributions to the housing fund when requesting variances or waivers to the existing codes. The County will work with the Housing



Finance Authority to determine how to utilize the lot inventory and encourage the development of “missing middle housing,” such as tiny homes or duplex units.

In order to reduce infrastructure costs, which remains a barrier to the development of affordable housing, St. Johns County and St. Augustine utility and road departments must work more closely with affordable development efforts. Rather than requiring a developer to construct new storm water retention ponds and lift-stations, allow the developer to utilize existing infrastructure to reduce costs when the site is adjacent to county or city-owned properties, whenever feasible. This would allow for additional units to be constructed on that property instead of space being utilized to satisfy infrastructure requirements.

St. Johns will encourage utility, road, and bridge departments to attend monthly Affordable Housing Advisory Committee meetings. Additionally, St. Johns County will work with utility partners to determine if portions of lift station construction costs can be incorporated into their capital improvement plans or if financing can be provided to make infrastructure construction more affordable for developers. County departments and the Affordable Housing Advisory Committee must meet periodically to discuss long-term planning efforts that will incorporate plans utilizing affordable developments and emphasize differing modes of transportation. Multimodal transportation hubs play an important role in economic development, especially as St. Johns County addresses barriers in racial equity impacting disadvantaged communities in the area.

### **LESSONS LEARNED FROM SIMILAR EFFORTS**

Utilizing state and federal standards for affordable housing, as well as recommendations from affordable housing advocate groups and the Affordable Housing Advisory Committee, St. Johns County has improved affordable housing programming over a period of several years. This proposal is unique in that we are seeking to address specific gaps in affordable housing that impact the economic development of West Augustine and the well-being and financial security of its residents.

### **PROPOSAL ADVANCEMENTS ALIGNED WITH EXISTING PLANNING INITIATIVES**

This proposal directly supports the advancement of local land use policy and planning initiatives by providing additional resources to accomplish recommended activities that enhance the production and preservation of affordable housing, as well as programs and initiatives that target low to moderate income earners and developers/builders. It also encourages ongoing collaboration efforts between St. Johns County, other governmental entities, and community stakeholders in the review, development, and implementation of policy supporting affordable housing needs in St. Johns County.

Increasing the number of affordable housing builds in the County and bolstering programs and incentives involving affordable housing complements current economic development and

community health initiatives in several different ways. First, because the residents of West Augustine are heavily employed in industries supporting St. Johns County tourism, increasing affordable housing in this area supports this workforce and benefits the economy in both West Augustine and St. Johns County. Second, access to housing is an important social determinant of health.

Infant mortality is directly correlated to the overall health of a community. In St. Johns County, the infant mortality rate among African American communities in St. Johns County is more than four times the rate of their white counterparts. Existing community initiatives are further strengthened with the increase of affordable housing development in St. Johns County. Other programs, such as loan, grant, and other financial assistance, also support these initiatives and decrease inequity in West Augustine's housing market.

### **SIGNIFICANT ENVIRONMENTAL RISKS ALIGNED TO PROMOTE COMMUNITY RESILIENCE**

In alignment with the 2023 St. Johns County Policy on Affordable Housing, renovation and improvement programs for eligible homeowners will support County efforts to eliminate substandard housing, which encourages homeowners to make improvements that will increase energy efficiency and reduce water consumption.

Historically, West Augustine has suffered from social and economic disparities that have hampered financial investment and economic development opportunities. One example of this disparity is seen within the sewer and utilities of West Augustine. St. Johns County has partnered with the City of St. Augustine to centralize sewer service, which will support further development of the area by expanding usage capacity while managing the environmental impact.

St. Johns County encourages innovative design techniques for construction and rehabilitation projects that promotes ongoing sustainability and affordability. New home construction and preservation projects are required to follow certain practices that utilize green building initiatives, which include:

- Energy Rater tests for pre and post rehabilitation projects that inform recommendations to reduce future utility and maintenance costs.
- Building Performance Tests to verify duct tightness and the overall performance of the building envelope.
- Gas Monoxor Tests to ensure proper combustion for existing gas appliances.
- Purchasing of Energy Star rated refrigerators, ceiling fans, and light fixtures; high efficiency air conditioning units with programmable thermostats; well-insulated exterior walls, doors, and ceilings; light colored roofing material; low/no VOC interior paint; light colored interior and exterior paint.
- Use of environmentally friendly pesticides and drought tolerant plantings
- Use of high efficiency toilet systems and low flow shower heads and faucets.

- Utilization of recycled material for flooring, insulation, countertops, and concrete driveways.
- Use of features that promote Aging in Place, such as lever handles on faucets and doorknobs, elevated toilets, zero-threshold exterior doors, and walk-in showers with backing for grab bars, where feasible.

## **ROADBLOCKS THAT IMPEDE IMPLEMENTATION**

At this time, we have been working with county, city, and community organizations involved with the planning of projects that support our goal of increasing the number of affordable housing builds and implementation of programs and incentives that support low to moderate income earners and developers of affordable housing.

Because we are proposing several revisions in current policy, it is possible the proposal may experience roadblocks that prolong the process to approve and implement policy revisions. However, because many policy revisions have been recommended by the Affordable Housing Advisory Committee and support local and federal affordable housing initiatives and legislation, we do not anticipate any roadblocks will permanently impact our capacity to accomplish the activities outlined in this proposal.

### **Geographical Scope**

Our proposal addresses the disadvantaged community of West Augustine, an area disproportionately impacted by poverty and racial inequity. Within the bounds of the West Augustine Community Redevelopment Area, 20 pilot lots have been selected for development in phases based on need utilizing factors such as paved roads and utilities.

Over 10 million historical and cultural tourists visit St. Johns County annually to experience the 450 years of history. Black History plays a key part throughout the history of St. Johns County and St. Augustine. There are currently 35 historically significant sites of Black History in St. Augustine, including Florida's first Museum of Black History which is the result of recent efforts to support the local arts and tourism industry. Recognizing the cultural and historical significance of the area, we are prioritizing the West Augustine community to address the historical disparities impacting African American residents, which includes enhancing the availability of and access to affordable housing.

The West Augustine community is predominantly African American, and many residents work in industries that support St. Johns County tourism. Over the last few years, West Augustine has been the focus of several initiatives aimed at promoting the development of the area and enhancing the health and well-being of residents. Focusing on this geographic scope, St. Johns County is building upon current initiatives and tackling barriers that affect economic and workforce development, community health, housing access and homelessness, and community sustainability.

Within our geographical scope, affordable housing development will impact the community of West Augustine in three primary and measurable ways. First, the number of available affordable housing units will increase. This will allow current West Augustine residents the opportunity to secure affordable housing instead of traveling out of St. Johns County. It will also allow for continued growth in the area, because increasing the number of affordable housing builds will encourage relocation to West Augustine. By default, increasing affordable housing development in this area will encourage continued economic growth, allowing the current workforce to remain in St. Johns County, while supporting growth within the workforce population. The benefits of economic growth from our proposal will be seen directly within the West Augustine community, but also positively impacts the County at large.

Second, by enhancing affordable housing programming and nurturing current partnerships with community housing advocates, we are directly supporting the needs of the historically disadvantaged West Augustine area. Our proposal allows for several key programs to continue or expand, allowing for greater reach of the target population within our geographical scope. Community redevelopment efforts have transformed portions of West Augustine, such as the addition of a community building and plans for a medical center, so by addressing the need for affordable housing we are taking a holistic approach at supporting the underserved of this community and implementing infrastructure improvements for long-term success and sustainability.

Lastly, the long-term impact of a holistic approach to community development, especially as it pertains to our affordable housing proposal, will be seen in the health and well-being of residents. We anticipate the impact of this project to be demonstrated in reduced infant mortality rates within the African American and low-income community in West Augustine. Because we are proposing activities that target core issues leading to poverty, we anticipate the impact of poverty to be reduced. This includes mental health, lifespan, educational opportunities, workforce development, and overall health and well-being.

### **Key Stakeholders**

Our key stakeholders include those with unmet housing needs and individuals from protected class groups. Other stakeholders that are community organizations and local and regional public agencies providing housing funding or technical assistance include St. Johns Housing Partnership, Homeless Coalition of St. Johns County, St. Johns CARES, Habitat for Humanity of St. Augustine/ St. Johns County, St. Johns County Continuum of Care, United Way of St. Johns County, West Augustine CRA, West Augustine Historical Community Development Corporation, and the Affordable Housing Advisory Committee. We engage our stakeholders through targeted outreach, collaboration on community projects, participation in public forums, and meetings to ensure their needs are addressed in our proposal. Additionally, we actively seek their input through surveys, such as the 2025 Comprehensive Plan Update survey through Inspire Engagement, to ensure their perspectives are incorporated into our decision-making processes.

We aim to build strong, mutually beneficial relationships with these stakeholders to drive positive change and impact in our community.

### **Alignment with Fair Housing Requirements**

St. Johns County presently participates in affordable housing activities and initiatives that align with the Fair Housing Act's mandates. This includes ongoing evaluation of housing policy and practice to ensure opportunities for affordable housing are purposeful in eliminating patterns of segregation and disparities in opportunities, promote fair housing choice, and foster inclusivity. Our housing programs follow state and federal regulations and are aimed at supporting the housing needs of low to moderate income persons without restriction based on protected characteristics.

Currently and within our proposed activities, St. Johns County works with a variety of community advocate and advisory groups that partner to identify and target populations that lack access to opportunity and equity. Programs are available to all qualifying individuals and do not support segregation of any race. Additionally, because this proposal targets the community of West Augustine, which has suffered from social and economic disadvantages and poverty and is a racially concentrated area, it further demonstrates our commitment to affirmatively further fair housing.

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**ST. JOHNS COUNTY**  
**EXHIBIT E – CAPACITY**

**PRO Housing Application Development**

The PRO Housing Application Development was prepared by employees of the St. Johns County Office of Intergovernmental Affairs and LEXIPOL. Lexipol was contracted for the narrative writing and application assembly.

The authors include:

- Kristin Ayala Crane Odom, Grants & Legislative Research Analyst, Office of Intergovernmental Affairs
- Sarah Newell, Senior Strategist, Office of Intergovernmental Affairs
- Connor Williams, Contractor – Grant Services, LEXIPOL
- Daisy Ornelas, Customer Success Manager-Subscriptions, LEXIPOL

**Agency Roles**

If the grant is awarded, the Office of Management and Budget will act as the grant administrator and overseeing the financial control and procurement process for all departments in St. Johns County. The Public Works Department, which is in charge of maintaining the County's infrastructure, will appoint a Capital Project Manager from the Engineering Division to ensure that the project progresses according to schedule and stays within budget. The Department comprises Engineering Services, Fleet Maintenance, and Road and Bridge maintenance, operating on a budget of \$108,960,820 and employing an additional 3.99 full-time employees (FTEs) in Fiscal Year 2025.

The Housing & Community Services Division of the Health and Human Services Department promotes affordable housing programs and addresses community development issues. In Fiscal Year 2025, the Division will operate on budget of \$1,687,680. The Housing & Community Services Division has 8 FTE's. For this project, a Programmatic Manager and Community Redevelopment Agency (CRA) Coordinator will oversee the implementation of the programs associated with this project. These departments will collaborate with stakeholders and other government agencies to carry out the activities outlined in this proposal.

**Leadership Capacity & Legal Authority**

The St. Johns County Board of County Commissioners consists of five elected officials who are responsible for administering county government. The commission serves as the executive of the local government, by levying local taxes, managing county institutions such as the Sheriff's Office, overseeing public health, enforcing building codes, and handling public works. As shown in the organizational chart, the County Administrator is the County's Chief Administrative Officer and provides leadership, direction, and management to all County departments under the

Board of County Commissioners, except for the County Attorney. The directors of the Health and Human Service Department and the Public Works Department report directly to the Deputy County Administrator.

**Partner Capacity**

St. Johns County’s partners include the Affordable Housing Advisory Committee, the Housing Finance Authority, and the West Augustine CRA. The Affordable Housing Advisory Committee reviews established policies and procedures, ordinances, and land development regulations, and it has adopted a comprehensive local government plan to recommend specific actions or initiatives to encourage or facilitate affordable housing while protecting the ability of the property to appreciate in value. The Housing Finance Authority was established to alleviate the shortage of affordable housing facilities and provide capital for investment in such facilities for low-, moderate-, and middle-income families in St. Johns County. The St. Johns County CRA is a public entity established under Florida Statute and governed by the St. Johns County Board of County Commissioners. Its purpose is to promote, coordinate, and fund various residential and commercial redevelopment efforts in three community redevelopment areas, including the West Augustine CRA. The West Augustine CRA steering committee comprises nine members and has a budget of \$1,703,633 for Fiscal Year 2025. The CRA Coordinator collaborates with various stakeholders to ensure compliance with community standards, oversees budgeted funding projects, and stays updated on redevelopment and affordable housing trends.

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**ST. JOHNS COUNTY  
EXHIBIT F – LEVERAGE**

St. Johns County remains committed to advancing racial equity in housing programs in alignment with federal and state guidance and to complying with federal and state requirements. Countless studies have shown that people of color are disproportionately impacted by homelessness compared to those of white race. Our mission is to ensure that racial equity is a cornerstone of all programs and initiatives that aim to create and facilitate affordable housing in St. Johns County, and we commit to continued utilization of all resources and tools available.

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**ST. JOHNS COUNTY**  
**EXHIBIT G – LONG-TERM EFFECT**

**OUTCOMES & LONG-TERM EFFECTS**

It is anticipated that the long-term impact of St. Johns County's affordable housing proposal will be a rise in home ownership among low-to-moderate income earners, marginalized populations, and within the historically vulnerable community of West Augustine. Among the metrics that will be used to measure this are poverty rates, home ownership rates, as well as population statistics collected at local, state, and federal levels. As programs and initiatives are successfully administered among our target population, we expect that the poverty rate in St. Augustine will decrease over the next 10 to 15 years, and home ownership rates will increase over that time period.

It is our intent, as outlined in this proposal, that our proposed approach directly addresses the core barriers that are impacting the development of affordable housing, as well as access to it, in St. Johns County. Our approach has been informed by our work with organizations which reflect the demographics of our target community, and the expertise they have in serving low-to-moderate income earners, particularly African Americans. Our activities are a result of state, federal, and local recommendations and regulations guiding affordable housing and thus mirror the data-driven, evidence-based practices that are known to eliminate barriers in affordable housing development and access.