

8

**AGENDA ITEM
Planning & Zoning**

Meeting

2/1/2024

MEETING DATE

TO: Planning and Zoning Board Members

DATE: January 19, 2024

FROM: Evan Walsnovich, Planner

PHONE: 904 209-0596

SUBJECT OR TITLE: CPA(SS) 2023-09 Preserve at Wards Creek

AGENDA TYPE: Business Item, Ex Parte Communication, Recommendation, Report

PRESENTER: Thomas Ingram - Sodl & Ingram, PLLC

BACKGROUND INFORMATION:

Request for a Small Scale Comprehensive Plan Amendment to amend the Future Land Use Map designation from Agricultural-Intensive (A-I) to Residential-D (Res-D) with a text amendment limiting development to 15 units per net developable acre, for approximately 19.22 acres of land located at 6351 County Road 16A. This application is a companion item to PUD 2023-18.

SUGGESTED MOTION/RECOMMENDATION/ACTION:

APPROVE: Motion to recommend approval of CPA(SS) 2023-09 Preserve at Wards Creek, based upon four (4) findings of fact as provided in the Staff Report.

DENY: Motion to recommend denial of CPA(SS) 2023-09 Preserve at Wards Creek, based upon four (4) findings of fact as provided in the Staff Report.



Growth Management Department

Planning Division Report

Application for Small Scale Comprehensive Plan Amendment

CPA(SS) 2023-09 Preserve at Wards Creek

To: Planning and Zoning Agency
From: Evan Walsnovich, Planner
Date: January 26, 2024
Subject: CPA(SS) 2023-09 Preserve at Wards Creek

REQUEST: Request for a Small Scale Comprehensive Plan Amendment to amend the Future Land Use Map designation from Agricultural-Intensive (A-I) to Residential-D (Res-D) with a text amendment limiting development to 15 units per net developable acre, provided, however, that at the time of initial development and until December 31, 2053, all residential uses on the property shall be income-restricted and rent-restricted for affordable housing consistent with the State Housing Initiatives Partnership program or other similar program administered by the Florida Housing Finance Corporation or successor agency. The subject property contains approximately 19.22 acres of land located at 6351 County Road 16A. This application is a companion item to PUD 2023-18, which proposes 288 affordable housing units.

Applicant: Thomas Ingram – Sodl & Ingram, PLLC
Owner: Bull Pasture, LLC
Hearing Dates: Planning and Zoning Agency – February 1, 2024
Board of County Commissioners – March 19, 2024
Commissioner District: District 2

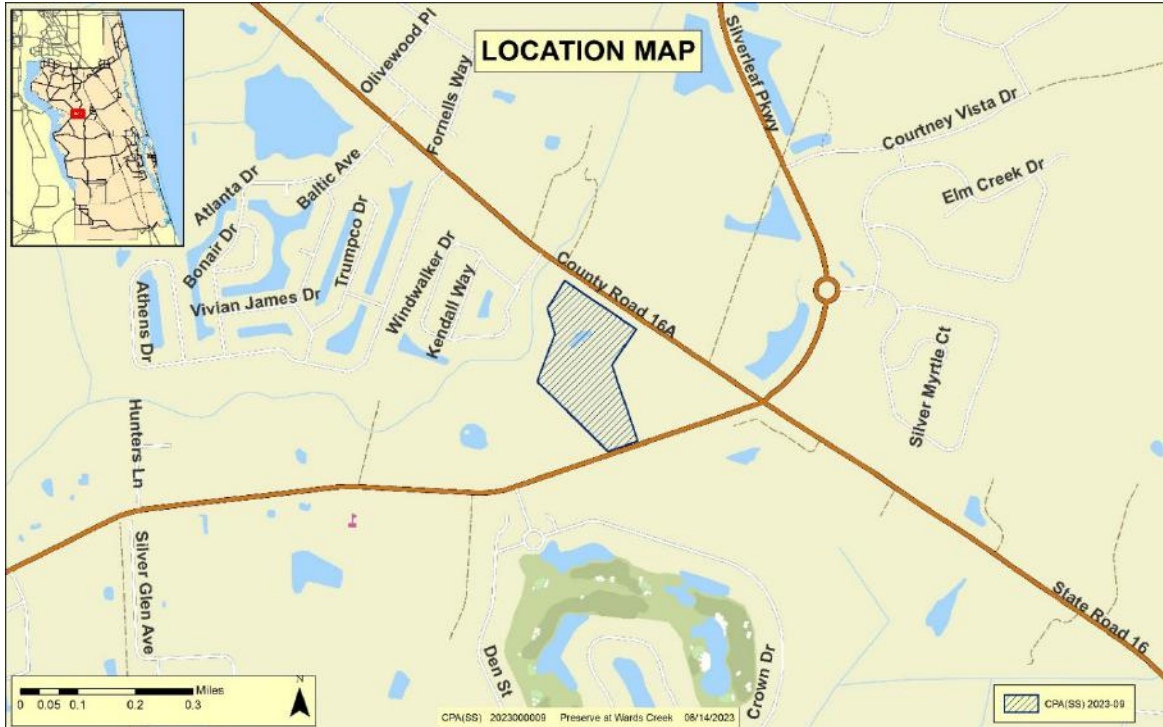
SUGGESTED MOTION/ACTION

APPROVE: Motion to recommend approval of **CPA(SS) 2023-09 Preserve at Wards Creek**, based upon four (4) findings of fact as provided in the Staff Report.

DENY: Motion to recommend denial of **CPA(SS) 2023-09 Preserve at Wards Creek**, based upon four (4) findings of fact as provided in the Staff Report.

MAP SERIES

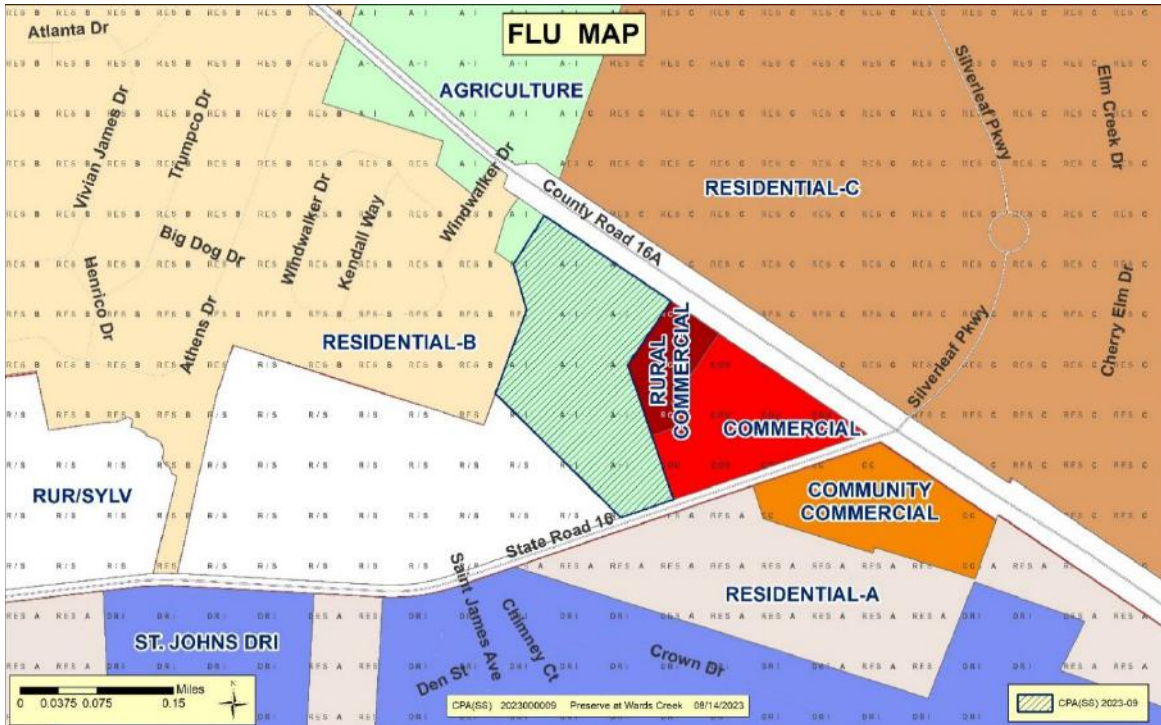
Location: The subject property is located on the western corner of County Road 16A and State Road 16.



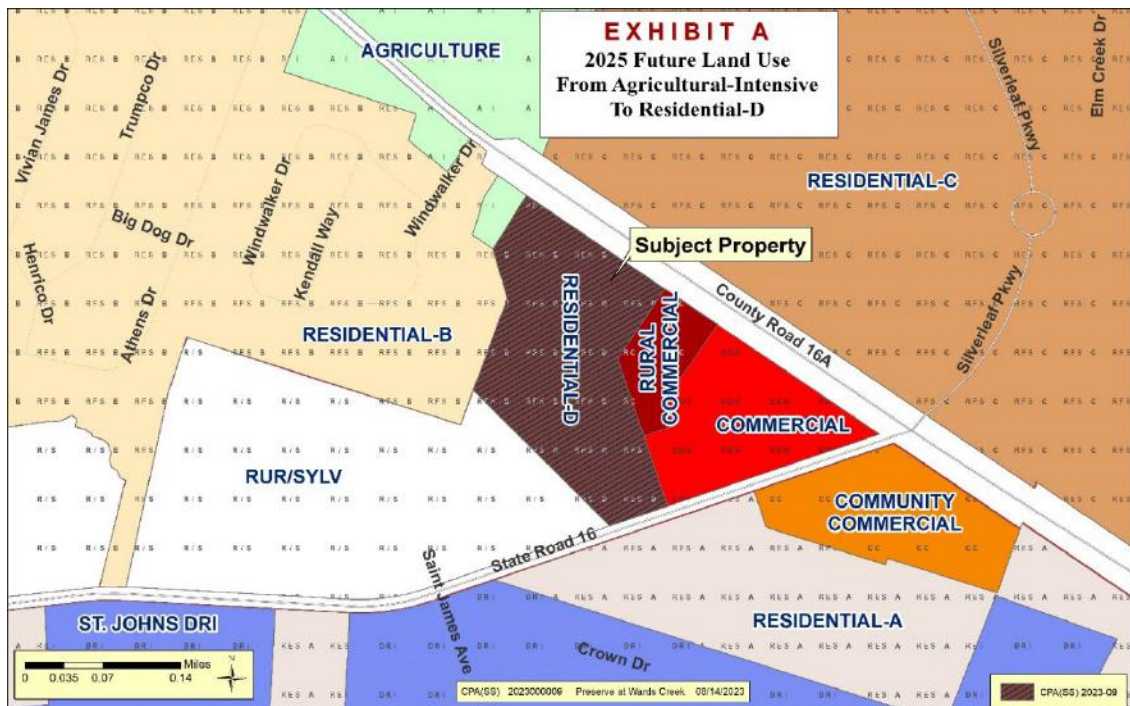
Aerial Imagery: The subject property is approximately 19.22 acres in size, including approximately .55 acres of wetlands. The subject property is currently vacant and lies to the east of the Wards Creek Planned Unit Development, and to the west of the Bridle Ridge Planned Unit Development, where a U-Haul facility is under construction. Property to the south includes mobile homes, and property to the north across County Road 16A is currently undeveloped.



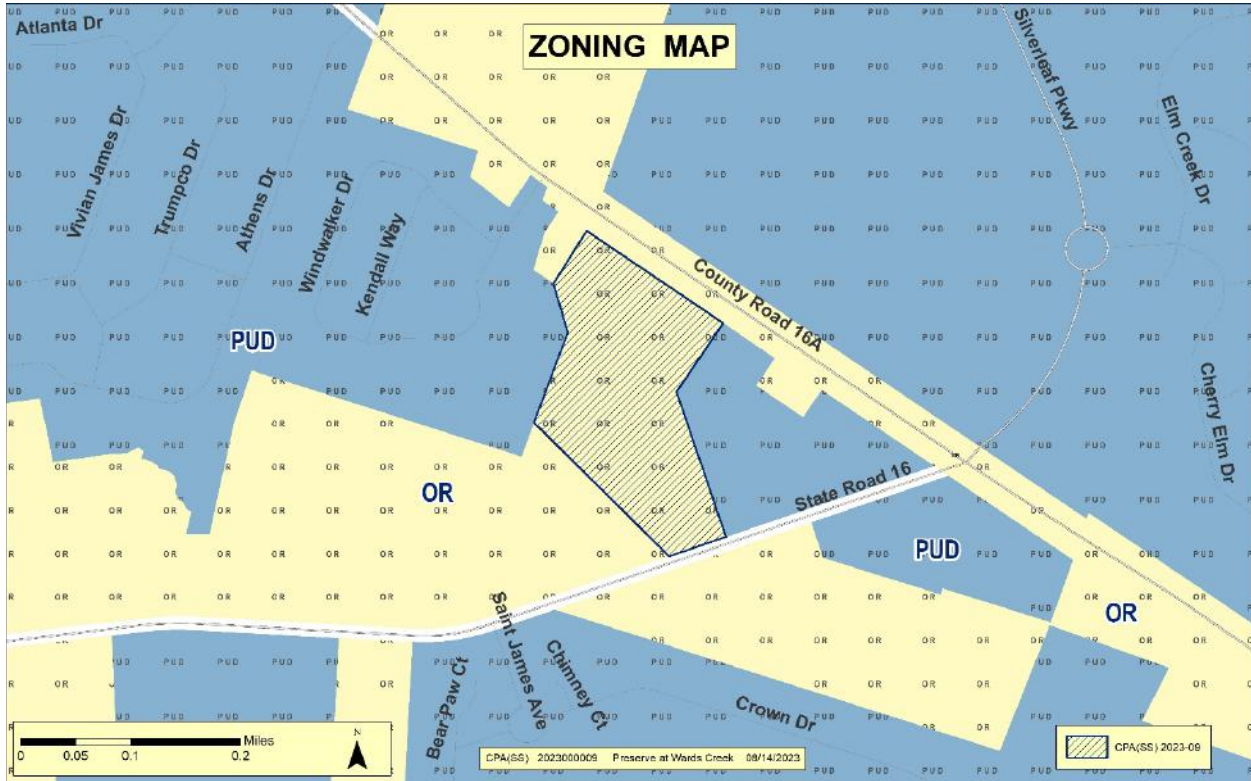
Existing Future Land Use: The subject property is currently designated Agriculture Intensive (A-I) on the Future Land Use Map. Properties in the immediate area are designated Rural Commercial, Commercial, Residential-B and Rural/Silviculture (R/S).



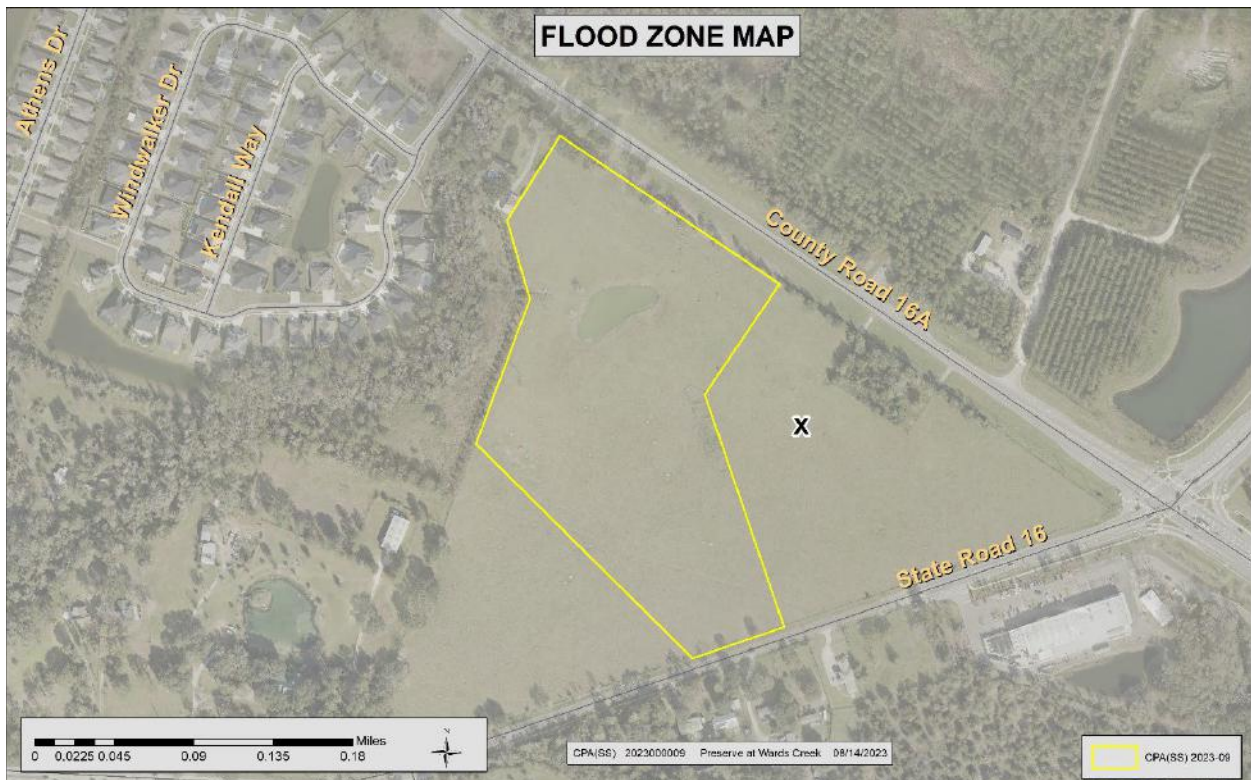
Proposed Future Land Use: The applicant is proposing a Residential-D (Res-D) Future Land Use designation. with a text amendment limiting development to 15 units per net developable acre, provided, however, that at the time of initial development and until December 31, 2053, all residential uses on the property shall be income-restricted and rent-restricted for affordable housing consistent with the State Housing Initiatives Partnership program or other similar program administered by the Florida Housing Finance Corporation or successor agency.



Zoning District: The subject property is zoned Open Rural (OR). The surrounding area is zoned OR and PUD.



Flood Zone: The property and the surrounding areas are within an X flood zone.



APPLICATION SUMMARY

This is a request to amend the Future Land Use Map (FLUM) designation from Agricultural-Intensive (A-I) to Residential-D (Res-D) with a text amendment limiting development to 15 units per net developable acre, for approximately 19.22 acres of land located at 6351 County Road 16A. The text amendment provides however, that at the time of initial development and until December 31, 2053, all residential uses on the property shall be income-restricted and rent-restricted for affordable housing consistent with the State Housing Initiatives Partnership program or other similar program administered by the Florida Housing Finance Corporation or successor agency. Proposed changes to increase the allowed density of the subject property are subject to the provisions of Chapter 163, Florida Statutes. A companion PUD zoning was submitted with the small-scale comprehensive plan amendment. The applicant is proposing 288 affordable housing units.

IMPACT REVIEW

Transportation:

The following assessment is a non-binding traffic impact analysis for Preserve at Wards Creek (PUD 2023-18 & CPA(SS) 2023-09) to assess for potential impact based solely upon the applicant's intent to develop within this Comprehensive Plan Amendment application from Agricultural Intensive to Residential D for 19.22 acres.

In accordance with the CPA application, the applicant seeks to change the existing Agricultural Intensive future land use designation to Residential D future land use to allow for the development of an affordable housing apartment complex. Based on the companion PUD rezoning, the development is proposed to consist of 288 affordable multi-family (apartment) units.

The proposed 288 affordable housing units is estimated to generate 1,214 daily trips and 112 p.m. peak hour trips (ITE LUC 223 Affordable Housing).

A preliminary proportionate fair share analysis is provided for the proposed residential development consisting of 288 affordable housing units. Based on the current roadway status within the 4-mile radius study area (Transportation Analysis Spreadsheet dated 6/1/2023), including trips from pending concurrency applications, the following **roadway segments are currently projected to be adversely impacted based on total committed traffic:**

Link 24 (CR 16A from River Reach Pkwy to SR 16)

Link 91.1 (SR 16 from CR 16A to IGP)

Link 91.2 (SR 16 from IGP to CR 2209)

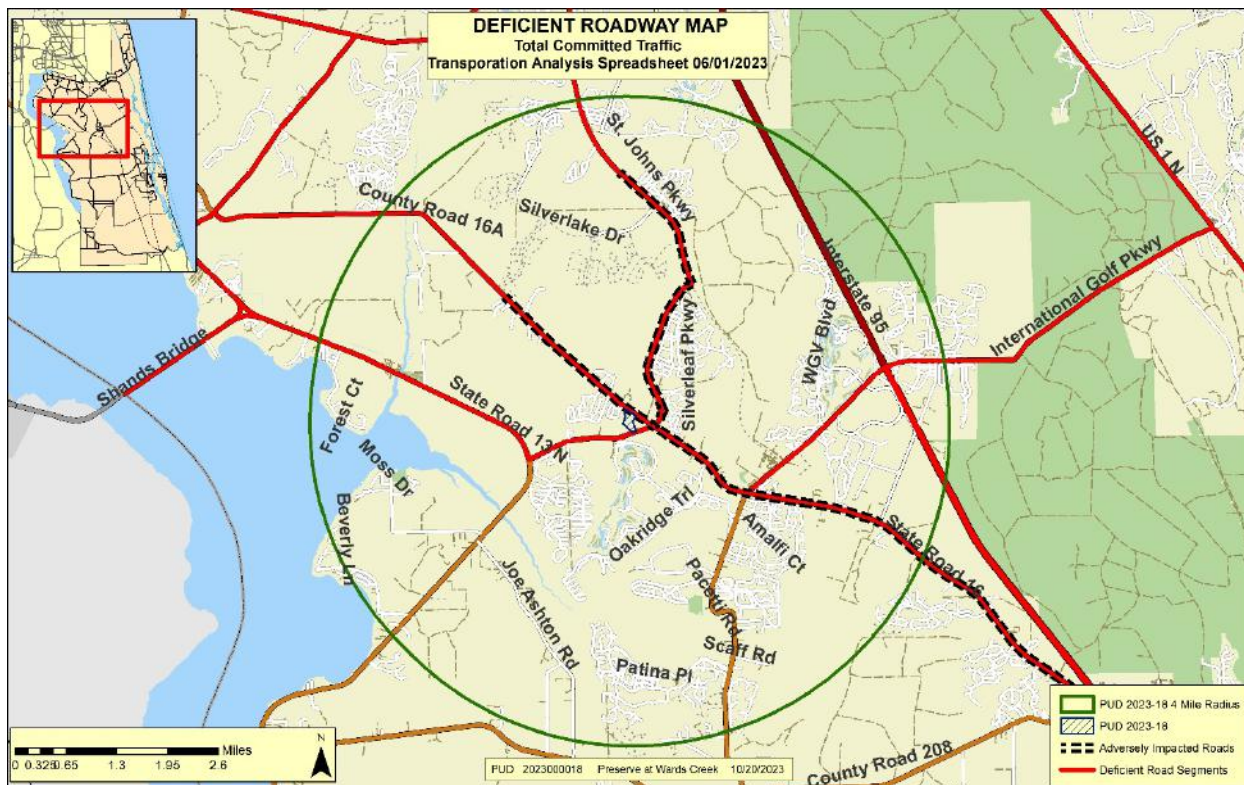
Link 92.11 (SR 16 from CR 2209 to S. Francis Rd.)

Link 92.12 (SR 16 from S. Francis Rd. to West Mall Entrance)

Link 170 (Silverleaf Pkwy from SR 16/CR 16A to CR 2209)

Link 171.2 (CR 2209 from Silverleaf Pkwy to First Coast Expressway)

Deficient Roadways Map: Adversely impacted segments are those roadway segments within the 4-mile radius study area that are currently over 100% of capacity based on total committed traffic and are impacted by project traffic at 1% or greater of the approved maximum service volume.



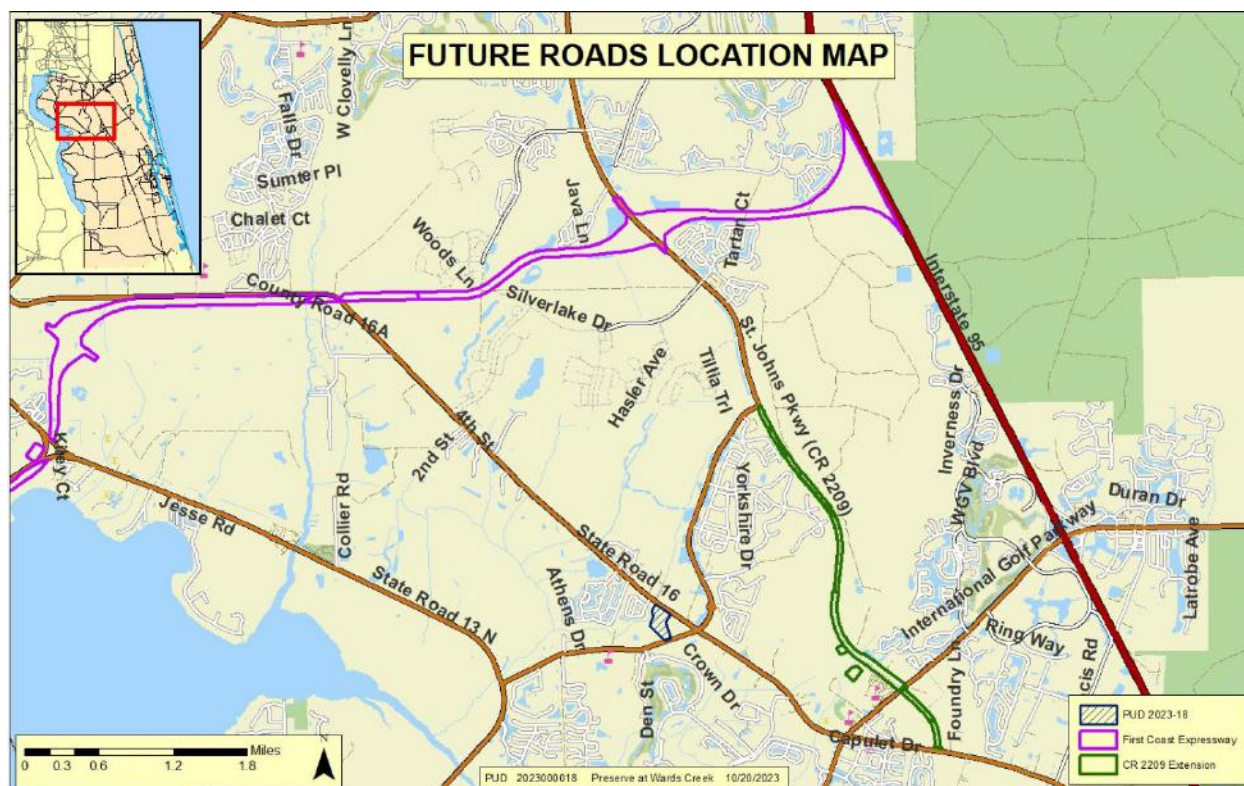
The required proportionate fair share for impacts to the adversely impacted segments shown above is currently estimated to be \$4,498,117.00 (preliminary estimate 10/19/2023), subject to final review in conjunction with a formal concurrency application currently in review (CONMAJ 2023-06). The concurrency application is still under review pending intersection analyses and school concurrency determination.

The current status of construction and/or proportionate share commitments for the adversely impacted segments is provided in the table below. The applicant has indicated intent to use the required proportionate share to construct roadway improvements in the area, which will be the subject of a future Proportionate Fair Share Agreement.

Impacted Roadway Commitments

Link ID	Roadway	Improvement Needed	Estimated Improvement Costs (2022)	Current Commitments	Current Status	Preserve at Wards Creek PFS
24	CR 16A (River Reach Pkwy to SR 16)	Widen to 4-Lanes - 2.66 miles (Suburban)	\$32,021,010	No Commitments for 4-laning; PFS Funds \$600,000 available for this area	Unfunded	\$2,244,673
91.1	SR 16 (CR 16A to IGP)	Widen 4 to 6 Lanes (Urban)	\$18,712,346	No Commitments for 6-laning	Unfunded	\$643,705
91.2	SR 16 (IGP to future CR 2209)	New Construction 4-Lane (Suburban)	\$10,400,289	County committed to construct CR 2209 between Silverleaf Pkwy and SR 16; and widen Link 91.2	CR 2209 and SR 16 currently in design; Construction funded for 2024 (County)	\$217,366
92.11	SR 16 (CR 2209 to S. Francis Rd.)	New Construction 4-Lane (Suburban)	\$11,800,154	Design underway by FDOT	Design Funded (FDOT) Construction currently Unfunded	\$60,181
92.12	SR 16 (S. Francis Rd. to West Mall Entrance)	New Construction 4-Lane (Suburban)	\$46,021,919	Design underway by FDOT	Design Funded (FDOT) Construction currently Unfunded	\$174,883
170	Silverleaf Pkwy (SR 16/CR 16A to CR 2209)	Widen 4 to 6-Lane (Urban)	\$24,859,049	No Commitments for 6-laning	Unfunded	\$676,166
171.2	CR 2209 (Silverleaf Pkwy to FC Expressway)	Widen 4 to 6-Lane (Urban)	\$19,964,453	No Commitments for 6-laning	Unfunded	\$481,143
	TOTALS		\$163,779,220			\$4,498,117

It is noted that there are significant roadway improvements planned in this area that will provide additional travel options and a change of traffic patterns is anticipated. Specifically, the First Coast Expressway is currently under construction by FDOT with completion estimated by 2030, which also includes additional lanes on I-95. The County will begin construction of a 4-lane CR 2209 between Silverleaf Pkwy and SR 16 as well as the widening of SR 16 to 4-lanes from IGP to CR 2209 in 2024. In addition, FDOT is currently in the design phase for the widening of SR 16 to 4-lanes from CR 2209 to the West Mall Entrance with the County and FDOT actively seeking funding for construction.



Water and Sewer:

The St. Johns County Utility Department (SJCUD) will be able to meet the water and sewer plant capacity for 288 apartments with a total anticipated usage of 86,400 gallons per day (gpd) of water and 69,120 gpd of wastewater based on general conditions listed in the Water & Sewer Availability Letter dated 7/14/2023 provided in **Attachments & Supporting Documents**. The general and specific conditions that will need to be adhered to are also located in this letter.

Drainage and Stormwater Management:

The project will comply with all applicable federal, state, regional and local permitting requirements.

Solid Waste:

The project will comply with all applicable federal, state, regional and local requirements.

Parks and Recreation, Open Space:

Neighborhood/Community Park: 3.46 acres

Regional Open Space: 17.28 acres

These provisions of recreation and open space are provided within the PUD Text.

Schools: There is insufficient capacity.

Mass Transit: There is sufficient capacity.

Fire Services:

ISO's Public Protection Classification (PPC) information plays an important part in the decisions many insurers make affecting the underwriting and pricing of property insurance. ISO analyzes the relevant data and assigns a PPC- grading from 1 (lowest risk) to 10 (highest risk). A higher ISO rating could mean higher homeowner insurance. This information is provided for the consideration of future homeowners. It is important to note, St. Johns County Fire Rescue does and will continue to respond to all properties within the County regardless of the ISO rating.

As of August 2016, ISO applies the following classification to properties in St Johns County:

- Class 3- property within 5 road miles of an existing fire rescue station and within 1000 feet of a creditable water supply such as a fire hydrant, suction point, or dry hydrant.
- Class 3X- property within 5 road miles of an existing fire rescue station but beyond 1000 feet of a creditable water supply.
- Class 10W- property beyond 5 road miles but less than 7 road miles from an existing fire rescue station, and has a creditable water source.
- Class 10- property beyond 5 road miles of a recognized fire rescue station.

Based on this project submitted, the current primary fire station is located at 235 Murabella Pkwy and has a creditable water supply; therefore, ISO would assign a rating of Class 3.

DEPARTMENTAL REVIEW

The Planning and Zoning Division has routed this request to all appropriate reviewing departments. There are no open comments; however, staff maintained a comment concerning compatibility with the surrounding area.

Office of the County Attorney Review:

All amendments to the St. Johns County comprehensive plan are legislative in nature. This is a policy-making decision to determine the future growth pattern of St. Johns County (i.e. is it appropriate to expand the development area boundary or to change the maximum theoretical growth in this area). A determination of consistency with the Comprehensive Plan and state law and approval or denial of the proposed amendment must not be arbitrary and capricious. Decisions on approval or denial of legislative land-use policy are determined on whether the decision is supported by evidence that is fairly debatable (i.e. whether reasonable minds may differ). This item is a legislative hearing, and therefore the Agency may take into account policy preferences expressed by persons with an interest in the amendment. The types of information, evidence, and documentation that the Agency may consider is broader than the competent substantial evidence of a quasi-judicial hearing.

Technical Division Review:

All future site engineering, drainage and required infrastructure improvements will be reviewed pursuant to the established Development Review Process to ensure that the development has met all applicable local regulations and permitting requirements. No permits will be issued prior to compliance with all applicable regulations.

The FDOT has reviewed the proposed intersection improvements with county staff. Based on the First Coast Expressway being completed in 2030, FDOT has opined that the widening of CR-16A from two to four lanes would provide a better benefit.

Planning and Zoning Division Review:

This is a request for a small-scale comprehensive plan amendment to amend the Future Land Use Map (FLUM) designation from Agricultural-Intensive (A-I) to Residential-D (Res-D), located at 6351 County Road 16A to allow 288 affordable housing units. The property contains approximately 19.22 acres. The applicant has provided a text amendment limiting the approximate density to 15 dwelling units per net acre. All residential uses on the property shall be income-restricted and rent-restricted for affordable housing consistent with the State Housing Initiatives Partnership program or other similar programs administered by the Florida Housing Finance Corporation or successor agency. A companion PUD zoning was submitted with the small-scale comprehensive plan amendment.

Currently, the property is being utilized as a bull pasture while neighboring properties are being changed to more intensive uses. However, the proposed change to Residential-D could be considered a “spot change” in this area of the county given there are only several locations currently that are designated to have the highest possible allowance of density by the Comprehensive Plan.

The Comprehensive Plan contains several policies regarding Comprehensive Plan Amendments, including Policies A.1.2.5, A.1.2.7, and A.1.3.11. These policies state the following (provided in part):

Policy A.1.2.5: All Comprehensive Plan amendments shall provide justification for the need for the proposed amendment and demonstrate how the proposed amendment discourages urban sprawl and not adversely impact natural resources. In evaluating proposed amendments, the County shall consider each of the following:

- a) the extent to which the proposed amendment is contiguous to an existing Development Area which has developed in a manner providing a compact, contiguous development pattern with the proposed amendment;
- b) the extent to which population growth and development trends warrant an amendment, including an analysis of vested and approved but unbuilt development;
- c) the extent to which adequate infrastructure to accommodate the proposed amendment exists, or is programmed and funded through an adopted Capital Improvement Schedule, such as the County Capital Improvement Program, the Florida Department of Transportation Five-Year Work Program, the North Florida Transportation Planning Organization (TPO) Transportation Improvement Program, or will be privately financed through a binding executed agreement, or will otherwise be provided at the time of development impacts as required by law;
- d) the extent to which the amendment will result in an efficient use of public funds needed for the provision of new infrastructure and services related to it;
- e) the extent to which the amendment will not result in a sprawl development pattern as determined by Chapter 163, Florida Statutes, and will not discourage infilling of more appropriate areas available for development within existing Development Area Boundaries; and the extent to which the amendment will result in a sustainable development pattern through a balance of land uses that is internally interrelated; demonstrates an efficient use of land; ensures compatible development adjacent to agriculture lands; protects environmental qualities and characteristics; provides

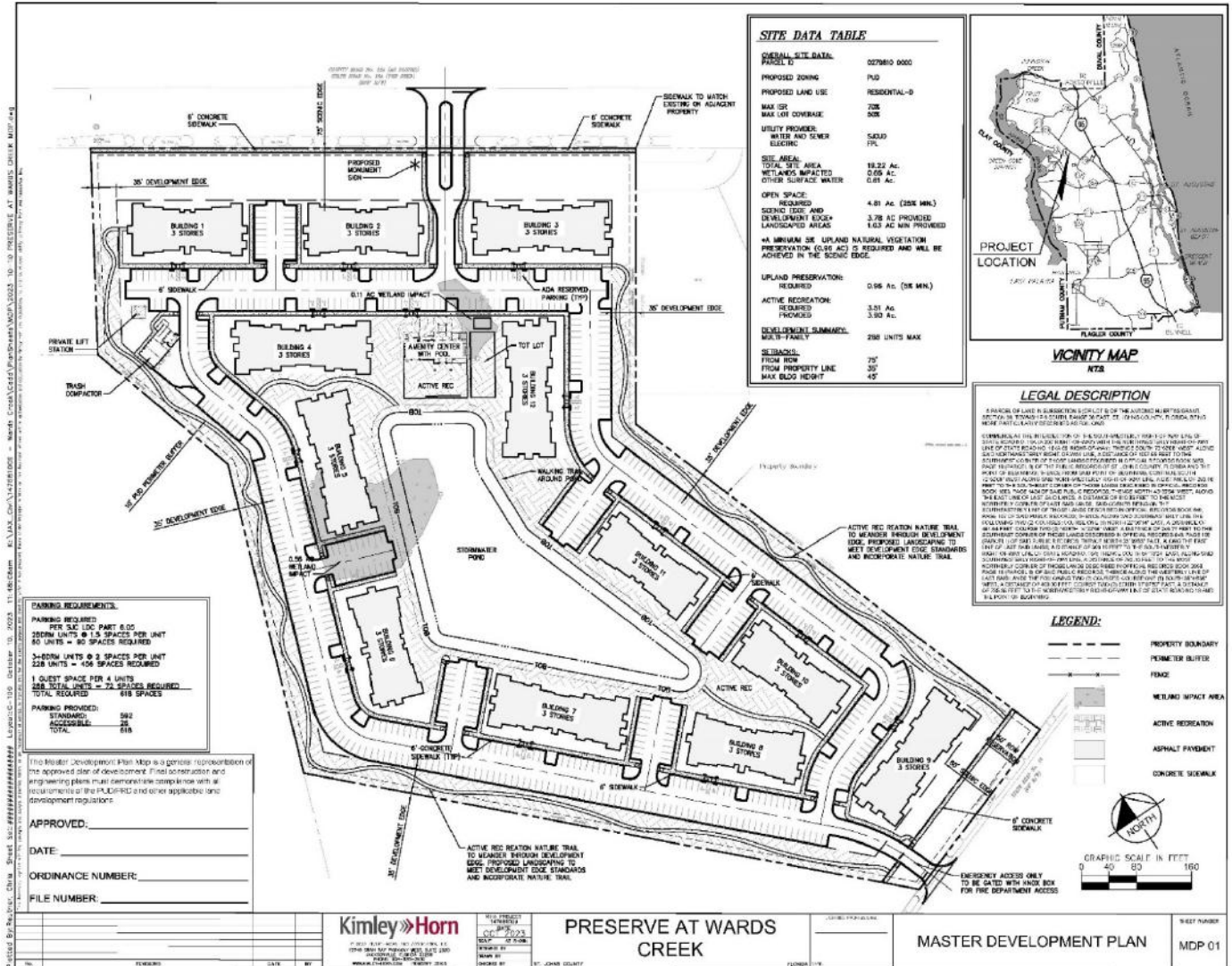
- interconnectivity of roadways; supports the use of non-automobile modes of transportation; and appropriately addresses the infrastructure needs of the community.
- f) the extent to which the amendment results in positive market, economic and fiscal benefits of the area as demonstrated through a market demand analysis, economic impact analysis and fiscal impact analysis.

Policy A.1.2.7: The County shall encourage urban and suburban growth within the development areas where public facilities and services exist. Development Areas are those areas designated on the Future Land Use Map, which depict the overall future growth pattern of the County. Areas designated R/S and A-I are not Development Areas. Comprehensive Plan amendments to add development areas shall be discouraged unless the applicant demonstrates the amendment provides economic development, job creation, preservation of the natural environment, or other public benefit.

Policy A.1.3.11: states the following: “When a Comprehensive Plan amendment, rezoning or development application is considered, the County shall ensure compatibility of adjacent and surrounding land uses. Land uses, include but are not limited to permitted uses, structures, and activities allowed within the land use category or implementing zoning district. Compatibility means a condition in which land uses can co-exist in relative proximity to each other in a stable fashion over time such that no use is unduly negatively impacted directly or indirectly by another use. Compatibility does not mean “the same as”. Compatibility refers to the sensitivity of development proposals in maintaining the character of existing development and environments. The compatibility of land uses is dependent on numerous characteristics which may impact adjacent or surrounding uses... In order to ensure compatibility with a Comprehensive Plan amendment, the County may require the submittal of a companion rezoning application, such as a PUD, Special Use request or other application showing development of the property.”

The property fronts County Road 16A to the north and State Road 16 to the south. The applicant has provided that the proposed development will only access County Road 16A but will have an emergency gate located on the State Road 16 side.

Conceptual Site Plan



The subject property is surrounded by undeveloped lands and properties previously changed into both commercial and residential Planned Unit Developments (PUDs). The largest among them is Silverleaf to the north along County Road 16A where there are over 15,900 residential units, 1,954,160 square feet of non-residential square feet of entitlements spanning from State Road 13 in the south to County Road 210 W in the north.

AFFORDABLE HOUSING ADVISORY COMMITTEE (AHAC) MEETING

At the monthly AHAC meeting held on Wednesday, September 20th the applicant Thomas Ingram along with representatives from the development firm Dominion presented this project. The team gave an overview of the funding apparatus that they utilize for projects such as this, their target demographics, and the positive effects that they can generate on the local economy. As of that meeting, they had spoken with a number of local businesses that were in favor of creating more Affordable Housing in the area so that their workers could live in the same county that they work in.

NORTHWEST SECTOR COMMUNITY MEETING

A Community meeting was held on Wednesday September 27, 2023, with more than 100 people attending. The meeting was led by both the applicant Thomas Ingram and representatives from the development firm Dominion, where they led with an informational session regarding funding, similar projects by Dominion, and the exact plans for the subject property. During the question phase of the presentation, people asked about how this specific site was chosen, scenarios that would allow for families/residents to qualify for this development, and what improvements would be made to the existing infrastructure. The Dominion team explained their selection process for both sites and residents followed by explaining the amount that would be paid towards concurrency for both schools and roadways in the area. The public was concerned with how both nearby roads and schools were deficient and overcrowded within the subject property's vicinity. Many residents compared this project to the Wade's Creek PUD that was proposed on the same parcel back in July 2022 and was denied with a vote of 4-1 at the Board of County Commissioners. The general consensus appeared to be that this more dense project would cause more disruption than the previous project which proposed 115 dwelling units as opposed to the current 288 dwelling units.

Follow-up Community Meeting

The applicant has chosen to hold an additional community meeting on Thursday, January 25, 2024 at the Holiday Inn – World Golf Village. Approximately, 50 people showed up to this meeting. The meeting started off yet again with representatives from the developer Dominion explaining their process of purchasing, developing, and maintaining the property in-line with the current Master Development Plan (MDP) Map and Text provided. There were updates on how much this project will be paying in both impact fees and concurrency to St. Johns County along with where the money would be going to for road improvements. Traffic Engineers/Specialists from Kimley-Horn were there to explain what they identified as issues within the area and how they planned to relieve them. The majority of work was focused on improving the intersection of State Road 16, Silverleaf Parkway, and County Road 16A. Their segment of the presentation also highlighted the planned roads of County Road 2209 and First Coast Expressway along with the expansion of County Road 16A; these were highlighted as other factors that the developer/applicant have no control on but would be changing the traffic patterns as they exist today. The developer chimed in that the construction for the site itself would not begin until early 2026. Inferring that the traffic problems would not be increased by this development for years if the proposed applications were approved at the Board of County Commissioners (BCC) meeting. The public asked about how this particular site was chosen for an affordable housing project when all of the surrounding developments are single-family subdivisions. The idea of equitable housing and allowing people the opportunity to live closer to where they work were cited as the driving forces for the decision. Members of the crowd made it clear that they believe that long commutes are just part of everyday life and that a dense housing project would be out of place in their area of the county.

CORRESPONDENCE/PHONE CALLS

As of the writing of this staff report, Staff has received numerous phone calls and letters of opposition to this project. All letters of opposition have been compiled and included in **Attachment 3: Correspondence**.

ACTION

Staff offers four (4) findings of fact to recommend approval or four (4) findings of fact to recommend denial. These findings are subject to change in the public hearing process.

ATTACHMENTS

1. Application and Supporting Documents
2. Recorded Documents Section
3. Correspondence

PROPOSED FINDINGS OF FACT
CPA (SS) 2023-09 Preserve at Wards Creek

APPROVE	DENY
1. The proposed Comprehensive Plan Amendment was fully considered after public hearing pursuant to legal notice duly published as required by law.	1. The proposed Comprehensive Plan Amendment was fully considered after public hearing pursuant to legal notice duly published as required by law.
2. The amendment is consistent with the Northeast Florida Strategic Regional Policy Plan.	2. The amendment is not consistent with the Northeast Florida Strategic Regional Policy Plan.
3. The proposed Comprehensive Plan Amendment is consistent with applicable sections of the St. Johns County Comprehensive Plan and the Land Development Code.	3. The proposed Comprehensive Plan Amendment is not consistent with applicable sections of the St. Johns County Comprehensive Plan and the Land Development Code.
4. The proposed Comprehensive Plan Amendment is consistent with the Goals, Objectives, and Policies of the St. Johns County Comprehensive Plan, including Policies A.1.2.5, A.1.2.7, A.1.3.11, A.1.15.2, and with other provisions provided during the public hearing.	4. The proposed Comprehensive Plan Amendment is not consistent with the Goals, Objectives, and Policies of the St. Johns County Comprehensive Plan, including Policies A.1.2.5, A.1.2.7, A.1.3.11, A.1.15.2, and with other provisions provided during the public hearing.

ATTACHMENT 1
APPLICATION AND SUPPORTING
DOCUMENTS



Comprehensive Plan Amendment Application
St. Johns County Growth Management Services Department
4040 Lewis Speedway
St. Augustine, Florida 32084
 Phone (904) 209-0675 Fax (904) 209-0676

This application, together with ALL REQUIRED EXHIBITS and application fee, should be completed and filed with the Long Range Planning Division prior to the established filing deadline for the public hearings before the Planning and Zoning Agency and Board of County Commissioners. A COMPREHENSIVE PLAN AMENDMENT DOES NOT ENTITLE THE APPLICANT TO A DEVELOPMENT PERMIT OR CERTIFICATE OF CONCURRENCY.

File No. _____ Fee _____ Date _____

Property Owner(s) _____ Phone _____

Address _____ Fax _____

City _____ State _____ Zip Code _____ Email _____

Are there any owners not listed No Yes If yes please list on separate sheet to be included with your application

Applicant _____ Phone _____

Address _____ Fax _____

City _____ State _____ Zip Code _____ Email _____

Type of Request This is a request to amend the **St. Johns County Comprehensive Plan as follows:**

Text Amendment (Sign certification statement and attach additional pages as necessary)

Element _____ Goal, Objective or Policy # _____ Page _____

Future Land Use Map Amendment (Complete the following sections)

Existing Future Land Use Map Designation _____ Zoning _____

Proposed Future Land Use Map Designation _____ Zoning _____

Location/Description: Property Appraiser's Parcel Identification No. _____

Street Address/Location _____

Total Acreage _____ Overall Dimensions _____ Flood Zone _____

Adjacent Future Land Use Designation North: _____ South: _____ East: _____ West: _____

Wetlands: Yes: No: Type: _____ Acres: _____

Soil Associations: _____

Provide brief description of existing property. Include existing land cover and uses, any existing structures, infrastructure.

CONSISTENCY WITH COMPREHENSIVE PLAN (attach separate pages):

1. Provide justification/reasons for not developing in designated development areas as shown on Future Land Use Map. Include economic reasons and, if available, market study.
2. Provide information regarding the consistency of the proposed land use amendment with the adopted Future Land Use Element objectives and Policies and any other relevant section of the Comprehensive Plan. Also address consistency with the Strategic Regional Policy Plan and the State Comprehensive Plan.

ESTIMATED IMPACT ON THE AVAILABILITY OF PUBLIC FACILITIES:

3. Describe how property is to be developed. Include phasing, uses and estimates of (a) number and type of dwelling units; (b) square feet and type of commercial/industrial uses; (c) open space and recreational area; (d) buffers; (e) wetlands; (f) drainage and infrastructure areas; and (g) other uses and sizes. Account for all acres. Provide phasing dates and anticipated buildout.
4. (a) The project will use: public sewer or private sewer or septic tank.
 (b) The project will use: public water or private water or private well.
5. (a) Will the project build its own water plant? Yes No.
 (b) Will the project build its own sewage plant? Yes No.
6. If public or private utilities are to provide services, attach letters from the utility company or companies stating whether the utility company anticipates the availability of capacity to service the project through all phases.

7. Estimated Water and Sewage Demand:

	Phase (Years)	Use	GPD	Peak
Water				
Sewage				
Water Utility	Name: _____		Address: _____	
Sewer Utility	Name: _____		Address: _____	

8. Describe anticipated drainage system:

9. Estimate the Solid Waste Demand by 5.7 pounds per person per day or by use. Indicate methodology:

Phase (Years)	Number of People or Use	Pounds per Day

10. Estimate the Transportation Disadvantaged Van Services Demand by applying 1.5 percent times the number of Dwelling Units times 2.44 Persons Per Unit. (Only applies to residential developments.)

Phase (Years)	demand = Dwelling Units X 2.44 Persons Per Unit X 0.015

11. Estimate the Recreation and Open Space Demand of residential projects by applying the following formulas:

- (a) Number of Dwelling Units X 2.4 Persons Per Unit X 5 Acres Per 1,000 Population for Neighborhood/Community Park Recreation, by phase:

- (b) Number of Units X 2.5 Persons Per Unit X 24 Acres per 1,000 Population for Regional/Open Space, by Phase.

12. Traffic – Estimate Average Weekday Peak Hour Trips by phase by number of dwelling units and square feet of each on-residential use using the trip generation rates from the latest edition of the Institute of Transportation Engineers *Trip Generation Manual*.

Phase (Years)	Dwelling Units or Square Feet of Each Use	Trips
	see CPA/Concurrency Land Development Traffic Assessment	

13. Estimate the area of impact using the *Traffic Impact Methodology and Procedures* contained in Appendix A of the **Land Development Code** and estimate the impacts on the Levels of Service on the segments within the Area of Impact by Phase. ATTACH CALCULATIONS (staff will complete for up to 29.99 peak hour trips).

Phase Years)	Road Segment #	Existing LOS	Project Trips	LOS with Project & Background Traffic by Phase End
				see LDTA

REQUIRED EXHIBITS: (MUST BE SUBMITTED IN THIS ORDER)

1. Owner's Authorization for Agent Form. All persons listed on the deed, purchase agreement, title opinion or other acceptable proof of ownership must complete an Owners Authorization.
2. Proof of ownership (copy of deed or purchase agreement, and title opinion).
3. Legal description and tax identification number.
4. General location map with subject property clearly identified.
5. Property Appraiser's Map with identification of subject property, zoning, and Comprehensive Plan Land Use Designation within 300 feet of property.
6. Comprehensive Plan Future Land Use Map with subject property clearly identified.
7. Most recent aerial of site showing property boundaries.
6. Copy of soils map showing property boundaries.
8. Generalized site plan with uses, phases as described in Question 13.
9. Water and Sewer Utility letter, if applicable (Question 16).
10. One (1) copy of application and exhibits.

NOTE: On each map include north arrow, property outline, name of person or firm who prepared the map, date of map preparation, and source of the map.

I HEREBY CERTIFY THAT ALL INFORMATION IS CORRECT:

Signature of owner(s) or authorized person if Owner's Authorization Form is attached:

Printed or typed name(s): Thomas Ingram

Signature(s): 

NAME AND ADDRESS OF PERSON TO RECEIVE ALL CORRESPONDENCE REGARDING THIS APPLICATION:

Name: Thomas Ingram

Mailing Address: 1617 San Marco Boulevard

Phone: (904) 612-9179

FAX: _____

E-mail: thomas.ingram@si-law.com

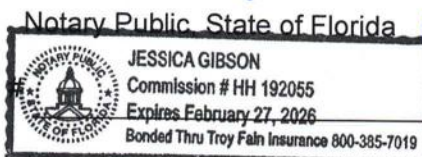
State of Florida County of St. Johns

The foregoing instrument was acknowledged before me by means of physical presence or online notarization _____

this 24th day of July, 2023, by Thomas Ingram as _____

for _____

Name Jessica Gibson



Jessica Gibson

Oath sworn: Yes _____ No

Notary Signature Jessica Gibson

My Commission expires: 2/27/2026

**Application for Small-Scale Comprehensive Plan Amendment
Preserve at Wards Creek (CPA(SS) 2023-09)
6351 County Road 16A
October 13, 2023**

**Owner: Bull Pasture LLC
Agent: Thomas Ingram, Elizabeth Moore – Sodl & Ingram PLLC**

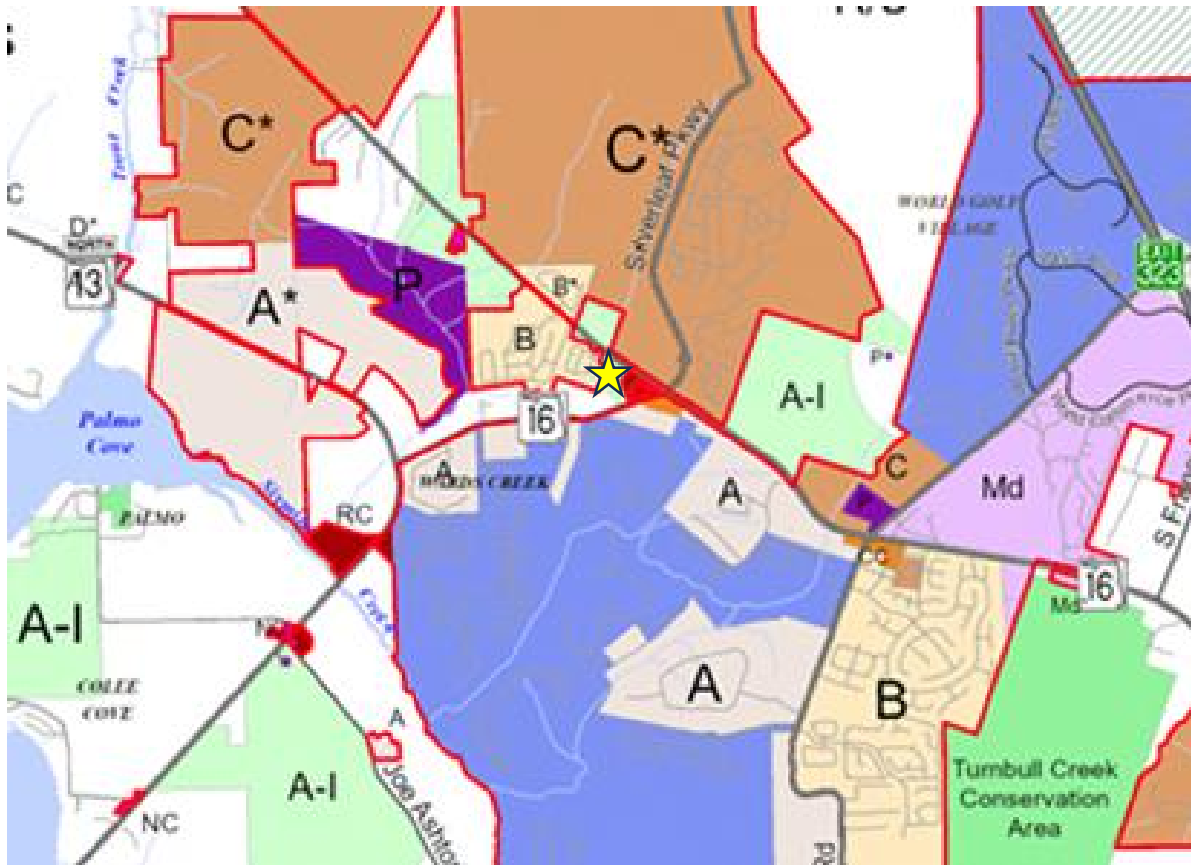
This is a request to amend the Future Land Use Map of the St. Johns County Comprehensive Plan for a 19.22-acre site located between State Road 16 and County Road 16A, near Silverleaf Parkway. The request is to amend the land use designation from A-I to Res-D, with a companion text policy stating the following:

The 19.22-acre property at 6351 County Road 16A and known as the Preserve at Wards Creek shall be entitled to develop at a density up to 15 units per net developable acre. Provided, however, that at the time of initial development and until December 31, 2053, all residential uses on the property shall be income-restricted and rent-restricted for affordable housing consistent with the State Housing Initiatives Partnership program or other similar program administered by the Florida Housing Finance Corporation or successor agency. Proposed changes to increase the allowed density of the subject property are subject to the provisions of Chapter 163, Florida Statutes.

CONSISTENCY WITH COMPREHENSIVE PLAN

- 1. Provide justification/reasons for not developing in designated development areas as shown on Future Land Use Map. Include economic reasons and, if available, market study.**

This site is an enclave within a Development Area that encompasses the majority of north St. Johns County.



Including this Property in the Development Area is a logical expansion of the County's primary Development Area, which runs from the north and east boundaries of the county south to Matanzas Inlet and includes the Silverleaf, World Commerce Center and World Golf Village Developments of Regional Impact. The Property is served by centralized utilities. It is adjacent to a U-Haul storage facility under construction, and is across County Road 16A from a designated Mixed Use area within Silverleaf, a 10,778 acre Development of Regional Impact approved for 16,300 homes, 3.23 million square feet of commercial, industrial and office uses, and 300,000 square feet of hospital uses. No affordable housing is required within Silverleaf, though the developer is providing assistance for affordable housing by other means.

Since the inception of the County Future Land Use Map under Ordinance 1990-53, established Development Areas have been expanded to accommodate population growth, market demand, and expanding availability of public facilities and services. The planning horizon for future development contemplated by the 1990 plan was the year 2005, the year that George W. Bush began his second term as President, and the year that YouTube

was founded. In 2005, the estimated County population was 160,266, about half of what it is today. The 1990 population was about 85,000.¹ The County's best planning efforts of 1990 simply did not attempt to predict our needs this far into the future. The current planning horizon of the Comprehensive Plan is 2025. Recent statutory changes will require that the planning horizon be extended.

Since the time of the original Future Land Use Map, amendments to the map have been initiated almost entirely by applications filed by landowners. The practice of amending the Map through landowner-filed applications can result in circumstances where, as here, public facilities and services exist, but the property itself is designated for a future land use which is wholly inconsistent with the development patterns and resulting in the inefficient use of public infrastructure.

For example, the site at the southerly corner of CR 16A and SR 16 was the subject of a land use amendment requested by the landowner to go from Residential-A to Community Commercial in 2016, under Ordinance 2016-19. This site is now a shopping center. The single family subdivision to the west of this site was the subject of a land use amendment requested by the landowner to go from Agriculture-Intensive to Residential-B, under Ordinance 2015-55. The Silverleaf development to the north was also the subject of several landowner-initiated plan amendment requests.

The Project is proposed to be developed with multi-family uses at a density of up to 15 units per net developable acre per the companion text policy identified above. The applicant has also requested expedited review as an Affordable Housing development (AHD Designation) under Section 7 of the Development Review Manual. Section 7 of the Development Review Manual allows for an expedited Development Permit review.

This application and the companion Planned Unit Development application proposes the development of workforce housing for households meeting the definition of very low, low, or moderate income households as provided in the State Housing Initiatives Partnership Program (SHIP), as published in the annual updates to its "Rents Adjusted to Unit Size" and "Income Limits Adjusted to Family Size by Number of Persons in Household" applicable to St. Johns County.

2. Provide information regarding the consistency of the proposed land use amendment with the adopted Future Land Use Element Objectives and Policies and any other

¹ US Census data.

relevant section of the Comprehensive Plan. Also address consistency with the Strategic Regional Policy Plan and the State Comprehensive Plan.

This application is consistent with the Local Housing Assistance Plan adopted by County Resolution 2023-149. Its purpose is to “meet the housing needs of the very low, low and moderate-income households,” “expand production of and preserve affordable housing,” and “further the housing element of the local government comprehensive plan specific to affordable housing.”

The proposed amendment is consistent with the Future Land Use Element Objectives and Policies, the County Comprehensive Plan, the Strategic Regional Policy Plan, and the State Comprehensive Plan. In particular, the proposed amendment is consistent with the following policies, restated below, with the policies identified in italics:

FUTURE LAND USE ELEMENT OBJECTIVES AND POLICIES

A.1.2.5 All Comprehensive Plan amendments shall provide justification for the need for the proposed amendment and demonstrate how the proposed amendment discourages urban sprawl and not adversely impact natural resources. In evaluating proposed amendments, the County shall consider each of the following:

- (a) the extent to which the proposed amendment is contiguous to an existing Development Area which has developed in a manner providing a compact, contiguous development pattern with the proposed amendment;*

The property is contiguous to existing Development Areas along most of its boundaries. Across from the Property on County Road 16A is Silverleaf, a Development of Regional Impact approved for over 16,000 homes and over 3 million square feet of nonresidential uses. A U-Haul storage facility is under construction along its easterly boundary. A creek runs along the westerly boundary.

- (b) the extent to which population growth and development trends warrant an amendment, including an analysis of vested and approved but unbuilt development;*

St. Johns County now has a population of over 300,000. There is a local and statewide shortage of affordable housing.² The proposed housing will help address the need for housing for households earning less than the average median income for the area.

- (c) *the extent to which adequate infrastructure to accommodate the proposed amendment exists, or is programmed and funded through an adopted Capital Improvement Schedule, such as the County Capital Improvement Program, the Florida Department of Transportation Five-Year Work Program, the North Florida Transportation Planning Organization (TPO) Transportation Improvement Program, or will be privately financed through a binding executed agreement, or will otherwise be provided at the time of development impacts as required by law;*

Affordable housing is infrastructure, necessary to providing services such as public education, public safety, food, maintenance, and construction of other infrastructure. Work is planned or underway to improve the area road network, including:

- Construction of the First Coast Expressway, connecting Green Cove Springs and points north and west to I-95 via a limited access toll road. This improvement is expected to reduce regional demand on State Road 16 and International Golf Parkway. Part of this project includes widening Interstate 95 north of International Golf Parkway.
- Construction of County Road 2209 from Silverleaf Parkway to State Road 16. This improvement will provide an additional north-south route from State Road 16 north, and will ultimately be extended south. A new intersection at State Road 16, south of International Golf Parkway, will provide an alternative route to State Road 16 north of International Golf Parkway. Construction of the segments between Silverleaf Parkway and State Road 16 is expected this year or next.
- Widening of State Road 16. Survey and design work to widen State Road 16 from International Golf Parkway to the West Mall Entrance (just north of I-95) is funded and being undertaken by the Florida Department of Transportation. This road improvement is the top funding priority of St. Johns County. Funding for construction will be determined at or near the time the design is complete. The State designs road improvements that they intend to build, and St. Johns County

² See Home Matters Report from the Florida Housing Coalition 2022, at <https://flhousing.org/wp-content/uploads/2022/08/Home-Matters-Report-2022.pdf>

has a track record of successfully obtaining regional and state cooperation for road improvements.

Water and sewer service are available to the property by St. Johns County Utility Department (SJCUD). The specific conditions in the Utility Availability Letter include:

1. SJCUD will require a 10-foot wide easement along the frontage of SR 16 located outside of the right-of-way reservation for future extension along this corridor.
2. Potable water service can be provided by connection to the existing 16-inch water main along CR 16A by completing the loop on SR 16 and offsite 16-inch transmission along SR 16 between Ace Hardware and the King and the Bear.
3. Reclaimed water connection is available on Silverleaf Parkway. Developer shall install a 16-inch reclaimed water main from point of connection on Silverleaf Parkway to SR 16 and a 12-inch reclaimed water main along CR 16A to the development.

(d) the extent to which the amendment will result in an efficient use of public funds needed for the provision of new infrastructure and services related to it;

The Property is at a central location for residential development in northwest St. Johns County. County water and sewer service are currently available to the Property.

(e) the extent to which the amendment will not result in a sprawl development pattern as determined by Chapter 163, Florida Statutes, and will not discourage infilling of more appropriate areas available for development within existing Development Area Boundaries; and

The proposed land use designation of the Property does not constitute urban sprawl under Section 163.3177(6)(b), Florida Statutes for numerous reasons. This proposed amendment is in an infill location, with extensive mixed-use development in the area. Roads, utilities and other government infrastructure are in place.

Moreover, by placing residential uses closer to existing and planned nonresidential uses, this amendment can help to substantially reduce energy consumption incurred in meeting daily and weekly shopping needs.

The development of this Property assists in preservation of agricultural areas by allowing for development of a relatively small, infill site, away from larger, contiguous agricultural

communities such as East Palatka and the outer Hastings area. The proposed amendment would not reduce public open space or natural lands.

- (f) *the extent to which the amendment will result in a sustainable development pattern through a balance of land uses that is internally interrelated; demonstrates an efficient use of land; ensures compatible development adjacent to agriculture lands; protects environmental qualities and characteristics; provides interconnectivity of roadways; supports the use of non-automobile modes of transportation; and appropriately addresses the infrastructure needs of the community.*

The Applicant will provide roadway and sidewalk interconnectivity at the site through implementation of a companion Planned Unit Development Zoning and through implementation of the St. Johns County Land Development Code.

- (g) *the extent to which the amendment results in positive market, economic and fiscal benefits of the area as demonstrated through a market demand analysis, economic impact analysis and fiscal impact analysis.*

See response to A.1.2.5(b) above.

Objective A.1.3 *Surrounding Land Use: The County shall locate land uses so they are compatible and complementary.*

The proposed land use is compatible with the uses approved in existing zonings for the surrounding property and complements the surrounding mixed-use areas.

Objective A.1.4 *Historical and Archaeological Resources*

A cultural resources assessment will be provided.

Objective A.1.11 *Provision of Efficient, Compact Development: The County shall encourage an efficient and compact land use pattern providing moderate overall densities and adequate land uses to support balanced growth and economic development.*

The proposed amendment would improve the efficiency of land use patterns in northwest St. Johns County by placing affordable housing near retail commercial development in this area of the County.

Goal A.2

To ensure that the Northwest Section of St. Johns County will grow in the form of complete communities and neighborhoods within a framework of connected development edges and recreational trails, an orderly roadway and transportation circulation system, that will sustain and provide a high quality of life, protection of the natural environment, a sound economy, efficient movement of goods, services, and people and provide a healthy social and cultural environment for all residents. For the purpose of this Goal, the Northwest Sector shall be defined as the area of St. Johns County bounded by Duval County, the St. Johns River, CR 208, and Interstate 95.

Development of the Property will comply with Goal A.2. The proposed development and land use amendment will help provide affordable housing to St. Johns County families.

Objective A.2.1.8

Northwest Sector Land Use Diversity: An overall goal of the Northwest Sector is to achieve a diverse mixture of residential, retail, office uses and civic uses with appropriate open space and recreational opportunities. The County encourages a minimum ratio of one hundred and twelve (112) square feet of retail and office space and 30 square feet of civic space per dwelling unit as a general overall goal to achieve diversity throughout the Northwest Sector.

The proposed amendment will diversify the housing choices and improve affordability within the Northwest Sector, in a corridor which contains a mix of residential, retail, office, open space and recreational opportunities.

Objective A.2.1.9

Northwest Sector General Development Pattern

- (a) Development shall respect existing development patterns and provide for compatibility, quality and integrity of existing neighborhoods. Screening between neighborhoods shall have a vegetation component. The use of opaque fencing, walls and similar privacy fencing around the perimeter of neighborhoods shall also provide natural vegetation along the outside.*

The companion zoning application will include a Scenic Edge along State Road 16. At the other boundaries, the companion zoning application proposes a Development Edge buffer with natural vegetation or landscaping, and screening requirements under LDC § 6.06.02(G) and (H).

- (b) *Incompatibilities between existing neighborhoods shall be mitigated through architectural design, development edges and recreational trails, additional landscaping and similar types of screening. Proposed mitigation for neighborhood incompatibility shall be determined by the Board of County Commissioners. The burden of proof shall be upon the applicant to prove to the Board of County Commissioners that the proposed mitigation meets the intent of this policy.*

The Property abuts one home situated on County Road 16A, which will be buffered by the Scenic Edge and Development Edge. Other residences to the northwest are buffered by a buffer parcel which includes Wards Creek and will be further buffered by the Development Edge.

- (c) *Development shall identify and incorporate into its plans measures to protect rural character, archeological, cultural, and historic sites, when these sites are deemed to be significant by St. Johns County or the State of Florida.*

The Applicant will comply with requirements imposed by Comprehensive Plan and the Land Development Code.

- (d) *Development shall avoid the creation of urban sprawl and strip development.*

Please see responses under Policy A.1.2.5 concluding that the proposed amendment does not create urban sprawl, as defined by Florida law. The proposed amendment and companion rezoning provides for a mixture of residential and nonresidential uses in the area.

- (e) *Development shall provide accessible open space in the form of squares, plazas, parks, greens and similar open space design. The extent, scale and size of these open space areas shall be submitted with the development plan. Where possible, areas used as open spaces shall consider the use of existing agricultural or rural silvicultural areas to help maintain the rural character of the sector.*

The Property will provide all required development and scenic edges and other open space and/or buffers in accordance with the PUD and the comprehensive plan.

- (f) *Residential, commercial, retail, office and other non-residential uses shall be provided in compact centers. Strip development shall be*

prohibited. Commercial, retail, office and other non-residential uses shall be interconnected with residential areas with vehicular, bike and pedestrian ways to assist in alleviating traffic congestion on other roadways.

The proposed development would expand an existing mixed-use node. Appropriate sidewalks within the project will be provided under the companion PUD.

- (g) When determined appropriate, development shall provide a mixture of housing types and price ranges to provide housing opportunities for all residents of the Northwest and benefit the area's economy.*

N/A

- (h) Development shall provide a pedestrian friendly transportation system. Pedestrian sidewalks or bikeways shall be provided.*

The proposed development will include an appropriate sidewalk system.

- (i) When determined appropriate, development shall provide the location and proposed density/intensity of development of each neighborhood, as well as the demand, location and size of schools, civic sites and parks in accordance with the requirements of these policies.*

N/A; this application is for a single neighborhood.

- (j) Development shall identify major, minor collector roadways and limited access arterial roadways. Interconnectivity within the development and with surrounding development shall be provided.*

The Property has road frontage on State Road 16 and County Road 16A. Access to the Project will be provided via County Road 16A, which will provide interconnectivity to Silverleaf, World Commerce Center, and surrounding uses. The Project will have an emergency fire/rescue vehicle access on State Road 16 that would be secured by an automatic gate and a Knox Box (rapid entry system) for use by the appropriate emergency first responders.

- (k) Development shall identify bikeways and pedestrian ways. Bikeway and pedestrian interconnectivity within the development and with the*

surrounding area shall be provided, if feasible.

The Project will provide pedestrian/bicycle and interconnection with County Road 16A and State Road 16, and vehicular interconnection with County Road 16A as noted above.

- (l) Development shall identify the extent, type and location of natural features and vistas in the planned development.*

The Property has been used for cattle grazing and contains an agricultural pond. There are approximately 0.66 acres of wetlands and 0.61 acres of artificially created surface waters present on the north-central portion of the Property. These wetlands and surface waters will be impacted as part of the planned development.

- (m) Development shall identify existing land uses and prevalent development patterns within and surrounding the proposed development within the defined community.*

The surrounding area is predominately mixed-use (commercial, light industrial, single family, and multifamily residential). The prevalent development pattern is for mixed-use development.

- (n) Development shall identify development edges and recreational trails and other environmental features within and surrounding the proposed development within the defined community.*

The Applicant will provide the required development and scenic edges in accordance with a PUD.

- (o) Development shall identify the developable land area within the development.*

Developable land within the Property is depicted on the Concept Plan.

- (p) When determined appropriate, Development shall identify public facilities and services available to the area, available capacity and any deficiencies.*

Public facilities are available to the area, including water, sewer, transportation, electricity, solid waste, public safety and parks. A traffic study will be provided. Utilities are available.

- (q) *Development shall use underground utilities unless topography, drainage, or similar constraints cause underground utilities not to be feasible. This includes electric, water, sewer, cable, fiber optics, and phone lines that may be located in the development edges.*

Development of the Property will use underground utilities unless infeasible.

- (r) *Development shall provide a statement of the community goals and objectives (Vision) consistent with the goals, objectives and policies of the Northwest Sector Overlay and provide how the proposed development meets the intent of the Vision.*

The vision of this Project is to provide affordable housing in Northwest St. Johns County. The Northwest Sector plan contemplates that the area would be predominately residential, but with commercial support uses, schools, parks, open spaces and civic spaces that serve the area. The proposed use is consistent with the plan.

- (s) *Development shall identify the relationship to the surrounding defined community, neighborhoods, and commercial support areas.*

The proposed FLUM change will be consistent and compatible with development in the surrounding area. The proposed land use designation is suitable given its access to the major road network and surrounding adjacent uses. The proposed amendment will contribute to a land use pattern that provides balanced growth in this area of the County.

- (t) *When determined appropriate, the Development shall identify the proposed locations for right-of-ways and reserve right-of-way for roadways depicted on the Northwest Sector Overlay Map.*

N/A

- (u) *Development shall identify neighborhood support facilities that are projected to be needed to address the impacts of the proposed development, such as but not limited to, traffic circulation, water and wastewater treatment plants, solid waste transfer facilities, fire stations, emergency medical services, police stations, government buildings, libraries, civic/cultural places, public gathering places, parks, and schools.*

The proposed development would have needs for public infrastructure and services similar to other existing residential uses in northwest St. Johns County, though multifamily development has on average, considerably lower transportation and school needs than single family development. This provision should be read in context with the County's Local Housing Assistance Plan and the Housing Element of the Comprehensive Plan.

Transportation Element

Goal B.1 The County shall provide countywide coordination and planning to achieve a balanced transportation system which consists of both public and private transportation networks and which provides for the safe and efficient movement of goods and people, including the transportation disadvantaged.

Objective B.1.1 Level of Service Standards. The County shall maintain Levels of Service standards based on data and analysis for all roadway segments within the major roadway network.

Development of the Property with affordable housing will provide an opportunity for St. Johns County workers to live closer to where they work, reducing burdens on the major roadway network. In addition to the numerous service and retail uses in World Commerce Center and Murabella, over three million square feet of nonresidential uses are approved within the Silverleaf development across the street from this Property. Affordable housing is essential for many of the workers in these developments.

Objective B.1.6 Transportation and Land Use. All residential, non-residential, and planned unit developments shall provide a circulation system which: provides safe access to the major roadway network; provides for proper design of local and collector streets within such development; and otherwise supports the objectives and policies of the Land Use and Transportation Elements of the Plan.

Access will be provided via County Road 16A, with an emergency fire/rescue vehicle access on State Road 16 that would be secured by an automatic gate and a Knox Box (rapid entry system) for use by the appropriate emergency first responders. The Applicant will comply with the requirements of B.1.6.

Policy B.1.6.2 To reduce trip lengths, reduce the demand for vehicular travel and discourage urban sprawl, the County shall adopt and enforce land use policies, standards and regulations that increase the County's retail and employment activities, promote high intensity mixed use developments which include the

requirements for multifamily housing including affordable housing and provide convenient shopping adjacent to residential neighborhoods.

Development of the Property will assist in reducing demand for vehicular travel and discourage urban sprawl by providing retail commercial activities closer to the residents of northwest St. Johns County.

Policy B.1.6.4 Circulation within and between Developments. The County shall, as necessary, ensure that development shall include features and provisions which encourage internal automobile circulation, bicycle use, pedestrian movement, and other features to minimize utilization of the major roadway network; and still make provisions for public road, public bikeway, and pedestrian access to the adjoining properties.

The Planned Development will include provisions for internal automobile, bicycle and pedestrian interconnectivity within the Property via internal driveways, sidewalks, and walkways.

Housing Element

*Objective C.1.1 Creation and Preservation of Affordable Workforce and Special Needs Housing
The County shall continue its housing implementation policies such as density bonuses, infill housing, and an expedited development review process for affordable workforce housing developments that provide for the development of sufficient housing in numbers, cost, and type to support existing and projected population throughout the planning period 2010-2025.*

Policy C.1.1.1 St. Johns County shall continue to improve the supply of affordable workforce housing for very-low, low, and moderate income households and special-needs households and to implement neighborhood improvement initiatives. The activities initiated by the County include the following:

(b) Applying for and administering rent supplement programs and other grants for very-low, low, and moderate income households;

(d) Developing new and maintaining existing cooperative joint-venture relationships with the private sector, public agencies, and non-profit organizations;

Policy C.1.1.4 The County shall maintain its existing incentives for affordable workforce housing in the Comprehensive Plan and Land Development Code and investigate new incentives, as necessary.

STATE COMPREHENSIVE PLAN

- Water Quality, § 187.201(7)(b)5

The Applicant has demonstrated the availability of local and regional water supplies.

- Water Quality, § 187.201(7)(b)10

The Project will help improve water quality by containing, treating and disposing of stormwater in an environmentally responsible manner.

- Water Quality, § 187.201(7)(b)12

The Development will be served by central wastewater treatment facilities. The Development's surface water management system will be designed to comply with all applicable requirements of St. Johns County, St. Johns River Water Management District, and Florida Department of Environmental Protection.

- Natural Systems and Recreational Lands, § 187.201(9)(b)3

The proposed amendment will not adversely impact endangered species.

- Air Quality, § 187.201(10)(b)2

The Development will maintain air quality. No industrial uses are proposed nor any other use likely to involve impacts to air quality.

- Land Use, § 187.201(15)(b)1

The Property is ideally located to accommodate affordable housing needs in St. Johns County.

- Land Use, § 187.201(15)(b)3

The proposed amendment contributes to the accomplishment of this Policy by providing an attractive and functional mix in the overall area of living, working, shopping and recreational activities.

- Land Use, § 187.201(15)(b)6

Development of the Property will comply with state and local policies designed to protect water quality and quantity and protect from flooding.

➤ *Transportation, § 187.201(19)(b)12*

The Subject Property is not located in a Coastal High Hazard Area and contributes to efficient urban development.

State Housing Strategy, See Ch. 2023-17 § 26, Laws of Fla. (CS/SB 102). The State Housing Strategy, as recently revised, requires local governments to provide incentives to the private sector “to be the primary delivery vehicle for the development of affordable housing.” Local incentives may include density bonuses. State funds are to be made available only to local governments which provide incentives or financial assistance for housing. All housing initiatives and programs must be nondiscriminatory.

ESTIMATED IMPACT ON THE AVAILABILITY OF PUBLIC FACILITIES

- 3. Describe how property is to be developed. Include phasing, uses and estimates of (a) number and type of dwelling units; (b) square feet and type of commercial/industrial uses; (c) open space and recreational area; (d) buffers; (e) wetlands; (f) drainage and infrastructure areas; and (g) other uses and sizes. Account for all acres. Provide phasing dates and anticipated buildout.**

Development is anticipated to occur in a single 10-year phase, with commencement to occur no later than four years after the date the PUD is recorded. The earliest date that residents are anticipated to move into the proposed development would be July 2026.

(a) Number and type of dwelling units

288, multifamily (affordable)

(b) Square feet and type of commercial/industrial uses

N/A

(c) Open space and recreational area

The Project complies with LDC § 5.03.03(A)'s and Coastal/ Conservation Element Policy E.2.2.9(a)'s required minimum 25% open space. Open space areas provided within the Project include, but are not limited to, recreation, common areas, buffers, and landscaped areas.

(d) Buffers

The Project will have a 10 foot natural or landscaped buffer along all property boundaries, which may be part of the required building setbacks, Development Edge and Scenic Edge.

Except for areas where wetlands impacts (fill) occurs adjacent to preserved wetlands, upland buffers will be required and maintained between the developed areas and the contiguous wetlands as required under the Land Development Code.

(e) Wetlands

The Property has 0.66 acres of wetlands and 0.61 acres of other surface waters on the site. The primary use of the Property has been as cattle pasture, with an associated cattle pond. All of these 1.27 acres would be developed as affordable housing and an associated stormwater management system.

(f) Drainage and infrastructure areas

An on-site stormwater management system will be constructed consistent with the requirements of St. Johns County and the St. Johns River Water Management District. The stormwater management facilities shall incorporate natural features that provide vegetation and buffers and promote wildlife habitat. Native aquatic vegetation shall be encouraged and allowed to continue to the extent practicable, while also being able to limit invasive, exotic, nuisance and excess vegetation such as high concentrations of cattails and water hyacinth or other circumstances which interfere with the function of the stormwater management system. Grass carp shall not be deliberately introduced. Only herbicides approved for aquatic use may be used within stormwater ponds. Cutting, mowing, or use of herbicides to remove native aquatic vegetation is discouraged.

(g) Other uses and sizes

The corresponding PUD application for this project (PUD 2023-18) contains additional detailed information.

Preserve at Wards Creek
PUD 2023-18
CPA(SS) 2023-09

Statement of Need

This Statement of Need is being submitted in support of the above-referenced applications.

Application PUD 2023-18 seeks to rezone approximately 19.22-acres from Open Rural (OR) to Planned Unit Development (PUD) for a 288-unit residential community, Preserve at Wards Creek, located at 6351 County Road 16A. Application CPA(SS) 2023-09 seeks to amend the Future Land Use Map of the St. Johns County Comprehensive Plan from a land use designation Agriculture-Intensive (A-I) to Residential-D (Res-D), with an affordable housing density bonus of 2 units per net developable acre and a companion text policy designating the development as income-restricted and rent-restricted for affordable housing for thirty years.

All units for the proposed development, Preserve at Wards Creek, will be considered affordable to households making not more than 60 percent of area median income, also known as “low income” households.

There is a need for this type of affordable housing in St. Johns County, and particularly in northwest St. Johns County, where there are no affordable housing communities. In fact, there is only one affordable housing community in northern St. Johns County. (See Exhibit A, the County’s list of affordable multifamily rental developments, and Exhibit B, a map prepared by the applicant showing their locations.) The total number of assisted units in the County (those units with income and rent restrictions or a subsidy) is only 1,605 according to the Florida Housing Data Clearinghouse, produced by the University of Florida Shimberg Center for Housing Studies.

Assisted Properties and Units by Funder, Summary					
Geography	Funder	Properties	Total Units	Assisted Units	HUD/RD Rental Assistance Units
St. Johns County	Florida Housing Finance Corporation	18	1,468	1,269	162
St. Johns County	HUD Multifamily	6	249	232	231
St. Johns County	USDA Rural Development	3	118	118	105
St. Johns County	Total, All Funders	23	1,605	1,389	276

Notes: Many properties receive funding from more than one agency, so properties and units may appear in more than one row. "Assisted Units" refers to units with income and rent restrictions. "HUD/RD Rental Assistance Units" refers to units subsidized through project-based rental assistance contracts with HUD or USDA Rural Development. Additional data definitions and special notes available in [AHI User Guide](#). See also [AHI Map](#).

Sources: Data sources and last updates available in [AHI User Guide](#).

<http://flhousingdata.shimberg.ufl.edu/assisted-housing-inventory/results?nid=5500>

Moreover, the National Low Income Housing Coalition published a Congressional District Housing Profile with renter statistics provided for each Florida Congressional District. For Florida’s 5th and 6th Districts (each encompassing part of St. Johns County), there is a deficit of affordable and available rental units totaling in the tens of thousands. (See Exhibit C, pages 5-6.)

The Attainable Housing Coalition of the St. Johns County Chamber of Commerce also published a white paper, “Workforce Housing in St. Johns County: Unattainable – Challenges and Solutions to Attainable Workforce Housing” (see [Exhibit D](#)). That white paper described the lack of available rental housing units that are affordable for most essential workers, such as hospitality workers, teachers, law enforcement, nurses, and manufacturing workers.

When the Florida Housing Coalition last looked exclusively at affordable housing in St. Johns County in its 2015 report, “Home Matters 2015 – St. Johns County Report,” it similarly found a lack of available, affordable rental units (see [Exhibit E](#)). Specifically, the Florida Housing Coalition found that 14,370 households in St. Johns County were low-income and cost burdened, meaning they paid more than 30% of their incomes for housing.

The Florida Housing Data Clearinghouse provides additional estimates on the number of St. Johns County households who are cost burdened as of 2022:

Total Population, 2018-2022 5-Year Estimates		
Geography	Population	Margin of Error (+/-)
St. Johns County	278,722	*****

Sources: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

All Households, Cost Burden by Income, 2022 Estimate (Summary)				
Geography	Household Income	Housing Cost Burden		
		30% or less	30.1-50%	More than 50%
St. Johns County	30% AMI or less	1,252	644	4,771
St. Johns County	30.01-50% AMI	2,579	2,694	3,098
St. Johns County	50.01-80% AMI	7,606	4,748	2,437
St. Johns County	80.01-100% AMI	7,195	3,871	403
St. Johns County	Greater than 100% AMI	61,890	3,933	1,025

Sources: Estimates and projections by Shimberg Center for Housing Studies, based on U.S. Department of Housing Development, Comprehensive Housing Affordability Strategy (CHAS) dataset and population projections by the Bureau of Economic and Business Research, University of Florida

<http://flhousingdata.shimberg.ufl.edu/population-and-household-projections/results?nid=5500>

In summary, there is a need for additional affordable housing in St. Johns County. The supply of existing units does not adequately meet the need in the County, and the proposed Preserve at Wards Creek development will provide much-needed housing to residents who need it.

Exhibit A

County's Multifamily Affordable Rental Developments

St. Johns County Government

Multi-family Rental Developments



If you are interested in the affordable rental apartments, you must call or visit the individual sites.

The funding or subsidies for these apartments come from a variety of Federal and State programs. If there are no vacancies, you are advised to put your name on the waiting list as it usually does not take long for a unit to become available. The rental offices have all the necessary paperwork.

Please Note: The affordable housing properties identified on this page are provided for informational purposes as a resource for current and prospective residents of St Johns County who are seeking options for affordable housing. The County makes no representations beyond affordability with respect to these properties.

Casa Del Mar

1575 A1A South, St. Augustine, FL 32080 ([View Map \(https://goo.gl/maps/1mDys6HmSG52\)](https://goo.gl/maps/1mDys6HmSG52).)
(904) 471-2444

Hastings Manor

309 Richardson Place, Hastings, FL 32145 ([View Map \(https://goo.gl/maps/8PgJzNaQ5Zv\)](https://goo.gl/maps/8PgJzNaQ5Zv).)
(904) 692-1208 or (352) 787-2700

Huguenot Harbor

506 Gunby Circle, St. Augustine, FL 32086 ([View Map \(https://goo.gl/maps/u5XcJMZDD6s\)](https://goo.gl/maps/u5XcJMZDD6s).)
(904) 829-5933 or (352) 787-2700

Maxwell Manor I

28 North Whitney St., St. Augustine, FL 32084 ([View Map \(https://goo.gl/maps/1PJJgRngtkz\)](https://goo.gl/maps/1PJJgRngtkz).)
(904) 824-0902

Maxwell Manor II (Palmer Pointe)

43 45 Palmer St., St. Augustine, FL 32084 ([View Map \(https://goo.gl/maps/MGEt8DYCVcx\)](https://goo.gl/maps/MGEt8DYCVcx).)
(904) 794-0035

Oaks Apartments

30 Desoto Place, St. Augustine, FL 32084 ([View Map \(https://goo.gl/maps/rvshVTWHuh72\)](https://goo.gl/maps/rvshVTWHuh72).)
(904) 824-8582 or 783-0360

Old Colony

107 Masters Drive, St. Augustine, FL 32084 ([View Map \(https://goo.gl/maps/nkWtMN3parF2\)](https://goo.gl/maps/nkWtMN3parF2).)
(904) 824-0902

Ponce Harbor

225 Ponce Harbor Drive, St. Augustine, FL 32086 ([View Map \(https://goo.gl/maps/54KGgpejJQG2\)](https://goo.gl/maps/54KGgpejJQG2))
(904) 794-4022

San Marcos Heights

170 Hometown Lane, St Augustine, FL 32084 ([View Map \(https://goo.gl/maps/Wyp68USJpu1resQi6\)](https://goo.gl/maps/Wyp68USJpu1resQi6))
(904) 240-4200

[www.sanmarcosheights.com \(https://www.sanmarcosheights.com\)](https://www.sanmarcosheights.com)

Southern Villas

52 Sunrise Blvd, St. Augustine, FL 32086 ([View Map \(https://goo.gl/maps/hUXpmrkR2D22\)](https://goo.gl/maps/hUXpmrkR2D22))
(904) 829-8989

Summer Breeze & Summerset Village

305 Summer Breeze Way, St. Augustine, FL 32086 ([View Map \(https://goo.gl/maps/gXX6A8aFLK22\)](https://goo.gl/maps/gXX6A8aFLK22))
(904) 797-1990

The Oaks at St. Johns

210 Nettles Ln., St. Augustine, FL 32095 ([View Map \(https://goo.gl/maps/mNkPbLQeyjG2\)](https://goo.gl/maps/mNkPbLQeyjG2))
(904) 599-9899

Whispering Pines

1200 Whispering Circle, St. Augustine, FL 32084 ([View Map \(https://goo.gl/maps/eKjkTX9V1v72\)](https://goo.gl/maps/eKjkTX9V1v72))
(904) 808-0588

Whispering Woods

210 Whispering Woods Lane, St. Augustine, FL 32084 ([View Map \(https://goo.gl/maps/YEe6GxVuc6P2\)](https://goo.gl/maps/YEe6GxVuc6P2))
)
(904) 819-0828

Woodcrest

100 Woodcrest Dr., St. Augustine, FL 32095 ([View Map \(https://goo.gl/maps/QivptTB32pK2\)](https://goo.gl/maps/QivptTB32pK2))
(904) 808-0737

Woodlawn Terrace

200 S Woodlawn St., St. Augustine, FL 32086 ([View Map \(https://goo.gl/maps/4tzrsq9y59C2\)](https://goo.gl/maps/4tzrsq9y59C2))
(904) 824-5011

Exhibit B



Location of County's Multifamily Affordable Rental Developments

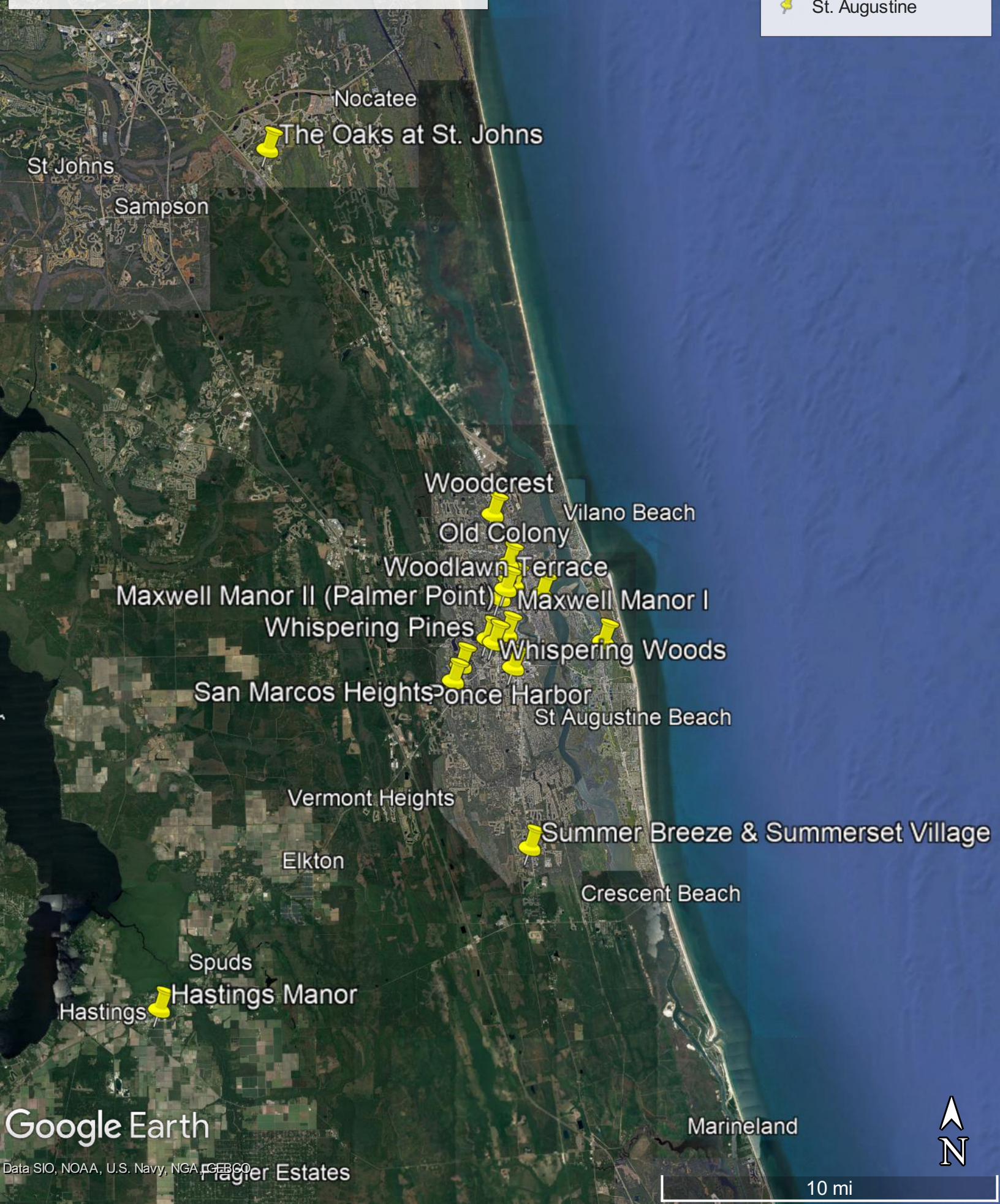
Affordable Housing

Palm Valley

Existing affordable rental apartments in St. Johns County

Legend

-  200 S Woodlawn St
-  St. Augustine



Google Earth



Data SIO, NOAA, U.S. Navy, NGA, GEBCO
Pager Estates

10 mi

Affordable Housing

Existing affordable rental apartments in St. Johns County

Legend

-  200 S Woodlawn St
-  St. Augustine



Google Earth

Image © 2024 TerraMetrics
Data SIO, NOAA, U.S. Navy, NGA, GEBCO

Exhibit C

National Low Income Housing Coalition,

Congressional District Housing Profile

CONGRESSIONAL DISTRICT HOUSING PROFILE



DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	16,614	12,370	74%	Income at or below 30% of AMI	34	-11,014
Income between 31% and 50% of AMI	16,010	5,093	32%	Income at or below 50% of AMI	61	-12,570
Income between 51% and 80% of AMI	23,359	1,150	5%	Income at or below 80% of AMI	107	3,688
All Renter Households	93,832	18,823	20%			

Renters make up 34% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Pensacola-Ferry Pass-Brent MSA	60,424	\$79,500	\$23,850	\$596	\$877	\$16.87	\$1,012	\$19.46	78	\$17.25
Crestview-Fort Walton Beach-Destin HMFA	26,962	\$90,600	\$27,180	\$680	\$987	\$18.98	\$1,172	\$22.54	90	\$17.36
Walton County HMFA	6,861	\$85,300	\$25,590	\$640	\$885	\$17.02	\$1,008	\$19.38	78	\$14.16

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

*Severely cost-burdened households spend more than 50% of income on housing costs, including utilities. **Or poverty guideline, if higher. AMI = Area Median Income. Last updated in March 2023. Please Contact NLIHC research staff at research@nlihc.org or (202) 662-1530 to request additional information.

DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	26,642	20,846	78%	Income at or below 30% of AMI	31	-18,360
Income between 31% and 50% of AMI	17,852	6,995	39%	Income at or below 50% of AMI	57	-19,170
Income between 51% and 80% of AMI	23,531	1,634	7%	Income at or below 80% of AMI	101	558
All Renter Households	105,204	29,590	28%			

Renters make up 36% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Tallahassee HMFA	61,320	\$81,200	\$24,360	\$609	\$941	\$18.10	\$1,124	\$21.62	86	\$14.97
Panama City MSA	24,062	\$78,100	\$23,430	\$586	\$1,010	\$19.42	\$1,170	\$22.50	90	\$17.41
Walton County HMFA	6,861	\$85,300	\$25,590	\$640	\$885	\$17.02	\$1,008	\$19.38	78	\$14.16
Jackson County	4,980	\$58,000	\$17,400	\$435	\$610	\$11.73	\$757	\$14.56	58	\$10.65
Washington County	1,907	\$52,300	\$15,690	\$392	\$575	\$11.06	\$757	\$14.56	58	\$12.36
Madison County	1,894	\$53,500	\$16,050	\$401	\$664	\$12.77	\$757	\$14.56	58	\$12.06
Wakulla County HMFA	1,779	\$78,800	\$23,640	\$591	\$863	\$16.60	\$1,025	\$19.71	79	\$15.67

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

*Severely cost-burdened households spend more than 50% of income on housing costs, including utilities. **Or poverty guideline, if higher. AMI = Area Median Income. Last updated in March 2023. Please Contact NLIHC research staff at research@nlihc.org or (202) 662-1530 to request additional information.

DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	25,961	20,913	81%	Income at or below 30% of AMI	28	-18,778
Income between 31% and 50% of AMI	14,939	5,512	37%	Income at or below 50% of AMI	63	-14,947
Income between 51% and 80% of AMI	17,583	1,243	7%	Income at or below 80% of AMI	105	3,035
All Renter Households	90,651	27,943	31%			

Renters make up 33% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Gainesville HMFA	47,455	\$85,600	\$25,680	\$642	\$864	\$16.62	\$1,038	\$19.96	80	\$15.58
Ocala MSA	36,694	\$65,200	\$19,560	\$489	\$806	\$15.50	\$995	\$19.13	77	\$16.56
Columbia County	6,904	\$65,500	\$19,650	\$491	\$663	\$12.75	\$873	\$16.79	67	\$15.54
Suwannee County	3,508	\$59,100	\$17,730	\$443	\$664	\$12.77	\$757	\$14.56	58	\$12.77
Levy County HMFA	3,489	\$51,900	\$15,570	\$389	\$575	\$11.06	\$757	\$14.56	58	\$11.65
Bradford County	3,171	\$60,600	\$18,180	\$455	\$665	\$12.79	\$758	\$14.58	58	\$17.64
Baker County HMFA	2,072	\$81,200	\$24,360	\$609	\$617	\$11.87	\$812	\$15.62	62	\$12.82

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

*Severely cost-burdened households spend more than 50% of income on housing costs, including utilities. **Or poverty guideline, if higher. AMI = Area Median Income. Last updated in March 2023. Please Contact NLIHC research staff at research@nlihc.org or (202) 662-1530 to request additional information.

DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	24,641	18,087	73%	Income at or below 30% of AMI	33	-16,614
Income between 31% and 50% of AMI	17,632	5,374	30%	Income at or below 50% of AMI	62	-15,964
Income between 51% and 80% of AMI	21,195	930	4%	Income at or below 80% of AMI	100	242
All Renter Households	94,245	24,460	26%			

Renters make up 35% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Jacksonville HMFA	198,851	\$86,500	\$25,950	\$649	\$995	\$19.13	\$1,188	\$22.85	91	\$20.92

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	15,422	12,367	80%	Income at or below 30% of AMI	25	-11,546
Income between 31% and 50% of AMI	15,054	6,022	40%	Income at or below 50% of AMI	42	-17,644
Income between 51% and 80% of AMI	23,983	1,831	8%	Income at or below 80% of AMI	93	-3,786
All Renter Households	101,089	20,668	20%			

Renters make up 37% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

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REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Jacksonville HMFA	198,851	\$86,500	\$25,950	\$649	\$995	\$19.13	\$1,188	\$22.85	91	\$20.92

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	17,706	14,168	80%	Income at or below 30% of AMI	21	-13,927
Income between 31% and 50% of AMI	14,798	6,894	47%	Income at or below 50% of AMI	42	-18,863
Income between 51% and 80% of AMI	19,983	2,042	10%	Income at or below 80% of AMI	88	-6,167
All Renter Households	83,111	23,486	28%			

Renters make up 28% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
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Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Orlando-Kissimmee-Sanford MSA	339,923	\$80,100	\$24,030	\$601	\$1,237	\$23.79	\$1,422	\$27.35	109	\$20.72
Jacksonville HMFA	198,851	\$86,500	\$25,950	\$649	\$995	\$19.13	\$1,188	\$22.85	91	\$20.92
Deltona-Daytona Beach-Ormond Beach HMFA	63,418	\$73,300	\$21,990	\$550	\$931	\$17.90	\$1,135	\$21.83	87	\$16.02
Ocala MSA	36,694	\$65,200	\$19,560	\$489	\$806	\$15.50	\$995	\$19.13	77	\$16.56
Palm Coast HMFA	10,359	\$74,600	\$22,380	\$560	\$925	\$17.79	\$1,193	\$22.94	92	\$14.45
Putnam County	8,536	\$54,700	\$16,410	\$410	\$585	\$11.25	\$770	\$14.81	59	\$15.87

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	14,141	12,746	90%	Income at or below 30% of AMI	10	-12,671
Income between 31% and 50% of AMI	13,963	8,320	60%	Income at or below 50% of AMI	24	-21,471
Income between 51% and 80% of AMI	18,547	2,482	13%	Income at or below 80% of AMI	82	-8,512
All Renter Households	88,723	23,916	27%			

Renters make up 31% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Orlando-Kissimmee-Sanford MSA	339,923	\$80,100	\$24,030	\$601	\$1,237	\$23.79	\$1,422	\$27.35	109	\$20.72
Deltona-Daytona Beach-Ormond Beach HMFA	63,418	\$73,300	\$21,990	\$550	\$931	\$17.90	\$1,135	\$21.83	87	\$16.02

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

*Severely cost-burdened households spend more than 50% of income on housing costs, including utilities. **Or poverty guideline, if higher. AMI = Area Median Income. Last updated in March 2023. Please Contact NLIHC research staff at research@nlihc.org or (202) 662-1530 to request additional information.

CONGRESSIONAL DISTRICT HOUSING PROFILE



DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	13,656	10,674	78%	Income at or below 30% of AMI	26	-10,095
Income between 31% and 50% of AMI	13,713	5,398	39%	Income at or below 50% of AMI	57	-11,792
Income between 51% and 80% of AMI	15,758	1,375	9%	Income at or below 80% of AMI	104	1,921
All Renter Households	71,609	17,805	25%			

Renters make up 25% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Orlando-Kissimmee-Sanford MSA	339,923	\$80,100	\$24,030	\$601	\$1,237	\$23.79	\$1,422	\$27.35	109	\$20.72
Palm Bay-Melbourne-Titusville MSA	57,536	\$82,300	\$24,690	\$617	\$984	\$18.92	\$1,196	\$23.00	92	\$20.66
Sebastian-Vero Beach MSA	12,192	\$79,900	\$23,970	\$599	\$941	\$18.10	\$1,135	\$21.83	87	\$14.82

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	14,307	12,612	88%	Income at or below 30% of AMI	13	-12,436
Income between 31% and 50% of AMI	14,639	8,279	57%	Income at or below 50% of AMI	21	-22,738
Income between 51% and 80% of AMI	19,806	2,800	14%	Income at or below 80% of AMI	82	-8,575
All Renter Households	83,516	23,912	29%			

Renters make up 39% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Orlando-Kissimmee-Sanford MSA	339,923	\$80,100	\$24,030	\$601	\$1,237	\$23.79	\$1,422	\$27.35	109	\$20.72
Lakeland-Winter Haven MSA	73,584	\$67,500	\$20,250	\$506	\$836	\$16.08	\$1,056	\$20.31	81	\$18.81

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	29,707	25,579	86%	Income at or below 30% of AMI	15	-25,134
Income between 31% and 50% of AMI	24,244	11,844	49%	Income at or below 50% of AMI	28	-38,628
Income between 51% and 80% of AMI	30,169	2,642	9%	Income at or below 80% of AMI	86	-11,533
All Renter Households	136,771	40,385	30%			

Renters make up 52% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Orlando-Kissimmee-Sanford MSA	339,923	\$80,100	\$24,030	\$601	\$1,237	\$23.79	\$1,422	\$27.35	109	\$20.72

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	9,950	8,017	81%	Income at or below 30% of AMI	22	-7,724
Income between 31% and 50% of AMI	10,886	4,538	42%	Income at or below 50% of AMI	42	-12,155
Income between 51% and 80% of AMI	13,687	1,827	13%	Income at or below 80% of AMI	85	-5,026
All Renter Households	60,626	14,641	24%			

Renters make up 23% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Orlando-Kissimmee-Sanford MSA	339,923	\$80,100	\$24,030	\$601	\$1,237	\$23.79	\$1,422	\$27.35	109	\$20.72
Lakeland-Winter Haven MSA	73,584	\$67,500	\$20,250	\$506	\$836	\$16.08	\$1,056	\$20.31	81	\$18.81
The Villages MSA	6,722	\$83,300	\$24,990	\$625	\$756	\$14.54	\$995	\$19.13	77	\$11.31

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	15,828	12,719	80%	Income at or below 30% of AMI	23	-12,191
Income between 31% and 50% of AMI	14,323	5,049	35%	Income at or below 50% of AMI	48	-15,546
Income between 51% and 80% of AMI	16,811	1,016	6%	Income at or below 80% of AMI	96	-1,648
All Renter Households	71,988	18,912	26%			

Renters make up 25% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Tampa-St. Petersburg-Clearwater MSA	423,683	\$82,100	\$24,630	\$616	\$1,110	\$21.35	\$1,347	\$25.90	104	\$21.43
Homosassa Springs MSA	10,667	\$68,600	\$20,580	\$515	\$717	\$13.79	\$943	\$18.13	73	\$14.73

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	18,573	14,950	80%	Income at or below 30% of AMI	21	-14,688
Income between 31% and 50% of AMI	17,902	8,245	46%	Income at or below 50% of AMI	35	-23,602
Income between 51% and 80% of AMI	22,211	2,183	10%	Income at or below 80% of AMI	86	-8,440
All Renter Households	98,711	26,038	26%			

Renters make up 30% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Tampa-St. Petersburg-Clearwater MSA	423,683	\$82,100	\$24,630	\$616	\$1,110	\$21.35	\$1,347	\$25.90	104	\$21.43

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	28,136	22,042	78%	Income at or below 30% of AMI	26	-20,952
Income between 31% and 50% of AMI	21,166	8,947	42%	Income at or below 50% of AMI	40	-29,534
Income between 51% and 80% of AMI	27,708	3,387	12%	Income at or below 80% of AMI	90	-7,777
All Renter Households	137,491	35,059	25%			

Renters make up 45% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Tampa-St. Petersburg-Clearwater MSA	423,683	\$82,100	\$24,630	\$616	\$1,110	\$21.35	\$1,347	\$25.90	104	\$21.43

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	22,344	19,219	86%	Income at or below 30% of AMI	16	-18,693
Income between 31% and 50% of AMI	18,354	7,499	41%	Income at or below 50% of AMI	38	-25,306
Income between 51% and 80% of AMI	22,918	1,702	7%	Income at or below 80% of AMI	90	-6,441
All Renter Households	106,092	28,728	27%			

Renters make up 39% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Tampa-St. Petersburg-Clearwater MSA	423,683	\$82,100	\$24,630	\$616	\$1,110	\$21.35	\$1,347	\$25.90	104	\$21.43
Lakeland-Winter Haven MSA	73,584	\$67,500	\$20,250	\$506	\$836	\$16.08	\$1,056	\$20.31	81	\$18.81

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	13,549	11,015	81%	Income at or below 30% of AMI	18	-11,078
Income between 31% and 50% of AMI	12,332	5,806	47%	Income at or below 50% of AMI	43	-14,676
Income between 51% and 80% of AMI	16,921	1,856	11%	Income at or below 80% of AMI	90	-4,163
All Renter Households	76,432	19,104	25%			

Renters make up 29% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Tampa-St. Petersburg-Clearwater MSA	423,683	\$82,100	\$24,630	\$616	\$1,110	\$21.35	\$1,347	\$25.90	104	\$21.43
North Port-Sarasota-Bradenton MSA	84,449	\$90,400	\$27,120	\$678	\$1,081	\$20.79	\$1,385	\$26.63	107	\$19.28

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	13,545	10,694	79%	Income at or below 30% of AMI	22	-10,608
Income between 31% and 50% of AMI	13,178	6,190	47%	Income at or below 50% of AMI	38	-16,590
Income between 51% and 80% of AMI	16,904	2,204	13%	Income at or below 80% of AMI	85	-6,690
All Renter Households	74,818	19,896	27%			

Renters make up 24% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
North Port-Sarasota-Bradenton MSA	84,449	\$90,400	\$27,120	\$678	\$1,081	\$20.79	\$1,385	\$26.63	107	\$19.28
Cape Coral-Fort Myers MSA	79,011	\$83,200	\$24,960	\$624	\$979	\$18.83	\$1,231	\$23.67	95	\$18.89
Punta Gorda MSA	14,679	\$76,000	\$22,800	\$570	\$928	\$17.85	\$1,142	\$21.96	88	\$14.43

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

*Severely cost-burdened households spend more than 50% of income on housing costs, including utilities. **Or poverty guideline, if higher. AMI = Area Median Income. Last updated in March 2023. Please Contact NLIHC research staff at research@nlihc.org or (202) 662-1530 to request additional information.

DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	14,593	11,623	80%	Income at or below 30% of AMI	22	-11,311
Income between 31% and 50% of AMI	13,954	4,982	36%	Income at or below 50% of AMI	46	-15,410
Income between 51% and 80% of AMI	18,562	1,724	9%	Income at or below 80% of AMI	90	-4,494
All Renter Households	78,830	18,548	24%			

Renters make up 30% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Lakeland-Winter Haven MSA	73,584	\$67,500	\$20,250	\$506	\$836	\$16.08	\$1,056	\$20.31	81	\$18.81
Naples-Immokalee-Marco Island MSA	37,894	\$98,600	\$29,580	\$740	\$1,295	\$24.90	\$1,583	\$30.44	122	\$18.89
Sebring MSA	9,838	\$63,500	\$19,050	\$476	\$709	\$13.63	\$933	\$17.94	72	\$13.88
DeSoto County	3,866	\$46,600	\$13,980	\$350	\$664	\$12.77	\$757	\$14.56	58	\$14.03
Hendry County	3,820	\$50,100	\$15,030	\$376	\$664	\$12.77	\$757	\$14.56	58	\$16.60
Okeechobee County	3,680	\$53,900	\$16,170	\$404	\$663	\$12.75	\$873	\$16.79	67	\$13.09
Hardee County	2,637	\$54,900	\$16,470	\$412	\$595	\$11.44	\$783	\$15.06	60	\$12.84

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	13,873	11,697	84%	Income at or below 30% of AMI	16	-11,694
Income between 31% and 50% of AMI	14,090	7,233	51%	Income at or below 50% of AMI	33	-18,695
Income between 51% and 80% of AMI	18,185	2,854	16%	Income at or below 80% of AMI	86	-6,277
All Renter Households	81,896	22,575	28%			

Renters make up 27% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Cape Coral-Fort Myers MSA	79,011	\$83,200	\$24,960	\$624	\$979	\$18.83	\$1,231	\$23.67	95	\$18.89
Naples-Immokalee-Marco Island MSA	37,894	\$98,600	\$29,580	\$740	\$1,295	\$24.90	\$1,583	\$30.44	122	\$18.89

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	30,526	24,668	81%	Income at or below 30% of AMI	22	-23,735
Income between 31% and 50% of AMI	24,193	11,945	49%	Income at or below 50% of AMI	34	-35,939
Income between 51% and 80% of AMI	26,632	2,540	10%	Income at or below 80% of AMI	87	-10,914
All Renter Households	112,756	39,491	35%			

Renters make up 44% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Fort Lauderdale HMFA	262,309	\$82,100	\$24,630	\$616	\$1,240	\$23.85	\$1,556	\$29.92	120	\$23.24
West Palm Beach-Boca Raton HMFA	174,325	\$90,300	\$27,090	\$677	\$1,274	\$24.50	\$1,578	\$30.35	121	\$23.39

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	13,202	10,652	81%	Income at or below 30% of AMI	22	-10,336
Income between 31% and 50% of AMI	11,952	6,290	53%	Income at or below 50% of AMI	36	-16,185
Income between 51% and 80% of AMI	15,063	2,262	15%	Income at or below 80% of AMI	81	-7,746
All Renter Households	71,988	19,713	27%			

Renters make up 25% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
West Palm Beach-Boca Raton HMFA	174,325	\$90,300	\$27,090	\$677	\$1,274	\$24.50	\$1,578	\$30.35	121	\$23.39
Port St. Lucie MSA	42,863	\$84,500	\$25,350	\$634	\$987	\$18.98	\$1,275	\$24.52	98	\$17.04

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	16,850	14,641	87%	Income at or below 30% of AMI	13	-14,655
Income between 31% and 50% of AMI	16,504	8,067	49%	Income at or below 50% of AMI	27	-24,360
Income between 51% and 80% of AMI	19,918	2,801	14%	Income at or below 80% of AMI	80	-10,762
All Renter Households	86,321	25,823	30%			

Renters make up 30% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
West Palm Beach-Boca Raton HMFA	174,325	\$90,300	\$27,090	\$677	\$1,274	\$24.50	\$1,578	\$30.35	121	\$23.39

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	20,078	17,720	88%	Income at or below 30% of AMI	15	-17,141
Income between 31% and 50% of AMI	16,724	10,487	63%	Income at or below 50% of AMI	18	-30,226
Income between 51% and 80% of AMI	22,812	4,034	18%	Income at or below 80% of AMI	74	-15,569
All Renter Households	105,561	33,267	32%			

Renters make up 35% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Fort Lauderdale HMFA	262,309	\$82,100	\$24,630	\$616	\$1,240	\$23.85	\$1,556	\$29.92	120	\$23.24
West Palm Beach-Boca Raton HMFA	174,325	\$90,300	\$27,090	\$677	\$1,274	\$24.50	\$1,578	\$30.35	121	\$23.39

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	45,245	34,629	77%	Income at or below 30% of AMI	28	-32,772
Income between 31% and 50% of AMI	29,802	13,324	45%	Income at or below 50% of AMI	40	-44,875
Income between 51% and 80% of AMI	30,644	3,411	11%	Income at or below 80% of AMI	84	-16,846
All Renter Households	143,115	51,804	36%			

Renters make up 52% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Miami-Miami Beach-Kendall HMFA	436,367	\$68,300	\$20,490	\$512	\$1,332	\$25.62	\$1,672	\$32.15	129	\$22.99
Fort Lauderdale HMFA	262,309	\$82,100	\$24,630	\$616	\$1,240	\$23.85	\$1,556	\$29.92	120	\$23.24

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	17,970	15,406	86%	Income at or below 30% of AMI	17	-14,913
Income between 31% and 50% of AMI	14,550	8,062	55%	Income at or below 50% of AMI	22	-25,333
Income between 51% and 80% of AMI	22,042	3,751	17%	Income at or below 80% of AMI	73	-14,502
All Renter Households	92,093	27,565	30%			

Renters make up 35% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
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Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

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REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Fort Lauderdale HMFA	262,309	\$82,100	\$24,630	\$616	\$1,240	\$23.85	\$1,556	\$29.92	120	\$23.24

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	38,044	28,642	75%	Income at or below 30% of AMI	26	-28,182
Income between 31% and 50% of AMI	23,507	9,230	39%	Income at or below 50% of AMI	39	-37,523
Income between 51% and 80% of AMI	23,823	1,570	7%	Income at or below 80% of AMI	87	-11,276
All Renter Households	112,597	39,561	35%			

Renters make up 46% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Miami-Miami Beach-Kendall HMFA	436,367	\$68,300	\$20,490	\$512	\$1,332	\$25.62	\$1,672	\$32.15	129	\$22.99
Naples-Immokalee-Marco Island MSA	37,894	\$98,600	\$29,580	\$740	\$1,295	\$24.90	\$1,583	\$30.44	122	\$18.89

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

*Severely cost-burdened households spend more than 50% of income on housing costs, including utilities. **Or poverty guideline, if higher. AMI = Area Median Income. Last updated in March 2023. Please Contact NLIHC research staff at research@nlihc.org or (202) 662-1530 to request additional information.



DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	39,731	30,249	76%	Income at or below 30% of AMI	26	-29,367
Income between 31% and 50% of AMI	25,598	11,793	46%	Income at or below 50% of AMI	36	-41,644
Income between 51% and 80% of AMI	26,065	3,281	13%	Income at or below 80% of AMI	83	-15,102
All Renter Households	135,181	46,040	34%			

Renters make up 50% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Miami-Miami Beach-Kendall HMFA	436,367	\$68,300	\$20,490	\$512	\$1,332	\$25.62	\$1,672	\$32.15	129	\$22.99

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

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DISTRICT-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30% of AMI	22,005	17,124	78%	Income at or below 30% of AMI	24	-16,751
Income between 31% and 50% of AMI	17,813	8,267	46%	Income at or below 50% of AMI	37	-25,029
Income between 51% and 80% of AMI	18,130	2,137	12%	Income at or below 80% of AMI	84	-9,297
All Renter Households	81,878	27,740	34%			

Renters make up 37% of all households in the District

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data

STATE-LEVEL RENTER STATISTICS

	Total Renter Households	Severely Burdened Households*	% with Severe Burden		Affordable and Available Rental Units Per 100	Surplus/ (Deficit) of Affordable and Available Rental Units
Income at or below 30%** of AMI	575,379	475,929	83%	Income at or below 30%** of AMI	23	-443,892
Income between 31%** and 50% of AMI	392,926	220,590	56%	Income at or below 50% of AMI	33	-650,305
Income between 51% and 80% of AMI	590,937	114,269	19%	Income at or below 80% of AMI	71	-459,261
All Renter Households	2,793,977	831,385	30%			

Renters make up 33% of all households in the state

Source: 2021 American Community Survey (ACS) Public Use Microdata Sample (PUMS)

REGIONAL RENTAL AFFORDABILITY STATISTICS

Metropolitan Statistical Areas (MSAs) and Counties in Districts	Total Renter Households	AMI	30% of AMI	Rent Affordable at 30% of AMI	One Bdrm Fair Market Rent	One Bdrm Housing Wage	Two Bdrm Fair Market Rent	Two Bdrm Housing Wage	Hours at Minimum Wage for Two Bdrm	Avg Renter Wage
Miami-Miami Beach-Kendall HMFA	436,367	\$68,300	\$20,490	\$512	\$1,332	\$25.62	\$1,672	\$32.15	129	\$22.99
Monroe County	13,406	\$100,500	\$30,150	\$754	\$1,370	\$26.35	\$1,759	\$33.83	135	\$18.19

Source: Out of Reach 2022. This congressional district includes at least a portion of the Fair Market Rent (FMR) areas listed above. For FMR areas that span more than one state, the data reflect this state's geography. For districts covering more than seven FMR areas, only the seven largest are shown.

*Severely cost-burdened households spend more than 50% of income on housing costs, including utilities. **Or poverty guideline, if higher. AMI = Area Median Income. Last updated in March 2023. Please Contact NLIHC research staff at research@nlihc.org or (202) 662-1530 to request additional information.

Exhibit D

Attainable Housing Coalition of the St. Johns County Chamber of Commerce,

Workforce Housing in St. Johns County: Unattainable –
Challenges and Solutions to Attainable Workforce Housing



Attainable Housing Coalition
of ST. JOHNS COUNTY CHAMBER OF COMMERCE

Workforce Housing in St. Johns County:

UNATTAINABLE

Challenges and Solutions
to Attainable Workforce Housing





Attainable Housing Coalition

OF THE ST. JOHNS COUNTY CHAMBER OF COMMERCE

Essential workers keep the local economy going. They ensure the community’s residents and visitors experience the best quality of life. They protect our neighborhoods and teach our children.

And many of them cannot afford to even live in the communities they serve due to a lack of housing in an attainable price range.

The Attainable Housing Coalition of the St. Johns County Chamber of Commerce is a group of businesses and individuals who recognize these challenges and are committed to working toward making St. Johns County a great place to live for everyone, especially the most essential workers.

The average St. Johns County teacher would need to earn more than three times their current wage to afford a home at the median sales price of more than \$500,000. And homes in lower price ranges simply aren’t available, even for rent.

These challenges have forced many of the most fundamental workers to seek housing outside of St. Johns County. Their extended commutes create traffic congestion and excess wear on county infrastructure and place an unfair burden on those reliant on child care. In some cases, they seek new jobs closer to home, further impacting the local economy.

The Attainable Housing Coalition is committed to working with builders and developers, local business leaders, financial institutions, and government partners to address the needs of our essential workers now and into the future.

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INTRODUCTION

Essential workers play a vital role in providing services that uphold the high quality of life we desire and expect in St. Johns County. We rely on these fundamental workers to keep us healthy and safe, to educate our children and to respond in a time of crisis. However, due to lack of attainable housing, many of these workers are forced to buy and rent homes outside of St. Johns County. Their absence can lead to a decline in quality of life for all St. Johns County residents.

This Attainable Workforce Housing Report is focused on the challenges faced by these workers who provide a high quality of life for all of St. Johns County’s citizens, and proposes solutions to address this critical issue.

Developing policies and partnerships to address the county’s critical workforce housing needs requires a full understanding of the complex dynamics of the housing market and the economic contexts underpinning attainable housing. This report fully demonstrates the scope and scale of St. Johns County’s workforce housing challenges, along with solutions to consider for policy direction and collaboration with both public and private stakeholders.

WHO ARE ‘ESSENTIAL’ WORKERS?

Many fundamental workers contribute to the quality of life in St. Johns County. For this report, “essential worker” refers to these professions, but many others fall within these income ranges.



Teachers and school support staff



Nurses and other health care workers



Tourism and hospitality workers, including food service



Law enforcement and first responders



Manufacturing workers

KEY FINDINGS

- Population growth, changing demographics, remote employment, short-term rentals and investor purchases are impacting the supply and demand for attainable housing.
- Relying on market fluctuations in interest rates and housing prices is not a sustainable solution for attainable housing.
- When considering options for attainable workforce housing, the county should explore a range of approaches for the short- and long-term implications that must also balance considerations for financial resources, local market conditions and community support.
- No single solution will fix this issue, but the county does have options to alleviate these housing challenges for essential workers. A comprehensive approach will involve a combination of options tailored to the specific context and requirements of our community. **For solutions to be sustainable, they must become the cornerstone of the St. Johns County Comprehensive Land Use Plan.**

WORKFORCE HOUSING CHALLENGES

Essential workers face a number of housing challenges that can impact not only their own quality of life but also the quality of life they contribute to for St. Johns County residents. **Two primary challenges are affordability of a mortgage or rent, as well as housing inventory in an attainable price range.**

HOUSING AFFORDABILITY

Defining ‘affordability’

Housing affordability is measured as a percentage of total household income spent on housing, including rent or mortgage, property taxes, homeowners insurance, homeowners association fees, community development district fees and utility costs.

The general guideline for how much income should be spent on housing is to spend no more than 30% of a household’s gross monthly income on housing expenses. This is often referred to as the “30% rule” and is commonly used by lenders, landlords and housing assistance programs to determine affordability.

What workers can afford

Every worker faces different financial situations and demands, but based on home price and salary data in St. Johns County, many of our essential workers cannot buy or rent housing in the county. The St. Johns County Board of County Commissioners in 2023 passed an ordinance establishing “affordable” housing as having a maximum initial sales price of \$260,000 per unit. **Even housing at this price is unattainable for the essential workers highlighted in this report.**

The following scenarios illustrate what these workers can afford based on the average salary of each profession, as well as the minimum income someone would need to attain housing in St. Johns County.



Households spending more than 30% of income on housing expenses are considered “cost burdened.”¹

1. Source: U.S. Department of Housing & Urban Development

ASSUMPTIONS

Illustrating what occupations can afford for housing can be a challenge due to the complexity and variability of individual financial situations and the wide variety of financing options offered by lenders and governmental agencies.

The examples on the following pages attempt to standardize the scenarios using a set of criteria that are reflective of averages whenever possible or the criteria that is typical for the essential worker occupations selected.

Worker salaries



Tourism & hospitality **\$28,300**

Average wage for food worker or hotel worker.



Teacher **\$47,500**

Annual base salary for 0-3 years of experience. Does not include any advanced degree compensation.



Law enforcement **\$55,000**

Officer with 5 years of experience.



Nurse **\$65,000**

Registered Nurse with 5 years of experience.



Manufacturing worker **\$65,000**

College graduate with security clearance but fewer than 3 years of experience.

Key figures

- The average first-time buyer pays about 6% of the home price for their down payment, while repeat buyers put down 13%.² We used 10% to represent both types of potential buyers.
- Median home price in St. Johns County: \$510,000³
- 30-year fixed mortgage rate: 6.87%⁴
- Down payment: 10%⁵
- Average credit score: 680-699⁶
- Homeowners insurance: 0.00912% of home value⁷
- Private mortgage insurance: 1.22% of loan amount⁸
- Homeowners association fee: \$200 per month⁹
- Median rental prices: \$1,623 (1BR); \$1,795 (2BR); \$2,290 (3BR); \$2,823 (4BR)¹⁰

2. Source: National Association of Realtors

3. Source: Northeast Florida Association of Realtors, March 2023

4, 5. Source: Bankrate

6. For moderate income in age range 18-40. Source: American Express

7. Source: Clovered

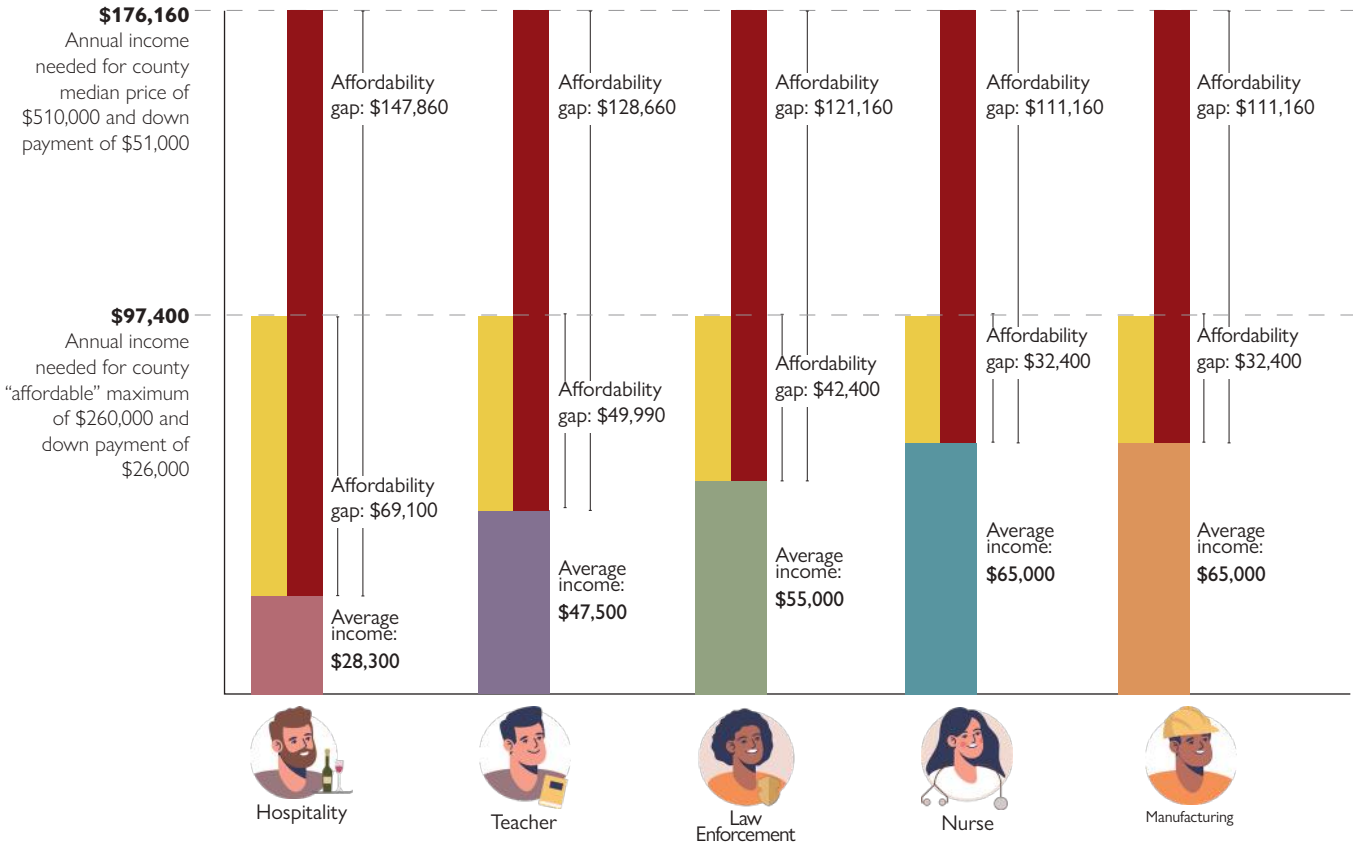
8. Average of carrier rates. PMI is required when down payment is less than 20%. Source: Nerdwallet

9. Average HOA fee across Florida. Source: HOAManagement.com

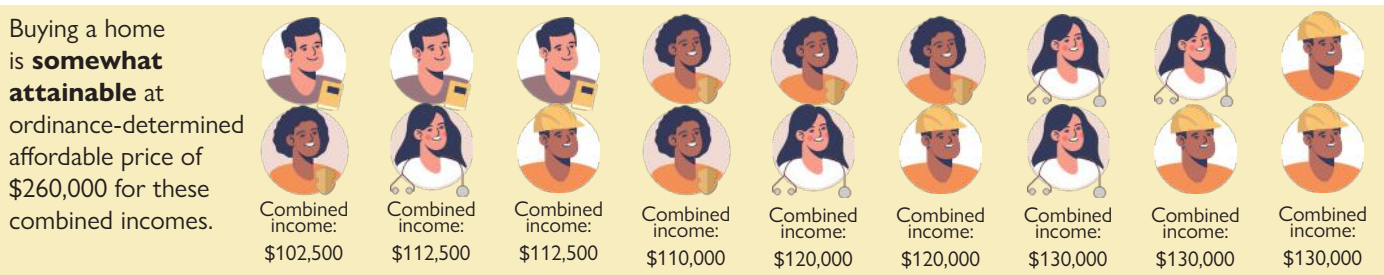
10. Source: Zumper

OWNERSHIP

To purchase a home in St. Johns County at the median price of \$510,000, a buyer needs a minimum annual income of \$176,160 (assuming no more than 30% of annual income will be spent on housing). To purchase a home at the ordinance-determined affordable price of \$260,000, a buyer needs a minimum annual income of at least \$97,400. **None of the essential workers are able to attain housing in St. Johns County on single-earner wages.**



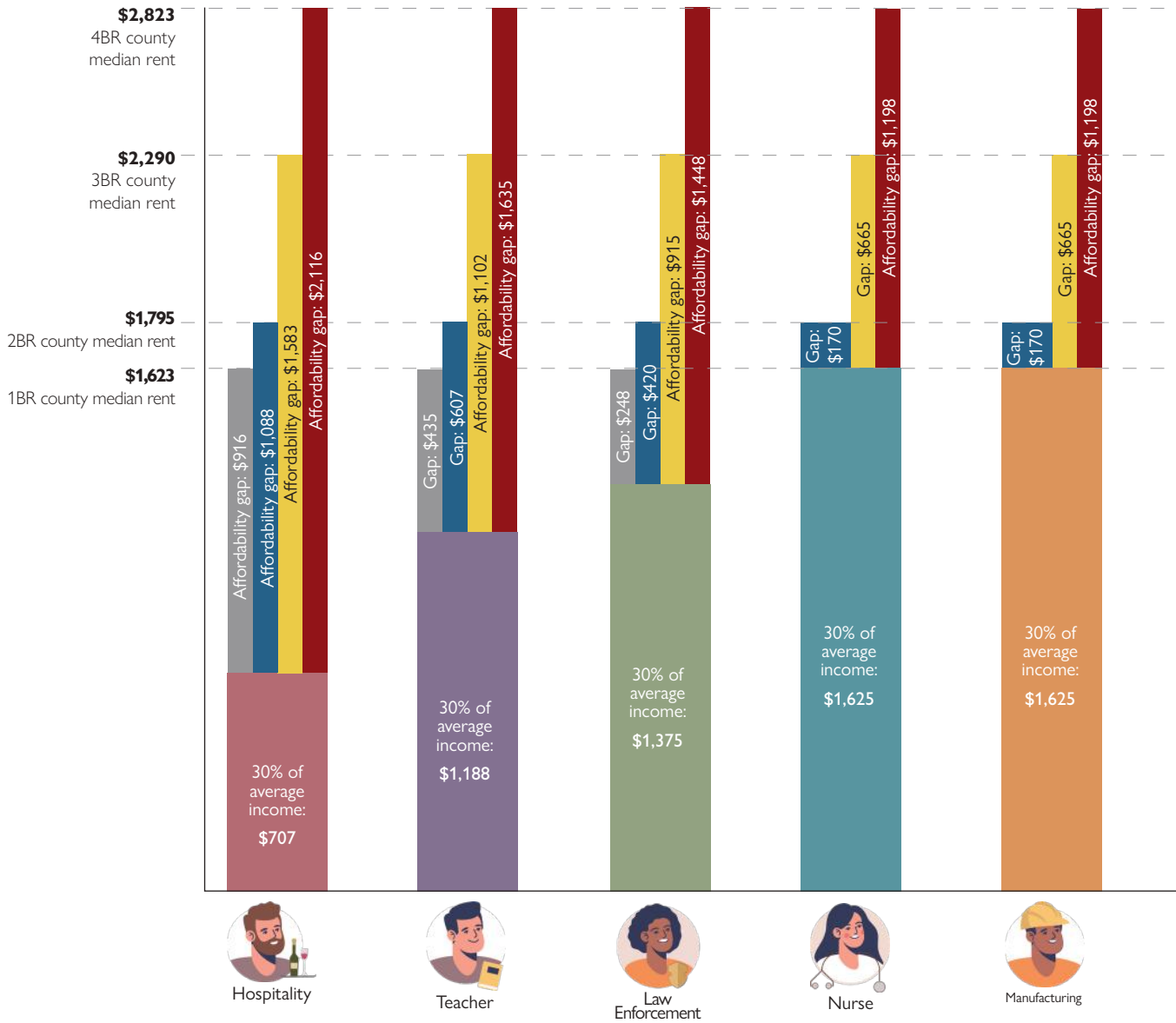
With two essential worker incomes, purchasing a home becomes somewhat more likely at the \$260,000 price. Notably, many hospitality workers cannot reach the necessary income, even when combined with another essential worker's income.



None of the essential worker incomes combined reach the income needed for the \$510,000 median home price.

RENTING

Rental housing is a presumable option for essential workers, as it offers lower upfront costs and fewer expenses related to property maintenance, insurance and taxes. To determine rental affordability, the same rule applies of spending no more than 30% of income on housing.*



Again, housing in St. Johns County remains out of reach for food service and hospitality workers. They would need to spend more than half their monthly income just to rent a 1-bedroom home, and only two of the workers — a nurse or a manufacturing worker — can rent a 1-bedroom home in St. Johns County on a single-earner income.

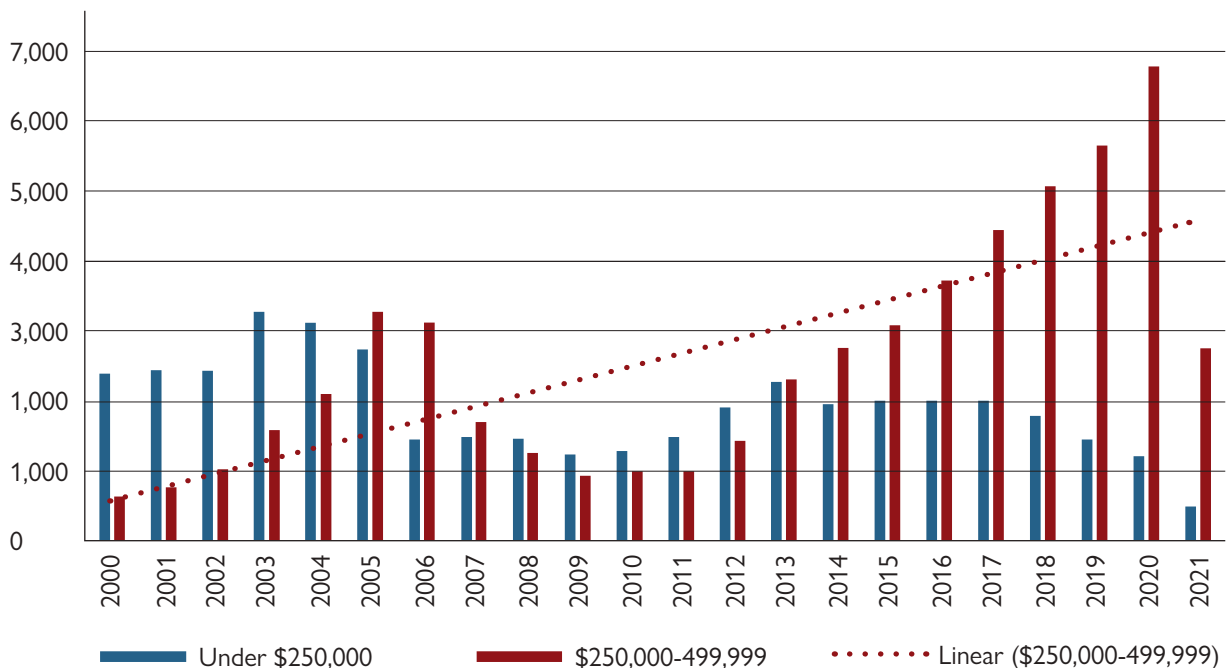
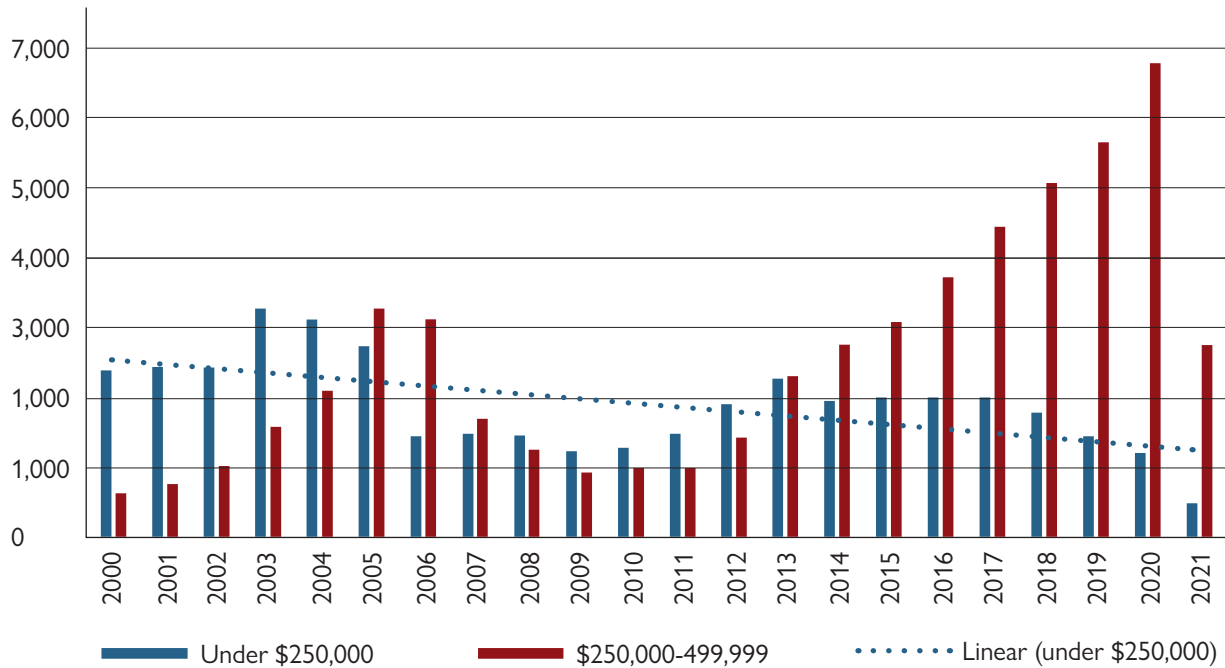
Multi-bedroom rental units are out of reach for many essential workers on a single income.

* Rental prices listed in this report do not reflect additional rental fees or renters insurance.

HOUSING AVAILABILITY

In addition to housing cost as a barrier to attainability for essential workers, housing availability presents a significant challenge for both purchase and rent. The supply of single-family housing in the county's affordability range has dwindled over the last 20 years, while inventory of higher-priced housing has surged.¹¹

The following chart shows the number of homes sold under \$250,000 and from 250,000 to \$499,999 over the years starting in 2000. The number of homes under \$250,000 in St. Johns County has been steadily declining since 2000 while the number of homes over \$250,000 has grown substantially and at a higher rate since 2013.



11. Sources: Florida Housing Data Clearinghouse, Shimberg Center for Housing Studies

Unfortunately, the same availability challenge exists for rental housing units. Only 3% of available rental units are priced in the affordability range of \$1,000-\$1,500 for two of the essential worker occupations. While many more units are available in the next higher range of \$1,501-\$2,000, they are unaffordable for the majority of essential workers. Based on median prices for rental units, these available units are most likely to be 1-bedroom units and impractical for families.



In May 2023, the number of available rental units in St. Johns County totaled 2,369, meaning only 70 units would be available in the \$1,000-\$1,500 range.¹³

Affordability and availability summary

- Purchasing a home at the median price is not attainable for any of the essential workers on their salary alone.
- Only the combined incomes of two essential workers (at the higher wage range) meet the minimum required income for the county's affordable housing maximum sales price of \$260,000.
- Notably, a hospitality and food service worker could not afford even the \$260,000 sales price in most cases, even when combined with another essential worker's income.
- Renting is only attainable for two of the essential worker occupations at the higher wage range.
- Availability of homes for purchase or rent at the price ranges our essential workers can afford is extremely limited.

13. Source: RentCafe

HOW WE GOT HERE

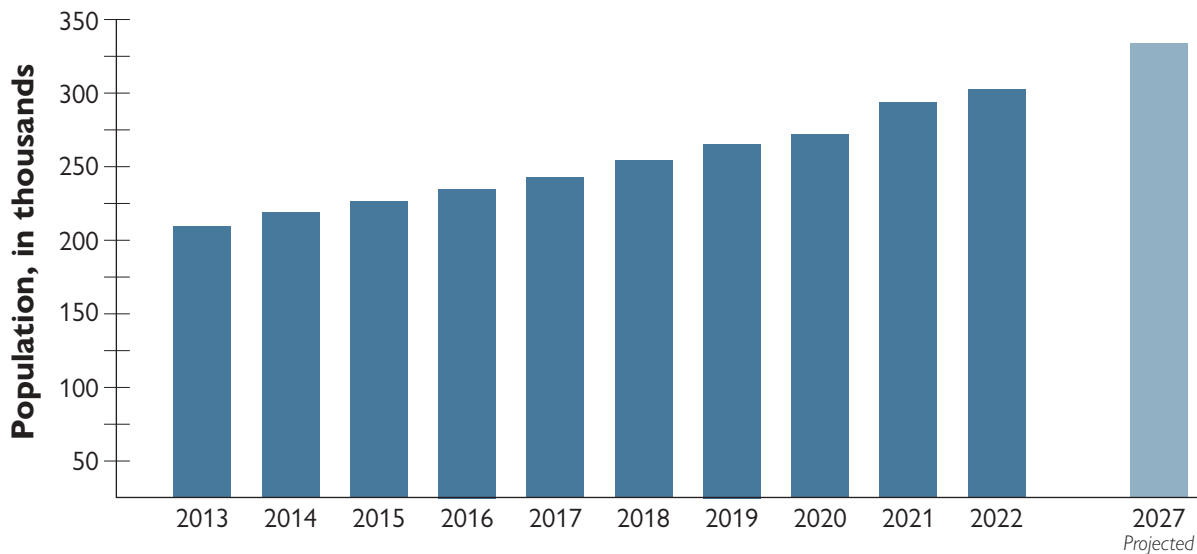
The current housing market in St. Johns County is the result of a variety of familiar market dynamics, such as supply and demand, along with new and emerging forces, like short-term rentals.

Understanding these dynamics can help guide, direct, and prioritize the evaluation of potential solutions to make housing more attainable for the county’s essential workers.

FACTORS IMPACTING HOUSING DEMAND

Population growth

St. Johns County’s population has increased 43% between 2013 and 2022 — from 209,647 to 306,841. Population is projected to reach more than 336,000 by 2027.¹⁴



St. Johns County has benefited from a well-deserved reputation as a desirable place to live, which has had a positive impact on population growth. The population increase in the county has been driven by several factors:

Quality of life	Economic growth	Proximity to Jacksonville
<ul style="list-style-type: none">• Excellent schools• Recreational activities• Natural amenities, such as beaches and parks	<ul style="list-style-type: none">• Strong job market• Low unemployment rate• Continued development	<ul style="list-style-type: none">• Major metro area within 30- to 45-minute commute of most communities• Larger job market

14. Source: St. Johns County Government

Demographic changes

Changes in demographics such as an aging population, changing household sizes and migration patterns all impact the demand for housing in St. Johns County.

Aging population: The median age in St. Johns County has increased from 42 years in 2010 to 44 years in 2021,¹⁵ indicating an aging population.

Increased population in older age groups: The proportion of residents age 55 and over, especially those aged 65 to 74 years old, has grown from 8.9% in 2010 to 12.7% in 2021.¹⁶

Shift in proportion of working-age adults: The proportion of working-age adults age 25-65 has decreased slightly from 53% in 2010 to 50.6% in 2021.¹⁷

Number of single people living alone: The percentage of total households with a householder living alone makes up more than 25% of the total households, with more than half of those over the age of 65.¹⁸ The increase in the number of single-person households has led to a demand for smaller, less expensive homes and apartments

Generational changes

Baby boomers (1946-1964): As this generation ages, there is an increased demand for retirement communities and homes that are more suitable for aging in place.

Gen X (1965-1980): Members of the “sandwich generation” are often raising children while also caring for aging parents. They seek housing options that offer family-friendly layouts, larger bedrooms and potential for multi-generational living arrangements.

Millennials (1981-1996): This demographic group represents more than 22% of the population. Members of this group are now entering their prime home-buying years and looking for homes that are affordable, located in walkable areas and have the latest technology.

Gen Z (1997-2012): While this generation is still relatively young, some emerging trends and preferences indicate what will be important to them for housing. They seek housing options with flexible floor plans, multifunctional spaces and accommodations to work or study remotely. They prefer housing in walkable communities near public transportation, shopping, entertainment and recreational facilities.

Overall, these changes to the population have shifted demand for different types of housing and where those homes are located, which has had a corresponding impact on the supply of this desired housing.

15, 16, 17, 18. Source: U.S. Census Bureau

Emerging pressures on demand

In addition to the normal drivers of demand for housing, such as population growth and changing demographics, new factors have contributed to an increase in demand.

Remote workers: Remote work has had a significant impact on the demand for housing. Many employees are now able to work from anywhere, leading to an increased demand for homes in what are typically vacation destinations, including areas like St. Augustine, where essential workers live year-round. Remote workers are moving to these areas, creating competing demand with essential workers.

Investors: Corporate investors could control 40% of U.S. single-family rental homes by 2030.¹⁹ By 2030, these investors are projected to hold 7.6 million homes, or more than 40% of all single-family rentals on the market.²⁰

Short-term rentals: The short-term rental phenomenon has impacted not only the demand for housing but also on supply and affordability in the following ways:

- With the demand for short-term rentals, homeowners can more easily list their homes as a vacation rental property rather than list them for sale. This has led to an increase in demand for homes in vacation destinations.
- Homeowners may choose to rent out their homes only on a short-term basis instead of to long-term tenants.
- The availability of short-term rentals has driven up housing prices — both for purchase and for rent — and increased difficulty for essential workers to attain housing in the same communities where they work.



St. Johns County experienced an 85% increase in short-term rentals from 2019 to 2023.²¹

Public transportation

With limited options for public transportation in St. Johns County, essential workers typically must drive to their jobs, reducing the amount of income that could be used for housing. The lack of public transportation also extends commute times and increases traffic congestion.

Demand summary

- The significant population growth in St. Johns County has driven up the demand for housing, as well as home prices for both purchase and rent.
- Changing demographics are shaping the demand for different types of housing.
- Remote employment, short-term rentals and investors are new factors that have impacted demand for housing.

19. Source: MetLife Investment Management

20. Source: CNBC

21. Source: All the Rooms

DRIVERS OF HOUSING SUPPLY

Land

Acquisition costs: Land cost is typically one of the largest expenses in any development project. In St. Johns County, land acquisition costs have been increasing in recent years, due in part to the increased demand for residential and commercial properties.

Site preparation costs: These costs include clearing the land, grading the site, installing utilities such as water and sewer lines, and building access roads.

Design and planning costs: These costs include architectural and engineering fees, as well as any costs associated with obtaining necessary permits and approvals.

Permitting and zoning costs: These costs refer to the expenses and time associated with obtaining required permits and complying with zoning regulations when undertaking a construction or development project.

Construction

Labor wages and materials: Labor and materials costs rose with the onset of the Covid-19 pandemic in 2020, and the upward trend has continued in the construction industry.

Higher transportation costs: Getting building materials to construction sites has become more costly, due to increased fuel prices and other transportation-related expenses.

Construction Costs

	1-Year Change	Since Pre-Pandemic
Wages	+5.6%	+10.5%
Materials	+16.8%	+42.5%
Total Costs	+10/:%	+23.9%

Sources: U.S. Bureau of Labor Statistics, Construction Outlook

Impact fees

In St. Johns County, impact fees are charged to new developments to help offset the county's costs of providing necessary additional infrastructure and services. These fees are typically based on the size and type of development, and they are intended to ensure the cost of growth is borne by the developers and new buyers rather than by current taxpayers. The fees might include:

- **Transportation:** Building and maintaining roads, bridges, and other transportation infrastructure.
- **Parks and recreation:** Building and maintaining parks, playgrounds, and other recreational facilities.
- **Public safety:** Providing law enforcement and fire protection services.
- **Schools:** Building and maintaining schools to accommodate additional students.

Zoning and ordinances

Zoning regulations and ordinances can have a significant impact on the supply and type of attainable housing depending on the specific requirements and standards set by the county.

- **Zoning for single-family homes:** Regulations that require a certain percentage of land to be set aside for single-family homes can make it difficult to build developments with more affordable options, such as apartments, townhomes or duplexes.
- **Density requirements:** Conversely, some zoning regulations require a low density of development, which can make it more difficult to build attainable housing.
- **Minimum lot sizes:** These requirements can limit the number of housing units that can be built on a given piece of land, reducing supply and options for attainable workforce housing.
- **Parking requirements:** Many zoning regulations require a minimum number of parking spaces per housing unit, which can increase the cost of development and reduce the number of attainable units that can be built on a given piece of land.
- **Height restrictions:** Keeping buildings low limits density and availability of multifamily housing like apartments and reduces access to lower-cost housing for essential workers.

Public opinion and community resistance

Public opinion can affect housing supply through resistance to certain types of housing development. Known as “not in my backyard” or NIMBYism, this local opposition is usually fueled by concerns over property values, increased density or perceived negative impacts, and can lead to stricter regulations or denial of affordable housing projects altogether.

Supply summary

- Cost of land has increased significantly in St. Johns County.
- Construction costs for labor and materials have remained high despite many supply chain issues being resolved post-pandemic.
- Impact fees offset cost to the county but can make attainable housing development too expensive for builders and developers.
- Zoning, ordinances and regulations have impacted the supply of housing that can be offered in the attainable price range for essential workers.
- Public opinion and “NIMBYism” can affect housing supply by either resistance to or support of certain types of housing development.

SOLUTIONS TO EVALUATE

When considering options for attainable workforce housing, a range of approaches are available for the county to explore, with both short- and long-term implications to balance with considerations for financial resources, local market conditions and community support.

No single solution will address the lack of of attainable workforce housing. But St. Johns County has a variety of “levers” to pull to increase availability and accessibility to housing for our most fundamental workers.

A comprehensive approach typically involves a combination of options tailored to the specific context and requirements of a community and **must become a cornerstone of the St. Johns County Comprehensive Land Use Plan.**

Other communities around the United States have developed and implemented a variety of programs to address attainable workforce housing shortages. The chart below summarizes these approaches. St. Johns County can apply these best practices and tailor the plans to the unique and complex dynamics of housing in this community.

These examples were selected based on programs or approaches that could be applied to the environment in St. Johns County. Some were selected based on a particularly innovative approach, similar demographics or similar economy. **A consistent best practice across many of these programs is incorporating accountability and reporting on successes and shortfalls for the respective programs.**

Land Use & Comprehensive Plans	Zoning & Regulations	Government Programs	Builder/ Developer Incentives
<ul style="list-style-type: none"> • Mixed-use development • Transit-oriented development • Land banking and public land use 	<ul style="list-style-type: none"> • Density bonus • Parking bonus • Cottage code • Form-based code 	<ul style="list-style-type: none"> • Government-owned city surplus property • Lot disposition program • Multiple unit property tax exemption • Low-income rental property tax exemption • Purchase assistance program • Opportunity zones 	<ul style="list-style-type: none"> • System development charge exemptions • Affordable housing impact fee assistance program • Special tax assessment for affordable housing • Expedited/ streamlined permit review for affordable housing

CASE STUDIES

LAND USE & COMPREHENSIVE PLANS

Land use and comprehensive plans shape the physical and regulatory framework for development and provide a more sustainable solution for promoting and providing affordable housing.

Mixed-use development

Comprehensive plans can encourage mixed-use development, combining residential and commercial uses within a single development. By integrating less expensive housing units into mixed-use projects, governments can enhance housing attainability while promoting vibrant, walkable communities.

Transit-oriented development

Land use plans can promote transit-oriented development, which focuses on building housing and other amenities around transit hubs. By prioritizing attainable housing in these areas, communities can provide more robust housing options for residents who rely on public transportation, reducing their transportation costs and increasing accessibility to areas with more jobs and essential services.

Land banking and public land use

Comprehensive plans can include strategies for land banking, where local governments acquire land for future development, including affordable housing projects. Public land can be repurposed for affordable housing, ensuring its availability for essential workers.

ZONING & REGULATIONS

Evaluating current zoning and regulations can have a significant impact on the supply of attainable workforce housing by attracting investors and developers to build housing in price ranges attainable for essential workers. Zoning is important to ensure complementary use of land, such as balancing residential areas with commercial properties. Thoughtful zoning and regulations contribute to a high quality of life for residents by managing development, depending on the needs of the community.

Land use restrictions

Regulations often dictate how land can be used within a specific area. In some cases, these restrictions may limit the types of housing that can be built or the density of development. If regulations prioritize larger (thus more expensive) housing units, building less expensive housing options can be difficult.

Minimum lot sizes and setbacks

Zoning regulations can require minimum lot sizes and setbacks, which can increase the cost of development. These requirements can limit the ability to build smaller, less expensive housing units on available land, making these developments financially less attractive to developers.

Density restrictions

Some zoning regulations impose density restrictions, such as limiting the number of units that can be built on a given plot of land. These restrictions can hinder the development of higher density, less expensive housing options like apartment buildings.

Parking requirements

Zoning regulations often include parking requirements that mandate a specific number of parking spaces per housing unit. These requirements can significantly increase construction costs, making affordable housing more difficult for developers to provide.

Approval processes and fees

Lengthy approval processes and high permit fees can add significant costs and delays to affordable housing development. These additional expenses can make pursuing affordable housing projects financially unfeasible for developers and builders.

Examples

Addressing the impact of zoning and regulations on attainable housing requires collaboration between policymakers, community stakeholders and housing advocates to promote the development of affordable housing and requires a comprehensive approach and long-term planning. Other communities have implemented zoning and regulation changes to promote attainable housing.

Density bonus

- **Bend, Ore.** Projects that defined up to 50% of the units as affordable are allowed to go to 1.5 times the standard density for that zone with a decreasing scale of 1.4 for 40% affordable, 1.3 for 30%, and so on.
- **St. Petersburg, Fla.** The Workforce Housing Density bonus allows an increase in the number of units on a site to provide an incentive for the construction of workforce housing which may be allowed by a zoning district either as additional units or as an additional floor area ratio. Workforce housing bonus density dwelling units are to be mixed with, and not clustered together or segregated in any way, from the market-rate units.
- **Palm Beach County, Fla.** Transfer of Development Rights is a voluntary program that allows a property owner to achieve a density bonus by purchasing the increase in density in new residential developments within the urban/suburban tier in unincorporated Palm Beach County from the PBC TDR Bank, or from a property owner with land in a designated area, without going through the land use amendment process. In order to increase density, the site must meet requirements to become a designated area and follow defined procedures. All TDR units are built on the development site, and 35% of TDR units are provided as workforce housing units.

Parking bonus

- **Bend, Ore.** For all multi-family developments at 60% of the area median income or under, the requirement is one parking space per unit instead of 1.5.
- **St. Petersburg, Fla.** Reduced multifamily parking requirements for market-rate units, affordable units, affordable senior units, and units adjacent to high-frequency transit routes to lower the cost of development and incentivize the construction of additional units.

Cottage code

- **Bend, Ore.** A cottage code provides a housing type that responds to changing household sizes and ages, e.g., retirees, small families or single-person households; provides opportunities for ownership of small, single-family detached units within residential zoning districts; encourages the creation of more usable space for residents of the development through

flexibility in density and lot standards; and supports growth management through efficient use of urban residential land. Small units (fewer than 1,000 square feet) share outdoor space.

Form based code

- **Arlington County, Va.** Form based code is an alternative zoning district for regulating development that helps realize a community’s vision for a specific area. Arlington County is uses form based code to transform Columbia Pike into a walkable community anchored by a lively “main street,” lined with restaurants, businesses and attractive public spaces, while preserving housing options for residents with a mix of incomes. The revitalized Columbia Pike will accommodate more people and higher-density development, and the form based code clearly defines and illustrate requirements for building heights, building and parking placement, historic facades, windows, balconies and other architectural features, as well as standards for public sidewalks, street trees, parking and parks, civic greens, and town squares. Affordable units and energy-efficient buildings are requirements of the neighborhood’s form based code.

GOVERNMENT PROGRAMS

Government incentives or exemptions can have a positive impact on affordable housing by encouraging its development and making it more financially viable. Here are some ways in which government incentives or exemptions can affect affordable housing:

Florida’s ‘Live Local Act’

Gov. Ron DeSantis signed the Live Local Act into law effective July 1, 2023. The following summary briefly describes the changes to existing county/municipal ordinances regarding the future development of “affordable housing” in select zoning areas.*

Prior law and new law effective July 1, 2023

Prior to July 1, 2023, a county/municipality was allowed to circumvent its comprehensive plan and zoning regulations when approving the development of affordable housing on any parcel zoned for residential, commercial, or industrial use, subject to certain conditions.

The Live Local Act

Under the Live Local Act, each county/municipality is required to prepare an inventory list of all real property within its jurisdiction that is owned by the county/municipality and deemed appropriate for affordable housing.

A county/municipality must administratively authorize a proposed residential or mixed-use project on any parcel zoned as commercial, industrial, or mixed-use, without any comprehensive plan amendments, rezoning or other special approvals needed, provided that the project contains at least 40% affordable units at a density that does not exceed the highest density allowed on any parcel where residential use is allowed with a building height that does not exceed the highest allowable building height for residential or commercial structures within one mile of the parcel and the project satisfies all other applicable land development regulations. If any other applicable land development regulations cannot be satisfied, then further action by the county/municipality may be required to obtain the necessary relief, but in no event shall a

* This summary is subject to revision once the implementation details are finalized.

county/municipality require a comprehensive plan amendment or rezoning (or other special approval) to allow the use, building height, or density.

A developer will now be able to view the county's/municipality's property that is deemed appropriate for affordable housing without having to contact the county/municipality and enter into a long-term ground lease (rather than acquiring fee title to the property) for purposes of developing affordable housing.

Property tax discounts/exemptions

First applies to the 2024 tax roll and is repealed Dec. 31, 2059. A nonprofit can now receive an ad valorem exemption on its land when a nonprofit enters into a 99-year ground lease with an affordable housing developer.

The 'missing middle'

The bill adds an ad-valorem property tax exemption for portions of property in a multifamily project up to 75% of the assessed value if the project provides housing to persons or families whose annual household income is greater than 80% but no more than 120% AMI; or 100% of the assessed value if the project provides housing to persons or families whose annual household income does not exceed 80% AMI. All developers can now receive a property tax exemption on the portions of their properties used for affordable housing if their properties qualify, including market rate developers.

Affordable housing property tax exemption

Allows counties and municipalities to adopt an ordinance to exempt portions of property used to provide affordable housing.

To be eligible, the portions of the property must be used to house persons or families whose annual income is no greater than 60% area median income; must contain more than 50 residential units of which at least 20% will be used to provide affordable housing; units must be rented for the lesser of an amount that does not exceed the amounts specified by the most recent multifamily rental program income and rental limit chart posted by Florida Housing Finance Corporation (derived from Housing and Urban Development); or 10% below the market rate; and the property must not have been cited for three code violations in the preceding 24 months and must not have outstanding code violations or related fines before final determination on a property's qualification.

Amount of exemption

If all units in the development are used for affordable housing, then the local government can exempt up to 100% of the assessed value of each residential unit used to provide affordable housing. If fewer than 100% of the units are used for affordable housing, then the local government can exempt up to 75% of the assessed value of each residential unit used to provide affordable housing.

Building materials sales tax refund

An owner may receive a refund for sales tax paid for building materials used to construct property, subject to a recorded agreement with Florida Housing, that has newly constructed units restricted by a land use restriction agreement to provide affordable housing to natural persons or families meeting the Extremely Low Income, Very Low Income, or Low Income limits. An affordable

housing developer can now seek a refund for sales taxes paid for building materials used for an eligible unit. This refund can be substantial as it allows for a refund of \$5,000 per eligible unit.

Corporate tax donation credit

This new law allows a corporation to receive a tax credit for money's contributed to Florida Housing for its State Apartment Incentive Loan, or SAIL, program. This credit is highly complex and could be very beneficial to companies that have substantial revenue, which may have maximized their yearly 10% charitable deduction limit and would also like to invest in affordable housing.

Federal opportunity zones

Opportunity zones are a community development tool authorized in the Federal Tax Cuts and Jobs Act of 2017 (H.R. 1) to encourage investment in designated areas. The Opportunity Zone program is intended to spur investment in distressed communities by allowing taxpayers specialized tax treatment, including deferred capital gains, for investments in Qualified Opportunity Funds, which, in turn, must invest at least 90 percent of their assets in businesses located in qualified Opportunity Zones. The IRS officially designates a census tract as an Opportunity Zone based on the recommendation of a tract by the state's governor. St. Johns County has two opportunity zones, which include Census Tract 204 and Census Tract 210.03. The opportunity zones are located within or adjacent to the City of St. Augustine limits.

Tax incentives

Governments can provide tax incentives to developers or investors who build or invest in attainable housing projects. These incentives can include tax credits, deductions, or exemptions that reduce the financial burden of developing or operating affordable housing units. By reducing the costs, tax incentives make it more attractive for developers to engage in affordable housing projects.

Grants and subsidies

Governments can offer grants or subsidies to support the construction or operation of attainable housing. These funds can help offset the higher costs associated with developing housing that are attainable for low-income individuals or families. Grants and subsidies can be provided directly to developers, housing organizations or individuals as rental assistance or down payment assistance.

Land and property incentives

Governments can provide land or property at reduced costs or through long-term leases to promote affordable housing developments. By reducing land acquisition costs, developers can allocate more resources toward building less expensive units, making the projects financially feasible.

Density bonuses and zoning incentives

Governments can offer density bonuses or zoning incentives to developers who include affordable housing within their projects. Density bonuses allow developers to build additional units beyond what is typically allowed in exchange for including affordable units. Zoning incentives can include relaxing parking requirements, height restrictions or setback rules for affordable housing developments.

Expedited approval processes

Governments can streamline and expedite the approval processes for affordable housing projects. Reducing bureaucratic red tape and shortening the timeline for obtaining permits and approvals, will save developers time and money, making affordable housing projects more attractive.

Regulatory exemptions

Governments can provide exemptions from certain regulations or fees that apply to market-rate housing developments. These exemptions can reduce costs and provide more flexibility in the design and construction of affordable housing units.

Examples

Government incentives or exemptions can significantly impact the availability and affordability of housing. By reducing financial barriers and providing supportive measures, governments can incentivize developers and investors to participate in affordable housing projects, ultimately increasing the supply of attainable housing.

Opportunity zones

- **Orlando, Fla.** Parramore Oaks will bring 120 new energy-efficient homes and a boost of economic activity to a downtown Orlando, community that has been a priority investment area for more than three decades. Parramore Oaks is located in a downtown Orlando redevelopment area where the city is pursuing reinvestment and revitalization efforts with an emphasis on providing more homes, cultural arts, retail, and transit options. A comprehensive plan for the Parramore neighborhood was developed in recent years through Enhance Central Florida — a community-generated plan for sustainable, inclusive transit-oriented development around several SunRail stations. The comprehensive plan called for new affordable and market-rate homes as a measure to prevent resident displacement given an increased desire to live in downtown Orlando.

City surplus property program

- **Bend, Ore.** The city periodically sells city-owned land for development as affordable housing.

Lot disposition program

- **St. Petersburg, Fla.** The City of St. Petersburg's Affordable Housing Lot Disposition Program connects qualified developers to vacant lots acquired by the city through foreclosure. The lots are provided at a nominal amount, with no up-front costs, on one condition: the developer constructs and sells the property to a qualified buyer whose income meets affordable housing standards notated by the city (at or below 120% area median income).

Multiple unit property tax exemption

- **Bend, Ore.** A 10-year tax exemption on improvements for multi-unit residential projects in core and transit-oriented areas that meet certain public benefit requirements.

Low-income rental property tax exemptions

- **Bend, Ore.** Qualifying low-income rental housing projects are eligible to receive a 20-year exemption from city property taxes.

Purchase assistance program

- **St. Petersburg, Fla.** Offers financial assistance to homebuyers purchasing a new or existing single-family residential housing unit, condominium, townhome or cooperative apartment located within the city's municipal boundaries.

BUILDER/DEVELOPER INCENTIVES

Incentive programs can encourage and attract builders and developers to participate in projects that specifically target the development or preservation of attainable housing. Providing benefits or rewards can influence the private sector to contribute to the attainable housing supply.

Examples

System development charges exemption

- **Bend, Ore.** All city system development charges are exempted for housing for which the developer or property owner agrees to record a deed restriction to maintain the property as affordable housing.

Affordable housing impact fee assistance program

- **Palm Beach County, Fla.** The county utilizes impact fee investment earnings to support the construction of affordable owner-occupied, for-sale and rental housing.

Special tax assessment for affordable housing

- **Greenville, S.C.** A property owner who provides affordable housing and is planning to rehabilitate the property may apply to have their tax assessment frozen for up to 20 years at the pre-rehab value and avoid tax increases over the same 20-year period.

Expedited/streamlined permit review for affordable housing

- **St. Petersburg, Fla.** An expedited permit review policy for affordable housing developments provides for a 10-day initial permit review process.
 - Instituted a process to reimburse developers of affordable single-family housing for the cost of constructing new sidewalks up to \$4,000 per development.
 - Reduced multi-family parking requirements for market-rate units, affordable units, affordable senior units and units adjacent to high-frequency transit routes to reduce the cost of development and incentivize the construction of additional units.

'Smart' density

- **Omaha, Neb.** Prairie Queen in Papillion, Neb., near Omaha, is the nation's first exclusively "missing middle" housing neighborhood, with 50 acres of housing that includes duplexes, triplexes, townhomes and similar options to accommodate a variety of household sizes and incomes. Homes are placed around a refined network of narrow streets and blocks to promote walkability, including thoughtful ways to "park" with alley loading and on-street parking, which helps maintain a tranquil vibe and keeps cars from defining the character of the neighborhood.

Prairie Queen was designed by Opticos Design of Berkeley, Calif., and the key to the project was a MMH Neighborhood Kit system, which presents a suite of simple unit plans that can

be deployed across sites to create buildings with character and vibrant neighborhoods of missing middle housing options.

To create efficiencies and cost savings, and to deliver projects at attainable price points, six unit plans are standardized with the intention that the unit plans can be assembled intelligently into a variety of building types, which in turn can be placed together to create neighborhoods with a lot of variety and character.

LAND TRUSTS

In the community land trust model, housing is made affordable by separating its value from the value of the land underneath it. A qualified low-income homebuyer can purchase a house, but the land is owned by a community-based nonprofit corporation, which provides a 99-year ground lease to the homeowner. Because the sales price of the home does not include the value of the land, the homebuyer has an affordable monthly mortgage payment and a nominal ground lease payment.

Florida is a national leader in the growth of community land trusts and is the first in the nation to have a certification program.

The terms of the 99-year ground lease place limitations on the resale of the home, requiring that the home be sold to another income-qualified family. The lease prescribes a “resale formula” that keeps the home price affordable to the next buyer while providing the seller with a fair return. There are several types of resale formulas, but most community land trusts use what are called “appraisal-based” formulas. These formulas set the maximum price as the sum of what the seller paid for the home plus a certain percentage of any increase in market value (as measured by appraisals). Most local groups starting community land trust programs spend a good deal of time examining various types of resale formulas before deciding on one that is right for them.

Examples

- **Palm Beach, Fla.** In exchange for a reduced purchase price and affordable homeownership opportunity, when a community land trust homeowner decides to sell a community land trust home (which does not include the land), he/she agrees to sell the home to another low- to moderate-income household for a price that is predetermined by the resale formula contained in the ground lease. The formula is designed to balance equity gain for the owner with a resale price that is affordable for future buyers.
- **Tallahassee, Fla.** The ground lease that secures the use of the land is for 99 years and is renewable and inheritable. Homeowners pay a nominal \$20-30 monthly ground lease fee to support the community land trust nonprofit organization, and the selling price starts at the investment in the home (mortgage plus down payment minus closing costs) and grows with the owner’s share of the equity as the home gains value over time.



Attainable Housing Coalition

OF THE ST. JOHNS COUNTY CHAMBER OF COMMERCE

Join the Attainable Housing Coalition
and support the workers that make our economy thrive.



www.sjcchamber.com/attainable-housing



Exhibit E

Florida Housing Coalition,

Home Matters 2015 – St. Johns County Report

EXCLUSIVE
**ST. JOHNS
COUNTY**
REPORT



HOME MATTERS

REPORT FROM THE FLORIDA HOUSING COALITION





HOME IS WHERE WE
FIND RESPITE;
where we feel safe where we
CONNECT with our **FAMILY**
keep our belongings and establish
ourselves within **OUR COMMUNITY.**

QUICK FACTS:

St. Johns County isn't paradise if you can't afford housing.

- About 6,800 very low-income households—including hardworking families, seniors, and people with disabilities—pay more than 50% of their incomes for housing.
- On a single day in January 2014, homeless service agencies counted about 1,400 people on the streets or in shelters—including nearly 340 people in families.
- Working-class jobs tend to have lower wages in St. Johns County than in the state as a whole. In many occupations, both blue-collar and white-collar, St. Johns County workers do not earn enough to rent a modest apartment or buy their first home.

*Note that these numbers only include people who are unsheltered or staying in emergency or transitional shelters. They do not include people who are doubled up or living in hotels/motels.

WHY DOES HOME MATTER?

The health, safety, and welfare of St. Johns County and the strength of its economy hinges on an adequate supply of affordable housing for working families, elders, and people with disabilities living on fixed incomes.

AFFORDABLE HOUSING REDUCES TAXPAYER EXPENSES

- Affordable, community-based housing for seniors and people with disabilities is about one-third of the cost of institutional care.
- Chronically homeless persons often cycle through jails, hospitals, and other crisis services. Permanent supportive housing for this high-need population can reduce taxpayer costs by about \$20,000 per person per year.
- Affordable housing can improve the health and educational outcomes of low-income families and children, reducing the public costs associated with illness and poor school performance.

AFFORDABLE HOUSING BOOSTS THE ECONOMY

- Money spent on affordable housing construction and rehabilitation has a ripple effect on local economies. Contractors and suppliers spend money on materials and labor, and workers spend their earnings locally.
- If the Sadowski Housing Trust Fund money is fully appropriated for housing, St. Johns County will receive over \$1.9 million in SHIP funds. This allocation will leverage a further \$8.4 million from public-private partnerships, creating nearly 200 jobs and generating over \$24.8 million in positive economic impact.



The Florida Housing Coalition has produced this report in support of Home Matters® (www.HomeMattersAmerica.com), a national movement to make Home a reality for everyone by elevating the importance of Home's impact on people's health, education, personal success, public safety, and the economy. Participating in Home Matters is a coast-to-coast coalition composed of members of the general public, leaders of housing and community development organizations, as well as other organizations concerned about increasing the positive impact of Home in their communities.

SECTION ONE:

Introduction: Why Does Home Matter?

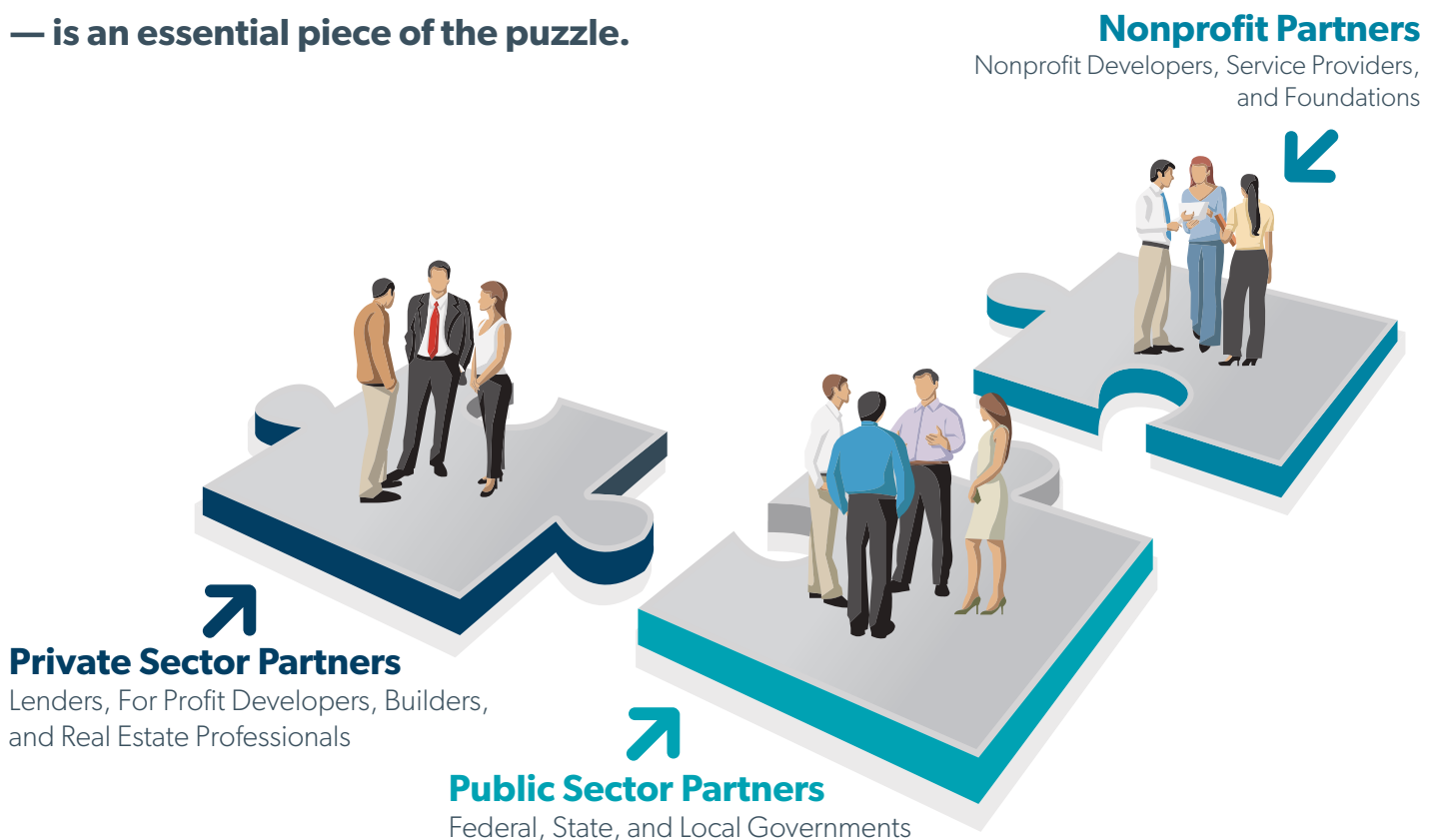
Home is the foundation of a vibrant community like St. Johns County. Home is our foothold in the neighborhoods where our children play and go to school. It is where we rest after a hard day's work, where we store our belongings, where our children do their homework. And for those of us who own homes, they are often our single greatest source of wealth.

For many low-income residents in St. Johns County, however, their housing is a source of stress rather than respite. Thousands of working families are paying more than they can afford for housing, and cutting back on necessities like nutritious food and health care as a result. Other low-income families respond to high housing costs by living in substandard housing, doubling up with family and friends, or moving frequently, all of which have negative impacts on their health, their children's education, and the wider community. By contrast, an adequate supply of affordable housing helps families put down roots, stay healthy and get ahead.

What is Affordable Housing?

In addition to being a basic human need, housing is a market commodity. However, the cost of constructing and maintaining a decent house or apartment exceeds what many low-income families can afford to pay in rent or mortgages. Additionally, in desirable communities like St. Johns County, more affluent homebuyers and renters bid up the price even of relatively modest housing. As a result, many low- to moderate-wage workers, and people living on fixed incomes due to age or disability, are priced out. Simply put, the inability of the housing market to supply these families with adequate housing is a market failure.

Every partner and every funding source in this community effort — **public, private, and nonprofit** — is an essential piece of the puzzle.



The way to correct this market failure is to provide incentives that make it profitable for private developers to invest in affordable housing. These incentives come from public-private partnerships among lenders, real estate professionals, community-based nonprofit organizations, and local, state, and federal government agencies. Affordable housing funders typically impose high standards for building quality and property management. Every partner and every funding source in this community effort—public, private, and nonprofit—is an essential piece of the puzzle.

The remainder of this section sets the stage for understanding the importance of affordable housing, summarizing research on its economic, health, and education benefits. Section 2 presents data on the need for affordable housing among low-income households in St. Johns County, including those in housing and those who are homeless. Section 2 also explores the influence of prevailing wages on housing cost burden, the tradeoffs that families must make between housing and transportation costs, and the implications of regional commuting patterns. Sections 3 and 4 explore drivers of housing cost burden for low-income renters and owners, respectively, in more detail. Section 5 examines future trends in affordable housing supply and demand, including the Silver Tsunami. Finally, Section 6 describes the role of the Sadowski Housing Trust Funds and other funding sources in crafting solutions to the affordable housing challenges in St. Johns County.

The Benefits of Affordable Housing

Economic Benefits

Affordable housing—like any other housing development—is an economic powerhouse. Construction and rehabilitation creates local jobs directly, as well as creating business for local suppliers, who in turn hire new workers to meet the increased demand. The workers provide a further boost to the economy by spending their wages at local restaurants, grocery stores, and other businesses. Once the development is finished and

occupied, the residents create demand for ongoing jobs to meet their needs.

Affordable housing also helps to attract employers to a region. In one survey, employers were asked which factors they consider when choosing a new branch location. Housing availability and cost were among the most important “quality of life” factors—only low crime rates and health care facilities ranked higher¹. When local housing costs are out of reach for entry-level and mid-level employees, they must live remotely and commute to work, increasing traffic congestion. Employers may find it harder to attract skilled workers, and have more problems with employee absenteeism and turnover².

In addition, affordable housing programs are less costly to taxpayers than providing social services to persons who are elderly, have disabilities, or are homeless or precariously housed. According to an AARP report³, Medicaid-funded nursing home care in Florida for seniors and people with disabilities cost over \$30,000 annually per person served, compared to less than \$10,400 for Medicaid Home and Community-Based Services. For an individual with developmental disabilities, HCBS costs \$30,323 annually, compared to over \$109,000 for an intermediate care facility. Homeless persons with severe mental illness, meanwhile, are often heavy users of public crisis services such as jails and emergency rooms. A study in Central Florida estimates that permanent supportive housing for chronically homeless individuals saves taxpayers an estimated \$20,000 per person⁴.

Health and Education Benefits

Housing plays a major role in our physical and mental health. For low-income individuals and families, lack of affordable housing can have a multitude of negative effects:

- Families in unaffordable housing are likely to cut back on nutritious food and health care⁵.

WHAT IS AFFORDABLE HOUSING?

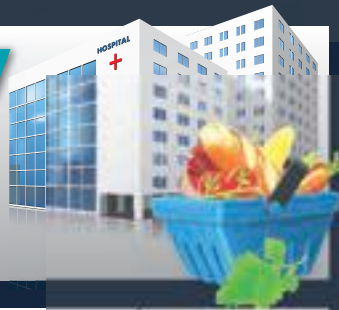
Misconceptions about affordable housing are widespread, with many citizens associating it with large, distressed public housing projects in central cities. However, plenty of public housing authorities in communities around the nation, large and small, are well-managed and have decent units. Furthermore, public housing is only one type of affordable housing. In this report, “affordable housing” refers to privately owned housing that receives a subsidy to bring its rent or purchase price down to a level affordable to a low- or moderate-income family. Except for the subsidy, affordable housing is indistinguishable from non-luxury market-rate housing—it has the same architectural and landscaping styles, and often has basic amenities like energy efficient appliances and community gathering spaces. Substandard housing is, by definition, not affordable housing.

HOUSING PLAYS A MAJOR ROLE IN OUR PHYSICAL AND MENTAL HEALTH.

For low-income individuals and families, lack of affordable housing can have a multitude of negative effects:

Food & Health Care

Families in unaffordable housing are likely to cut back on nutritious food and health care.



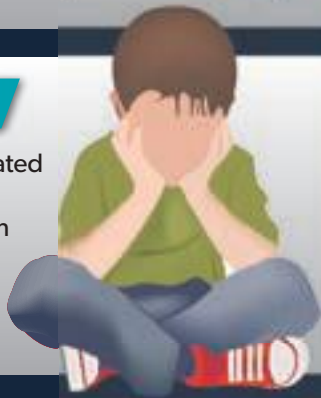
Health Hazards

Dust, mold, and cockroaches can cause asthma and allergies, and peeling lead paint can reduce IQs and cause behavioral problems in children. Unsafe structural conditions, such as faulty wiring, increase the risk of fire and injury.



Stress & Depression

Frequent moves are associated with stress and depression, and overcrowding has been linked to poor health in children.



Exacerbated Health Problems

Living on the streets or in shelters poses unique health risks. Homelessness also makes it difficult to rest and recuperate after illnesses, find a place to store medications, and keep wounds clean and dry.



- Substandard housing poses a variety of health hazards. Dust, mold, and cockroaches can cause asthma and allergies, and peeling lead paint can reduce IQs and cause behavioral problems in children. Unsafe structural conditions, such as faulty wiring, increase the risk of fire and injury^{6,7}.
- Many low-income families move frequently or double up with friends and relatives if they cannot find affordable housing. Frequent moves are associated with stress and depression, and overcrowding has been linked to poor health in children^{8,9}.
- Homelessness exacerbates a person's pre-existing health problems, and living on the streets or in shelters poses unique health risks (including tuberculosis, violence, and exposure to weather). Homelessness also makes it difficult to rest and recuperate after illnesses, find a place to store medications, and keep wounds clean and dry¹⁰.

Many of the health problems associated with a lack of affordable housing are closely connected to children's educational performance. For example, exposure to lead paint is known to cause developmental delays in children, while asthma from exposure to dust and mold can cause children to miss school and fall behind. Frequent moves, overcrowding, and homelessness have also been linked to lower educational attainment in children¹¹.

If a lack of affordable housing can contribute to ill health and educational problems among low-income families and children, then affordable housing is the foundation for good health and achievement in school. For example, a study in Boston found that children in subsidized housing were 19% less likely to be food insecure and 35% more likely to be in good health than children whose families were on the waiting list for subsidized housing¹². Additionally, both subsidized rental housing and homeownership have been linked to better educational outcomes for children^{13,14}.

SECTION TWO:

Housing Cost Burden and Related Factors
Low-Income, Cost Burdened Households in St. Johns County

St. Johns County’s population of 197,115 is much smaller than the populations of Florida’s major urban counties, and accounts for only 1% of the state’s total population. St. Johns County has a relative lack of diversity, with Blacks and Hispanics comprising only 5% and 6% of the county’s population, respectively, compared to 16% and 23% for the state as a whole. Additionally, St. Johns County has a median household income of \$64,876, the highest in the state. By comparison, Florida’s overall median household income is \$46,956. Although the County has a higher homeownership rate than the state as a whole, median income is higher for both owner and renter households¹⁵.

If St. Johns County is a relatively small, wealthy community in Florida, does it even have an affordable housing problem?

As it turns out, the answer is yes. Households in the state as a whole are more likely to be low-income and struggling with high housing costs, but a significant share of St. Johns County

households—14,370 households, or 20% of the total—are low-income and housing cost burdened, or paying more than 30% of their incomes for housing (see definitions in Sidebar). About two-thirds of low-income households (67%) in St. Johns County are cost burdened, similar to the state as a whole (69%). In other words, although St. Johns County is relatively wealthy, its low-income households are nearly as likely to suffer from high housing costs as low-income households statewide (Figure 1).

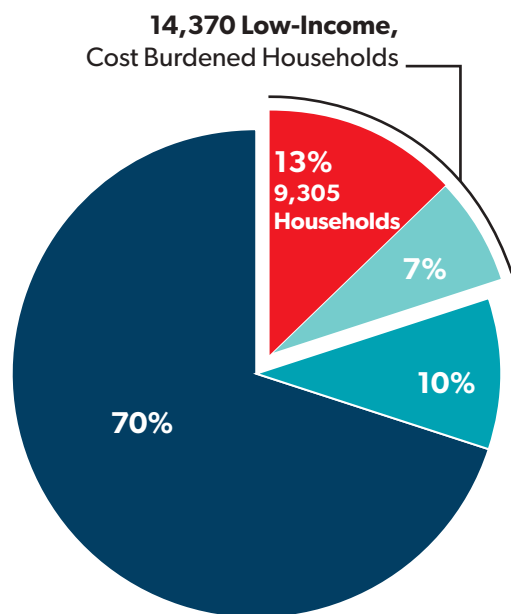
Of the County’s low-income, cost burdened households, 9,305 are severely cost burdened (Figure 2), meaning they spend more than 50% of their incomes for housing (see definitions in Sidebar). These households represent 13%, or about one in eight, of all St. Johns County Households. About 6,800 of these households are “very low-income”, meaning that their incomes are no more than 50% of the median income for the area¹⁶. These households are a particularly important population for local leaders to consider when discussing affordable housing need.

Not surprisingly, the absolute number of severely cost burdened households increases as income bracket decreases. Extremely

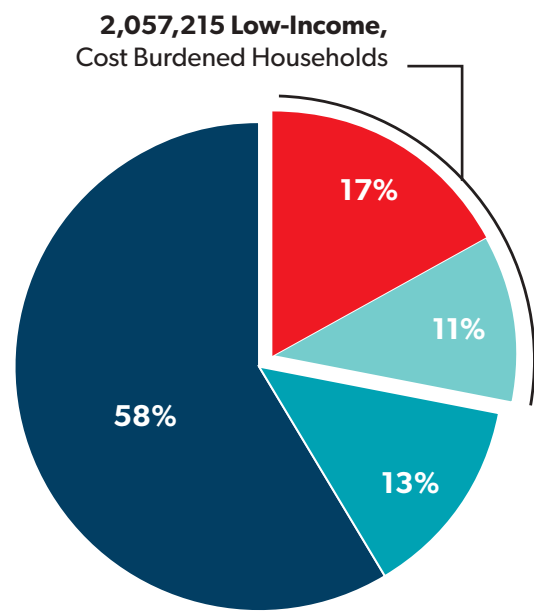
^a HUD uses the median income for the Jacksonville metropolitan area to determine the limits for low-income, very low-income, and extremely low-income households in St. Johns County. Median income among both owner and renter households is lower in Duval County than in St. Johns County.

Figure 1. Low-Income, Cost Burdened Households in St. Johns County and the State of Florida.
 (Source: U.S. Department of Housing and Urban Development [HUD] 2007-2011 Comprehensive Housing Affordability Strategy [CHAS] data.)

St. Johns County



State of Florida



■ **Low-Income, Severely Cost Burdened**
 ■ **Low-Income, Not Cost Burdened**
 ■ **Low-Income, Moderately Cost Burdened**
 ■ **Non-Low-Income Households**

A Note on Terminology Income and Housing Cost Burden

According to the federal government and the State of Florida, housing is affordable if it costs no more than 30% of a household’s gross income. This includes rent or mortgage payments, utilities, and property taxes and insurance, if applicable. If housing costs 30% or more of a household’s income, but less than 50%, the household is considered “moderately cost burdened”, and a household paying 50% or more of its income for housing is “severely cost burdened”.

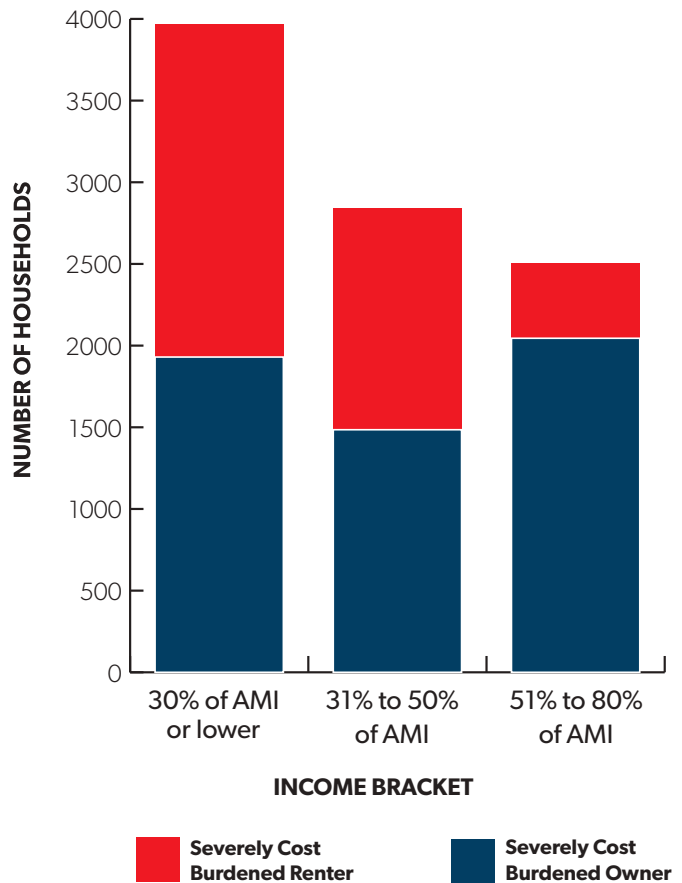
Florida Statutes and certain federal housing programs define “low-income” (or “LI”) households as those that earn no more than 80% of the median income for households of their size within their geographic area. Federal housing assistance programs usually calculate “Area Median Income” (AMI) for metropolitan areas and nonmetropolitan counties within a state. “Very low-income” (VLI) households are those that earn no more than 50% AMI, and “Extremely low-income” (ELI) households earn no more than 30% AMI. In this report, the term “low-income” includes all households at or below 80% AMI, and “very low-income” includes all households at or below 50% AMI. Thus, all ELI households are also classified as VLI and LI, but the reverse is not true.

Florida Statutes defines a “moderate-income” household as having an income up to 120% AMI. In this report, “moderate-income” refers to households with incomes between 80% and 120% AMI.



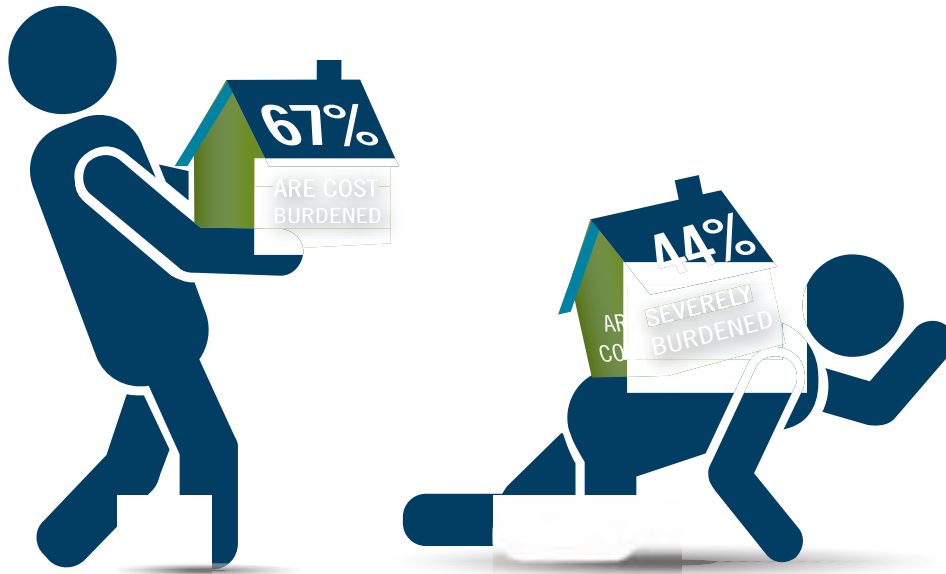
low-income households (0-30% AMI) with severe cost burden are more likely to be renters, while severely cost burdened households in the 51% to 80% income bracket are more likely to be owners (Figure 2). Although the latter income bracket has the highest absolute number of severely cost-burdened owner households, owners in lower income brackets have a higher likelihood of being severely cost burdened (see Appendix 1).

Figure 2. Severe Housing Cost Burden (Paying >50% of Income for Housing) Among Low-Income Households in St. Johns County.
(Source: HUD 2007-2011 CHAS data.)



Please note that the data for owner households in Figure 2 includes those with and without mortgages, and owners with mortgages are more likely to be cost burdened. State-level data shows that low-income owners with mortgages are also more likely to be cost burdened than renters in the same income bracket, which may be due in part to the proliferation of adjustable-rate mortgage loans during the housing boom (see the Home Matters for Florida 2015 report). In St. Johns County, the legacy of subprime and adjustable-rate loans may also explain why homeowners dominate the severely cost burdened households in the 51% to 80% AMI bracket in terms of absolute numbers.

Overall, 67% of St. Johns County’s low-income households are cost burdened, and 44% are severely cost burdened.



This translates to **14,370** cost burdened low income households, of which **9,305** are severely cost burdened.

Homelessness

When a household’s rent or mortgage payments compete with other basic needs, such as food and healthcare, they are at risk of homelessness. In the 2014 “Point-in-Time” [PIT] count^b, St. Johns County identified a total of 1,401 “literally homeless” people—those staying in shelters, on the street, or in other places not meant for human habitation. As Table 1 shows, the population of literally homeless people has increased by 13% in St. Johns County since 2007, compared to a 14% decrease statewide. Homeless people in families increased by an alarming 144% in the County, compared to a 15% decrease statewide. The County saw more progress in reducing chronic homelessness

among individual adults, compared to the state as a whole (a 45% decrease compared to an 8% decrease), but experienced a 17% increase in veteran homelessness while the state achieved a 42% decrease. Keep in mind that Point-in-Time counts are highly susceptible to factors such as weather and count volunteers, and PIT counts of smaller homeless populations are likely to have a higher level of error.

Unfortunately, family homelessness has steadily increased in St. Johns County, according to another commonly used measure. The U.S. Department of Education provides funding and other support for public school districts to identify children and youth

^bThe U.S. Department of Housing and Urban Development (HUD) requires Point-in-Time counts of “literally homeless” people to be conducted at least biennially by “Continuums of Care”, or geographically delineated networks of homeless service providers. Most Continuums of Care in Florida and across the nation conduct their PIT counts on a single night in the last week of January. PIT Count data has limitations, and it is not the only data source used to understand the scope of homelessness at the state and national levels. However, Continuums of Care across the nation have conducted PIT counts for about a decade, allowing analysts to identify homeless population trends within and between communities over time.

Table 1. Point-in-Time Counts of Homeless People in St. Johns County and the State of Florida.(Source: HUD Point-in-Time Count data¹⁷.)

Homeless Population Category	Population in St. Johns County 2014	Percent Change in St. Johns County	Percent Change in Florida
Total Homeless Population (2007-2014)*	1,401	13%	-14%
Persons in Families (2007-2014)	339	144%	-15%
Chronically Homeless Individuals (2007-2014)	65	-45%	-8%
Veterans (2011-2014)**	48	17%	-42%

*HUD uses 2007 as a baseline year for Point-in-Time data.

** 2011 was the first year that HUD had reliable estimates of Veteran homelessness at the Continuum of Care level.

Table 2. Homeless Students Identified in Public School Districts in St. Johns County and the State of Florida.(Source: National Center for Homeless Education¹⁹, Florida Homeless Education Program²⁰.)

Population	Number of Students in St. Johns County	St. Johns County % Change (Academic Year '09-'10 to '12-'13)	Florida % Change (Academic Year '09-'10 to '12-'13)
Total Homeless Students	679	98%	44%
Shelter, Transitional Housing, Awaiting Foster Care, Unsheltered	104	3%	19%
Doubled Up or in Hotels/Motels	575	138%	50%
Unaccompanied Children and Youths	130	171%	7%

who are homeless at any time during the academic year (including summer school), using a definition that includes children who are doubled-up or living in hotels or motels due to their family's loss of housing or economic hardship. Local school district liaisons help homeless children, youth and their families overcome barriers to school enrollment and attendance, and help them identify the services needed to return to stable housing¹⁸.

At the state level, the population of homeless students increased by 44% between the 2009-2010 and 2012-2013 academic years (Table 2). The increase in St. Johns County over the same period was even sharper—98%—yielding a homeless student population of 679 children and youths by the 2012-2013 academic year. At both the County and state level, the increase in student homelessness is driven primarily by an increase in students who are doubled up or living in hotels and motels. However, in St. Johns County, the increase in students who are literally homeless or awaiting foster

care placement is smaller than at the state level (3% compared to 19%), while the increase in students who are doubled up or living in hotels or motels is greater (138% compared to 50%).

Department of Education data on student homelessness can be used as a rough proxy for family homelessness, including families that are doubled up or living in motels, because most of the students identified by local liaisons are staying with their parents or guardians. However, a significant minority of homeless students are unaccompanied. Some of these children and youths are truly living alone, while others are living with adult relatives, friends, or neighbors in an informal arrangement with the child's parents or guardians. St. Johns County had 130 unaccompanied homeless students in the 2012-13 academic year, a 171% increase since the 2009-10 academic year. By comparison, the State of Florida saw only a 7% increase in unaccompanied homeless students during that time period.

HOMELESS CHILDREN POPULATION ON THE RISE

ON THE STATE LEVEL

The population of homeless students increased by 44% between the 2009-2010 and 2012-2013 academic years.



IN ST. JOHNS COUNTY

The increase over the same period was even sharper—98%—yielding a homeless student population of almost 700 by the 2012-2013 academic year.



Low-Wage Jobs

As we saw at the beginning of this section, St. Johns County has the state's highest median household income. As Table 3 shows, well-paid management occupations are a more prominent part of the labor market for people who live in St. Johns County^c. Median earnings for management occupations and several other white-collar occupation categories—including business and financial operation occupations and healthcare practitioner occupations—are higher for St. Johns County residents than for Florida workers as a whole. Sales occupations, the top occupation category among County residents, also have considerably higher median earnings than in the state overall—\$33,196 compared to \$25,435.

For several low- and medium-skill occupation categories, however, St. Johns County residents have lower median earnings compared to Floridians as a whole. Food service workers living in the County have median annual earnings of \$11,987—barely above the federal poverty line for a single person—compared to \$14,969 at the state level. County residents in building and grounds cleaning/ maintenance occupations are also somewhat lower paid, with median earnings of \$16,374, compared to \$17,316 at the state level. County residents in personal care and service occupations have median earnings of only \$13,174, compared to \$16,489 at the state level (not shown in Table 3).

In short, many well-paid, white-collar workers live in St. Johns County, but they mask the presence of many residents who work in occupations with depressed wages. Many low-income workers share housing costs with a spouse or roommates, but this is not a failsafe way to make housing affordable. These households can quickly fall into financial crisis due to job loss, illness, child care emergencies, break-down of an automobile, or other disruptions. Additionally, many low-income households consist of single parents with young children²¹.

These lower-paid workers provide services that are vital for the quality of life for wealthier St. Johns County

^c This dataset is for the civilian employed population 16 years and older in St. Johns County. Many employed people who live in St. Johns County have jobs in other counties.

residents, such as cooking restaurant meals, landscaping homes, and cleaning office buildings. Not only do these workers deserve to find affordable homes near their jobs, but they are more likely to

deliver top-quality services to their clients if they are not struggling to keep a roof over their heads.

Table 3. Most Common Occupation Categories Among Civilian Workers (Age 16+) Living in St. Johns County and the State of Florida.
(Source: American Community Survey 2013 5-year estimates.)

Top 10 Occupation Categories Among St. Johns County Residents	
Occupation Category	Median Earnings
Sales and related occupations	\$ 33,196
Management occupations	\$ 80,023
Office and administrative support occupations	\$ 28,808
Food preparation and serving related occupations	\$ 11,987
Business and financial operations occupations	\$ 56,374
Education, training, and library occupations	\$ 39,201
Health diagnosing and treating practitioners and other technical occupations	\$ 70,091
Construction and extraction occupations	\$ 29,649
Building and grounds cleaning and maintenance occupations	\$ 16,374
Personal care and service occupations	\$ 13,174

Top 10 Occupation Categories Among Florida Residents	
Occupation Category	Median Earnings
Office and administrative support occupations	\$ 27,134
Sales and related occupations	\$ 25,435
Management occupations	\$ 56,964
Food preparation and serving related occupations	\$ 14,969
Education, training, and library occupations	\$ 38,256
Building and grounds cleaning and maintenance occupations	\$ 17,316
Construction and extraction occupations	\$ 26,542
Business and financial operations occupations	\$ 48,003
Health diagnosing and treating practitioners and other technical occupations	\$ 62,886
Production occupations	\$ 26,843

Housing and Transportation Costs

Faced with high housing costs in the communities where they work, many families live in outlying communities. However, this strategy is not entirely successful, since many of these families have to pay for long commutes. The Center for Neighborhood Technology [CNT] calculates a “Housing + Transportation Affordability Index” for communities across the nation. Just as 30% is the maximum share of income that a family can affordably devote to housing, CNT has determined that 45% is the maximum affordable share of household income that can be spent on combined housing and transportation costs.

As Table 4 shows, many more St. Johns County households are cost burdened when transportation costs are taken into account^d. All typical households at 80% AMI pay over 45% of their incomes for housing and transportation, and the average household at this income pays 71% of its income for housing and transportation. In addition, 95% of typical median-income households in St. Johns County are cost burdened according to the H + T Index, paying an average of 57% of their incomes for housing and transportation. Housing + Transportation costs are similar in neighboring Flagler County, which has a smaller population than St. Johns County, and are lower in Duval County. Housing and transportation costs are strongly influenced by the flow of workers between counties, as discussed below.

^d These percentages, unlike Census data, are not based on a "universe" of actual households, but are the result of a mathematical modeling exercise using a hypothetical "average" household at 80% AMI (not at or below 80% AMI). The model uses actual regional data on incomes, household composition, workers, housing and transportation costs, and other variables to construct profiles of "average" households and determine their average housing and transportation costs.

Table 4. Housing + Transportation Costs for Residents of St. Johns and Neighboring Counties.
 (Source: Center for Neighborhood Technology [CNT] H+T Affordability Index²².)

County of Residence / Income Level	Average Housing + Transportation Costs (% of Income)	% of Households Paying >45% of Income for Housing +Transportation
St. Johns / 80% of Median Income	71	100
St. Johns / Median Income	57	95
Duval / 80% of Median Income	62	97
Duval / Median Income	50	72
Flagler / 80% of Median Income	71	100
Flagler / Median Income	57	98

Regional Commuting Patterns

Economists who study regional labor markets use a “gravity” model to understand workers’ commuting patterns. Larger economies in a region, which tend to be communities with larger populations, exert a “gravitational pull” on smaller communities, attracting numerous in-commuters. St. Johns County is strongly influenced by the “gravity” of Duval County’s economy, as well as other employment centers in the region.

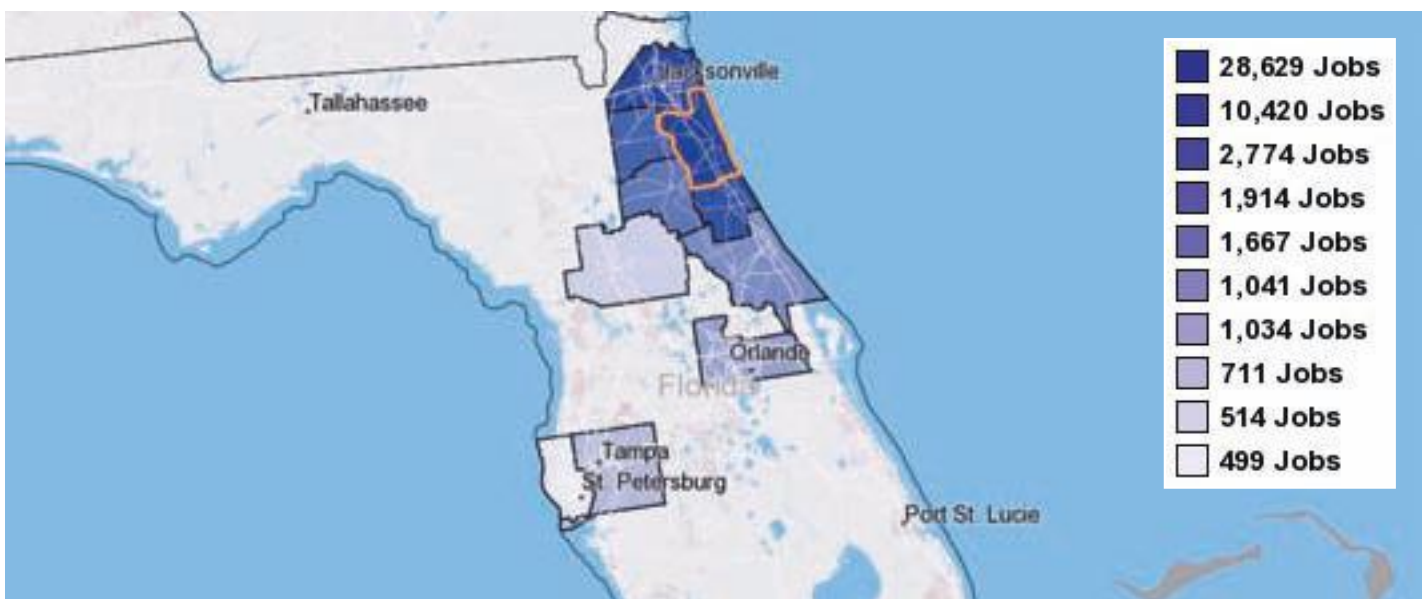
According to the most recent data available, St. Johns County had close to 57,000 jobs. About 28,600 of these jobs were filled by County residents, and the remaining 28,300 jobs were filled by residents of other counties. Most employed people living in St. Johns County commute to other counties for work. By contrast, nearly 77% of people who live in Duval County are also employed there²³.

Over 40% of the jobs held by St. Johns County residents are found in Duval County, more than any other county. A somewhat smaller share of residents (36.5%) stay in St. Johns County to work, and about one in four workers commute to other counties, including Hillsborough.

In addition to being affected by the “gravity” of Duval County and other regional economies, St. Johns County exerts its own gravitational pull on neighboring communities. As Figure 3 shows, over 18% of people who work in St. Johns County live in Duval County, and over 30% come from counties such as Flagler, Clay, and Putnam.

What do these commuting dynamics mean for housing affordability in St. Johns County? It is normal for a moderately

Figure 3. Counties Where St. Johns County Workers Live.
 (Source: U.S. Census Bureau 2011 LEHD data.)



urbanized county to draw in employees from more rural surrounding counties, even as some of its own residents out-commute for work. However, this “normal”, seemingly inevitable pattern may be a manifestation of the housing-transportation tradeoff discussed above. As Table 5 shows, St. Johns County has the highest housing costs in the region. If more people who work in St. Johns County could afford to live here, it would reduce wear and tear on our roads while increasing the tax base.

By the same token, could St. Johns County residents who work in other counties simply move to those counties to reduce their housing and transportation costs? The problem with this approach is that the economic vibrancy and quality of life in St. Johns County is not likely to benefit from an exodus of residents. It takes a critical mass of residents with a variety of job skills

to make St. Johns County the moderately powerful regional economy that it is.

For now, these commuting patterns are the reality in which St. Johns County operates. The issue of combined housing and transportation costs, and the commuting patterns that arise as families make these tradeoffs, are especially relevant to “workforce” housing. Moderately low-income individuals are more likely to work full-time than families at or near the poverty line, and have greater means to purchase and maintain automobiles for inter-county commutes. To encourage our teachers, police officers, and health care workers to live in the County, and to avoid driving skilled young residents away, it is necessary to have a wide range of housing options.

Table 5. Housing Costs in St. Johns County and Surrounding Counties.
(Source: ACS 2013 5-year estimates.)

County	Median Gross Rent	Median Monthly Owner Costs (Units With a Mortgage)
Clay	\$1,013	\$1,487
Duval	\$935	\$1,431
Flagler	\$1,039	\$1,413
Orange	\$1,022	\$1,619
Putnam	\$634	\$992
St. Johns	\$1,073	\$1,850
Volusia	\$898	\$1,326

**SECTION THREE:
Challenges for Renters**

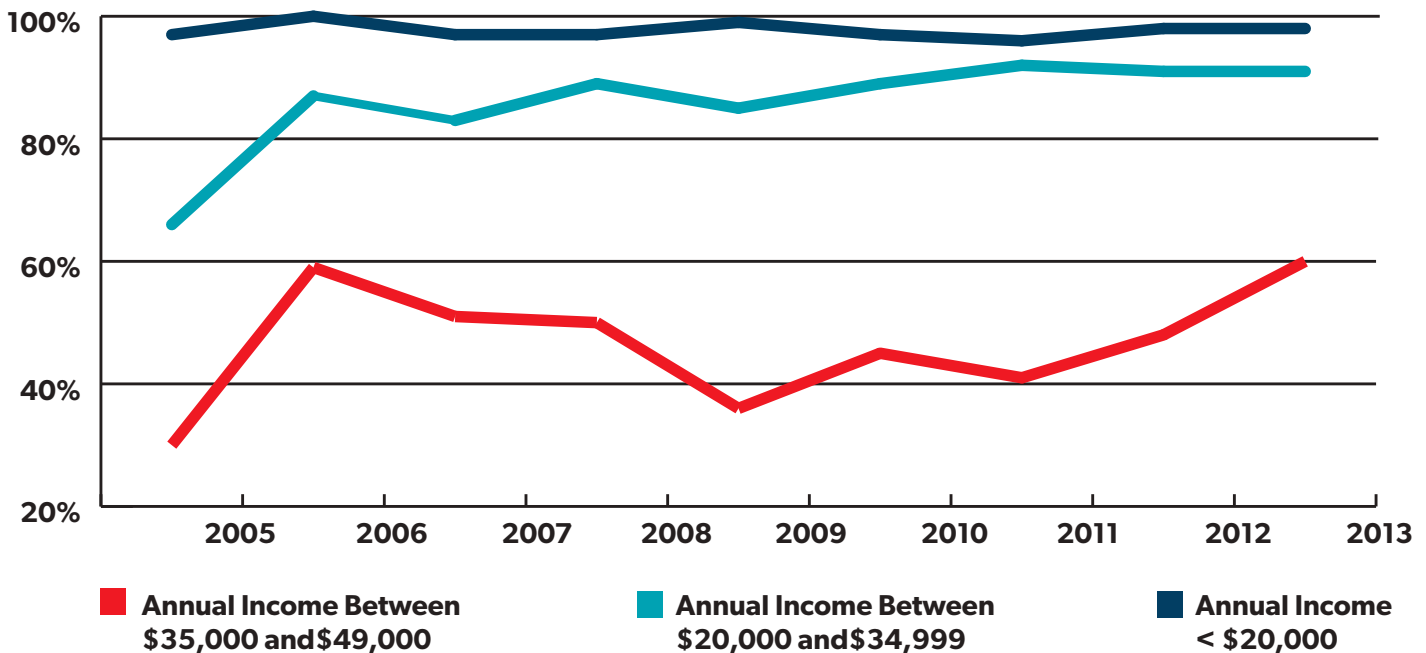
As Section 2 demonstrates, a majority of low-income households in St. Johns County are housing cost burdened. This is especially true for renters, and the prevalence of cost burden among St. Johns County renters is similar to statewide trends (see Appendix 1). The total number of renter households has increased in recent years while the supply of rental housing has remained fairly constant, with a decline in vacancy rates likely meeting the increased rental demand (see Appendix 2). However, more efficient utilization of the existing rental stock in St. Johns County is not enough to meet the housing needs of low-income renters. (See Appendix 3 for a note about methodology for examining trends over time.)

Figure 4 shows American Community Survey data on the percentage of renters at different income brackets that are cost burdened. These income brackets do not perfectly correspond

to federal and state designations of low-income, VLI and ELI households, since they do not account for household size, but they are a useful proxy to examine cost burden over time. Cost burden among renter households with annual incomes below \$20,000 has consistently hovered at or near 100% since 2005. For renter households with incomes between \$20,000 and \$35,000, rates of cost burden have crept up since 2005 and plateaued above 90%.

For renter households with incomes between \$35,000 and \$50,000, the dip in cost burden rates in the early recession years may indicate that landlords and property managers offered discounts and other incentives to renters in an effort to fill vacant units²⁵. It may also be due to a shift in the rental market away from high-cost units (see Figure 11 in Section 5), or to differences in the datasets for each year (Appendix 3). In either case, it is notable that the share of cost burdened renter households in this

Figure 4. Housing Cost Burden among Renters in Lower Income Brackets.
(Source: ACS²⁴.)



income bracket was 60% in 2013, similar to the level in 2006. The data suggests that even if the recession dampened rental costs for renters in this income bracket, the effect is starting to wear off.

The rest of this section discusses several factors unique to low-income renters, and explores why housing cost burden among these renters is high and increasing.

Mismatch Between Rents and Wages

Although St. Johns County has a relatively high median renter income, low-income renter households are nearly as likely to be cost burdened in St. Johns County as in the state as a whole (Appendix 1). Wealthy communities rely on many low-paid employees, including waiters and waitresses, janitors, cashiers, security guards, and nursing assistants. When these employees do not earn enough to afford housing near their jobs, they may have to sacrifice food, healthcare, and other necessities. Alternatively, they may be forced to live in neighboring communities where housing is less expensive, as discussed in the previous section. Both tradeoffs can impact job performance, increasing tardiness, absences due to illness and transportation issues, lost productivity, and employee turnover.

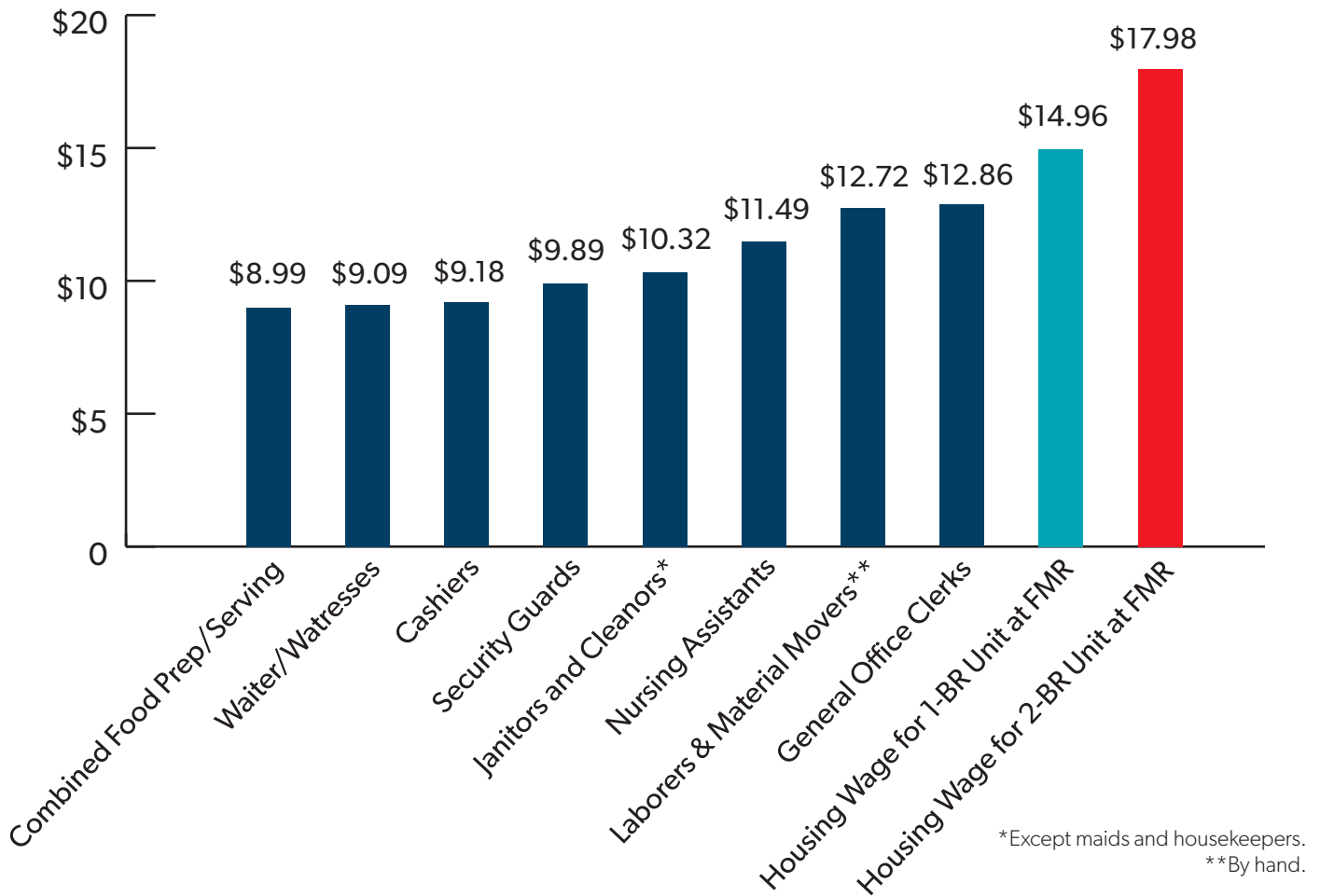
Figure 5 compares the median wages for key low-wage jobs with the hourly wage needed to afford a 1- or 2-bedroom apartment at

Fair Market Rent in the Jacksonville metropolitan area^e. All of the occupations shown are among the top 15 most common in the Jacksonville metro—with the exception of security guards, which are the 23rd most common occupation. The median wages range from \$8.99 for food preparation and serving workers to \$12.86 for general office clerks, and none of the occupations earns enough to afford a one- or two-bedroom apartment at Fair Market Rent.

Strikingly, the “housing wage” to afford a one-bedroom apartment translates to an annual income over \$31,000, assuming the renter works 40 hours per week, 52 weeks per year. As Table 3 shows, many occupation categories in St. Johns County have median annual incomes below this threshold. This includes office and administrative support occupations, as well as construction and extraction occupations. Although the Fair Market Rents in Figure 5 are calculated for the whole Jacksonville metro area, it is unlikely that they overstate housing costs in St. Johns County. As the data in Table 5 suggests, St. Johns County actually has higher housing costs than Duval County. The wages for specific occupations in Figure 10 may be higher or lower in St. Johns County compared to Duval County²⁸, but these figures are useful as a barometer of housing affordability for low-wage workers in St. Johns County.

^e The U.S. Bureau of Labor Statistics makes wage data for specific occupations available at the metropolitan area and balance-of-state level. St. Johns County is included in the Jacksonville metro area.

Figure 5. Comparison of Median Wages and “Housing Wages” for Common Occupations in the Jacksonville Metropolitan Area.
 (Source: Florida Department of Economic Opportunity [DEO] 2014²⁶, National Low Income Housing Coalition [NLIHC] 2014a²⁷.)



Shortage of Affordable and Available Rental Units

St. Johns County does have rental units, both subsidized and unsubsidized, that are affordable to low-income households. However, there are not enough of these units to go around. Not only is the overall supply of affordable rentals limited, but some of these rentals are already occupied by higher-income households. In other words, low-income renters find themselves in a game of musical chairs with other low-income renters and higher-income renters for a limited number of affordable units.

This shortage of affordable and available units is illustrated in the infographic on the adjacent page. For low-income households overall, 98 rental units are affordable and available for every 100 renter households. However, at lower income levels, the shortage is obvious: only 37 affordable and available rentals for every 100 very low-income households, and only 22

affordable and available rentals for every 100 extremely low-income households²⁹.

Please note that this measure may understate the actual prevalence of housing cost burden among low-income households. For example, a household at 60% AMI could live in an apartment affordable at 75% AMI. The household would be cost burdened, but the rental unit would still count as affordable and available to households between 51% and 80% AMI. In fact, slightly over half of renter households with incomes between 51% and 80% AMI are moderately cost burdened in St. Johns County³⁰. In other words, the estimated 98 affordable and available rentals for every 100 low-income households do not completely eliminate housing affordability problems for renters in this income bracket. Nonetheless, very low-income and extremely low-income renters clearly have the highest level of need in St. Johns County.

Tightened Rental Market

On a national level, the rental market recovered much more quickly than the homebuyer’s market. After peaking in 2009, rental vacancies have declined to levels not seen since the early 2000s. This tightening of the national rental market has been attributed to former homeowners entering the rental market after foreclosures, as well as to young families delaying first-time homeownership³¹.

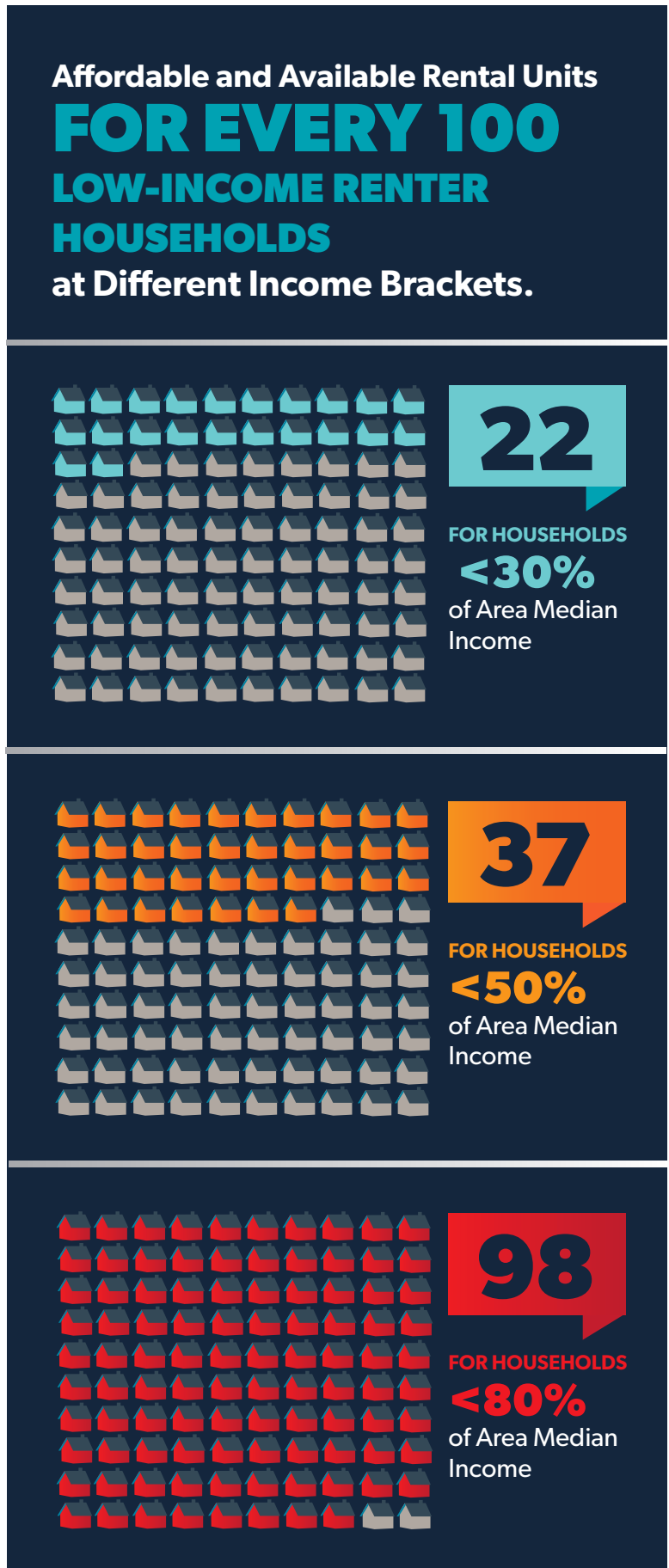
Figure 6 shows rental vacancy rates for St. Johns County and the State of Florida. Rental vacancies in St. Johns County increased from 14% in 2007 to 17% in 2008, and then declined slightly in 2009 (see Appendix 3 for data limitations). Between 2010 and 2013, rental vacancies plunged from 16% to 9%, which may be lower than pre-recession rental vacancy rates. In 2013, the rental vacancy rate had dipped to about 9%, lower than its pre-recession level. Rental vacancy rates in Florida overall have generally been lower, cresting at 12% in 2011 and decreasing slightly to 11% by 2013.

Vacancy rates in any community are usually higher for rental units than for homeownership units, reflecting the fact that renter households tend to move more frequently. As a result, a rental unit is more likely to be vacant at any given time. The generally higher vacancy rates in St. Johns County may reflect a relatively high rate of turnover among tenants, which in turn could point to relatively high levels of economic instability among a subset of renters. It may also reflect a higher concentration of seasonal rentals³³.

In either case, the sharper and quicker decline in vacancy rates in St. Johns County indicates increased competition for rental units. Additionally, the 2013 Analysis of Impediments to Fair Housing reports that over 3,000 rental units have been lost to condominium conversions since the mid-2000s³⁴.

The cost of rental units is, of course, just as important as the supply of vacant rentals for low-income households.

^f In calculating rental vacancy rates, the American Community Survey excludes vacant units that are off the market, it does not distinguish between vacant-for-rent units that are meant for year-round or seasonal occupancy. A rental unit is counted as “occupied” if its inhabitants at the time of the survey live there at least three months out of the year.



As Figure 5 demonstrated, rents in St. Johns County are out of reach for many workers who earn low to moderate wages. This is reflected in the trend of median rents relative to the rents that are affordable to median-income renters, adjusted for inflation (Figure 7).

Despite some year-to-year variability (see Appendix 3), both median gross rents and the rents affordable to median-income renters have been relatively stagnant in St. Johns County since

the depth of the Recession. At the state level, median rents have been similarly stagnant, while affordable rents at median renter income have declined (see Home Matters for Florida 2015). Renter incomes in St. Johns County may be buoyed up by the strong tourism industry and the prevalence of higher-income renters. Nonetheless, median rents have been out of reach for the median-income renter in St. Johns County since 2006, and the gap does not appear to be narrowing.

Figure 6. Rental Vacancy Rates in St. Johns County and the State of Florida. (Source: ACS³².)

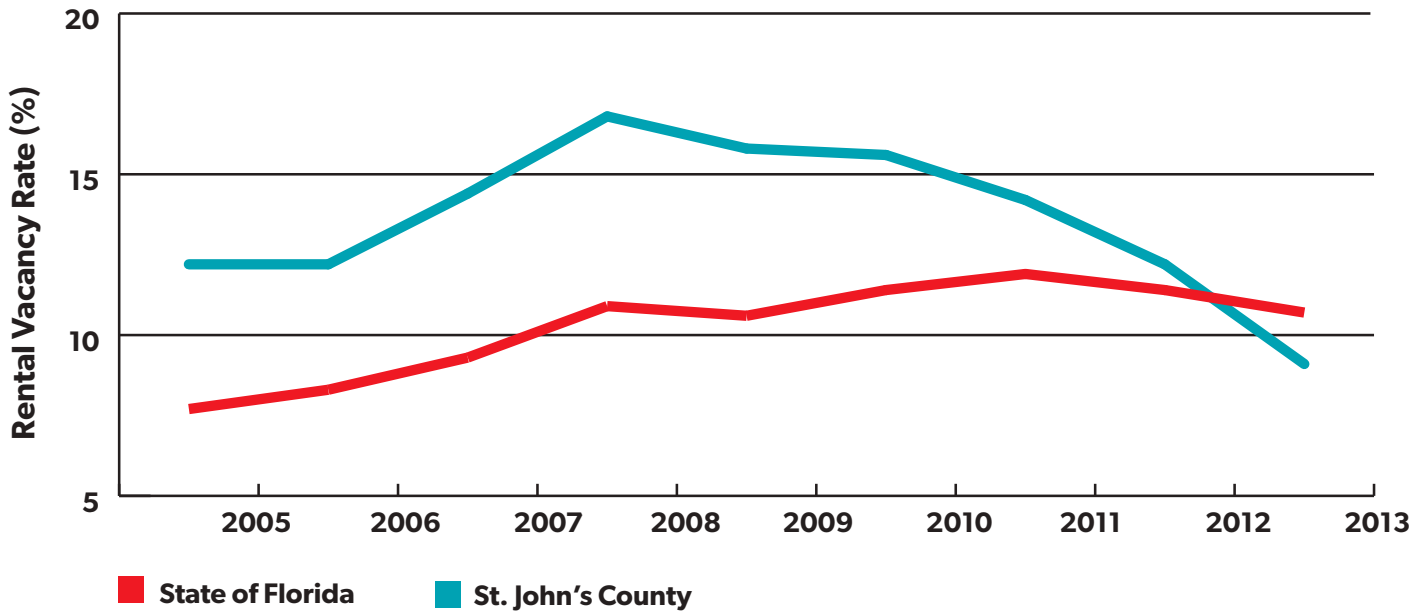
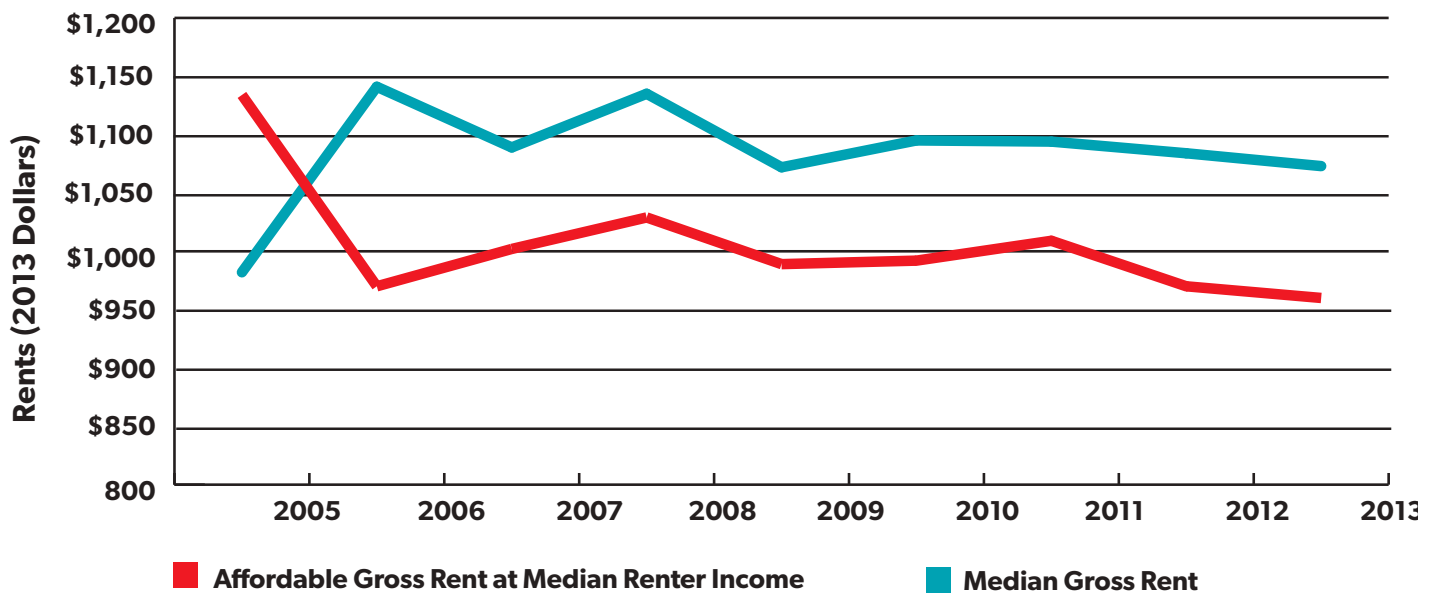


Figure 7. Comparison of Median Gross Rent and Affordable Gross Rent at Median Renter Income in St. Johns County. (Source: ACS³⁵.)



SECTION FOUR:**Challenges for Homebuyers**

Although the Great Recession has tempered American attitudes toward homeownership somewhat, most renters still aspire to own a home one day³⁶. While a community's affordable housing strategy should never neglect or disparage renters, homeownership has undeniable benefits, including a chance to put down roots in a community, gain access to desirable neighborhoods and schools, and build wealth.

For many low- and moderate-income families, homeownership is a viable option—provided it includes strong underwriting criteria and sustainable interest rates (see discussion of Figure 2 on p. 6). Some critics blame the Community Reinvestment Act (CRA) for precipitating the foreclosure crisis, since it requires banks to lend to underserved homebuyers in their communities, but rigorous research dispels this myth. CRA-regulated lenders are subject to strong underwriting standards, and their CRA-related loans have performed similarly to their other mortgage products. Moreover, fewer than 10% of subprime loans in the years before the foreclosure crisis were made by CRA-regulated institutions³⁷, and middle- and high-income homeowners accounted for the most mortgage defaults after 2007³⁸.

Despite the availability of inexpensive bank-owned and short sale homes in the wake of the foreclosure crisis, many Florida communities still have high populations of cost burdened owners and a limited supply of affordable homes for sale. This is certainly true in St. Johns County, where home prices are relatively high and over half of low-income, cost burdened households own their homes (see Figure 2). This section compares the wages of several occupations in K-12 education, an important sector of the economy in St. Johns County, with the wages needed to afford a median-priced home. We then examine the supply of homes for sale at different price points in St. Johns County.

Low Wages Relative to Local Home Prices

The Home Matters for Florida 2015 Report showed that median home prices in three metro areas (Melbourne, Tampa, and Miami) are out of reach for many low- and moderate-income

professionals and paraprofessionals in industries that provide essential services, such as health care, education, and public safety. In St. Johns County, the affordability of homes for K-12 education employees is of particular interest, since the School District plans to build over 10 new schools in the next decade.

According to data from the St. Johns County Property Appraiser on qualified warranty deed sales of single-family homes, townhomes and condominiums, the median sale price for homes sold between October 1, 2013 and September 30, 2014 was \$257,000. This is considerably higher than the statewide weighted median price of about \$166,300 for single-family homes, townhomes, and condos in 2014³⁹. The 2013 Analysis of Impediments to Fair Housing found that St. Johns County has higher home prices than the state as a whole for two reasons: 1) homes are more expensive per square foot, and 2) homes tend to be larger.

As Figure 8 shows, the County's median home sale price is well out of reach for several school employees with entry-level salaries, including teachers, secretaries and administrative specialists, custodians, and food service managers and workers⁸. A teacher, for example, could not afford to buy a median-priced home even if s/he had a spouse with the same annual income. Even with supplemental income from other jobs, these school employees would be unable to afford homes (see box on page 19 for assumptions about supplemental income).

Each entry-level school district employee shown in Figure 9 also falls short of the income needed to buy a home at \$150,000, a price often used to describe starter homes. The required annual income for a \$150,000 home, \$48,926, is close to the HUD income limit of \$50,550 for a low-income family of four in the Jacksonville metro area.

Food service workers and custodians fall short of the income needed even to rent a one-bedroom unit at fair market rent. The ability of food service managers to afford a one- or two-bedroom apartment at Fair Market Rent is dependent on their ability to supplement their salary from the School District.

⁹ The assumptions for calculating "housing wages" for median-priced homes were as follows: 1) 30-year fixed rate mortgage at 4% interest, 2) FHA-insured with a 3.5% down payment, 3) Front-end ratio of 31%, back-end ratio of 41%, 4) All other household debt service is 18% of annual income, 5) Assessed value is 85% of the purchase price, 6) Homestead exemption is \$50,000, 7) Mill levy is \$18.84, and 8) Property and mortgage insurance combined is 1% of the purchase price annually.

Figure 8. Comparison of Annual Incomes for Selected Entry-Level, K-12 School Employees to Annual Incomes Needed to Afford Local Housing. (Source: St. Johns County School District 2015⁴⁰, St. Johns County Property Appraiser 2014⁴¹, Florida DEO 2014.)

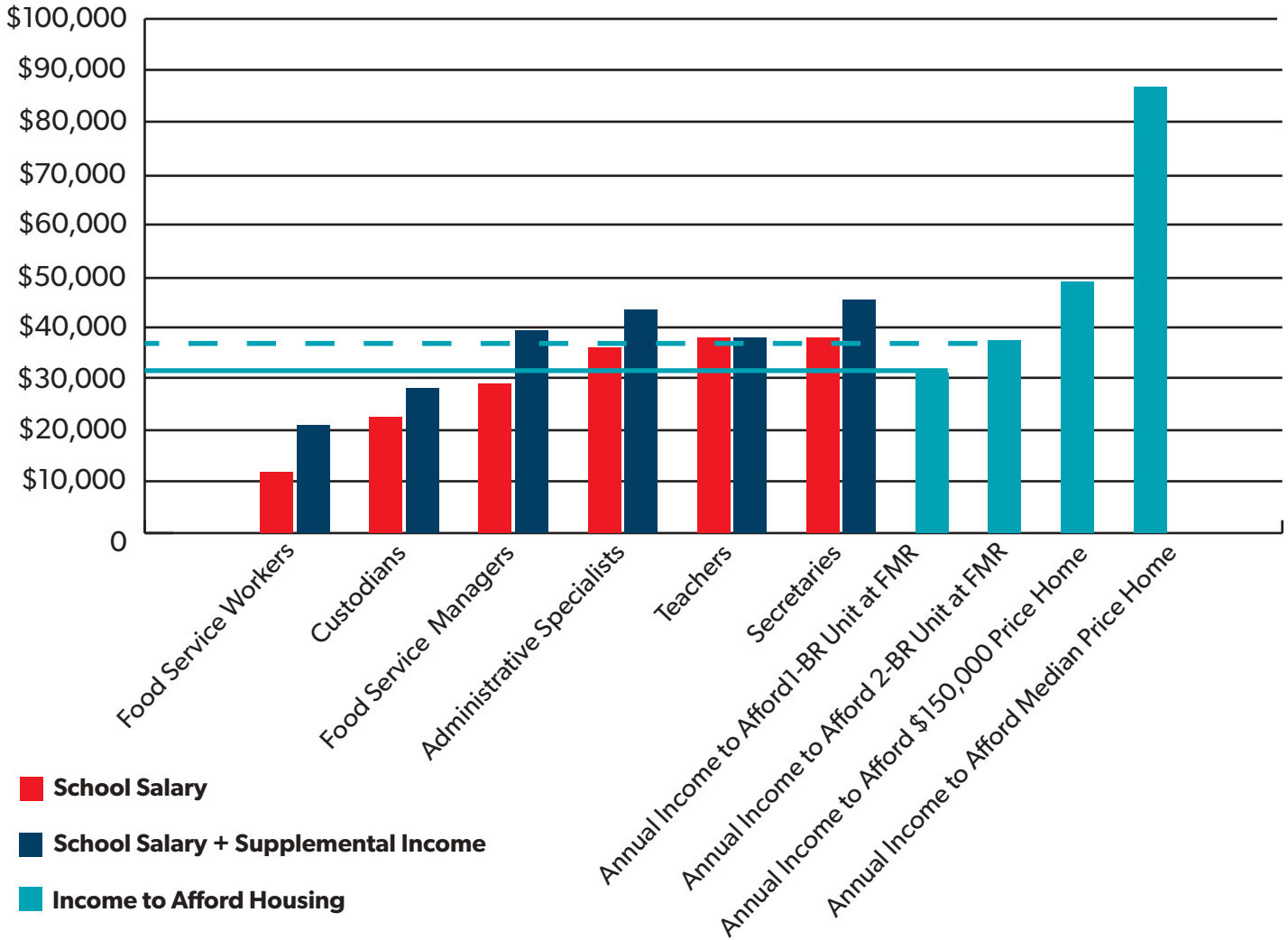
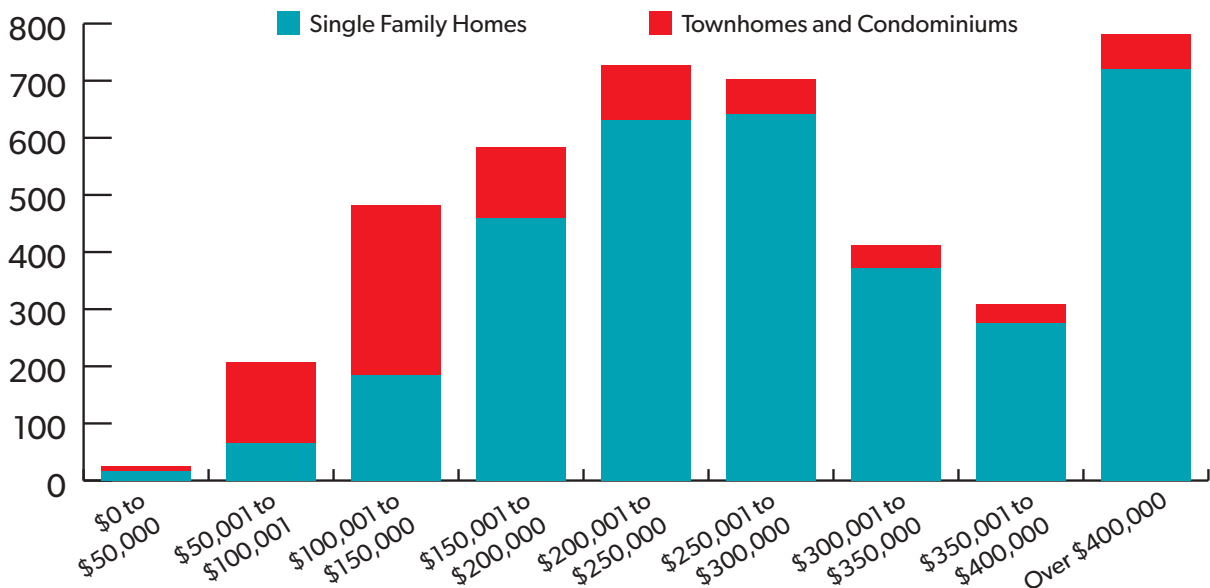


Figure 9. Sale Prices of Single-Family Homes, Townhomes, and Condominiums Sold from 10/1/13 to 9/30/14 (qualified warranty deed sales). (Source: St. Johns County Property Appraiser.)



Limited Supply of Moderately Priced Homes

Even if low- and moderate-income workers in St. Johns County cannot afford median-priced homes, they may be able to buy more modestly priced homes in the local inventory. However, the supply of homes at price points available to these workers and their families is limited. Figure 9 shows the distribution of sale prices for single-family homes, townhomes, and condominiums sold between October 1, 2013 and September 30, 2014. The market is clearly skewed toward higher-priced homes, with sales over \$150,000 accounting for 83% of the total.

In the 51% to 80% AMI income bracket, St. Johns County has 2,095 cost burdened renters⁴², of which 460 are severely cost burdened

(see Figure 2). Many of these renters would undoubtedly like to buy a home someday. The 714 homes sold for \$150,000 or less could, in theory, have made a dent in the severely cost-burdened renter households between 51% and 80% AMI^h. However, this number would fall far short of housing moderately cost burdened renters—let alone the 2,045 severely cost burdened owners who may want to downsize to a less expensive house (Figure 2). Moreover, this home sale data tells us nothing about the condition of the homes. Many of the less expensive single-family homes and condos may be “fixer-uppers” that require tens of thousands of dollars in repairs.

^h According to HUD’s 2014 income limits, the maximum income for low-income households in the Jacksonville metro area ranges from \$35,400 for a single person to \$66,750 for an 8-person household. Whether the supply of homes for sale at or below \$150,000 could meet the needs of low-income, severely cost burdened renter households depends on the number of bedrooms in the homes and the sizes of the renter households.

Annual Salaries & Estimated Supplemental Income of Selected St. Johns County School District Employees

The table below shows detailed data for Figure 8. The St. Johns County School District, upon request, selected five occupations for which to provide data on entry-level salary, number of days working for the School District during each calendar year, and the duration of a daily shift. We assumed that entry-level employees in the selected occupations (except for teachers) work 8 hours per day in a comparable occupation on days that they are not working for the School District. Please note that these days are not all consecutive—they include weekends and holidays during the school year, in addition to summer break. Since it would be impractical for school employees to fill all of these days with supplemental employment, our estimates of supplemental income are conservatively high.

For supplemental employment, we used the entry-level wage for comparable occupations from the Florida Department of Economic Opportunity’s Occupation and Employment Statistics (OES). Entry-level wages are appropriate because 1) the analysis focuses on entry-level School District employees, and 2) these employees have such narrow windows of time outside of their School District work that they may rely on staffing agencies, which pay lower wages than direct employment.

According to the School District data, food service workers have 6-hour shifts, teachers have 7.5-hour shifts, and the other three occupations have 8-hour shifts. We considered teachers to have full-time work, since they spend many hours outside of school grading papers and creating lesson plans. However, we assumed that food service workers would seek enough supplemental employment to bring their average work day up to 8 hours.

School Employee	Entry-Level Annual Salary	Days Not Working at School	Comparable Occupation	Entry-Level Wage	Total Income When Not at School	Total Annual Income
Teachers	\$38,000	169	N/A	N/A	N/A	\$38,000
Food Service Workers	\$11,914	179	Combined Food Preparation and Serving Workers	\$8.45	\$9,090	\$21,004
Custodians	\$22,599	113	Janitors and Cleaners	\$8.48	\$5,476	\$28,075
Secretaries	\$38,000	169	Secretaries and Administrative Assistants	\$10.40	\$7,429	\$45,429
Administrative Specialists	\$36,000	179	Secretaries and Administrative Assistants	\$10.40	\$7,429	\$43,429
Food Service Managers	\$29,050	113	First-Line Supervisors of Food Preparation and Serving Workers	\$10.90	\$10,277	\$39,327

(Source: St. Johns County School District 2015, Florida DEO 2014.)

SECTION FIVE:

Future Trends

The number of low-income, cost burdened households in St. Johns County is expected to rise in tandem with overall population growth, and the production of homes and apartments affordable to low-income families is not likely to keep pace under a business-as-usual scenario. Of particular concern is the “Silver Tsunami”, which will increase the population of low-income elderly people who are subject to high housing costs, and at risk of being institutionalized at taxpayer expense. This section provides a qualitative analysis of the future of housing affordability in St. Johns County.

More Low-Income, Cost Burdened Households

The Shimberg Center for Housing Studies at the University of Florida projects the number of cost burdened households by age of household head, income bracket, and tenure through 2040⁴³. As Table 6 shows, the number of low-income households that are severely cost burdened is expected to increase by over 9,000 between 2015 and 2040, from 12,128 households to 21,245 households. The number of low-income, elderly-headed, severely cost burdened households will more than double, from 3,432 in 2015 to 7,684 in 2040. On average, the projected annual growth rate of low-income, severely cost burdened households is 365. For the subset of these households that are headed by an elderly person, the projected annual growth rate is 170 households.

Affordable Housing Demand Likely to Exceed Supply

The projected increase in low-income, cost-burdened households shown in Table 6 does not take into account any new affordable

housing production. However, if affordable units (both subsidized and unsubsidized) are produced at a constant rate through 2040, it is unlikely that they will meet the future need for affordable housing.

For low-and moderate-income homebuyers, new building activity in St. Johns County will not necessarily relieve the pressure on home prices. Although the County Building Department issued 2,533 single-family permits in 2014, the average building value (excluding land value) was over \$279,000⁴⁴. By comparison, the average sale price (building and land combined) of single-family homes sold between 10/1/2013 and 9/30/2014 was \$275,000⁴⁵. It appears that new single-family home construction is targeted to the same affluent buyers who currently dominate the County’s home sale market.

In the rental market, the share of units with rents of \$1,250 and higher has declined, while the share of units renting for \$800 to \$999 has increased (Figure 10). Gross rents between \$800 and \$999 are affordable to households with annual incomes between \$32,000 and \$39,960, but Figure 10 shows contract rents for vacant-for-rent units. Taking utility costs into account, some of these units may be affordable to families at the high end of the low-income spectrum. However, there are several reasons not to place excessive confidence in the ability of the private rental market to serve these families:

1. The data in Figure 10 does not compare the mix of moderately priced units to the average size of moderately low-income families. For example, a family of four would be

Table 6. Projections of Low-Income, Severely Cost Burdened Households in St. Johns County*.

(Source: Shimberg Center for Housing Studies 2015a.)

Household Type	2015	2020	2025	2030	2035	2040	Average Annual Change (# of Households)
All Low-Income, Severely Cost Burdened Households	12,128	14,371	16,368	18,214	19,804	21,245	365
Low-Income, Severely Cost Burdened Owner Households	7,062	8,469	9,666	10,867	11,812	12,722	226
Low-Income, Severely Cost Burdened Renter Households	5,066	5,902	6,702	7,347	7,992	8,523	138
Low-Income, Severely Cost Burdened Elderly-Headed** Households (Owner and Renter)	3,432	4,544	5,545	6,684	7,254	7,684	170

*The data for all years shown are projections.

**Household head is 65 or older.

understandably reluctant to rent a unit with only one or two bedrooms, especially if they have children of different sexes.

2. The supply of vacant-for-rent units between \$800 and \$999 may not increase indefinitely. The increase seen during the recession and its aftermath may be a market correction after the excesses of the housing boom.
3. As discussed on p. 14, low-income renters are competing with higher-income households for moderately priced rentals.
4. Even if enough vacant-for-rent units were affordable and available for families between 51% and 80% of AMI, these families may prefer to buy homes. As Figure 10 shows, St. Johns County offers limited homeownership opportunities even for families near the top of the low-income spectrum.

The share of vacant-for-rent units below \$799 per month—those most affordable to the lowest-income families—is small and gradually declining. Units renting for \$600 to \$799 per month decreased from 18% of vacant-for-rent units in 2009 to 15% in 2013—from 584 to 329 units in absolute numbers. During the same period, units renting for \$599 or less decreased from 9% to 8% of vacant-for-rent units, an absolute drop from 286 to 162 units. These low-cost rental units tend to be older than the

overall rental housing stock, and are at greatest risk of loss due to demolition or conversion to higher-cost units⁴⁷.

The subsidized portion of the rental market in St. Johns County is limited, and the rate of production is slow. The County currently has 1,482 subsidized rental units in 25 privately owned developments (Table 7), with funding sources including the State Apartment Incentive Loan (SAIL) program, Low Income Housing Tax Credits, rental assistance contracts from HUD and the U.S. Department of Agriculture, state HOME funds, local bonds, and others. Since 2005, the County has lost three affordable housing developments with a total of 156 units, due to their affordability restrictions expiring. By 2024, another three developments with a total of 86 units may be lost from the County’s affordable housing stock. If the affordability restrictions for these developments are not extended, St. Johns County will have lost about 12 subsidized units per year between 2005 and 2024.

Production of subsidized housing in St. Johns County has slowed since the height of the housing boom. Between 2000 and 2007, nine developments with a total of 917 units were constructed, a production rate of about 115 per year. Most of these units are in six multifamily developments listed in the Shimberg Center’s

Figure 10. Rent Asked for Vacant-For-Rent Units in St. Johns County. (Source: ACS⁴⁶.)

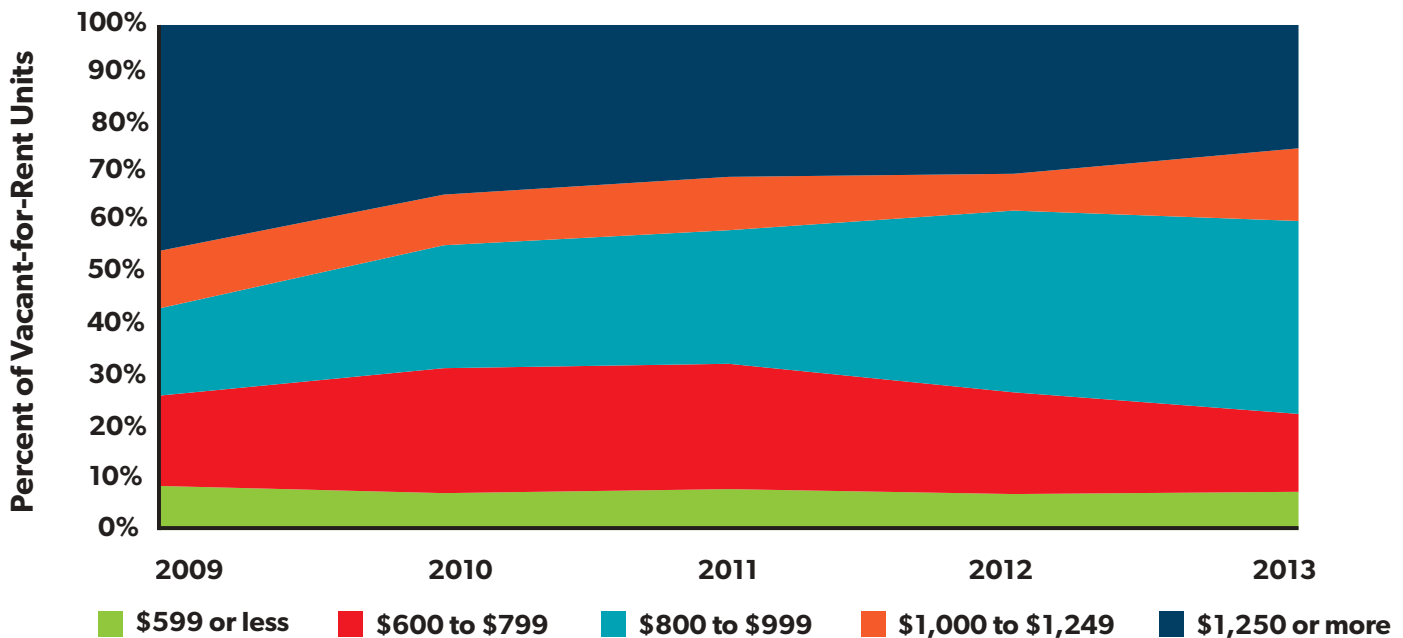


Table 7. Privately Owned, Subsidized Rental Housing in St. Johns County.

(Source: Shimberg Center for Housing Studies 2015b⁴⁸, data provided by local affordable housing providers⁴⁹, personal communication with property managers⁵⁰, Florida Housing Finance Corporation⁵¹.)

Category	Number of Units	Number of Developments
All subsidized rental housing currently in service	1,482	25
Lost from subsidized rental stock since 2005	156	3
Affordability restrictions set to expire before 2025	86	3
Subsidized rentals constructed between 2000 and 2007	917	9
Subsidized rentals approved for funding, not yet in service	10	2

Assisted Housing Inventory, which tracks rental units constructed or rehabilitated with major federal, state, and local funding sources (e.g. Low Income Housing Tax Credits, HUD and USDA rental assistance, state HOME funds, local bonds, etc.). Since 2008, local housing providers have added 70 new units, or about 10 per year, to the affordable rental stock through construction, acquisition, master leasing, or assumption of management responsibilities. Another ten units have been approved for funding, and will likely come online in 2015 or 2016. See Appendix 5 for a list of all subsidized rental developments in St. Johns County.

The Shimberg Center's Assisted Housing Inventory does not explicitly track units subsidized by the County's State Housing Initiatives Partnership (SHIP) program, an important locally controlled funding source discussed in Section 6. SHIP provides assistance primarily for homeownership activities, but also supports rental housing. In St. Johns County, SHIP assistance strategies include purchase assistance, rehabilitation of owner-occupied housing, disaster recovery, assistance with utility connection fees, and rental construction subsidies. In recent years, the number of housing units in the County assisted by SHIP has ranged from 12 in the 2011-12 fiscal year, when funding was severely limited, to 114 in the 2008-09 fiscal year. Between the 2006-07 and 2011-12 fiscal years, SHIP assisted an average of 64 housing units per year⁵².

In a business-as-usual scenario, the annual rate of units assisted by SHIP and state multifamily rental funds is not likely to keep pace with the annual increase in severely cost burdened households, let alone help the pool of severely cost-burdened households already living in St. Johns County. If we optimistically use available data for the most productive years for affordable housing (115 multifamily rental units + 114 SHIP-assisted units⁵³), the number of units assisted would fall short

of the annual increase in severe cost burden (365 households annually; see Table 6).

Moreover, St. Johns County is unlikely to return to pre-recession rates of affordable housing production in the near future, assuming a business-as-usual scenario. In recent years, affordable multifamily developers have had difficulty qualifying for Low Income Housing Tax Credits (LIHTC), an important source of financing for large developments. Since SHIP funds were often used as gap financing for LIHTC developments, the annual count of SHIP-assisted units is likely to be lower as well. Section 6 discusses strategies for overcoming "business-as-usual" in St. Johns County.

Silver Tsunami

As Table 6 shows, the number of low-income, elderly-headed households that are severely cost burdened in St. Johns County is expected to increase from about 3,400 in 2015 to over 7,600 in 2040. As people age, they are more likely to live on fixed incomes and have disabilities, and may struggle to remain in their homes due to high housing costs or lack of handicap-accessibility features. Aging baby boomers, in particular, are more likely to have high debt loads and less likely to have pensions than the generation that preceded them, further limiting their ability to move to more affordable, accessible homes or pay for retrofits to their current homes. Elders whose homes are unaffordable or lacking accessibility features may be forced to cut back on other necessities or move into nursing homes or assisted living facilities—at considerable taxpayer expense⁵⁴.

The homeownership rate among elderly-headed households in St. Johns County is projected to be 84% in 2040 (Appendix 4), about the same as in 2015. Homeowners generally enter old age in a better financial position than renters, since they often have paid off

their mortgages and have more wealth (in their homes and other sources)⁵⁵. Indeed, in St. Johns County, only 12% of elderly-headed owner households are predicted to be low-income and severely cost burdened in 2040, compared to 31% of elderly-headed renter households. However, since the homeownership rate among elderly-headed households is so high, the majority of low-income, severely cost burdened elderly households will be homeowners.

In many cases, elderly homeowners live in aging units that are water-and energy-inefficient. Even if property taxes, insurance, and any remaining mortgage costs are affordable, high water and energy costs may push an elderly homeowner's total housing costs above the cost burdened threshold. These homeowners benefit from federal, state, and local programs that subsidize energy and water conservation measures, including sealing cracks in the building envelope, improving insulation, fixing water leaks, installing low-flush toilets, and repairing or replacing inefficient heating and cooling units.

Whether or not they meet the definition for being housing cost burdened, low-income elderly homeowners may face challenges with housing quality and accessibility. For these elders, financial assistance with rehabilitations and retrofits—including installing wheelchair ramps, installing grab bars in bathrooms, and widening doorways to make them wheelchair-accessible—can make the difference between aging in place and being forced to move.

The County's SHIP program often helps to pay for these repairs, and 25% of SHIP-assisted units between the 2006-07 and 2011-12 fiscal years were occupied by or targeted to elderly-headed households. The share of low-income, severely cost burdened owner households that are elderly-headed is projected to increase from 33% in 2015 to 42% in 2040, suggesting that the County's SHIP program will have to spend a greater share of its funds on programs such as owner-occupied rehabilitation.

For elderly renters that are low-income and severely cost burdened, subsidized and handicapped-accessible housing is often the best approach. In fact, subsidized rental housing is generally more likely to have accessibility features than unassisted rentals⁵⁶. The share of low-income, severely cost burdened renter households that are elderly-headed is projected to increase from 22% in 2015 to 28% in 2040. Among the County's privately owned, subsidized rental housing (see Table 7), about 33% of units are targeted

toward elderly households. This suggests that affordable rental production is already well calibrated to the relative needs of elderly and non-elderly low-income households.

If St. Johns County shifted all of its affordable housing resources to constructing and rehabilitating housing for elders, it would pit this population's needs against the needs of children, their parents, people experiencing homelessness, and non-elderly people with disabilities. The best way to ensure that St. Johns County meets the housing needs of its growing elderly population is to ensure that local and regional affordable housing developers have the resources they need to serve both elderly and non-elderly households. Public- and private-sector support for dwelling-level and neighborhood-level features that improve accessibility—including wheelchair accommodations and access to public transit—will ensure that elders benefit from future affordable housing development.

With the help of SHIP funds, Mr. Pullium was able to replace his garden tub with a low-threshold shower equipped with grab bars and a bench.



SECTION SIX:

Affordable Housing Resources

Despite being a wealthy community, popular with tourists and retirees, St. Johns County has a substantial minority of households that are low-income and struggling with high housing costs. Both median rents and home sale prices are out of reach for many low-income workers, and the supply of modestly priced homes and apartments is limited. For working families who find lower-cost housing far from their jobs, their combined housing and transportation costs can easily absorb over half of their income. Meanwhile, an increasing number of individuals and families are literally homeless, doubled up, or living in motels. Going forward, the production and preservation of affordable housing in St. Johns County is not likely to keep pace with increased demand, let alone meet the needs of those who are already cost burdened or without permanent housing.

In the next few years, St. Johns County expects to become a HUD entitlement community, making it eligible for much-needed direct HOME and Community Development Block Grant allocations. However, there will always be a need for a locally controlled, highly flexible funding source, both to serve as a local match and to fund activities that may not comply with federal housing programs. State and local affordable housing funds can also buffer against fluctuations in federal funding. In St. Johns County and other Florida communities, the Sadowski State and Local Housing Trust Funds meet this need. The following section describes the structure and impact of the Sadowski Funds in St. Johns County, and their role in leveraging public-private partnerships.

Sadowski History and Major Programs

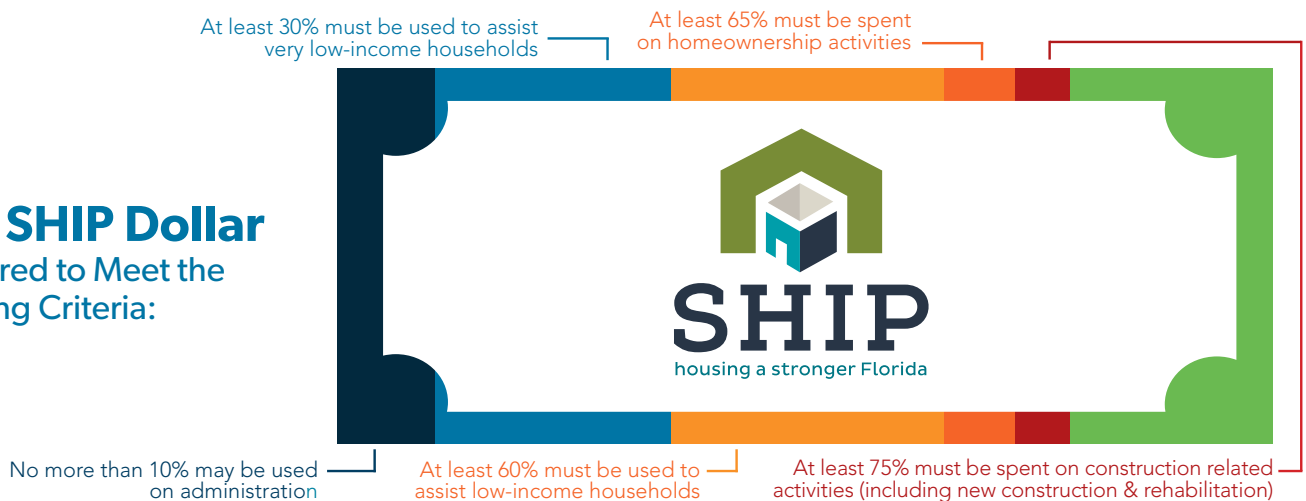
More than 20 years ago, a diverse coalition of Florida’s affordable housing advocates, business and industry groups, and faith-based organizations recognized the need for a dedicated state revenue source for affordable housing. In 1992, the state legislature passed the William E. Sadowski Affordable Housing Act, named after a Department of Community Affairs secretary who had recently died in a plane crash. The Sadowski Act raised the state documentary stamp tax on deeds by ten cents per \$100 of the property’s value¹, and directed the new funds to two trust funds, one for local governments and one for the state.

The Local Housing Trust Fund supports the State Housing Initiatives Partnership (SHIP) program, which primarily funds the production and preservation of affordable ownership housing for low- and moderate-income households. The Florida Housing Finance Corporation uses a population-based formula to distribute SHIP funds to all 67 counties and to cities eligible for Community Development Block Grant (CDBG) funds. SHIP is most commonly used to support home construction, rehabilitation to make homes safe and/or handicapped accessible, and down payment assistance. It gives local governments plenty of flexibility to meet local needs and preferences, as long as a few basic requirements are met. These requirements, found in Florida Statute 420, include:

- At least 65% must be spent on homeownership activities
- At least 75% must be spent on construction (including new construction and rehabilitation)
- At least 30% must be used to assist very low-income households
- At least 60% must be used to assist low-income households
- No more than 10% may be used on administration

¹ In 1995, the State Legislature shifted another ten cents of documentary stamp tax revenue from general revenue to the Sadowski trust funds.

Each SHIP Dollar is Required to Meet the Following Criteria:



The State Housing Trust Fund supports several activities, including administration of the Sadowski funds by Florida Housing. The main Sadowski-funded state program is the State Apartment Incentive Loan (SAIL) program. SAIL provides funding on a competitive basis for the construction of affordable multifamily rental housing. SAIL usually serves as “gap financing” for developments with other funding sources, such as the Low Income Housing Tax Credit.

Impact of Sadowski Funds in St. Johns County

The amount of SAIL funding that St. Johns County receives in any given year depends on whether proposed developments in the County receive SAIL funds from the State. SHIP funding, on the other hand, is guaranteed so long as the State Legislature appropriates the Sadowski Trust Fund monies dedicated for this purpose. If the funds are fully appropriated for housing, St. Johns County is expected to receive over \$1.9 million in SHIP funds in FY 2015-2016 (Table 8). This SHIP allocation would leverage over \$8.3 million in additional public and private funds—a ratio of 4.4 to 1. The funds leveraged by SHIP would assist 79 owner-occupied and 28 rental units, creating nearly 200 jobs and generating over \$24.8 million in economic impact for the County. (See the Sidebar on page 23 for a local example of using SHIP to leverage other resources.)

In addition to boosting the County’s economy, SHIP has given numerous low- and moderate-income families a hand up (Table 9). SHIP assisted 382 housing units in St. Johns County between FY 2006-07 and FY 2011-12. During this time period, the share of SHIP-assisted units occupied by elderly and homeless households

is similar to that for statewide SHIP expenditures. The share of SHIP-assisted units occupied by households with a member with developmental disabilities (1.3%) was lower than for the state as a whole (3.1%). For their FY 2013-14 and 2014-15 allocations, all SHIP communities will likely report higher shares of assisted units occupied by people with developmental disabilities, due to proviso language requirements in the legislative appropriation of SHIP funds for these years.

Additional Funding Sources

As important as the Sadowski Trust Funds are, they were never meant to single-handedly meet the affordable housing needs of Florida communities. They were intended to leverage a wide variety of public and private resources, including federal funding programs, local government contributions, support from local foundations and businesses, and volunteer hours. Local “skin in the game” is especially important—it shows that the community recognizes how a broad range of housing options improves its overall quality of life.

The beginning of this section discussed the potential benefits to St. Johns County of becoming a HUD entitlement community. Additional public support could come in the form of increased general revenue commitments from the County government, as well as a commitment from the Community Redevelopment Agency to include affordable housing in new residential and mixed-use developments. Consistent support from local public agencies allows affordable housing developers to gain experience and organizational capacity, laying the groundwork for leveraging private-sector contributions.

Table 8. Estimated Economic Impacts of State Housing Initiative Partnership Funds in St. Johns County (Source: Sadowski Coalition 2014⁵⁷.)

Type of Impact	Amount of Impact
Projected Trust Fund Revenue in FY 15/16	\$1,907,266
Other funds leveraged	\$8,364,993
Owner-occupied units assisted	79
Rental units assisted	28
Total jobs created	197
Total economic activity generated	\$24,831,537

Table 9. SHIP-Assisted Units in St. Johns County and the State of Florida. (Source: Florida Housing Finance Corporation⁵⁸.)

SHIP Impact FY 2006-2007 to 2011-2012	SHIP Impact FY 2006-2007 to 2011-2012	
	St. Johns County	State of Florida
Target Population		
Total units	382	34,872
Elderly (% of Total Units)	25%	24%
Homeless (% of Total Units)	1.3%	1.4%
Developmental Disabilities (% of Total Units)	1.3%	3.1%

Conclusion

Affordable Housing is Essential for St. Johns County

Having a healthy, affordable place to call home is the foundation of our lives and the basis of a strong local economy. Affordable housing allows low- and moderate-income working families to live near their places of employment, and enables our elderly and disabled family members on fixed incomes to be integrated in their neighborhoods.

- Affordable housing construction and rehabilitation stimulates local economies by creating jobs and generating business for contractors and suppliers.
- Affordable housing improves a family's physical and mental health, and helps children excel in school.
- For the elderly and people with disabilities, affordable community-based housing is one-third of the cost of institutional care.
- For people who are chronically homeless, affordable housing breaks the costly cycle through hospitals, jails, and other taxpayer-funded crisis systems, saving about \$20,000 per person per year.

We Don't Have Enough Affordable Housing in St. Johns County:

- 14,370 households are paying more than 30% of their incomes for housing, the maximum amount considered affordable by experts.
- About 6,800 very low-income households are severely cost burdened, meaning that they pay more than 50% of their incomes for housing.
- Nearly 680 school-aged children and youths were doubled up with family and friends, living in motels, in homeless shelters, or on the street in academic year 2012-13, a 98% increase from academic year 2009-10.
- The number of unaccompanied homeless children and youths in our public schools increased by 171% between the 2009-10 and 2012-13 academic year.
- St. Johns County has the region's highest housing prices, and a typical low-income family pays 71% of its income for housing and transportation costs combined.

Many St. Johns County Workers Don't Earn Enough to Pay for Housing:

- Many low-wage workers in the region's most common occupations—including nursing assistants—don't earn

enough for a 1-bedroom apartment at Fair Market Rent.

- Even at the median renter income of \$38,414, a median-priced rental unit in St. Johns County is unaffordable.
- St. Johns County has only 37 affordable and available rental units for every 100 very low-income renter households.
- Median-priced homes in St. Johns County are well out of reach for many low- and moderate-income homebuyers, including many public school employees. Modestly priced homes for sale are in short supply.

Business as Usual Won't Keep Pace with Affordable Housing Need:

- The total number of low-income, severely cost burdened households is projected to increase by over 9,000 between 2015 and 2040, and the number of low-income elderly households that are severely cost burdened will more than double.
- New single-family homes and rental vacancies are not likely to be offered at prices affordable to low-income families.
- The current level of affordable housing subsidies available in St. Johns County will not keep pace with the rising demand for affordable housing.
- To ensure that the County's growing elderly population can live safely in their homes for as long as possible, we must scale up our affordable housing construction and rehabilitation efforts across the board. Accessibility retrofits are also vital to keeping elders in their homes.

St. Johns County is at a Crossroads

In many ways, St. Johns County is grappling with the consequences of its own success. Because we are an attractive community with low taxes, our population and demand for services have grown. As County citizens discuss the best way to sustain the public services that contribute to our high quality of life, we must remember that "we"—all of us—are members of this community and have a basic need for safe and affordable housing. Our janitors and nursing assistants are just as much a part of our community as our doctors, lawyers, and retirees. Our economy depends on the ability of every worker, job seeker, elder, and person with disabilities to have a decent place to call home.

When a significant share of our population can't find decent affordable housing, our quality of life is eroded. Employers struggle with

higher employee absenteeism, tardiness, and turnover, and customers get poorer service. Residents in substandard, low-cost housing struggle with poor indoor air quality, high utility costs, and other health and safety issues. The hidden costs of insufficient affordable housing include higher health insurance premiums, uncompensated health care provided by local hospitals, and higher taxes for public facilities like jails and detox centers.

For affordable housing developers and their partners, the State Housing Initiatives Partnership (SHIP), funded by the Sadowski Local Housing Trust Fund, has historically played a keystone role in leveraging public-private partnerships in St. Johns County. If the County receives its full SHIP allocation for FY 2015-16, it will create nearly 200 jobs and generate nearly \$25 million in positive economic impact.

Clearly, one of the most important things that St. Johns County leaders can do to promote affordable housing is to consistently advocate for full appropriation of the Sadowski State and Local Housing Trust Fund monies for housing. However, ensuring that we have a healthy mix of housing options is ultimately a community responsibility, requiring a community effort. This effort requires us to look both outward and inward—outward at more effective use of state and federal funding sources, and inward at our local tax base, business and faith communities, charitable organizations, and ordinary St. Johns County residents willing to volunteer their time. A healthier balance of homes at all price levels means a stronger St. Johns County.



HOME MATTERS FOR ST. JOHNS COUNTY'S FAMILIES



HOME MATTERS FOR ST. JOHNS COUNTY'S SPECIAL NEEDS POPULATIONS



HOME MATTERS FOR ST. JOHNS COUNTY'S ELDERLY



HOME MATTERS FOR ST. JOHNS COUNTY'S VETERANS



HOME MATTERS FOR ST. JOHNS COUNTY'S YOUTH AGING OUT OF FOSTER CARE



HOME MATTERS FOR ST. JOHNS COUNTY'S ECONOMY

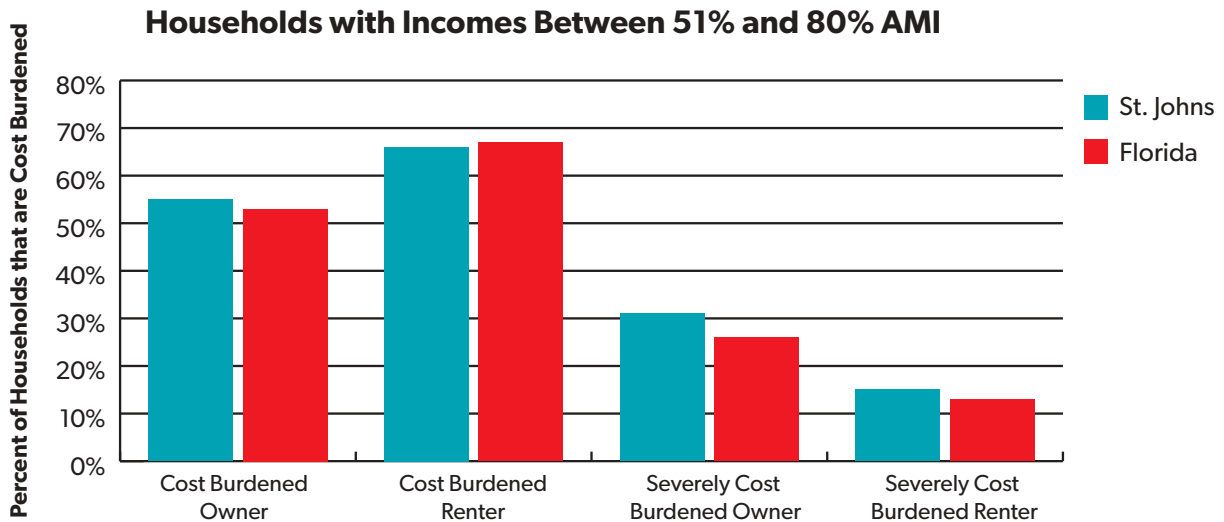
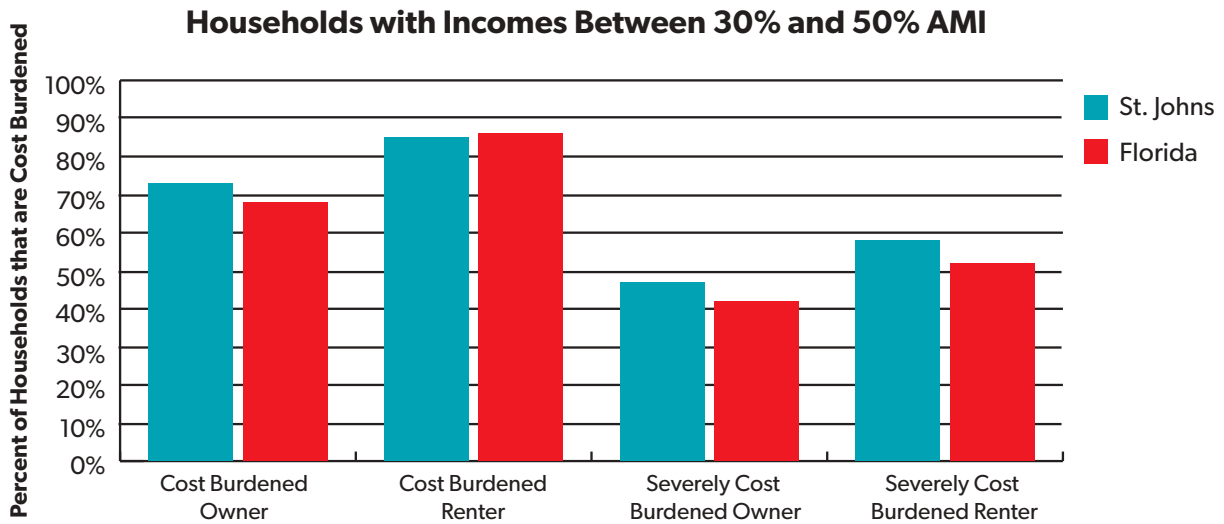
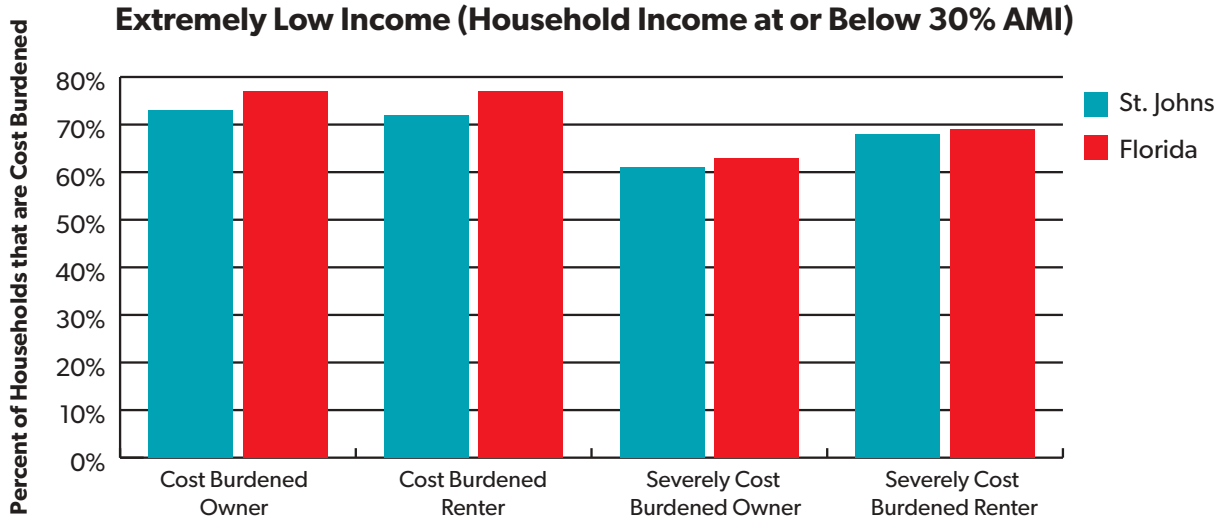
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- ⁵⁰ Personal Communication, 2/24/2015 with property managers or parent company representatives for Hastings Manor and Summerset Village to clarify Shimberg Center for Housing Studies data on assisted housing and lost affordable housing properties in St. Johns County. Hastings Manor's affordability period is still in effect, and "renews automatically" according a parent company representative. At Summerset Village, all 216 units still have affordability restrictions; none have been lost from the affordable housing inventory. We were unable to contact a representative of Casa Del Mar, which will lose affordability restrictions in 2015 according to Shimberg data. We made a conservative assumption that Casa Del Mar's affordability restrictions will be renewed and will still be in place after 2025.
- ⁵¹ Florida Housing Finance Corporation. In a review of applications selected in Requests for Applications [RFAs] in 2013 and 2014, we identified the Moultrie Lakes Condominium and Pacetti Group Home projects, which were awarded funding pursuant to RFA 2013-006 and RFA 2014-105, respectively.
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- ⁵³ At least one multifamily rental property in the Shimberg Center's Assisted Housing Inventory [AHI] for St. Johns County received SHIP funds. However, the Shimberg Center does not collect data on whether developments in the AHI received SHIP funds. As a result, this optimistic estimate of annual affordable housing production is likely to double-count some units.
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APPENDIX 1:

Housing Cost Burden by Tenure



(Source: 2007-2011 CHAS data.)

APPENDIX 2:**Owner and Renter Housing Unit Data**

Variable	2005	2006	2007	2008	2009	2010	2011	2012	2013
Owner Occupied	49,100	49,721	50,529	51,387	53,454	54,234	55,240	56,768	58,210
Renter Occupied	14,155	18,169	15,345	16,135	14,673	16,090	16,567	17,253	17,348
Owner Vacancy Rate	2%	4%	4%	4%	5%	4%	4%	3%	3%
Renter Vacancy Rate	12%	12%	14%	17%	18%	16%	14%	12%	9%
Owner Units (occupied and vacant)	49,949	51,955	52,470	53,696	55,973	56,730	57,482	58,705	59,887
Renter Units (occupied and vacant)	16,122	20,694	17,926	19,393	17,850	19,064	19,309	19,650	19,085
Homeownership Rate	78%	73%	77%	76%	78%	77%	77%	77%	77%
Percent Owner Units (occupied and vacant)	76%	72%	75%	73%	76%	75%	75%	75%	76%

ACS. [5-year estimates for years 2009 through 2013; 3-year estimates for 2007 and 2008; 2005 and 2006 ACS]

APPENDIX 3:**A Note on Methodology**

For analyses that required American Community Survey data, we used 5-year estimates whenever possible. Although 1- and 3-year estimates are more current than 5-year estimates, they are less reliable because each data point has a relatively high margin of error. The smaller the population of the geographic area in which data is gathered, the higher the margins of error are likely to be. Because St. Johns County has a much smaller population than the State of Florida as a whole, analyses of trends over time are far more likely to be distorted by random variations in the estimates from year to year. Preliminary analyses showed that, for certain variables of interest in St. Johns County, 5-year ACS data showed similar underlying trends over time as 1- or 3-year ACS data, with fewer random fluctuations.

5-year ACS estimates were not available for some variables in some years. For 2007 through 2009, we used 3-year ACS estimates for variables that did not have 5-year ACS estimates. The 2005 and 2006 ACS estimates are effectively 1-year estimates, although these survey years did not have the full scope of subsequent 1-year estimates. In this report, we presented ACS data from 2005 to 2009, in addition to more recent years, for the reader's reference. However, readers should not use the data to draw conclusions about trends in the years when 5-year estimates were not available, or about differences between more recent years and the years prior to 2009 or 2010. Each figure that shows a change in a variable over time includes a citation of the ACS estimates used.

APPENDIX 4:**2040 Projections of Severe Cost Burden Among Low-Income Elderly-Headed Households.**

Elderly-Headed Owner Households	39,119
Elderly-Headed Renter Households	7,729
Homeownership Rate Among Elderly-Headed Households	84%
Low-Income, Severely Cost Burdened, Elderly-Headed Owner Households	5,280
Percent of All Elderly-Headed Owner Households	12%
Low-Income, Severely Cost Burdened, Elderly-Headed Renter Households	2,404
Percent of All Elderly-Headed Renter Households	31%

(Source: Shimberg Center for Housing Studies 2015a.)

APPENDIX 5:**Affordable Rental Housing Inventory in St. Johns County**

Development Name	Affordable Units	Year Built or Added to the Affordable Housing Stock
Hastings Apartments	20	1971
Woodlawn Terrace Apartments	76	1971
Casa Del Mar Apartments	29	1978
Southern Villas Apartments	60	1981
The Oaks Apartments	32	1983
Hastings Manor Apts	23	1990
Arc Of St. Johns County	15	1992
Huguenot Harbour	34	1995
Woodcrest	90	1997
Whispering Pines - St Augustine	145	1999
Maxwell Manor*	12	2000
[Homes purchased by the Emergency Services & Homeless Coalition of St. Johns County]*	13	2001
Ponce Harbor	144	2002
Whispering Woods	200	2003
Oaks At St. Johns	160	2004
[Homes purchased by the Emergency Services & Homeless Coalition of St. Johns County]*	4	2004
Summer Breeze Apartments	132	2006
Summerset Village Senior	216	2006
Maxwell Manor II	36	2007
[Home purchased by the Emergency Services & Homeless Coalition of St. Johns County]*	1	2009
[Single-family homes purchased by St. Johns Housing Partnership]*	6	2009
[Four condominiums purchased and four condominiums master-leased by Alpha-Omega Miracle Home]*	8	2010 (approx.)
[Homes purchased by St. Johns County with Neighborhood Stabilization Program funds, managed by St. Johns Housing Partnership]*	17	2011
[Homes purchased by the Emergency Services & Homeless Coalition of St. Johns County]*	1	2013
Old Colony Apartments*	8	2014
Pacetti Group Home*	6	Not yet in service
Moultrie Lakes Condominiums*	4	Not yet in service

*Not listed in Shimberg Center's Affordable Housing Inventory

(Source: Shimberg Center for Housing Studies 2015b, data provided by local affordable housing providers, personal communication with property managers, Florida Housing Finance Corporation.)

The Florida Housing Coalition expresses its gratitude to St. Johns Housing Partnership, a St. Augustine-based not-for-profit organization committed to promoting safe, decent and affordable housing in north Florida.

Since 1998, St. Johns Housing Partnership has developed, rehabilitated, and retrofitted homes for low-income families, elders, and people with disabilities in St. Johns County. The Partnership has been a tireless advocate for the Sadowski State and Local Housing Trust Funds.





Affordable Housing is an Integral Part of Community Revitalization and Economic Development



The Florida Housing Coalition, Inc., is a nonprofit, statewide membership organization which brings together housing advocates and resources so that all Floridians have a quality affordable home and suitable living environment.




**FOR MORE INFORMATION,
CONTACT:**

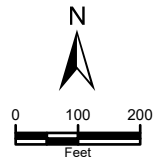
The Florida Housing Coalition
1367 E. Lafayette St., Ste. C
Tallahassee, FL, 32301
(850) 878-4219
info@flhousing.org
FLHousing.org

Exhibit 8 - Soils Map



Symbol	Description	Hydric	Acres
34	Tocoi Fine Sand	No	12.86
44	Sparr Fine Sand, 0 to 5 Percent Slopes	No	5.85
63	Placid Fine Sand	Yes	0.48
69	Bakersville Muck	Yes	0.01
Total			19.20

-  Project Boundary
-  Soil
-  Hydric Soil



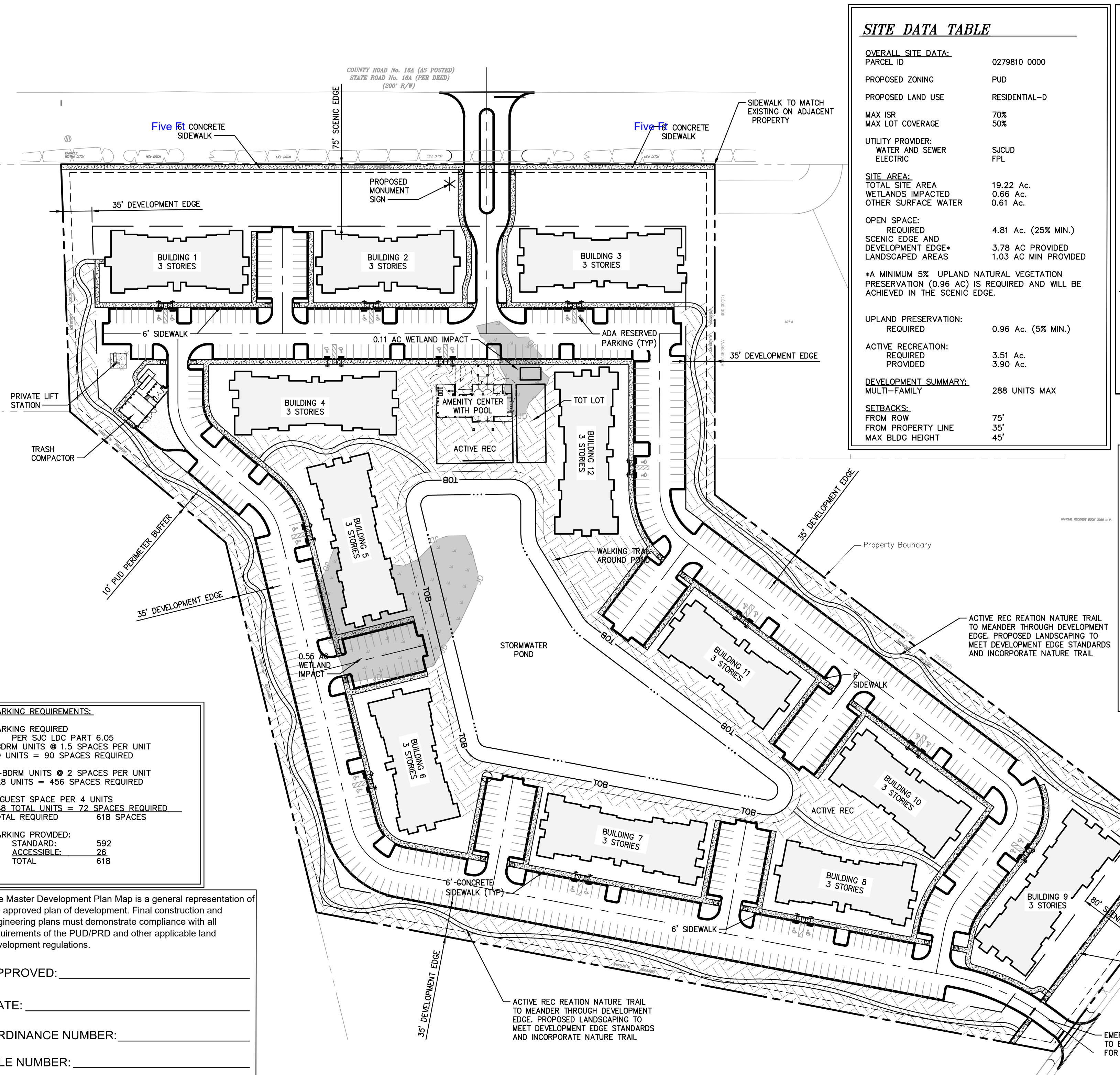
**Figure 4
Soils**

St. Augustine - County Road 16A
St. Johns County, Florida
Date: 6/12/2023



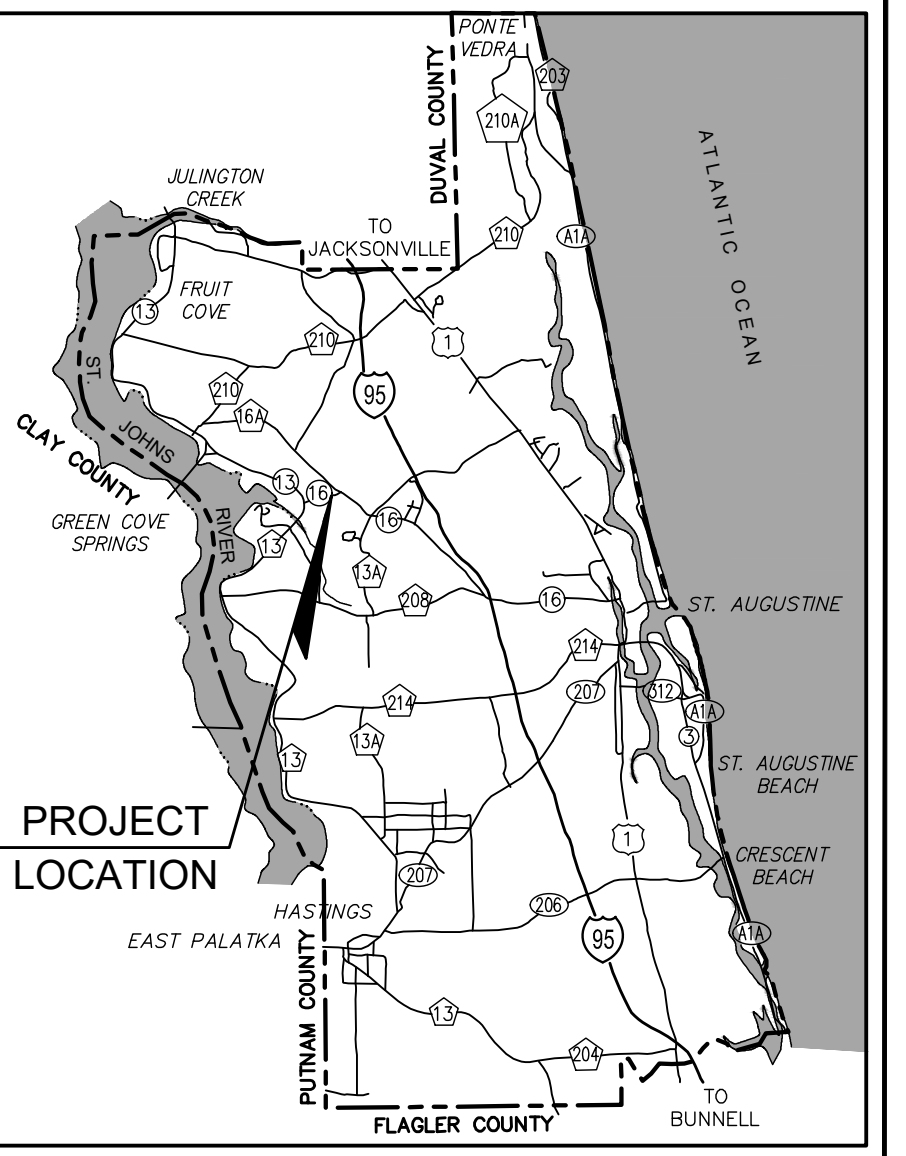
Sources: NRCS, 2022; Esri World Imagery, 2020; ECT, 2023.

Plotted By: Reuther, Chris Sheet Set: ##### Layout: C-100 October 10, 2023 11:48:08am K:\JAX_Civil\147681009 - Wards Creek\Cadd\PlanSheets\MDP\2023-10-10_PRESERVE AT WARDS CREEK MDP.dwg
 This document, together with the concepts and designs presented herein, is for informational purposes only for the specific purpose and shall not be construed as a contract or offer of insurance or any other financial product. It is intended to be used in conjunction with the insurance policy and the actual policy terms, conditions, coverages, exclusions, and limitations. It is not intended to be used as a substitute for the actual policy.



SITE DATA TABLE

OVERALL SITE DATA:	
PARCEL ID	0279810 0000
PROPOSED ZONING	PUD
PROPOSED LAND USE	RESIDENTIAL-D
MAX ISR	70%
MAX LOT COVERAGE	50%
UTILITY PROVIDER:	SJCUD
WATER AND SEWER	FPL
ELECTRIC	
SITE AREA:	
TOTAL SITE AREA	19.22 Ac.
WETLANDS IMPACTED	0.66 Ac.
OTHER SURFACE WATER	0.61 Ac.
OPEN SPACE:	
REQUIRED	4.81 Ac. (25% MIN.)
SCENIC EDGE AND DEVELOPMENT EDGE*	3.78 AC PROVIDED
LANDSCAPED AREAS	1.03 AC MIN PROVIDED
*A MINIMUM 5% UPLAND NATURAL VEGETATION PRESERVATION (0.96 AC) IS REQUIRED AND WILL BE ACHIEVED IN THE SCENIC EDGE.	
UPLAND PRESERVATION:	
REQUIRED	0.96 Ac. (5% MIN.)
ACTIVE RECREATION:	
REQUIRED	3.51 Ac.
PROVIDED	3.90 Ac.
DEVELOPMENT SUMMARY:	
MULTI-FAMILY	288 UNITS MAX
SETBACKS:	
FROM ROW	75'
FROM PROPERTY LINE	35'
MAX BLDG HEIGHT	45'



VICINITY MAP
NTS

LEGAL DESCRIPTION

A PARCEL OF LAND IN SUBSECTION 5 (OR LOT 5) OF THE ANTONIO HUERTAS GRANT, SECTION 38, TOWNSHIP 6 SOUTH, RANGE 28 EAST, ST. JOHNS COUNTY, FLORIDA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCE AT THE INTERSECTION OF THE SOUTHWESTERLY RIGHT-OF-WAY LINE OF STATE ROAD NO. 16A (A 200' RIGHT-OF-WAY) WITH THE NORTHWESTERLY RIGHT-OF-WAY LINE OF STATE ROAD NO. 16 (A 66' RIGHT-OF-WAY); THENCE SOUTH 72°52'08" WEST, ALONG SAID NORTHWESTERLY RIGHT-OF-WAY LINE, A DISTANCE OF 1057.89 FEET TO THE SOUTHWEST CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 3950, PAGE 18 (PARCEL B) OF THE PUBLIC RECORDS OF ST. JOHNS COUNTY, FLORIDA AND THE POINT OF BEGINNING; THENCE FROM SAID POINT OF BEGINNING, CONTINUE SOUTH 72°52'08" WEST ALONG SAID NORTHWESTERLY RIGHT-OF-WAY LINE, A DISTANCE OF 290.16 FEET TO THE SOUTHEAST CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 1603, PAGE 1424 OF SAID PUBLIC RECORDS; THENCE NORTH 43°32'54" WEST, ALONG THE EAST LINE OF LAST SAID LANDS, A DISTANCE OF 910.05 FEET TO THE MOST NORTHERLY CORNER OF LAST SAID LANDS, SAID CORNER BEING ON THE SOUTHEASTERLY LINE OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 649, PAGE 107 OF SAID PUBLIC RECORDS; THENCE ALONG SAID SOUTHEASTERLY LINE THE FOLLOWING TWO (2) COURSES: COURSE ONE (1) NORTH 22°06'14" EAST, A DISTANCE OF 461.64 FEET; COURSE TWO (2) NORTH 14°22'56" WEST, A DISTANCE OF 246.77 FEET TO THE SOUTHEAST CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS 649, PAGE 109 (PARCEL I) OF SAID PUBLIC RECORDS; THENCE NORTH 33°39'53" EAST, ALONG THE EAST LINE OF LAST SAID LANDS, A DISTANCE OF 300.10 FEET TO THE SOUTHWESTERLY RIGHT-OF-WAY LINE OF STATE ROAD NO. 16A; THENCE SOUTH 54°13'24" EAST, ALONG SAID SOUTHWESTERLY RIGHT-OF-WAY LINE, A DISTANCE OF 792.15 FEET TO THE MOST NORTHERLY CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 3950, PAGE 18 (PARCEL B) OF SAID PUBLIC RECORDS; THENCE ALONG THE WESTERLY LINE OF LAST SAID LANDS THE FOLLOWING TWO (2) COURSES: COURSE ONE (1) SOUTH 35°46'30" WEST, A DISTANCE OF 400.00 FEET; COURSE TWO (2) SOUTH 17°07'52" EAST, A DISTANCE OF 735.65 FEET TO THE NORTHWESTERLY RIGHT-OF-WAY LINE OF STATE ROAD NO. 16 AND THE POINT OF BEGINNING.

PARKING REQUIREMENTS:

PARKING REQUIRED	
PER SJC LDC PART 6.05	
2BDRM UNITS @ 1.5 SPACES PER UNIT	
60 UNITS = 90 SPACES REQUIRED	
3+BDRM UNITS @ 2 SPACES PER UNIT	
228 UNITS = 456 SPACES REQUIRED	
1 GUEST SPACE PER 4 UNITS	
288 TOTAL UNITS = 72 SPACES REQUIRED	
TOTAL REQUIRED	618 SPACES
PARKING PROVIDED:	
STANDARD:	592
ACCESSIBLE:	26
TOTAL	618

The Master Development Plan Map is a general representation of the approved plan of development. Final construction and engineering plans must demonstrate compliance with all requirements of the PUD/PRD and other applicable land development regulations.

APPROVED: _____

DATE: _____

ORDINANCE NUMBER: _____

FILE NUMBER: _____

LEGEND:

- PROPERTY BOUNDARY
- PERIMETER BUFFER
- FENCE
- WETLAND IMPACT AREA
- ACTIVE RECREATION
- ASPHALT PAVEMENT
- CONCRETE SIDEWALK

GRAPHIC SCALE IN FEET
0 40 80 160

EMERGENCY ACCESS ONLY TO BE GATED WITH KNOX BOX FOR FIRE DEPARTMENT ACCESS

Northwest Sector Community Planning Public Participation Meeting - Summary

Wednesday, September 27, 2023, from 6 to 8 p.m.
Legends 3 Room at Renaissance St. Augustine - World Golf Village,
500 South Legacy Trail, St. Augustine

Prepared by Applicant

A Northwest Sector Community Planning Public Participation Meeting regarding the Preserve at Wards Creek applications for a rezoning to PUD (PUD 2023-18) and a small-scale Comprehensive Plan amendment (CPA(SS) 2023-09) was held on Wednesday, September 27, 2023, from 6:00 to 8:00 p.m. at the Renaissance St. Augustine - World Golf Village.

Notice of the meeting was provided pursuant to Section 33 of the St. Johns County Development Review Manual. (See Exhibit A for the meeting notice affidavit). Specifically, notice of the meeting was published on September 11, 2023 in the St. Augustine Record. (See Exhibit B.) Individual notices were also mailed on September 1, 2023 to the property owners located within 300 feet of the subject property boundaries. (See Exhibit C for list of individuals who received notice, and Exhibit D for notice provided.) A public information sign was posted at the subject property on September 11, 2023. (See Exhibit E.) Finally, on the day of the meeting, public information signs were posted at the venue. (See Exhibit F.)

Approximately 200 individuals attended the meeting, but only 128 signed the attendance sheet. (See Exhibit G for sign-in sheet.)

Attending on behalf of the applicant/property owner were Katessa Archer, Sarah Shambrook, Thomas Williams, and Alex Baker for Dominion; Jack Hulsberg and Chris Reuther for Kimley-Horn, the project engineer; Natalie DeYoung of Wingard, project consultant; and Tom Ingram and Beth Moore of Sodl & Ingram, counsel to the applicant.

Katessa Archer gave a slideshow presentation showing the project location and site plan. She also explained the need for affordable housing in the County and how this project would help meet that need by offering housing opportunities to workers in a location closer to their places of employment.

The questions and comments from the attendees generally expressed support for the mission of affordable housing and recognized the affordable housing shortage in the County but also voiced numerous concerns. The predominant concerns consisted of traffic and overcrowding in schools. For example, several individuals complained about the capacity at local schools and their use of portable classrooms, and how the location of this development would mean busing would not be provided—further adding to traffic based on the lack of infrastructure for students to walk to school. Other attendees provided personal anecdotes about local traffic. Dominion discussed some of the roadway improvements coming to the area.

Some attendees were not as supportive of the mission for affordable housing. One attendee referred to the project as a “hot steaming turd” and another stated that it would be a low-end development that would negatively affect property values. Several attendees stated that workers should instead live in a cheaper neighboring county and commute longer. In response, Dominion recounted a meeting from earlier in the day where Flagler Health could not hire surgical technicians because of their requirement to live within 30 minutes of the hospital. Moreover, Dominion also explained that those workers who commute longer also contribute to the traffic concerns that attendees complained about.

Several attendees asked procedural questions about when the applications would be presented at the PZA and BOCC hearings, and about the current zoning of the property and the rezoning requested. One attendee asked whether the County could require affordable housing to be more spread across multifamily developments rather than all concentrated in one, and there was a discussion of the types of incentives and the zoning the County could enact. Moreover, some attendees asked about specifics of the affordable housing regulations and what type of limits would be imposed on the income of residents and how those numbers were calculated.

At one point, an attendee who had finished asking a question tried to maintain control of the microphone by shoving a Dominion representative to the floor.

Approximately 40 attendees were able to ask questions or provide comments during the meeting. A more thorough recitation of the questions and comments is enclosed. (See Exhibit H.)

Exhibit A

Community Meeting Notice Affidavit

(see attached)



St. Johns County Growth Management Department
 Planning & Zoning Section
 4040 Lewis Speedway
 St. Augustine, Florida 32084
 Phone: 904 209-0675 Fax: 904 209-0576 E-mail:
 plandept@sjcfl.us

COMMUNITY MEETING NOTICING AFFIDAVIT

Date: October 17, 2023

I hereby certify that the Community Planning Public Participation Meeting noticing procedures outlined in Development Review Manual Section 33, and as required by Comprehensive Plan Policy A.2.1.7, have been properly completed for application number PUD23-18; CPA(SS)23-9 for a Community Meeting held on September 27, 2023. I understand that the Community Meeting must be held at least 15 days prior to the Planning and Zoning Agency hearing, and that this affidavit must be completed and returned within three business days of the community meeting with a summary of the discussion or the item may be continued to the next available hearing date.

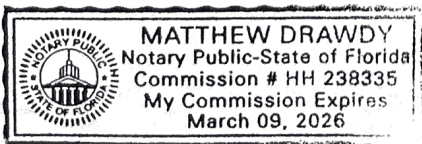
Notice Requirement	Date and Initials
<input checked="" type="checkbox"/> Adjacent Property Owner Notice sent 15 days prior to scheduled meeting	9/1/2023 <i>EM</i>
<input checked="" type="checkbox"/> Sign(s) Posted 15 days prior to scheduled meeting	9/11/2023 <i>EM</i>
<input checked="" type="checkbox"/> Published Notice with copy to Planning and Zoning 15 days prior to scheduled meeting	9/11/2023 <i>EM</i>
<input checked="" type="checkbox"/> Signs posted at location meeting	9/27/2023 <i>EM</i>
<input type="checkbox"/> Flyers posted within Northwest sector (optional)	

Elizabeth Moore
 Applicant Signature

October 17, 2023
 Date

STATE OF FLORIDA
 COUNTY OF Duval

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this 17th day of October, 2023, by Elizabeth Moore as authorized representative for applicant.



Matthew Drawdy

Notary Public, State of Florida
 Name: Matthew Drawdy
 My Commission Expires: 3/9/2026
 My Commission Number is: 238335

Personally Known OR Produced Identification _____
 Type of Identification Produced _____

Exhibit B

Proof of Publication

(see attached)

LOCALiQ

FLORIDA

PO Box 631244 Cincinnati, OH 45263-1244

PROOF OF PUBLICATION

Matthew Drawdy
Sodl and Ingram PLLC
1617 San Marco BLVD
Jacksonville FL 32207-3001

STATE OF WISCONSIN, COUNTY OF BROWN

Before the undersigned authority personally appeared, who on oath says that he or she is the Legal Coordinator of the St Augustine Record, published in St Johns County, Florida; that the attached copy of advertisement, being a Main Legal CLEGL, was published on the publicly accessible website of St Johns County, Florida, or in a newspaper by print in the issues of, on:

09/11/2023

Affiant further says that the website or newspaper complies with all legal requirements for publication in chapter 50, Florida Statutes.

Subscribed and sworn to before me, by the legal clerk, who is personally known to me, on 09/11/2023



Legal Clerk



Notary, State of WI, County of Brown

8.25.26

My commission expires

Publication Cost:	\$191.68	
Order No:	9261911	# of Copies:
Customer No:	972868	1
PO #:	Preserve at Wards Creek NW Sector Comty Mtg	

THIS IS NOT AN INVOICE!

Please do not use this form for payment remittance.

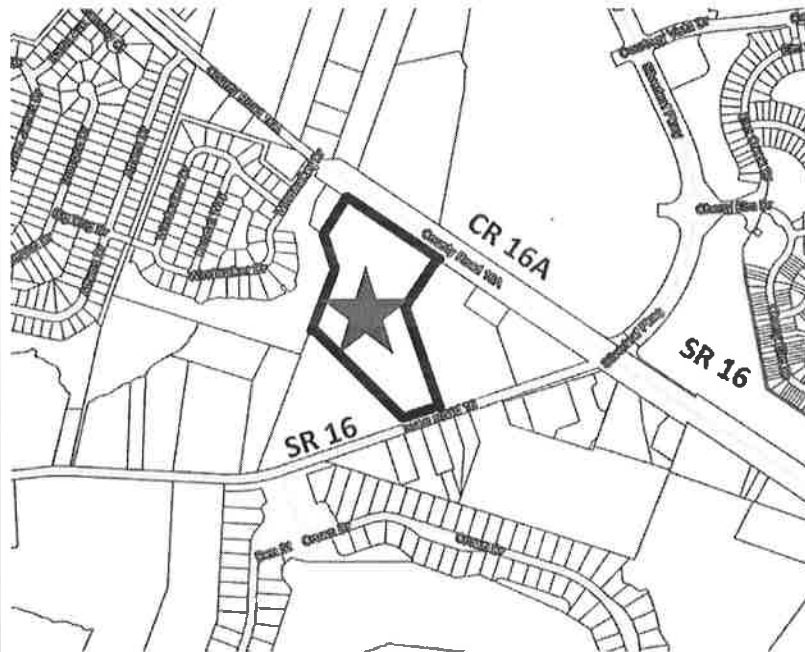
MARIAH VERHAGEN
Notary Public
State of Wisconsin

NOTICE OF COMMUNITY MEETING
Wednesday, September 27, 2023 at 6:00 P.M.
(presentation at 6:30)

RENAISSANCE ST. AUGUSTINE - WORLD GOLF VILLAGE
500 South Legacy Trail, St. Augustine

NOTICE OF NORTHWEST SECTOR COMMUNITY
PLANNING PUBLIC PARTICIPATION MEETING

REGARDING applications for rezoning (PUD 2023-18) and a small-scale amendment to the St. Johns County Comprehensive Plan (CPA(SS) 2023-9). The subject property is located at 6351 County Road 16A and consists of approximately 19.22 acres fronting County Road 16A and State Road 16, between Windwalker Drive and Silverleaf Parkway. These applications propose to rezone the subject property from Open Rural (OR) to Planned Unit Development (PUD), and to change the Future Land Use Map designation of the property from Agriculture Intensive (A-I) to Residential-D with an accompanying text amendment to limit residential uses to affordable housing until 12/31/2038 and to allow up to 15 dwelling units per net developable acre. The primary intended use is multifamily. The project is known as Preserve at Wards Creek.



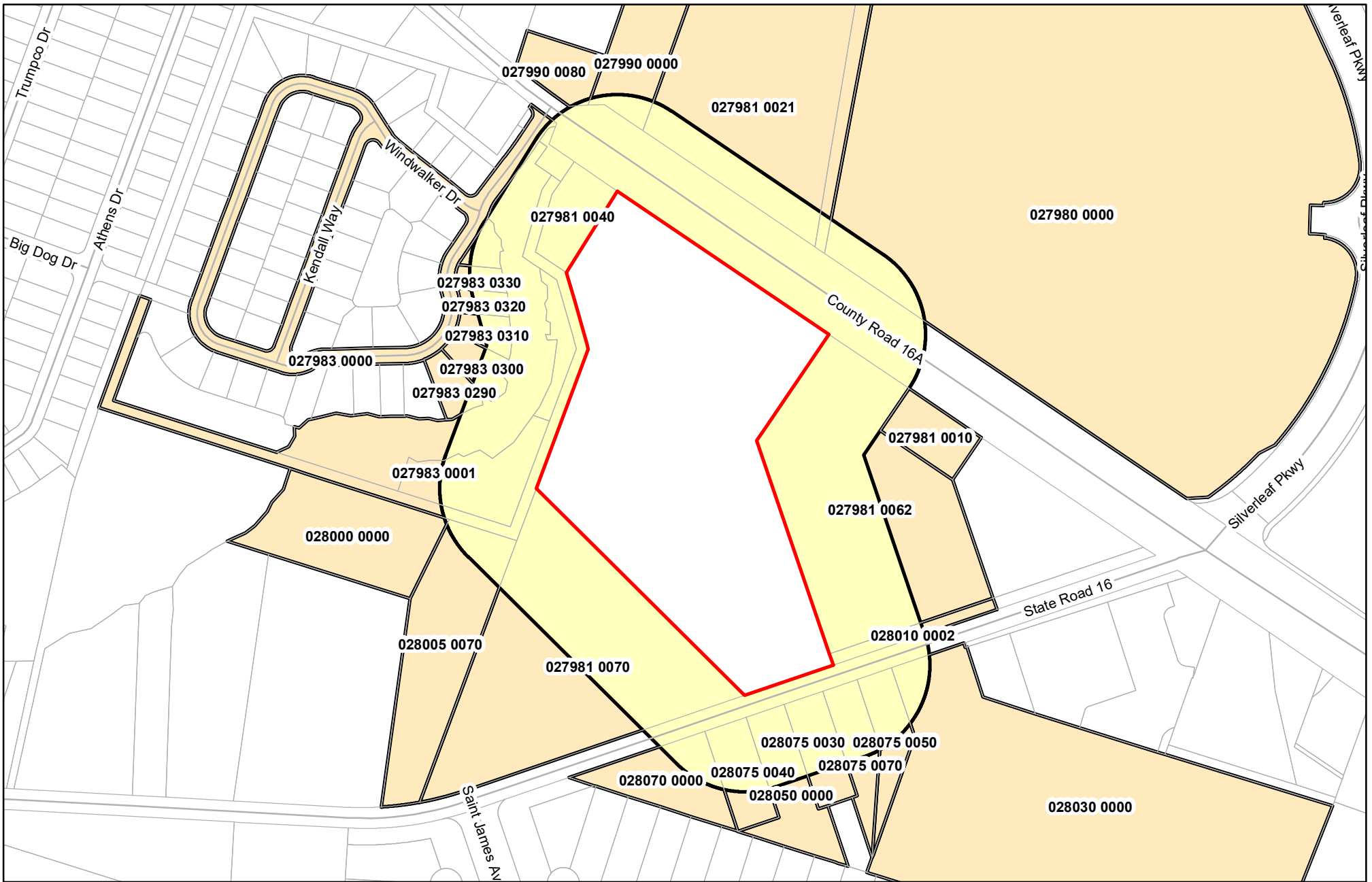
NOTICE IS HEREBY GIVEN THAT a community meeting will be held to discuss the proposed applications on Wednesday, September 27, 2023, from 6:00pm - 8:00pm at the Renaissance St. Augustine - World Golf Village, 500 South Legacy Trail, St. Augustine, Florida. The presentation will begin at 6:30pm. The public is invited to attend, and participation is welcomed.

NOTICE TO PERSONS NEEDING SPECIAL ACCOMMODATIONS AND TO ALL HEARING-IMPAIRED PERSONS: In accordance with the Americans with Disabilities Act, persons needing a special accommodation to participate in the proceedings should contact Thomas Ingram at (904) 612-9179. For hearing impaired individuals: Florida Relay Service: 1-800-955-8770, no later than five (5) days prior to the date of the community meeting. For other related questions, please contact Thomas Ingram at (904) 612-9179 or thomas.ingram@si-law.com.

Exhibit C

Notice Recipients

(see attached)



**Parcels within 300' of
CPA(SS)_2023000009
Preserve at Wards Creek**

AMAJ LLC
2160 AUTUMN COVE CIR
FLEMING ISLAND FL 320030000

FRUIT COVE BAPTIST CHURCH JAX
501 STATE ROAD 13
SAINT JOHNS FL 322592832

WHITES FORD INVESTMENTS LLC
50 SILVER FOREST DR
STE 200
SAINT AUGUSTINE FL 320920000

ARBOR MILL AT MILL CREEK HOME0
2800 N 6TH ST UNIT 1
PMB 305
SAINT AUGUSTINE FL 320840000

GOOGE JASON,CHLOE
167 WINDWALKER DR
SAINT AUGUSTINE FL 320920000

WHITES FORD TIMBER LLC
50 SILVER FOREST DR
STE 200
SAINT AUGUSTINE FL 320920000

ARC OF THE ST JOHNS INC
2101 ARC DR
SAINT AUGUSTINE FL 320840000

LEE BRIAN C,CHERYL
6399 COUNTY ROAD 16A
SAINT AUGUSTINE FL 320921801

WILDER FAMILY TRUST D:03/25/13
147 WINDWALKER DR
SAINT AUGUSTINE FL 320920000

BENNER SMITH LIMITED LLC
191 SURFSIDE AVE
SAINT AUGUSTINE FL 320840000

MILL CREEK SHOPS LLC
5207 DOOLITTLE RD
JACKSONVILLE FL 322540000

BILLS MICHAEL A,MEGAN A
133 WINDWALKER DR
SAINT AUGUSTINE FL 320920000

MORRIS HARRY LEE ETAL
9585 CR 13N
SAINT AUGUSTINE FL 320920000

BRUNKE ROBERT J
6400 COUNTY ROAD 16A
SAINT AUGUSTINE FL 320921802

ORTIZ JUAN ANTONIO ET AL
177 WINDWALKER DR
SAINT AUGUSTINE FL 320920000

CHACHRA KOKIL
2808 S PORTOFINO RD
SAINT AUGUSTINE FL 320920000

ST JOHNS COUNTY
500 SAN SEBASTIAN VW
SAINT AUGUSTINE FL 320840000

CHARD ANNA C
6345 STATE ROAD 16
SAINT AUGUSTINE FL 320922108

SUEPAGE HOLDINGS LLC
569 PONTE VEDRA BLVD
PONTE VEDRA BEACH FL 320820000

DEAN AMANDA V,CHAD A
157 WINDWALKER DR
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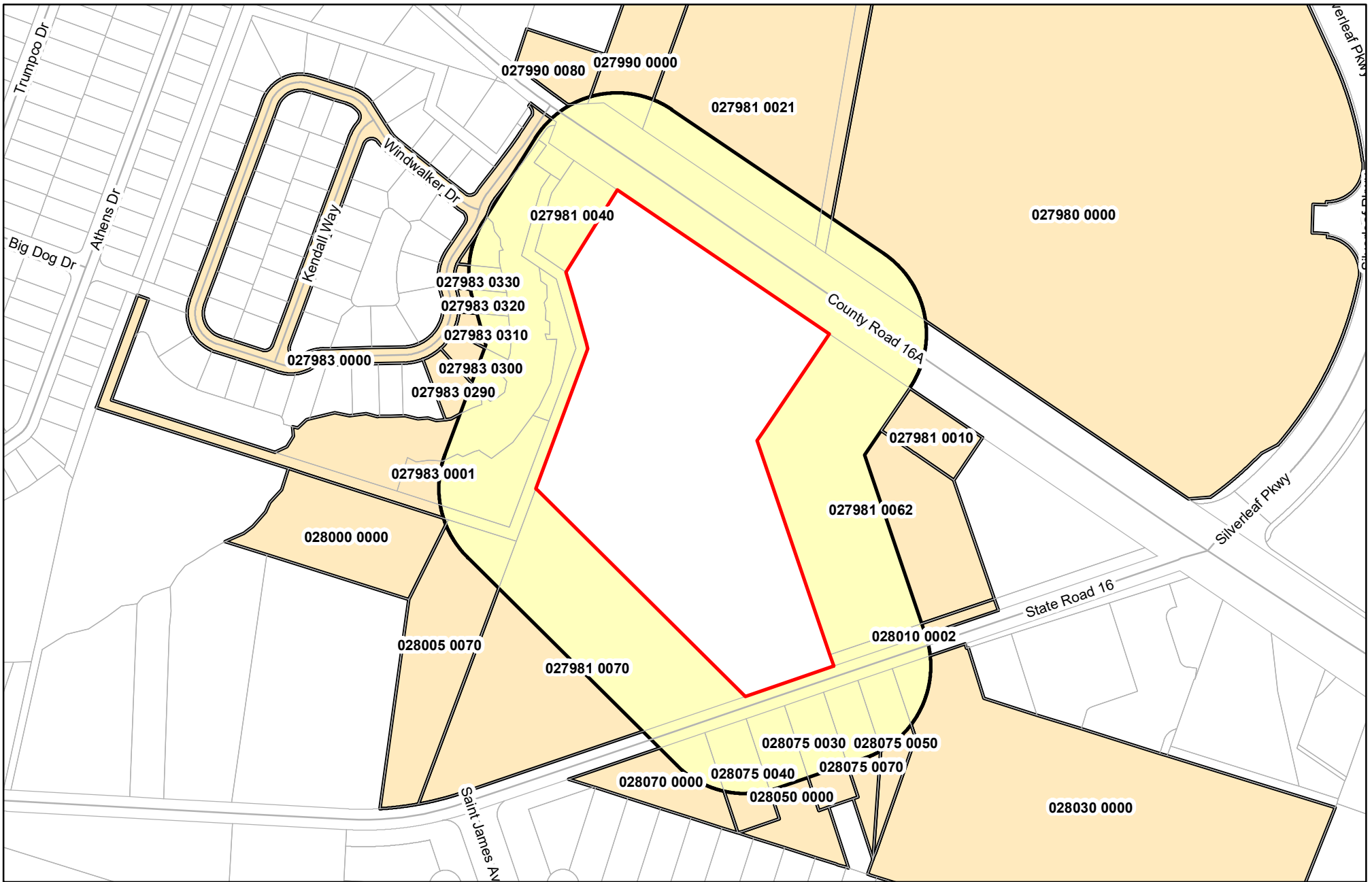
U-HAUL CO OF FLORIDA
C/O AMERCO REAL ESTATE COMPANY
2727 N CENTRAL AVE
PHOENIX AZ 850040000

EPISCOPAL CHURCH IN THE DIOCES
325 N MARKET ST
JACKSONVILLE FL 322020000

WEBB PATRICIA LEE CHARD
6355 STATE ROAD 16
SAINT AUGUSTINE FL 320922108

PIN	NAME	ADDRESS	ADDRESS 2	CITY ST ZIP	LEGAL DESCRIPTION
0280750070					5-4M ANTONIO HUERTAS GRANT SUB SEC 5 PT OF NE1/4 OF SE1/4 OF SW1/4 LYING SE OF SR 16 112.06FT ON RD
0280000000	AMAJ LLC	2160 AUTUMN COVE CIR		FLEMING ISLAND FL 320030000	5-3 ANTONIO HUERTAS GRANT SUB PT SW1/4 OF SW1/4 OF SUB SEC 5 LYING N SR 16 (BOOTH RD) & SE
0279830001	ARBOR MILL AT MILL CREEK HOME0	2800 N 6TH ST UNIT 1	PMB 305	SAINT AUGUSTINE FL 320840000	97/13-22 WARDS CREEK TRACTS C DE-1 DE-2 R-1 R-2 R-3 SC-1 SC-1 SWMF-1 & SWMF-2
0280750050	ARC OF THE ST JOHNS INC	2101 ARC DR		SAINT AUGUSTINE FL 320840000	5-4K ANTONIO HUERTAS GRANT SUB SEC 5 PT OF NE1/4 OF SE1/4 OF SW1/4 LYING SE OF SR 16
0280050070	BENNER SMITH LIMITED LLC	191 SURFSIDE AVE		SAINT AUGUSTINE FL 320840000	5-3G ANTONIO HUERTAS GRANT SUB PT OF SW1/4 OF SW1/4 OF SUB SEC 5 LYING N OF SR16 - 105FT
0279830330	BILLS MICHAEL A,MEGAN A	133 WINDWALKER DR		SAINT AUGUSTINE FL 320920000	97/13-22 WARDS CREEK LOT 33 OR4914/1618
0279900000	BRUNKE ROBERT J	6400 COUNTY ROAD 16A		SAINT AUGUSTINE FL 320921802	5-2 ANTONIO HUERTAS GRANT SUB SUB SEC 5 E'LY 206FT OF SW1/4 OF NW1/4 LYING N OF CR 16A
0279900080	CHACHRA KOKIL	2808 S PORTOFINO RD		SAINT AUGUSTINE FL 320920000	5-2H ANTONIO HUERTAS GRANT SUB SEC 5 PT OF SW1/4 OF NW1/4 LYING NE OF CR 16A 190.58FT ON RD
0280500000	CHARD ANNA C	6345 STATE ROAD 16		SAINT AUGUSTINE FL 320922108	5-4B ANTONIO HUERTAS GRANT SUB SUB SEC 5 PT OF NE1/4 OF SE1/4 OF SW1/4 LYING SE OF SR 16 611
0279830310	DEAN AMANDA V,CHAD A	157 WINDWALKER DR		SAINT AUGUSTINE FL 320920000	97/13-22 WARDS CREEK LOT 31 OR4893/338
0279810021	EPISCOPAL CHURCH IN THE DIOCES	325 N MARKET ST		JACKSONVILLE FL 322020000	ANTONIO HUERTAS GRANT SUB PT OF SEC 5 LYING N OF CR16A OR5571/116
0279810070	FRUIT COVE BAPTIST CHURCH JAX	501 STATE ROAD 13		SAINT JOHNS FL 322592832	5-1G ANTONIO HUERTAS GRANT SUB PT OF S1/2 OF SUB SEC 5 TRI PT LYING N OF SR 16 & SW
0279830300	GOOGE JASON,CHLOE	167 WINDWALKER DR		SAINT AUGUSTINE FL 320920000	97/13-22 WARDS CREEK LOT 30 OR4897/1832
0279810040	LEE BRIAN C,CHERYL	6399 COUNTY ROAD 16A		SAINT AUGUSTINE FL 320921801	5-1D ANTONIO HUERTAS GRANT SUB PT OF S1/2 SUB SEC 5 161.9FT ON CR 16A

PIN	NAME	ADDRESS	ADDRESS 2	CITY ST ZIP	LEGAL DESCRIPTION
0280300000	MILL CREEK SHOPS LLC	5207 DOOLITTLE RD		JACKSONVILLE FL 322540000	5-4A ANTONIO HUERTAS GRANT SUB PT SUB SEC 5 PT OF N1/2 OF SW1/4 OF SE1/4 & TRI PTS ADJ
0280750030	MORRIS HARRY LEE ETAL	9585 CR 13N		SAINT AUGUSTINE FL 320920000	5-4H ANTONIO HUERTAS GRANT SUB SUB SEC 5 PT OF NE1/4 OF SE1/4 OF SW1/4 LYING SE OF SR 16
0279830290	ORTIZ JUAN ANTONIO ET AL	177 WINDWALKER DR		SAINT AUGUSTINE FL 320920000	97/13-22 WARDS CREEK LOT 29 OR4951/582
0279830000	ST JOHNS COUNTY	500 SAN SEBASTIAN VW		SAINT AUGUSTINE FL 320840000	97/13-22 WARDS CREEK ROWS DEDICATED TO ST JOHNS COUNTY PER
0280100002	ST JOHNS COUNTY	500 SAN SEBASTIAN VW		SAINT AUGUSTINE FL 320840000	5-5RW ANTONIO HUERTAS GRANT SUB SUB SEC 5 - PT OF W800FT OF NW1/4 OF SE1/4 LYING S OF SR16- BEING
0280700000	SUEPAGE HOLDINGS LLC	569 PONTE VEDRA BLVD		PONTE VEDRA BEACH FL 320820000	5-4D ANTONIO HUERTAS GRANT SUB PT OF N1/2 OF SE1/4 OF SW1/4 OF SEC 5 446.59 FT ON SR 16
0279810062	U-HAUL CO OF FLORIDA	C/O AMERCO REAL ESTATE COMPANY	2727 N CENTRAL AVE	PHOENIX AZ 850040000	5-1FB ANTONIO HUERTAS GRANT SUB PT OF S1/2 SUB SEC 5 LYING SW OF CR 16A & NW OF SR 16 - BRIDLE RIDGE
0280750040	WEBB PATRICIA LEE CHARD	6355 STATE ROAD 16		SAINT AUGUSTINE FL 320922108	5-4J ANTONIO HUERTAS GRANT SUB SUB SEC 5 PT OF NE1/4 OF SE1/4 OF SW1/4 LYING SE OF SR 16
0279810010	WHITES FORD INVESTMENTS LLC	50 SILVER FOREST DR	STE 200	SAINT AUGUSTINE FL 320920000	5-1A ANTONIO HUERTAS GRANT SUB PT OF SW1/4 OF SEC 5 LYING S OF CR 16A 272 X 160FT
0279800000	WHITES FORD TIMBER LLC	50 SILVER FOREST DR	STE 200	SAINT AUGUSTINE FL 320920000	5 ANTONIO HUERTAS GRANT SUB ALL SUB SEC 5 (EX SW1/4 OF NW1/4) LYING NE OF SR 16 & CR
0279830320	WILDER FAMILY TRUST D:03/25/13	147 WINDWALKER DR		SAINT AUGUSTINE FL 320920000	97/13-22 WARDS CREEK LOT 32 OR4963/1781 & 5510/1766



**Parcels within 300' of
PUD_2023000018
Preserve at Wards Creek**

AMAJ LLC
2160 AUTUMN COVE CIR
FLEMING ISLAND FL 320030000

FRUIT COVE BAPTIST CHURCH JAX
501 STATE ROAD 13
SAINT JOHNS FL 322592832

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0279830320	WILDER FAMILY TRUST D:03/25/13	147 WINDWALKER DR		SAINT AUGUSTINE FL 320920000	97/13-22 WARDS CREEK LOT 32 OR4963/1781 & 5510/1766

Exhibit D

Mailed Notice

(see attached)

September 1, 2023

Dear Neighbors,

We are hosting a community meeting to discuss applications filed with St. Johns County to develop a multi-family residential development at 6351 CR-16A. This property is located near the intersection of County Road 16A and State Road 16. The proposed development would include up to 288 multifamily homes on the approximately 19.22-acre property, as affordable housing. Please see the attached public notice and illustrative site plan for more detail. Dominion Development & Acquisitions is seeking to be the developer of this property following the property's sale and obtaining all required permits and approvals.

Community Meeting

September 27th, 2023

6:00 PM to 8:00 PM

World Golf Village Renaissance St. Augustine Resort

500 S Legacy Trail,
St. Augustine, FL 32092

We will have a presentation beginning at 6:30pm, and we will be available before and after the presentation if you have any questions or comments.

If you have any questions or would like additional information, please do not hesitate to contact us at Thomas.Williams@dominiuminc.com.

Sincerely,

Katessa Archer

Senior Vice President & Project Partner
Dominium

Thomas Ingram, Sodl & Ingram PLLC

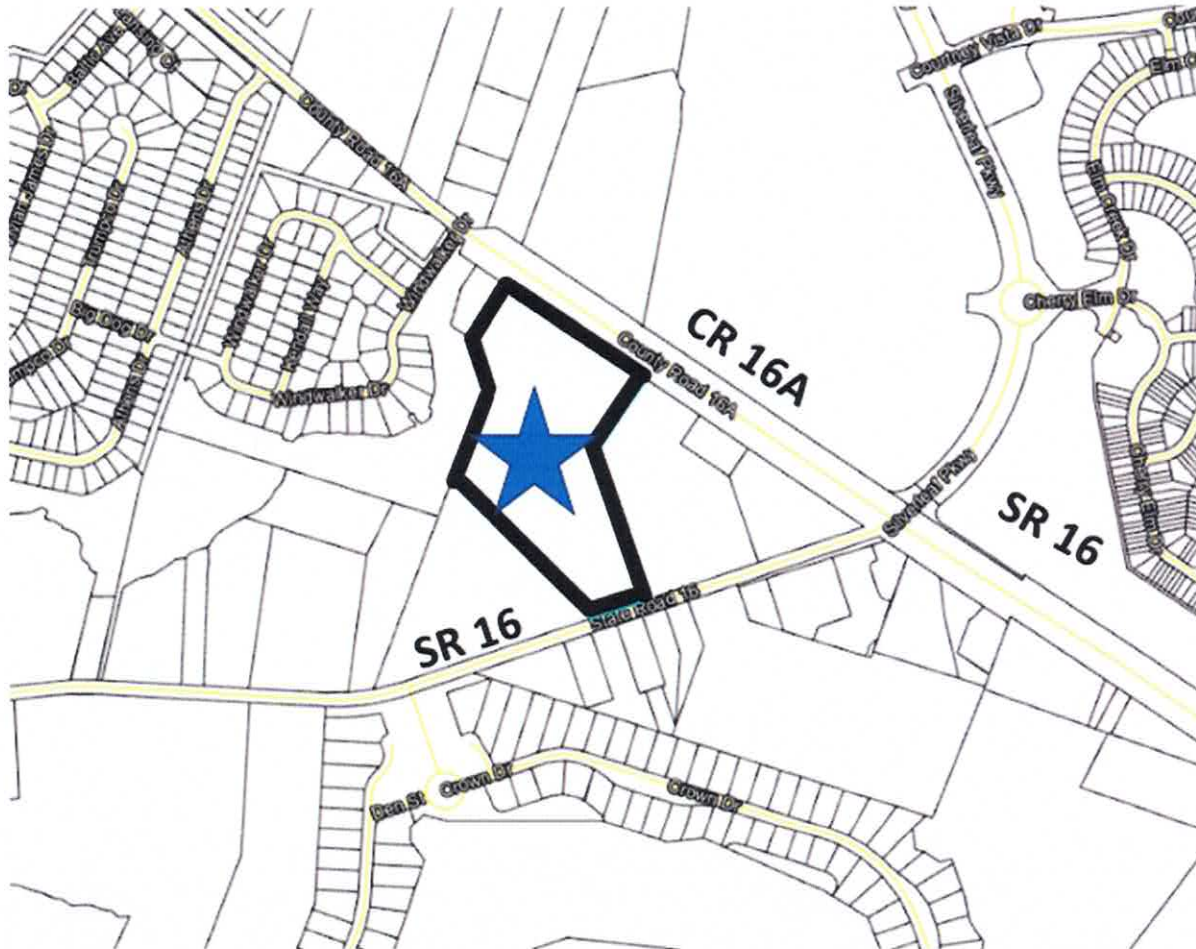
Applicant/Agent for landowner, Bull Ranch LLC

Attachment: Illustrative Site Plan, Public Notice for Community Meeting



NOTICE OF COMMUNITY MEETING
Wednesday, September 27, 2023 at 6:00 P.M. (presentation at 6:30)
RENAISSANCE ST. AUGUSTINE – WORLD GOLF VILLAGE
500 South Legacy Trail, St. Augustine

NOTICE OF NORTHWEST SECTOR COMMUNITY PLANNING PUBLIC PARTICIPATION MEETING REGARDING applications for rezoning (PUD 2023-18) and a small-scale amendment to the St. Johns County Comprehensive Plan (CPA(SS) 2023-9). The subject property is located at 6351 County Road 16A and consists of approximately 19.22 acres fronting County Road 16A and State Road 16, between Windwalker Drive and Silverleaf Parkway. These applications propose to rezone the subject property from Open Rural (OR) to Planned Unit Development (PUD), and to change the Future Land Use Map designation of the property from Agriculture Intensive (A-I) to Residential-D with an accompanying text amendment to limit residential uses to affordable housing until 12/31/2038 and to allow up to 15 dwelling units per net developable acre. The primary intended use is multifamily. The project is known as Preserve at Wards Creek.



NOTICE IS HEREBY GIVEN THAT a community meeting will be held to discuss the proposed applications on Wednesday, September 27, 2023, from 6:00pm – 8:00pm at

the Renaissance St. Augustine – World Golf Village, 500 South Legacy Trail, St. Augustine, Florida. The presentation will begin at 6:30pm. The public is invited to attend, and participation is welcomed.

NOTICE TO PERSONS NEEDING SPECIAL ACCOMMODATIONS AND TO ALL HEARING-IMPAIRED PERSONS: In accordance with the Americans with Disabilities Act, persons needing a special accommodation to participate in the proceedings should contact Thomas Ingram at (904) 612-9179. For hearing impaired individuals: Florida Relay Service: 1-800-955-8770, no later than five (5) days prior to the date of the community meeting. For other related questions, please contact Thomas Ingram at (904) 612-9179 or thomas.ingram@si-law.com.

Exhibit E

Posted Signs at Subject Property

(Qty. 3)


COMMUNITY MEETING
Wednesday, September 27, 2023
6:00 P.M. - 8:00 P.M. (presentation at 6:30)
Location: Renaissance St. Augustine - World Golf Village
500 South Legacy Trail, St. Augustine

NOTICE OF NORTHWEST SECTOR COMMUNITY PLANNING PUBLIC PARTICIPATION MEETING TO DISCUSS applications for rezoning (PUD 2023-18) and for a small scale amendment to the St. Johns County Comprehensive Plan (CPA (SS) 2023-9), filed for this property.

Proposed Development: 288 multifamily (affordable) dwelling units on 19.22 acre site at 6351 County Road 16A, between Windwalker Drive and Silverleaf Parkway.


Zoning Change - Open Rural (OR) to Planned Unit Development (PUD)
Comprehensive Plan change - Agriculture (A-I) to Residential-D with text amendment

NOTICE TO PERSONS NEEDING SPECIAL ACCOMMODATIONS AND TO ALL HEARING-IMPAIRED PERSONS: In accordance with the Americans with Disabilities Act, persons needing a special accommodation to participate in the proceedings should contact Thomas Ingram at (904) 612-9179. For hearing impaired individuals: Florida Relay Service: 1-800-955-8770, no later than five (5) days prior to the date of the community meeting. For other related questions, please contact Thomas Ingram at (904) 612-9179 or thomas.ingram@si-law.com.



**24"W x 24"H x 4mm Coroplast sign
w/ digital print overlay & step stakes
(Single-Sided)**

PLEASE READ ENTIRE PAGE AND PROOF THIS ARTWORK CAREFULLY
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COMMUNITY MEETING
Wednesday, September 27, 2023
6:00 P.M. - 8:00 P.M. (approximate to 6:30)
Location: Neighborhood 50 Initiative - Ward Leaf Village
500 South Legacy Blvd., Myrtlewood

NOTICE OF HOMEOWNERS ASSOCIATION MEETING
The Board of Directors of the Homeowners Association (HOA) is pleased to announce a community meeting on Wednesday, September 27, 2023, at 6:00 P.M. The meeting will be held at the Neighborhood 50 Initiative - Ward Leaf Village, 500 South Legacy Blvd., Myrtlewood. The meeting will discuss the proposed Neighborhood 50 Initiative and the HOA's role in the project. The meeting is open to all homeowners in the Neighborhood 50 Initiative. If you have any questions, please contact the HOA at (813) 940-1234.

AGENDA
1. Welcome
2. Presentation by the Neighborhood 50 Initiative
3. HOA's role in the project
4. Q&A
5. Meeting adjourns

NOTICE OF MEETING
The Board of Directors of the Homeowners Association (HOA) is pleased to announce a community meeting on Wednesday, September 27, 2023, at 6:00 P.M. The meeting will be held at the Neighborhood 50 Initiative - Ward Leaf Village, 500 South Legacy Blvd., Myrtlewood. The meeting will discuss the proposed Neighborhood 50 Initiative and the HOA's role in the project. The meeting is open to all homeowners in the Neighborhood 50 Initiative. If you have any questions, please contact the HOA at (813) 940-1234.



COMMUNITY MEETING
Wednesday, September 27, 2023
6:00 P.M. - 8:00 P.M. (presentation at 6:30)
Location: Renaissance St. Augustine - World Golf Village
500 South Legacy Trail, St. Augustine

NOTICE OF NORTHWEST SECTOR COMMUNITY PLANNING
PUBLIC PARTICIPATION MEETING TO DISCUSS applications for
reworking PUD 2023-18) and for a small scale amendment to the St. Johns
County Comprehensive Plan (CPA/SS) 2022-24 filed for this property.

Proposed Development: 283 multi-family (townhome) dwelling units on
0.22 acre site at 6541 County Road 166, between Woodhuck Drive
and Silverleaf Parkway.

Zoning change - Opco Rural (OR) to Planned Unit Development (PUD)
Comprehensive Plan change - Agriculture (A-D) to Residential-D (single-
lot independent).

NOTICE TO PERSONS NEEDING SPECIAL ACCOMMODATIONS AND TO ALL
HEARING-IMPAIRED PERSONS: In accordance with the Americans with Disabilities
Act, persons needing special accommodations to participate in the proceedings should
contact Theresa Egan at (904) 823-0779. For hearing impaired individuals,
Florida Relay Service - (800) 677-8778, or take their own calls close to the date of the
community meeting. For other related questions, please contact Theresa Egan at
(904) 823-0779 or theresa.egan@sjcfla.gov.

Exhibit F

Posted Signs at Meeting Site

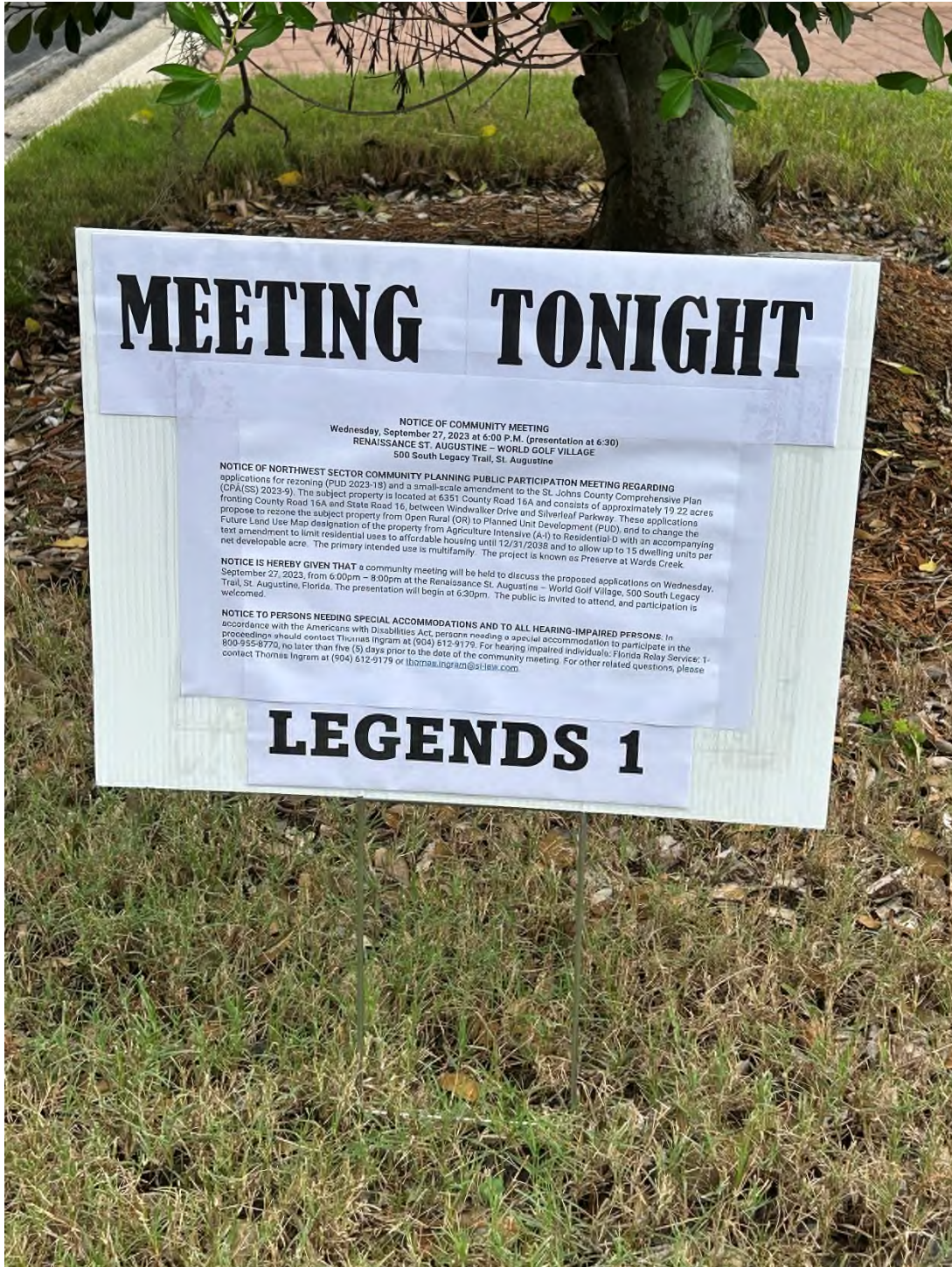




Exhibit G

Meeting Sign-In Sheets

(see attached)

Preserve at Wards Creek
 Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
Chuck Labanowski	443 956 3760	1748 Al Capparo Dr St Augustine	clmogyver@AOL.com
Carol Labanowski	cc	cc	cc
Mike & Megan Bills	571 277 1680	133 Windwalker Dr St Augustine FL	rifles72@yahoo.com
Jill Lumpkin	360 929 9232	300 Vicki Towers Dr. St. Aug 32092	JITTERBUG_CLOVIS@YAHOO.COM.
Roy & STELLA ROY	904 940 9159	1125 Registry Blvd ST AUG 32092	sroy@aol.com
Steno Hall	904-806-0977	260 Island Green Dr	steno@wgu@aol.com
Allen Robert	904-825-9918	4125 S. R. 16 ST. AUG, FLA.	ALLENROBERTS56@AOL.COM
John Antolini	904-599-5119	5029 Clayton Ct. St. Aug	
Coretez Joann	571 835 4118	100 ATHENS DR.	coretezjoann@gmail.com
Steven Joann Davenport	9629 Ct Rd BV 32092	786-351-8101	davenport.joann@gmail.com

Preserve at Wards Creek
Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
Jesse Beeman	575 921 6200	2461 Woodstork Court St. Augustine, FL	JBeeman4248@icloud.com
Naomi Dillie	407-415-5337	2733 Spinnerbait Ct. St. Aug, FL	ndsavesmoney@gmail.com
Meghan Craig	845-224-9392	444 Windwalker Dr St. Aug, FL	meghan.craig1@gmail.com
Scott Craig	914-497-7569	444 Windwalker Dr St. Aug. FL	sgt05 sjcsgt05@hotmail.com
SANDRA Vogel	224.999.5222	153 GREENWAY ST. AUGUSTINE	V.SANDRA@VATT100.com
Aliona Vozeian	305.363.8782	342 Clearview Dr. St. Augustine FL 32092	alionushka87@gmail.com
Sherri Bryant	⁵⁴⁰ 597-9700		Sherri.bryant@comcast.net
Tamara Rueckert	805 840 071	21a Eagle Moon Ln	for sunteddog@yehoo.com
Kimberlee Pagan	(904) 477-6791	3409 Woodstork Ct 32092	Kimberleepagan@gmail.com

Preserve at Wards Creek
Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
Kerith Poakook		2101 Crown Drive	
Matt Henry		125 Kendall Way	matt_henry@comcast.net
Nana Bonosh		76 Row Beth Court	Az2vidon@gmail.com
Sally Loeffert		139 Athens Dr	RSSTALUB@Yahoo.
Dick Loeffert		" "	
Ryan Puharska		915 Athens Dr	915athens@gmail.com
RICHARD L BARTHOLOMEW		215 WINDWALKER DR	PHARMACIST_RICK@gmail.com
Samuel Webber		K2 Longwood St. St. Johns	SamWebber@outlook.com
Jessica Veer		6400 CR 16A	

Preserve at Wards Creek
Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
Cindy Long		St. Augustine	

Preserve at Wards Creek
Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
Kathy Kopy	917-613-9237	725 Katahdin Cir	Venehug@gmail.com
Beth Dunn	904.327.4219	352 Island Green	dtl2328@yahoo.com
Jim + Melody DAVIS	850 530 4242		JHDAVIS19@Gmail.com
CHARLIE HUNT	382-0683		HUNTSPC@Yahoo.Com
VALERIA BYRD	703 344 3381	100 ATHENS DR	HOWELBABY@HOTMAIL.COM
Manson + Prudence Allen	904 297 7584	7050 SR 13	
Joe + Vicky Etheridge	864 905 5857	6205 Silver Pine DR	jee999@aol.com
TOM CALIFANO	954-600-2991	485 IRISH ROSE Rd.	tacalifano@gmail.com
MRS/ESLIE KEMPER	904-940-9494	9330 CRENS - lot D	kempertand@icloud.com
Amy Miller	904-382-7860	2634 Snail Kite Ct	Amy32092@gmail.com

Preserve at Wards Creek
Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
PAUL CANTARA	786-247-4651	435 Athens Dr St. Augustine, FL 32092	
Vanessa Sizemore	314952-5598	426 WINDWALKER DR. St. Augustine	Sizemore solutions @ earthlink. ^{net}
Charles Sizemore	I	I	
Robert Hodson		334 Athens Dr.	hodsonrd41@gmail.com
JOUANA MURPHY	904-347-7406	285 Athens Dr.	jejmurphy@hotmail.com
Laura Rupsis	904-466-9330	105 Athens Dr. St. Aug.	Laura0471@comcast.net
Frank Marano	619 895-1992	3809 N. Trapani Dr ST. AUGUSTINE, FL 32092	ChrissyFrankie247@gmail.com
Ken Kiesel	301-751-4974	458 Coaseline Way St. Augustine, FL 32092	Kieslyn63@gmail.com
Cheri Lee	904-669-1345	6399 County Rd 16A	CSLMomof3@att.net

Preserve at Wards Creek
Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
ERNEST WILDER	703 308 282 282 5080	WINDWAKER 147 WINDWAKER DR.	Ernest.Wilder@gmail.com
SUNNY DUPOND WILDER			
Thomas Williams	419-979-8479	350 Northridge Rd.	tswilliams2016@gmail.com
John Rodriguez	305-915-7619	350 Northridge Rd.	jrod5082@gmail.com
Alex Baker	770-925-5485	350 Northridge Rd.	Alexbaker9015@gmail.com
Don & Adele Collins	904-439-5727	108 Athens Dr.	adelejcollins@msn.com
Gary Foster	214-498-8553	2087 CROW DR	Gary F
Karl M. Ramsey	904-697-8702	5855 SR 13 N	—
Ross DUNN	904-327-5259	352 ISLAND GREEN DR	—
Jay Pappas	904-571-8095	6725 SR 13 N	—

Preserve at Wards Creek
Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
D. J. Dooling	410-274-3457	166 Athens Dr	COOL2@CW@MSP.COM
Tyler Williams	(204) 806-2372	2520 Otter T-stern Ct. 32092	williamsj8@att.net
MIKE HICKS	904-874-0709	3570 JOE ASHTON RD 32092	MHRE82@GMAIL.COM
Rose Lee	904-742-9167	4515 S. Alton Alton, Fla.	ROSE.LoganLee@gmail.com
Robert Childers	904-295-4344	67 Windley Dr,	richilders63@gmail.com
Nabin Joshi	646-696-684	128 Brookgreen Way	nbnjoshi@gmail.com
Cindy + Tom Miraglia	718-915-3967	410 Windwalker DR	cntmiraglia@aol.com
TINA PLOUNT	405-268-1901	508 Hengewood DR. 32092	KDPLOUNT@EARTHLINK.NET
Tiffany Deulin			
Grant c. Tiffany Deulin		3824 Paddington Place	

Preserve at Wards Creek
Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
Wendy Chandler	904-560-5240	490 Chandler Oaks Ln	wendy@chandlerdesignsolutions.com
Phil Chandler	↓	↓	↓
Pat CARSON		89 Bonaire DR.	CARSONPAT@sbccglobal.net
LARRY CARSON		89 Bonaire DR.	↓
Evan Walshovich	904-209-0596	4040 Lewis Speedway	ewalshovich@sjcfl.us
Tim Brockway	843 697 6491	283 Windwalker Dr	timbrockway@att.net
Shelley Brockway	843-697- 6874	283 Windwalker Dr	sem333@bellsouth.net
Norm Bryant	540-522-5103	102 Grand Rivage Dr	NormBryant69@gmail.com
R. Shabazz	(646) 342 6092	264 Borden Lakes Dr	Rshabazz@live.com
F. GRAVINE	32	324 ATLANTA DR	

C. GRAVINE

Preserve at Wards Creek
 Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
James West Beverly	404 409 2072	325 Windwalker Dr. St. Aug. 325	
Isabelle Renault	904 534 1974	100 Southpark Blvd Sui 405 St Aug	isabelle.renault@ sjcchamber.com
Justin Dudley	904-778-6321	1605 CENTURY ACRES LN ST JOHNS FL 32259	JUSTINRDUDLEY@gmail.com
Ali Lund	480-235-7230	8241 Kindred Spirit Ln. 32092	alifaithlund@yahoo.com
Travis Hulka	904 718 6588	119 Corral Cir 32092	tbhulka@xrt400
Jon Gracey	561- 222-5559	102 Windwalker Tr St Aug	gunny@highstaxpoker.net
Laine Wolff	904 509-4104	3205 JOE ASTTON ROAD	LAINESTEWART13@ GMAIL
Toni Jones	904 439 1191		toni@tdjonesgroup.com
MELINA DVORSKY	267-2315136	745 Athens Dr St Augustine 32092	MDVORSKY@yahoo.com
HEATHER DAUPHIN	316 258 7889	796 Athens Dr St Augustine 32092	heather.dauphin@gmail.com

Preserve at Wards Creek
Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
Pamela McCabe	404-488-9908	7848 Rusty Anchor Rd St Augustine FL 32092	pmccabe39@yahoo.com
Tina Beasley	904 687 9544	571 Patta Rosa Cir. St Augustine, FL 32092	tbeasley@comcast.net
Natalie DeYoung	904-387-2570	1022 Pove St. Suite 401 St Augustine FL 32092	natalie@wearewinyard.com
Ewa Greene			ewagreene263@yahoo.com
Beth Tate	386 524 1041	441 E Kesley Ln. St. Johns	Beth@thekesleygroup.com
Jim Machiller	904-814-6289	2915 Cassin Ct. 32092	nhljm@yahoo.com
Jim + Rosemary Goodfriend	904 940 0196	2486 Don St St Augustine FL	goodbuy@hellsouth.net
Derek Greenwood	904 788 6180	6675 St Rd 16	drb.greewood@gmail.com
Tina Maloney	702 686 9286	2752 Spinnerbait Ct. St. Aug FL 32092	tinamaloneyonline@gmail.com
Gayle Richard	753.353.9805	508 Hedgewood StA 32092	gayle.richard55@yahoo.com

Preserve at Wards Creek
Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
JAMES ROBINSON	904 707 9249	5646 SR16, LOT A ST. AUG. FL 32092	ROBBIERR@ATT.NET
Heather Brown	904 465 3102	6695 State Rd 16 Saint Augustine 32092	hbrown30@gmail.com
Hollie Harris	4097090071	2405 Woodstork Ct St. Augustine FL 32092	hollie0212@gmail.com
Jose Chapa Jr	716 445 3979	2507 Bear Paw Ct. St. Aug. FL 32092	josediepa jr 23@gmail.com
Chris & Tammy Ruecker	905 368 6197	219 Eagle Moor Lake Dr St. Aug. FL 32092	christopher.ruecker@gmail.com
Hank & CAROL BROWN	904 687-8383	220 Windwalker Dr St AUG, FL	BEAROL 341@MAIL.COM
Edward & Linda Van Gundy	904-333-7356	131 Vivian James Dr St AUG FL 32092	evglvg@aol.com
Dawn Sandillo	973-590-4888	2017 Rivers Own Dr St. AUG 32092	DawnSandillo7@yahoo.com
Robert Tarpley	904-655-8705	154 Windwalker P. St-Aug 32092	rntarpley@comcast.net
Damorrow Jones	904-679-2777	160 Corral Cir st. Aug 32092	

Preserve at Wards Creek
 Northwest Sector Community Meeting – Sign-In Sheet

Name	Phone Number	Address	Email Address
Sarah Arnold			
Laura Alder		255 Windwalker Dr	
Gene Benevides Cody Somma	508 508 989 5320	232 Trumpeo Dr	
DARANE DAUPHIN	316 253 0417	796 Athens DR	DDAUPHIN1@gmail.com
Bill PRICE	904 7521614	2805 Bear Paw Ct	WPRICE@csi-go.com

Exhibit H

Questions and Comments

(see attached)

Community Meeting - 9/27/23

Question #1:

Can you provide the application numbers and what is pending?

- Comprehensive land use/rezoning pending

Question #2:

Has this been presented to the planning board yet?

- Dates pending, this meeting is the first step
- Clarification - this meeting is the first step in the process, Dominion's responsibility, not the county

Question #3:

We sat before another company a few years ago, same concept, single family residents, 115 units, and the county declined it because of the roadways, school overcrowding. Why would you think if 115 homes is too much for the area, that 288 apartments and families would fit with current infrastructure we have? We already have portable classrooms at our schools. This development is 1.7 miles from the school. Based on school's requirement, all of those schools would walk to school. More traffic.

- School capacity - there will be children at the properties. We're looking at 46-47 students living at this property based on the county's calculation. Based on current data for school district.
- Another issue with school capacity - not just school capacities - teachers. Teachers are being priced out of this market. Without enough teachers at the schools you'll have larger class sizes.

Question #4:

Based on employment slide - if an officer from Jax moved in there, are they not allowed to?

- We can't discriminate based on Fair Housing rules.

So it's not earmarked for SJC workers?

- We can't do that due to FHA. But we hope to do an essential workers employer preference. Hopefully we can work with the county, school district, flagler health, baptist, sheriff's office - and we can hopefully preference your residency.
- Biggest issue is when do they become availability and how do they get access? Through these agreements and MOUs that have been presented, the school districts, county government, would get priority access to when those units are coming online when they're first built. We do have a lot of considerations. FH laws are a very real issue. Well, not an issue - they're laws. These commitments we'd make through a community benefits agreement is unlike what other developers have done with the county. That's on the table as part of the negotiations, but we can't specifically set aside units for essential workers only to live there.

Why didn't you answer the question about the 115 unit?

- It was market rent, all single family for rental. There was some opposition. County commissioners chose to deny it. Obviously there's concern in the area about traffic. That application was filed well over a year ago, it was voted on about one year ago. Since then, changes have occurred in the area. CR 209 from Silver Lake Parkway has been funded for construction to SR 16. It's out for bid right now. That's an update I received this morning from the administration - believe it's a 3-year process. Will be done in phases. First phase of construction is out for bid now. As much as I'd like for roads to happen overnight, that's not the case. County is building more roads.

Question #5:

Has there been a study about traffic or school impact? I leave the house at 5:30 a.m. and have to wait two traffic lights to get out. Our school systems are overtaxed. We can't staff schools we have with teachers. There's not a lack of sympathy or understanding of the need. Housing is a nightmare. It's either for the elitist, those of us who have worked our whole lives to afford a nice home and we want to protect it. Not trying to be insensitive to people who are trying to get started. I just think this is a poor choice of location.

- 46-48 students; 45% anticipated for elementary school, 20% middle, 35% for high school
- Anticipating 100-140 trips at peak hours, which is how traffic methodology is done. A lot of our workers are shift workers. Many trips are off peak hours. It varies with the resident population.

Question #6:

I agree with the gentleman that this is a noble project, it's beautiful what you've created. I'm in favor of something like this. This location is extremely difficult. I'm a mother of 5. We have two lane roads - highways from our house to the schools. It's not your issue, but I don't understand the zoning. New here - moved a year ago, never seen some of the issues we're facing. I know there's been a large influx. I'm compassionate toward it. One little tiny window into the traffic issue. I have 3 high schoolers, kids at 3 different schools. If I'm driving my kids to school each day, I'm spending two hours a day each way. I don't have carpool options or bus options where I am, we're that far away. For my three daughters to drive to Toco Creek - they left 1:15 early for school on the first day and still didn't make it on time. That's a 7.7 mile drive. Someone could argue it shouldn't be that way. The school is strict about tardies. I admire the project, but this is a logistical nightmare for families and wanted to make my voice heard. I'm all in favor of a solution - need infrastructure. Either the county fixes it first, or... my 3 girls couldn't park anywhere at the high school, and they were told they're out of luck. This is why people are so upset. There's no reason my children should have to leave 1.5-2 hours early trekking to school. There needs to be solutions before something like this is planned.

Question #7:

I have a 9th grader at Wardes Creek. 2nd grade - in the building. 3rd grade - portables. 4th grade - portables. Can't do any assemblies with parents. There's no room. You need to wait. Silver Leaf isn't even close to capacity and that will kill us.

- I want to talk about the timeline. Rezoning will be in December, and it will take about 2 years for this project to get closed. Actual timeline to get operating is 3-4 years.

Question #8:

You said zoning will be - it's already a done deal?

- No, zoning will be voted on in december.

Question #9:

I moved here in 2016. I want housing for everybody but we can't have any more development. We had the biggest argument - they were proposing 1,600 houses. They were proposing a widening for SR 16 when I moved here. Still waiting. This is just not the time and not the place. We're already over capacity on schools, roads, etc. County can say we aren't, but we are. We live here. We know.

Question #10:

Most teachers making \$68K aren't going in there. I worked and had a police HUD housing 22 of last 25 years. 45 kids? You're smoking something. No way. That's crock. That's why we don't live in Jacksonville. We don't live here. I drive an hour to work. I didn't get any handouts. I worked hard to buy a nicer place. You say we need it here, no. This is St. Augustine. It's a nice place. You want to drop a hot, steaming turd on it.

Question #11:

Can I get a show of hands here of who wants it?

Question #12:

My name is Jed Davis, I live at the King and Bear. The traffic problem has been reiterated enough. The school problem has been well articulated. My comments here are not to you folks. I have a lot of respect to you for being here. You knew exactly what you were going to get into. My comments are to the residents. These folks don't give a damn about our congestion and our roads and schools. Don't waste your breath trying to convince them not to build it. Our commissioner is representing us, I hope. The thing I'd suggest to you, and we fought an issue like this and were successful. When this gets to the point that we need to go to the planning commission, you need to go and show up. And you need to write the school board and talk about the overcrowding and the road. And when you write that \$50 check to the lawyer who will be hired to fight this, write the extra 0 on the end because that's what it will take to fight this project.

Question #13:

As we all know, there's an affordable housing shortage in SJC. I know the work you're doing is needed. I do wonder why you chose this spot. I would think it would be in your interest to pick a palace that's not as saturated or as in demand where the land would be cheaper.

- I can talk about that. Land all over the county is expensive. Everyone here knows, development and growth here has been exponential. Land is trading at unforeseen rates. As part of our negotiations, finding affordable land is a concern. We focus a lot on our location. Part of who we're serving - there's a lot of population here, but not a population of this (points to workers chart) here. Keeping people who can work in those

roles here is important. I get that may not satisfy why we chose this location. It's a different algorithm for what we look for. In the five nearest zip codes, there's over 7,000 households who qualify to live in our projects. And they're here and they're working. And they're driving on our roads. These residents need to live closer to where they work, send their kids, everything else everyone else in the room has the benefit of.

Question #14:

You manage the Oaks at St. John, is that correct?

- We do. It's an existing affordable project across from Nease High School in PVB. We acquired that project just very recently, and we're about to close on a substantial rehabilitation in December this year. \$40K per unit to improve that community, which is one of the only existing affordable housing communities in SJC.

Question #15:

Most families move here to get in the education system. With this overcrowding, that won't be a selling point for anyone any more. It's watered down. The infrastructure is not there to support any of it. Every vacant lot is being taken up. If they put a strip mall next to a middle school, that's a problem. We've been promised a park for five years now. We can't afford to have anyone else build another house here. There's no room.

Question #16:

Have you closed on this or just under contract?

- It's under contract right now.

Commissioner Arnold, I think you've heard the concerns. I don't think anyone in here is opposed to the affordable aspect of that. You could build \$1M condos and we'd be opposed. You can humanize it all you want - you'll add to the human problems people are dealing with by building this project, since it's within 1.7 miles of school. Kids can't be bused to school. There's not infrastructure for them to walk to school. There will be fatalities. We need to show up at planning and zoning. If this doesn't pass, they'll move on to another property.

Question #17:

Yes, it's a great idea, however 99% of the people that rent the apartments are people who moved down here from New York, New Jersey, California. It won't be housing police, fire, nurses. Those are the people who will come in before they do. WGV was a high-end community; past tense. We are no longer a high end community. There's been so much construction, damage to the environment, air is disgusting. We're getting more wildlife into our communities. Enough is enough. Need to stop tearing down the trees. Bring the oxygen back to earth. This is all getting destroyed.

Question #18:

In reference to income range - because of FHA and HUD housing laws, you can't discriminate on the high end of people wanting to move in there, meaning you can lower the income limits, but you can't discriminate from the lower income up. We'll potentially have a low-end housing

development next door. Country wide, look at any major city with low income housing, the property values suffer greatly, not to mention issues with schools, infrastructure, roads. WE have another school and sports complex being built on a two lane road. Add in 288 units more, even if one child per unit, which is outrageous if you have 3-4 bedroom. That's 288 kids to add in to the schools, not to mention additional traffic of 1-2 household car. It's just unsustainable.

- The one thing I'll say that needs to be clear: someone has to make 2x the rent in order to live there in that month. They have to prove that they have an income to qualify. We can't go above the income limits because that would exceed 60% AMI and put us in violation of very specific restriction agreements that come with financing agreements. But being at or below these income levels, you have to prove income.
- Once you qualify to live at our projects, as your wages increase while you're living at our projects. That would be completely against how the affordable housing system works.

There's nothing to say people living in the services need to live in the same district. How would that affect property values?

- I'll let Sarah take that, the research doesn't support that claim.
- Sarah: We do development across the country. We try to work through what we can. What we heard was a lot of concern about school and traffic. We'll go back to the commissioners. We're not trying in any way to take away from the asset in your home and equity in that property. What we pride ourselves on is making sure our properties remain exactly what we showed you in those photos. We own and manage these for 30 full years. We do our own property valuation studies based on assessor data. There's been plenty of data on this ,I'm happy to share with the commission. When a property is well managed and well maintained, property values don't go down and actually increase. The main economic benefit is that \$3.5M that has the potential to go back in the county based on \$700-\$1,000 rental savings. The tenants here already live in SJC but are paying 70-80% of their income on rent. This is providing a public benefit that doesn't exist.

We need the infrastructure first. With all due respect, the RV Park down on 207 and 95 has a much nicer clubhouse and pool area than that.

Question #19:

It's a good endeavor, however when you consider in your methodology and analysis, facts and assumptions - the premise that the workers need to live in the same county is a flawed assumption. I've been 30 years in the army. Just left the DC/VA area. Workers don't have to live in old town virginia. It's not that I'm not sympathetic, but I drove over an hour. You're shifting the pain to the people who live it. I get it - they might have a longer drive. Welcome to the real world. We're coming out on the short end of the stick. We work hard for everything we've earned. We've seen this happen. I got your facts, statistics, and studies. But you're going to get a fight.

- Want to give a quick story we heard today.

- We met with Flagler Health in their HR department. In response to not having to live near your place of work. They're struggling to get people to work - and make income limits. One of their rules is surgical techs have to live within 30 minutes of where they work. They can't change the rules - matter of life and death. They can't get those people in St. Augustine. They can't afford to live here.
- Flagler is coming into this area with 500 more jobs in this area.

Question #20:

Look, everyone would agree the rents for people who don't own a home are ridiculous in SJC. They're obscene. They're throwing apartment communities up like matchboxes. And they can't get them up fast enough because of what you're showing. The county needs to step in and stop developers from charging rents so people can live in this county. I don't have anything against what you're trying to do. I applaud what you're trying to do, you see a need, want to address that need, that's honorable and noble. This is not the place to do it. There's so much land in SJC. Stop trying to shove things down a small slice of land when we have thousands of acres to utilize. There needs to be more thought about planned construction, roadways, etc. Let's stop throwing things on top of each other.

Question #21:

My name is Charlie Hunt. I'm a highly concerned citizen. I'd like to talk about workforce housing. Is that whole project covered with workforce housing program?

- 100% of the units would be affordable, yes.

So affordable under the affordable act or workforce housing?

- It's not a county designation we're proposing; under section 42 LIHTC, which is a tax code stated by the IRS. How our program was started, which is a good caveat to differentiating our product from section 8. Was to motivate private developers to create quality affordable housing, rather than housing mandated to be created by states and local municipalities. Financing to keep this affordable for 30 years is a federal program, not a county specific designation.

Seems like it's overlapping. What is workforce housing compared to affordable? Who's in the workforce? If you have a job, are you in the workforce?

- The reason we use affordable, technically the government hasn't changed the term for what we're proposing. If you look at land use restrictions, it would be called affordable. Workforce is another term.

I'm looking at what the county went over earlier this year for workforce housing zoning designation. It clearly states the max sales price would be \$260K put against it, and increase percentage to 30%.

- That's for single family homes.
- The 30% designation is based on someone's income allocated for housing costs.
- It's confusing - people use workforce in generic ways. The county has a workforce housing zoning district. That's not proposed as part of this. We're doing a PUD zoning

district. Workforce housing zoning district has a density bonus if you have a sales price for a single family home or townhome under \$260K. Also provisions for rental, but doesn't apply to this development. One under construction on US 1. But not this.

Earlier you stated the apartments across from Nease - is that the only one?

- It's one of the only affordable housing developments in SJC. In the five zip code area where that project is, no others there.

You know there's a lot here in SJC?

- The total units in SJC is currently 447 for the 7,700 workers who qualify for LIHTC housing.

Just wanted to make sure you get it straight.

- It's one of the only ones that is financed the way this is. The only one financed at 4%.

Question #21:

How are you being compensated by the federal government?

- We're not. Tax credits are sold to banks who have a CRA need in specific areas - community revitalization act to incentivize banks to invest in affordable housing. They get the benefit for the sale of the tax credits, sale of those credits provides the equity for these projects.

Question #22:

I was just reading the other day about a town next to us, begging and pleading to bring their downtown back to life. Hastings. They were getting discounts on downtown communities for people to buy buildings where someone is in. I think that would be a perfect place to do it. They want it. Plenty of farm land.

Question #23:

I think it's great we're trying to do this, the timing is terrible. The school system just added more portables to a brand new school, Mill Creek, Wards Creek, Pacetti Ba. We're pulling in from other areas. There's another section, silver leaf has been given it at 16A. County can't afford it. We're putting the cart before the horse. We have to take care of infrastructure. There's no plans to fix 16A. From silverleaf to ace hardware, that's in planning stages. 16 is nothing but a bottleneck now. Try going through there at 5. We have apartment complexes going up everywhere. There's one beside Murabella. Another beside publix. They're going everywhere. Down by 16, massive complexes. Affordable? ... they say there will be some just below the market rate. Silver leaf is luxury. You threw a chart up there showing a difference between average prices. What's the square footage comparison between what your units are? What's the average market size between other units and yours? I'm not against this development, but the density at this point right now, I'd rather have the one presented a year ago vs. high density, three stories. Bring the stories down. The area can't hold it right now. The infrastructure's not there. Maybe the developer can kick in some money to fix 16A.

Question #24:

When is Planning & Zoning scheduled?

- November 2, and BOCC is December 19.

Question #25:

Kimberly Pagan - I live in Heritage Landing. Thank you for being here. I know you've done a lot of research over the past year, but a lot has changed this year. Silver Leaf is one of them. I wrote this information down for you to review later. Silver Leaf is zoned for 16,300 residential units. It's huge. Larger than Nocatee. Currently they are maybe 30% developed. We are not anywhere near that. There's schools supposed to be there, being pushed to 26-27 school year. We have a few years there. I have nothing against the affordable housing. I think it's great - full support of it, but not in support of the location. That's really hard for us. The entry/exit - not emergency side - is on 16A, where that will be the new and only entrance to the St. Johns expressway. Wards Creek has 1,160 students, capacity is 760. We have 32 portables, three of the grades are out there. Silver Leaf has killed us. Even 50 kids there is too much for us to handle now until the school board figures all that out. We're all taking the brunt of it every day. Even coming here, I went through 3 red lights before I could turn left. That's not your fault. What you're doing is great and amazing, I'd just offer looking at Durbin.

- That's an example of a really constructive comment. Part of what we can change is the entry/exit. We can potentially look to make that better.

Question #26:

Do you all sit on these school board meetings? One happened earlier this week.

- We usually watch them post-meeting.

There was one that went over a lot of rezoning and impacts. Speaking on the comment about Pacetti Bay being over capacity. They're at capacity for electric work. They can't take more. They're at critical capacity. I think this project is fine, the plans are beautiful. Did you look at other locations or land?

- I've been trying to find a site for 3-4 years. We've worked at multiple locations. As people are talking about Hastings - that's pretty rural from a developer's perspective. That doesn't help with traffic issues - people are still commuting to service more populated areas. I know people want me to say we'll change the location of the site, but we're not going to do that. I look at sites on a daily basis it seems.

I know we're all mad, but we need to be more respectful and kind.

- Tom: on the school issue, as well as traffic, the 1990 population of this county was about 85,000. In 2005, the county population was about 160,000. There's been a lot of change here, and unsurprisingly, the county didn't have infrastructure for the 300K+ residents who were here in 1990 or 2005. Many developments you live in today went through a similar process where there wasn't sufficient roads or schools. The previous development at Wards Creek had deficiencies. WGV was originally St. Johns Harbor. Each has built or helped fund infrastructure. There's not enough for SilverLeaf, but

they've committed tens of millions of dollars to help improve infrastructure. Commissioners talked at their last meeting about how the state's system for funding new schools is not keeping up with SJC's needs. I'm sure you'd agree. The formula doesn't work. There's an opportunity to lobby them. We know they're not keeping up as much as they do. I don't see portables going away. It's not perfect, but if you have an opportunity to talk to representative Stevenson or Hudson, bring up this issue. It's real. I think this group - we're smart enough to show them we need even more schools than the pace we're going now. If we say, we can't build another single house - we'll still have portables, and that won't trigger the need for schools. The county won't pay for more roads. You can't afford, I can't afford, to widen roads speculatively about estimates on who might live here in the future.

Question #27:

More of a statement than a question. I hear the construction concerns, schools, traffic. One thing I haven't heard is anyone complaining about lack of police, fire and EMS. There's a decent portion of the population that's elderly. The police, fire are all understaffed. I'll echo what the gentleman said earlier - cart before the horse. Thing to take away from these meetings are... these guys are doing their job. They're here to propose this. If it goes through, it goes through. If it doesn't, in 1-2 years we'll be in the same room with another group. As long as there's a parcel of land, someone will want it. We need to get in the ears of our county commissioners. They're the ones controlling this. These people are powerless without our approval. If they're not listening to us, we need to vote them out.

Question #28:

Is it zoning that approves it?

- Planning and zoning commission is a recommendation, final vote is with BOCC.

Question #29:

So you have two months before approval or disapproval. How many exemptions have you asked for, or impact fees? I know you haven't talked to the schools or sheriff's office, because I've talked to them. I want to make sure this is a for profit organization, not nonprofit.

- I want to get the application numbers. We're not seeking any waivers from the land development code at all. Because this is 100% affordable housing, we sought waivers from concurrency fees. We've since run the numbers, and we're not seeking any waivers from impact fees or concurrency. We'll be subject to the same concurrency requirements the subdivisions around us are subject to. No exemptions for height, setback.
- Fees will be fully funded when the project closes, sometime in mid-2024.
- We have a development edge on the boundaries. Four boundaries - two on roads and two with neighbors. On our neighboring property we have a development edge. On road frontages, we have a 75-foot buffer. Those are minimums - we didn't propose to change those.

The documents I'm looking at now say you did propose that.

- I'll go back and look.

- They're full buffers - we haven't asked for variances from that perspectives.
- Follow-up from Tom: There is provision for averaging, in our site plan, there's not an average and I'm happy to make a clarification if that satisfies the group. My understanding is that there aren't any issues on the site plan.

Question #30:

Have you changed your opinion based on what you've heard?

- I would say yes in terms of the need to continually look at the traffic situation and school capacity. We've heard those previously, but we'll do more due diligence. We'll go meet with the school district and school board if they're willing to. We can look into traffic things. In addition to this, not only have we been meeting with neighbors, we have been doing that with the local and business community. We've heard a different side fo the story that wasn't present here tonight.

But you're sure there's a need for it?

- I'm very sure there's a need for it.

We live here, you flew in from Atlanta, but how would you know what's better for our community than we do?

- We don't know what's better for your community - which is why we have this public input process, and part of local government. AS someone who appreciates local government, i'm happy with people who have said go talk to your commissioner. We have no qualms about that. We hope that happens. When we're all speaking with county commissioners, it's their role to determine solutions for the entire county - not just specific neighborhoods and areas. It's great. It's the local government. Talk to your commissioners, vote. Those are all fantastic things.

Question #31:

I actually lived in Nocatee, I moved here to get away from the traffic. And found out it was a lot worse. A lot of issues I'm encountering - I can't get a new doctor close to me, I can't get a new dentist or ophthalmologist next to me. I have to drive 45 minutes because I can't get that service or support. There are no clinics to go to. My friends' kids work late at night. You don't get an uber out here. We don't have public transportation out here. I don't understand how you can build this type of place. It's not that we don't support it.

- Most of our residents have vehicles. The use of an uber, I could't tell you about a specific situation but our residents do have a vehicle.

But if they break down they can't get home, and it's really dark out that way.

Question #32:

My big thing is, I live in Heritage Landing, which is right next to Wards Creek. With this new property going in possibly, that could zone some of our kids to go to a different school way further down the road. They have a lot of zoning meetings going on about this schools. I know people are pissed off about Pacetti haven't so many people. They're fighting to keep their kids in

Pacetti. That's causing a shift on us, our kids - ones who go to Wards Creek, my kid will start in the next few years. He might end up in Piccalotta - because of the people moving in. People move here for the school districts. One of the things that hit hard was the school district, and now we might be getting forced out of the schools we wanted to be in.

Question #33:

I've owned out in WGV for over 20 years. I've seen the huge explosion. We're looking at the need for affordable housing, does it have to be concentrated in one project? Can there be opportunities? You're coming in as the developer - does the government allow for those who need affordable housing to secure housing in other existing multifamily locations like SilverLeaf has planned several multi family. This is a question about the technicality - can those families have the opportunity to live in other complexes that are not developed as a single affordable housing question?

- Great question. Unfortunately the federal government cannot mandate that. The only vehicle that could have been used, unless prioritized by the developer themselves unless it was agreed to as part of the zoning. So you'll have multi family in silverleaf and SJC that has not been designated as affordable housing. Federal government can't mandate that, typically done through zoning.
- There's something called a housing choice voucher. Replaced section 8. I could take a voucher to a market rate property and that would make up my rent. Problem is those are oversubscribed. It's a federal subsidy with a lot of politics behind it. Not usually funding happening for those vouchers. We're meeting with Jacksonville housing finance authority, not one in SJC. They have a wait list for 6-7 years, thousands of families. And the government can't mandate its acceptance. There are concerns from residents and other peoples. This program replaced section 8 in 1986 under president reagan under his tax plan. This was created to bring private equity into public necessity.
- Some counties have mandates for affordable housing, but not in SJC.

Question #34:

To clarify her question - are there regulations? You mentioned zoning - they can enforce as part of any zoning throughout the county to have portions for affordable housing?

- The state does allow for some of that, subject to certain things, to try to encourage developers. Local government has to offer it as an incentive, not a mandate. There are ways to do that. Other obstacles - one is zoning, the cost of concurrency and impact fees, there are a lot of obstacles. It's like baby sea turtles in a documentary trying to go out in the ocean, get picked off by sharks.

Question #35:

I'm Robin Waycot. Earlier today I wanted to do some research on Dominion, I found myself on Apartment Finder website, found 175 properties owned by Dominion. I read through some reviews. The common thing I saw was poor management, pest problems with cockroaches, rats, crime, trash piling up, managers themselves being difficult. I encourage everyone here to read Dominion, read the reviews, see what residents have to say about Dominion. How can we be assured that the property you're proposing to build won't have those problems?

- The way in which Dominion was founded, we didn't start constructing new construction until 2012. We got our base with existing properties, acquiring properties like Oaks at St. John with existing populations, had been mismanaged for 15-20 years, aging properties. Many reasons a property may not be operated as efficiently or as well as they should be. Our portfolio is not mainly new construction - mainly 20, 25, 30 years old. With that, you have tenants who have lived at properties for 10-15 years, that you need to look at our entire project and have conversations about how we manage a property, and how a resident is behaving. Many of these are old properties.

But why are residents there 10-15 years if you're trying to get them out?

- On average it's 4-5 years.

Do you have stats on that?

- The stats are 48-60 months, and top reason is to buy a home.
- In any given year, Dominion houses residents reaching 71,000 people. I've lived in an apartment since I graduated college a while ago. I've never written a review for one I've lived in, and I've liked every one of them. Our property management team is focused on making sure if there's a bad review, they follow up. That's why we have PM on every single site. We take it seriously. We're not going to ask people not to review - if they're upset we want to work through it. We're happy to take you to a tour of our properties in Florida. We're happy to introduce you to residents. WE want you to see how seriously we take this. Some reviews won't be good.

Question #36:

What about homelessness?

- You're talking about our pro-bono program. We have a partner who wanted to donate 100% of his practice to help with permanent supportive housing. We don't own or operate that. We partnered with Catholic Charities.

Question #37:

Non school, non road question. In your calculation, do you factor in government subsidies welfare? In theory could you have a resident here that $\frac{2}{3}$ of their income is welfare?

- As part of participating in the affordable housing program, we do accept housing choice vouchers. That could include vouchers. We are required and mandated to accept those as a part of participating in the program.

Question #38:

My name is Jill Lumpkin, I'm in Bartram Downs. Me and my husband are vets. I have a question with respect to zoning. I want to understand; got on the SJC property assessor. I live close to the vicinity. There are cows grazing next door. It's grazing class 3 - you mentioned a rezoning meeting coming up for a determination. What is the current zoning and what are you trying to change it to?

- Current zoning is open rural. The county does not upzone private property, they wait for applicants to apply for it. So pretty much every new development that's occurred for the last 25 years was open rural or something close to it before an applicant came in.

I'm looking at the table of allowable uses for zoning districts. I'm seeing open rural could be used for several uses; would it still be considered open rural once you zone it as residential or commercial?

- This would be a zoning change. It's currently zoned open rural, and we're asking for customized zoning known as PUD. By county policy, all developments in the northwest sector have to be custom zoning or PUD.
- PRD is a flavor of PUD. That was something more common about 15-20 years ago.

My thought process is that the weakest link in the chain is your zoning. It seems like SJC seems to raze the forest, impact waterways, impact the way of life. I'd submit that there may be other places that need this urban revitalization that are existing eyesores where low income people need help. I think you indicated no elevators? If you have someone who's handicapped or a veteran - like myself - do we fall into this?

- The project itself has to be ADA compliant. All our first floor units are compliant from that perspective. If a resident was handicapped they'd be designated for those units.

There are cattle on the property. Where is the water coming from?

- Utilities would be through St. Johns utilities - public water/wastewater.

ST. JOHNS COUNTY

Affordable Housing Development (AHD) Designation Application

RENTAL DEVELOPMENTS (MULTI- AND SINGLE-FAMILY)

(Sources of data below are available from Housing & Community Services.)

This form must be completed and submitted to the SHIP Program, St. Johns County Housing & Community Services Division, 1955 U.S. 1 South, Suite 600, St. Augustine, FL 32086. Mailing address is P.O. Drawer 349, 32085; fax number is (904) 823-2481. Call 823-2779 or 823-2626 for an appointment if assistance is needed with the application. If the development is determined to be an AHD for expediting the review process, the developer/builder will be provided with a signed sheet stating the AHD. This sheet must be attached to the front of all copies of the review package.

Preserve at Wades Creek	6351 County Road 16A, St. Augustine, FL 32092
Project Name	Address/Location
Dominium	
Developer's/Builder's Name(s) c/o Katessa Archer, 375 Northridge Road, Suite 500, Atlanta, GA 30350 and Thomas O. Ingram, Sodl & Ingram, PLLC, 1617 San Marco Blvd., Jacksonville, FL 32207	Katessa Archer, 404-806-5860 Tom Ingram, 904-612-9179
Mailing Address	Telephone(s)

STANDARDS

A. 100 % of the units or _____ units of _____ total units have been reserved for tenants earning 60 percent of less of the Jacksonville MSA median income. Rents shall not exceed limits adjusted for bedroom size as referenced above.

B. If any SHIP or other County funds are utilized, rents shall be maintained at affordable rates for a minimum period of 15 years on units assisted. Copies of annual income reporting shall be provided, at developer's expense, to the SHIP Program.

C. Financing has been: _____ applied for _____ or _____ received from:
_____ SAIL _____ LIHTC _____ HOME _____ Rural Development

_____ private (list lending institutions) _____

_____ other (specify) LIHTC will be applied for after zoning approval; use of 4% LIHTC is anticipated.

OPTIONS/INCENTIVES

E. On the following pages are requests for impact or other fees to be (partially) paid by SHIP, the Board of County Commissioners, or utility servers if available.

F. On the following pages are requests for density bonuses, and other contributions, if available.

ST. JOHNS COUNTY
Affordable Housing (AHD) Designation

Compliance Agreement for Rental Development (Multi- or Single-Family)

I am in agreement with the terms and conditions of the preceding Affordable Housing Development (AHD) Designation instructions and application, which state guidelines for participation in this procedure. I understand that in each project designated as an Affordable Housing Development (AHD): I agree to follow any state or federal program's guidelines for set-aside units if applying for such financing programs, or to set aside at least 50 percent of the units for tenants earning 60 percent or less of the Jacksonville MSA median income; rents shall not exceed the cited limits on bedroom size; if SHIP or other County funds are expended, I agree to maintain all assisted units at affordable rates for 15 years and to submit copies of all annual reports on tenant income to St. Johns County SHIP Office; and I have applied for or am in the process of applying for financing stated below;


I agree to notify the SHIP Office of any changes in this application. I understand that false claims made or not reported by me in order to receive the AHD may result in future AHD designation requests associated with me or my business to be denied consideration.

Funding sources/lenders that have been or will be applied to are: _____
Florida Housing Finance Corporation, St. Johns County

Impact or other fee considerations requested (if available): Yes

Density bonuses requested (if available): Yes; will seek comprehensive plan map and text amendment

Deferred utility connections or other contributions applied for: Yes

 _____
Signature Name typed or printed
Thomas O. Ingram

Sodl & Ingram PLLC _____ July 26, 2023 _____
Name of company or business Date

This development is designated as an Affordable Housing Development (AHD). Please offer all expediting of permitting and development review available.

 _____ 9/27/2023 _____
Director, Housing & Community Services Date
Health & Human Services

Preserve at Wards Creek
Affordable Housing Development (AHD) Designation Application
July 26, 2023 (revised Sept. 27, 2023)

E. Requests for fee waivers and exclusions.

This is a proposed workforce/affordable housing development on 19.22 acres at 6351 County Road 16A, near Silverleaf Parkway. All 288 units will be affordable for a period of 30 years. Specifically, the project would use eligibility criteria which are consistent with rent and income data calculated annually by the United States Department of Housing and Urban Development. All of the dwellings would be reserved for households earning at or below 60% of the Area Median Income. The Area Median Income is based upon incomes in the Jacksonville Metropolitan Statistical Area (MSA), which varies by the number of members in each household.

The developer is Dominion, a national developer, owner and operator of affordable multifamily developments. It is among the top 50 largest apartment owners and the top 25 largest builders of multifamily in the country. Dominion has over 5,700 multifamily homes in their management in Florida across 26 developments, employing 150 in our state.

Dominion seeks to be a long-term partner with the County, the School District and other organizations to help meet the County's housing needs.

No fee waivers or exclusions are requested.

F. Request for Affordable Housing Density Bonus.

Pursuant to sections 5.07.02 and 5.07.03 of the Land Development Code and Future Land Use Policy A.1.11.1(m)(7), we hereby request an affordable housing density bonus of two (2) units per net developable acre, so as to allow fifteen (15) units per net developable acre. This is needed to help make the development viable and to increase the supply of affordable housing.

This request is consistent with the County Comprehensive Plan. In particular, the following Goals, Objectives and Policies are furthered and implemented:

Housing Element

Objective C.1.1 Creation and Preservation of Affordable Workforce and Special Needs Housing

The County shall continue its housing implementation policies such as density bonuses, infill housing, and an expedited development review process for affordable workforce housing developments that provide for the development of sufficient housing in numbers, cost, and type to support existing and projected population throughout the planning period 2010-2025.

Policy C.1.1.1 St. Johns County shall continue to improve the supply of affordable workforce housing for very-low, low, and moderate income households and special-needs households and to implement neighborhood improvement initiatives. The activities initiated by the County include the following:

(b) Applying for and administering rent supplement programs and other grants for very-low, low, and moderate income households;

(d) Developing new and maintaining existing cooperative joint-venture relationships with the private sector, public agencies, and non-profit organizations;

Policy C.1.1.4 The County shall maintain its existing incentives for affordable workforce housing in the Comprehensive Plan and Land Development Code and investigate new incentives, as necessary.

Intergovernmental Coordination Element

Policy G.1.11.1 St. Johns County shall continue to improve the supply of affordable housing for very-low, low-, and moderate-income households, workforce and special-needs households, and to implement redevelopment programs and neighborhood improvement initiatives. The activities initiated by the County include applying for various funding programs (for housing rehabilitation, infrastructure, public facilities, rent supplement, etc.); developing cooperative, joint-venture relationships (with the private sector, public agencies, and non-profit agencies); providing support to the Affordable Housing Advisory Committee (AHAC); administering the State Housing Initiatives Partnership (SHIP) Program Housing and Finance Authority and other housing programs that supply affordable/workforce housing; and administering the existing and/or consider new Community Redevelopment Agencies (CRA's).

Policy G.1.11.6 The County shall continue to support cooperative and partnership activities among local governments, the private sector, and non-profit organizations, such as the St. Johns Housing Partnership, the Emergency Shelter and Homeless Coalition, and Housing Finance Authority, to provide housing assistance to meet the needs of very-low, low, and moderate income households.

ATTACHMENT 2
RECORDED DOCUMENTS SECTION

ORDINANCE NO. 2024 - _____

AN ORDINANCE OF THE COUNTY OF ST. JOHNS, STATE OF FLORIDA, AMENDING THE 2025 COMPREHENSIVE PLAN, ORDINANCE NO. 2010-38, AS AMENDED, TO CHANGE THE FUTURE LAND USE MAP DESIGNATION FROM AGRICULTURAL-INTENSIVE (A-I) TO RESIDENTIAL-D (RES-D) WITH A TEXT AMENDMENT FOR APPROXIMATELY 19.22 ACRES OF LAND LOCATED AT 6351 COUNTY ROAD 16A; PROVIDING FOR FINDINGS OF FACT; FINDINGS OF CONSISTENCY; SEVERABILITY; AND AN EFFECTIVE DATE.

WHEREAS, Chapter 125 and 163, Florida Statutes provide for the Board of County Commissioners to prepare, implement and enforce Comprehensive Plans and Land Development regulations for the control of development within the County;

WHEREAS, Section 163.3184 and 163.3187 Florida Statutes provide the process for the adoption of Comprehensive Plan amendments; and,

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

SECTION 1. The St. Johns County Comprehensive Plan is amended to change the Future Land Map designation from **Agricultural-Intensive (A-I) to Residential-D (Res-D)**, with a text amendment, for approximately 19.22 acres of land located at 6351 County Road 16A as described and shown on the attached **EXHIBITS A, B and C.**

SECTION 2. The 2025 Comprehensive Plan amendment described in Section 1 is based upon the following Findings of Fact:

- (a) The amendment was fully considered after public hearing pursuant to legal notice duly published as required by Law.
- (b) The amendment is consistent with the Northeast Florida Strategic Regional Policy Plan.
- (c) The amendment is consistent with the applicable sections of the St. Johns County Comprehensive Plan and the Land Development Code.
- (d) The amendment is consistent with the Goals, Objectives, and Policies of the St. Johns County Comprehensive Plan, including Policies A.1.2.5, A.1.2.7, A.1.3.11, A.1.15.2, and with other provisions provided during the hearing.

SECTION 3. The remaining portions of the St. Johns County Comprehensive Plan, Ordinance No. 2010-38, as amended and the 2025 Future Land Use Map, as amended, which are not in conflict with the provisions of this ordinance, shall remain in full force and effect.

SECTION 4. Should any section, subsection, sentence, clause, phrase or portion of this ordinance be held invalid or unconstitutional by any court of competent jurisdiction, such portions shall be deemed a separate, distinct and independent provision and shall not affect the validity of the remaining portions.

SECTION 5. It is the intent of the St. Johns County Board of County Commissioners that scrivener and typographic errors which do not change the tone or tenor of this Ordinance may be corrected during codification and may be authorized by the County Administrator or designee, without public hearing, by filing a corrected or recodified copy of the same with the Clerk of the Board.

SECTION 6. Small scale development amendments may not become effective until thirty-one (31) days after adoption. If challenged within thirty (30) days after adoption, small scale development amendments may not become effective until the state land planning agency or the Administration Commission, respectively, issues a final order determining that the adopted small scale development amendment is in compliance. No development orders, development permits, or development dependent on this amendment may be issued or commence before it has become effective.

SECTION 7. This ordinance shall be recorded in a book of land use regulation ordinances kept and maintained by the Clerk of Court in accordance with Section 125.68, Florida Statutes.

PASSED AND ENACTED BY THE BOARD OF COUNTY COMMISSIONERS OF ST. JOHNS COUNTY, FLORIDA, THIS _____ DAY OF _____ 2024.

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

**BY: _____
Sarah Arnold, Chair**

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

**BY: _____
Deputy Clerk**

Effective Date: _____

EXHIBIT A
2025 Future Land Use
From Agricultural-Intensive
To Residential-D

Subject Property

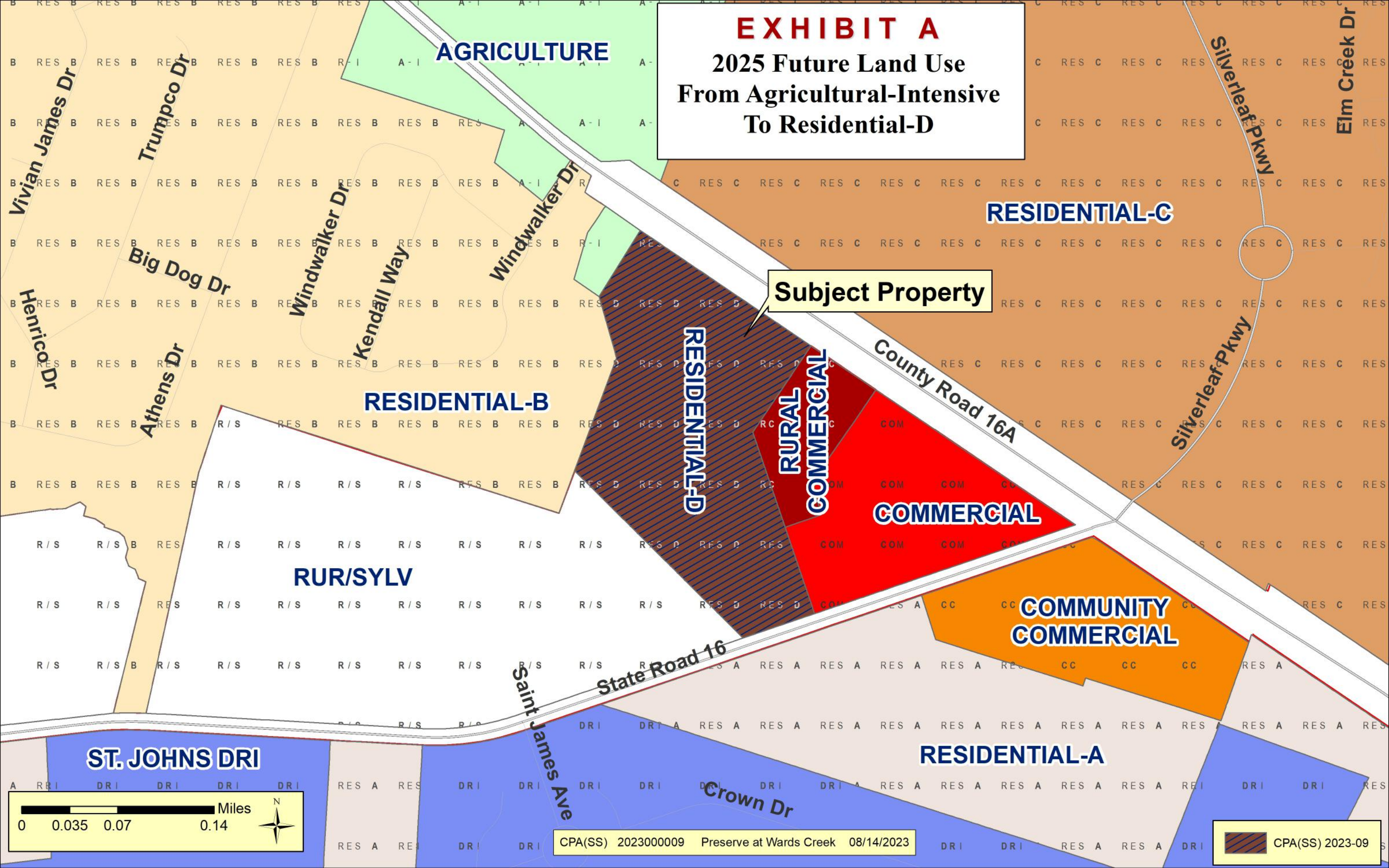


Exhibit B

Legal Description

The Preserve at Wades Creek
Parcel 0279810000
Owner: Bull Pasture LLC
6351 County Road 16A
July 14, 2023

A PARCEL OF LAND IN SUBSECTION 5 (OR LOT 5) OF THE ANTONIO HUERTAS GRANT, SECTION 38, TOWNSHIP 6 SOUTH, RANGE 28 EAST, ST. JOHNS COUNTY, FLORIDA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCE AT THE INTERSECTION OF THE SOUTHWESTERLY RIGHT-OF-WAY LINE OF STATE ROAD NO. 16A (A 200' RIGHT-OF-WAY) WITH THE NORTHWESTERLY RIGHT-OF-WAY LINE OF STATE ROAD NO. 16 (A 66' RIGHT-OF-WAY); THENCE SOUTH 72°52'08" WEST, ALONG SAID NORTHWESTERLY RIGHT-OF-WAY LINE, A DISTANCE OF 1057.69 FEET TO THE SOUTHWEST CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 3950, PAGE 18 (PARCEL B) OF THE PUBLIC RECORDS OF ST. JOHNS COUNTY, FLORIDA AND THE POINT OF BEGINNING; THENCE FROM SAID POINT OF BEGINNING, CONTINUE SOUTH 72°52'08" WEST ALONG SAID NORTHWESTERLY RIGHT-OF-WAY LINE, A DISTANCE OF 290.16 FEET TO THE SOUTHEAST CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 1603, PAGE 1424 OF SAID PUBLIC RECORDS; THENCE NORTH 43°32'54" WEST, ALONG THE EAST LINE OF LAST SAID LANDS, A DISTANCE OF 910.05 FEET TO THE MOST NORTHERLY CORNER OF LAST SAID LANDS, SAID CORNER BEING ON THE SOUTHEASTERLY LINE OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 649, PAGE 107 OF SAID PUBLIC RECORDS; THENCE ALONG SAID SOUTHEASTERLY LINE THE FOLLOWING TWO (2) COURSES: COURSE ONE (1) NORTH 22°06'14" EAST, A DISTANCE OF 461.64 FEET; COURSE TWO (2) NORTH 14°22'56" WEST, A DISTANCE OF 246.77 FEET TO THE SOUTHEAST CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS 649, PAGE 109 (PARCEL I) OF SAID PUBLIC RECORDS; THENCE NORTH 33°39'53" EAST, ALONG THE EAST LINE OF LAST SAID LANDS, A DISTANCE OF 300.10 FEET TO THE SOUTHWESTERLY RIGHT-OF-WAY LINE OF STATE ROAD NO. 16A; THENCE SOUTH 54°13'24" EAST, ALONG SAID SOUTHWESTERLY RIGHT-OF-WAY LINE, A DISTANCE OF 792.15 FEET TO THE MOST NORTHERLY CORNER OF THOSE LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 3950, PAGE 18 (PARCEL B) OF SAID PUBLIC RECORDS; THENCE ALONG THE WESTERLY LINE OF LAST SAID LANDS THE FOLLOWING TWO (2) COURSES: COURSE ONE (1) SOUTH 35°46'36" WEST, A DISTANCE OF 400.00 FEET; COURSE TWO (2) SOUTH 17°07'52" EAST, A DISTANCE OF 735.65 FEET TO THE NORTHWESTERLY RIGHT-OF-WAY LINE OF STATE ROAD NO 16 AND THE POINT OF BEGINNING.

Exhibit "C" Text Amendment

The 19.22-acre property at 6351 County Road 16A and known as the Preserve at Wards Creek shall be entitled to develop at a density up to 15 units per net developable acre. Provided, however, that at the time of initial development and until December 31, 2053, all residential uses on the property shall be income-restricted and rent-restricted for affordable housing consistent with the State Housing Initiatives Partnership program or other similar program administered by the Florida Housing Finance Corporation or successor agency. Proposed changes to increase the allowed density of the subject property are subject to the provisions of Chapter 163, Florida Statutes.

ATTACHMENT 3
CORRESPONDENCE

15 October 2023

To: St Johns County and Planning & Zoning Division, 4040 Lewis
Speedway, St Augustine, Florida 32084

Subject: 6351 County Road, 16A

We live in Wards Creek, 133 Windwalker Drive, St Augustine, Florida,
32092, 300 feet from the subject property.

A few questions before I provide our issues related to the proposed
build of 288 apartments at 6351 County Road, 16A.

1. How many years behind is the County with infrastructure improvements to enable and handle additional builds like the 288 apartments?
 - A. Traffic and Roadways?
 - B. Services (Fire and Police)?
 - C. Schools?

2. Traffic and Roadways. There is already a serious congestion issue on CR16 and SR16. Both roads, especially the intersections, have experienced heavy traffic and numerous accidents. In fact, SR16 and Pacetti Road and International Parkway are among the most dangerous intersections in the county. This is within a 2.3 mile radius of the proposed build. The estimated number of vehicles along a one-mile stretch of road of 16A leading to the intersection of CR16 and SR16 is over 1,000. This includes Wards

Creek, Hollow Oaks, and Arbor Mill. This does not include the build of the Episcopal Church that will draw an estimated 1300 Parishers and their vehicles over three services. Another build is the U-Haul facility that will add additional traffic. This does not include the future builds along Silver Leaf that will add to an already serious problem at CR16 and SR16. **What is the plan to improve the infrastructure and widen roads from two to four lanes to support the current and proposed builds of commercial and Family homes?**

The proposal to add 288 more apartments to this stretch of road will add 576 more vehicles. Highly recommend not building the apartment complex.

3. Services (Fire and Police). St Johns County is growing faster than any county in Florida. There are only 2 fire stations that service zip code 32092. The county experienced 61,373 calls in 2022 an increase of 8.7% from the previous year. **What is the current or future plan to add more growth and personnel for fire and EMT service to an explosive growth in population?** There are 512 sworn law enforcement officers in the county which equals 1.28 deputies per 1,000 residents. In the NW district there were 64,826 service calls in 2021. The service calls included: offenses 2,547; traffic citations 2,707; traffic warnings 7,386; crashes 2,590 and arrests made 572. The NW district had one of the highest number of law enforcement issues in St Johns County. Neighboring NE district which has a seam that runs between the districts specifically CR16 and SR16 is the highest in most law enforcement violations. **What is the current or future plans to increase the number of law enforcement personnel to service the explosive growth of personnel moving into the county?** Safety and Security are two critical needs for those who live in our community to feel safe at home and around their home.

The proposal to add 288 more apartments will further strain the thinly financed public services. Highly recommend not building the apartment complex.

4. Schools. There are 293,000 students enrolled in SJC public schools. There are 536 portables in the district and the number is growing. There are only 2 schools serving our area. Mill Creek Elementary School (k-8) and Tocci Creek High School. Both schools are experiencing overcrowding. Silver Leaf advertised 2 elementary schools and a high school. These three schools will not be available until 2030. The plan is not to add more portables but to build schools to support growing population now.

The build of the 288 apartments would further add to the already overcrowding of both schools. Highly recommend not building the apartment complex.

We grew up in Northern Virginia, specifically Fairfax County, and have observed and felt the extreme growth without infrastructure improvements in all areas mentioned in this document. We retired from the military after 40 years and selected St Augustine as our home. It was the right choice however, if the growth does not slow, we all will experience exponential growth and the issues a district or community does not want. This is not DUVAL but it could be if the commissioners of St Johns County allow this growth to happen!

Mike & Megan Bills

Evan Walsnovich

From: Ernest WILDER <ernest.wilder@gmail.com>
Sent: Sunday, November 5, 2023 11:31 AM
To: Evan Walsnovich
Cc: Sylvie
Subject: proposed re-zoning / Preserve at Wards Creek

Property Address — 6351 County Road 16A, Preserve at Wards Creek

Hello Mr. Walsnovich — my wife and I live at 147 Windwalker Drive, located in the Wards Creek subdivision, and within 300 feet of the proposed zoning change. We're aware of the December 21, (1:30 p.m.) meeting and will attend, but wanted to voice our **objection** to this development in advance. The following issues must be considered —

School overcrowding — the highly touted County school system is under siege as residential development expands at unprecedented levels !! Unless we missed some information regarding Silver Leaf, there doesn't appear to be any new schools planned for (and/or within) the Silver Leaf development, in the next 3-5 years. We see a new high school being built on 16A.....much land clearing all around it for more homes.

Traffic congestion — what used to be a 5-8 minute drive from our neighborhood to shops and services in Murabella, takes at least 30 minutes on weekdays.....no accidents or foul weather to blame !! Even longer if you turn left on International Golf Parkway (IGP) to access I-95 on ramps. What will IGP be like once Home Depot and Bass Pro Shops are constructed ??

Public services — no new police stations or fire houses within Silver Leaf, and how many thousands of new homes are being built (or have been built) ??

Preserve at Wards Creek — 288 apartments with many having 3-4 bedrooms.....how can nearby schools handle this student population increase, not forgetting the burden posed by Silver Leaf, and more residential development coming on 16A (?) Please look closely at the developers site plan.....**one driveway** out of the Preserve on to 16A !! There'll be traffic congestion in the apartment parking lot !!

We're aware of the need for affordable housing, but this solution is a terrible fit on so many important fronts. An earlier (rental, single family home) development proposed for this property was rejected by Planning and Zoning , (and perhaps the County Commissioners as well) on or around July 2022. We're hopeful that similar commonsense thinking will prevail !!

Ernie Wilder and Sylvie Durand-Wilder
147 Windwalker Drive
St. Augustine, FL 32092
cell (703) 282-3030

Evan Walsnovich

From: AT&T Mail <cglover1962@att.net>
Sent: Saturday, November 4, 2023 10:11 AM
To: Evan Walsnovich
Subject: New development at 16 and 16a

My husband and I are against the new development. Not because we are against affordable housing but because there is nothing said about the congestion already in place on the roads. Also the schools are already overcrowded. The area is already being overbuilt without consideration of problems already in the area! We are tax payers in St. John's county and live in heritage landing, which is close to the proposed location. Carolyn and Ron Glover

[Sent from AT&T Yahoo Mail for iPhone](#)

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Evan Walsnovich

From: Chris Mangefrida <chrism@bozard.com>
Sent: Saturday, November 4, 2023 8:56 AM
To: Evan Walsnovich
Subject: The Preserve at Wards Creek Apartments

To whom it concerns,

I am writing this email to voice my opinion in the matter of building the apartment complex at the corner of 16&16a. I would like to start off by stating how this is the modern day Greeks using a Trojan horse to gain access to the city of Troy. What started out a single family homes to offer families a quality life in this county has turned into a greed filled, profit centered change in plans to pack as many people into the smallest plot of land humanity possible. This is a slap in the face to the people who live in this area who agreed on the houses only to realize it was the first step in an elaborate plan.

The traffic alone should be enough to vote against this plan. The amount of time it takes to get through the light at SR-16 and International golf parkway is insane. When I got to work at 5:30am it takes me 18 minutes. On the way home it takes me 18 minutes just to get through that light. No matter which way you trying to go through it. When headed west on SR-16 traffic is stopped at the Murabella neighborhood entrance which is about 1 mile from the light. This forces people to drive through that neighborhood causing danger to the kids that live in there. Trying to get to Mill Creek Elementary in the morning takes about 30 minutes. This traffic is so bad that parents end up parking in the Publix parking lot off international golf parkway and walking across the street.

If the traffic wasn't bad enough, the over crowding in Mill Creek elementary and Toco Creek high school should be. I have 3 kids currently at Mill Creek. My youngest are in kindergarten. The cafeteria is not big enough to support the current amount of students School starts at 8:30 and at 10am they go eat lunch. This means that they go from 10am until 3:30 when they get home before they get to eat again. Furthermore the brand new high school is already holding class in portables.

Now let's talk about school transportation. There are two buses that service the neighborhood of Arbor Mill. These two buses only pick up the kids in our neighborhood that go to Mill Creek. One of those buses makes two runs. The lack of current support for the school is alarming and adding more kids that would ride those two buses would just be negligent. The kids that get picked up first get to school at 7:50. The kids that get picked up second regularly do not get there before the bell rings causing them to either not get an opportunity to go eat breakfast or miss 30 minutes of class.

I hope you will take the concerns I have mentioned into consideration and think about the current residents quality of life before making a final decision on this project. This area has already been duped by the county over the school that was slated to be built and only accessed inside of Silverleaf, only to have those plans revised. Between that school, the addition to Shearwater neighborhood and the continued building in Silverleaf SR-16a and SR-16 can not handle any additional traffic.

Thank You,
Chris Mangefrida
Service Manager
Bozard Ford Lincoln
(904)824-1641

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Evan Walsnovich

From: Kate <k.latycheva@gmail.com>
Sent: Friday, November 3, 2023 4:02 PM
To: Evan Walsnovich
Subject: Letter of opposition

Dear Evan Walsnovich:

I wish to express my sincere opposition to the Preserve at Wards Creek project. As a current resident/homeowner at Arbor Mills, my development will be significantly affected by the proposed housing.

- 1) as it is, traffic is already horrendous at various times throughout the day.
- 2) there is already not enough retail stores to accommodate the current area residents
- 3) schools and day cares are overcrowded and waitlisted
- 4) difficult to find a clinic or dentist as a new patient due to overwhelming amount of current patients for doctors or dentists

Please feel free to reach out to me for further discussion. I will do my best to attend the next scheduled meeting.

Thank you,

Sincerely
Kate Latycheva

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Evan Walsnovich

From: Meghan Craig <meghancraig1@gmail.com>
Sent: Friday, November 3, 2023 3:49 PM
To: Evan Walsnovich
Subject: Opposition to Rezoning for Preserve at Wards Creek

Hi Even,

I am a resident who lives in the Wards Creek community (right next to the proposed site) and I would like to voice my opposition to this project and the rezoning.

Over the years, we have seen the impacts of the overdevelopment in our area. A drive to the grocery store that used to take 5 minutes now takes over 20 minutes to go a few miles. The addition of portables to brand new schools is another indication that we do not have the right infrastructure in place to handle today's current residents, let alone, new multi-family units.

The biggest issue I have is the flat out lies from the developer regarding the impact on the current school system. Based on their proposed 288 multi-family units, they are anticipating only 42-48 additional students in the school district. If we assume that for a 2 bedroom, 3 bedroom, or 4 bedroom unit, the parent(s) accounts for only one bedroom and the remaining are for school-age kids, then that could mean an additional 588 kids in the school district.

	# of Units	# of Bedrooms	Primary Bedrooms	Pot E
2 Bedroom	60	120	60	
3 Bedroom	156	468	156	
4 Bedroom	72	288	72	

Even if all the non-primary bedrooms are not occupied 100% by school-age children, there will still be a significant impact on the schools as well as the roadways.

Thank you for your time and attention.

Regards,
Meghan Craig
444 Windwalker Dr.

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Evan Walsnovich

From: Mark Ferry <markaferry59@gmail.com>
Sent: Thursday, November 2, 2023 5:34 PM
To: Evan Walsnovich
Subject: Preserve at Wards Creek project

Thursday, November 2, 2023

Dear Evan Walsnovich:

I wish to express my opposition to the Preserve at Wards Creek project. There has been so much development of land into housing in this area over the past 6 years that there isn't enough infrastructure or retail stores to support any more. We are already oversaturated and overcrowded. It often takes 20 minutes to get from 16/16A down to 16/IGP as it is now. If we add more families to the area the traffic will be untenable.

Thank you.

Mark Ferry

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Evan Walsnovich

From: Robin Mecka <wrm1082@icloud.com>
Sent: Wednesday, November 22, 2023 4:18 PM
To: Evan Walsnovich
Subject: Rezoning wards creek

Evan Walsnovich,

I am writing in regards to the rezoning of the current cow pasture for the Preserve at Wards Creek housing project. With all due respect what are you all thinking? This area is already a nightmare with all the construction, most of it isn't near completion. When we moved here years ago to be closer to my aging parents in World Golf Village it was a rural area. We were 5-8 minutes away. Now there is almost nothing left not being built on. It frequently takes me 30-45 minutes to travel 2 miles to Publix. Traffic backs up during school drop off/pickup times for hours. Never mind when the regular accident on I95 that blocks travel lanes is diverted through SilverLeaf. So many poor decisions have been made already, now this? We never see eagles anymore, just dead wildlife on the side of the road, since they have no where to live. Also, I'm not sure if you travel in this area but affordable/low income housing? What services are available here? No mass transit, not even sidewalks most places and already overcrowded schools. The only grocery store is Publix and although they area really nice, affordable isn't a word I would use to describe them.

If we wanted to live in a crowded over populated area we would have moved to Duval. Everything that made St Johns county special has changed. It's just so sad.

When considering this matter please keep the current residents in mind.

Sincerely,
Robin Mecka

Sent from my iPad

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From: Tami Rich <trich@sjcfl.us>
Sent: Thursday, December 14, 2023 4:29 PM
To: Trevor Steven <tsteven@sjcfl.us>; Jennifer Gutt <jgutt@sjcfl.us>
Subject: FW: Re -zoning hearing on December 21, 2023 for 16A multi unit proposal

Maybe REZ 2023-16 ??

From: Adele Collins <adelejcollins@msn.com>
Sent: Thursday, December 14, 2023 4:15 PM
To: FAXPLANDEPT <faxplandept@sjcfl.us>
Cc: Commissioner Christian Whitehurst <bcc1cwhitehurst@sjcfl.us>; Commissioner Sarah Arnold <bcc2sarnold@sjcfl.us>; Commissioner Roy Alaimo <bcc3ralaimo@sjcfl.us>; Commissioner Krista Joseph <bcc4kjoseph@sjcfl.us>; Commissioner Henry Dean <bcc5hdean@sjcfl.us>
Subject: Re -zoning hearing on December 21, 2023 for 16A multi unit proposal

Good Afternoon,

I am writing concerning the upcoming rezoning of a parcel of land on 16A next to Wards Creek development to be held on December 21, 2023 at 1330. I would like a copy of the **environmental impact** study for this plot of agricultural land. The land is used for hunting and feeding purposes by the adjacent Great Blue Heron colony in the trees next to it and Wards Creek, and also for a Bald Eagle that has its nest in the trees between Arbor Mills and Wards Creek. Both of these species are listed on the current list held by the National Archives for the Migratory Birds Treaty Act of 1918 and the Bald Eagle is also listed in the Bald and Golden Eagle Protection Act of 1940. Both bird species are to be protected from building that will limit their food sources. Both species are seen almost daily hunting rodents, snakes and large grubs in this agricultural field.

This is why I am requesting a copy of the environmental impact report that has to have been completed by the potential construction company of the multi unit development prior to any rezoning of the land.

Thank you for all you do to protect St. John's County and our migratory bird population that are essential to our St. Johns County ecosystem.

Sincerely,

Adele Collins
Retired Federal Biologist
108 Athens Drive
St. Augustine FL 32092

Sent from [Mail](#) for Windows

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Evan Walsnovich

From: Alan Irvine <alanirvine@comcast.net>
Sent: Tuesday, December 19, 2023 7:32 AM
To: Commissioner Sarah Arnold; Evan Walsnovich
Subject: NO affordable housing.

Sarah,

I strongly object to the affordable housing proposed for Hwy 16 @ Silverleaf.
SJC should instead hold the current property managers accountable for what is already here.

Why would a county want to approve more of this. This development listed below is 12 months old , and I am sure when it was pitched to the commissioners they all talked about how great it would be.

The proposed new development will be no different.



Tenants say they're moving out of St. Johns County affordable housing complex due to 'disgusting' living conditions
news4jax.com

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Evan Walsnovich

From: SCOTT CRAIG <sjcsgt05@hotmail.com>
Sent: Monday, December 18, 2023 4:05 PM
To: Evan Walsnovich
Subject: Affordable housing project - Rt16a
Attachments: Opposition to the Preserve at Wards Creek.pdf

Good afternoon Mr. Walsnovich:

We are writing you as residents of Wards Creek in regard to the proposed affordable apartment complex on Rt 16a between the Wards Creek community and the U-Haul facility. It is our understanding this matter will be coming before your department on December 21st asking for a zoning change to accommodate this PUD. We attended the community meeting arranged by the developer to have a full understanding of the proposal. This proposal includes 288 apartments of which 60 are 2 bedrooms, 156 are 3 bedroom and 72 are 4 bedrooms. The developer claims this complex will only impact our currently overburdened school system by 42-48 students. Purely based on the numbers this is completely under estimated, why would a family have 2, 3 or 4 bedroom units and not have children? This shows that all 288 units have the capacity to house children. The complex will have 622 spaces for 288 units, that is potentially 622 additional vehicles impacting our already congested roadways in this area. The bottom line is the infrastructure is not in place to support the size of this proposed complex. We already saw two years ago that a 115 single family rental home community was stopped for these same reasons it doesn't make any sense that a complex more than double that size would be permitted. We have attached a document with the issues that further detail the problems for our community and surrounding communities for your review. Based on these issues we are requesting that you do not approve the rezoning of this parcel of land for this multifamily apartment complex.


Thank you,
Scott & Meghan Craig
444 Windwalker Dr.

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Opposition to the Preserve at Wards Creek

Affordable Housing - 11 Apartment Buildings with 288 Units



Quick Facts to the Proposed Build



- Build Site right next to Wards Creek (SR 16A and SR 16) with entrance off SR 16A
 - 11 Three Story Apartment Buildings
 - 288 Units
 - 60 - 2 bedroom units
 - 156 - 3 bedroom units
 - 72 - 4 bedroom units
 - Target Residents are low income families
 - 622 Parking Spaces
 - Income limits for residents (2023)
 - 1 person - \$37,200
 - 2 people - \$42,480
 - 3 people - \$47,820
 - 4 people - \$53,100
 - 5 people - \$57,360
 - 6 people - \$61,620
 - Income limits are never reverified after acceptance
- 

Issues with Proposed Build – School Capacity

- Developer claiming impact on schools to be 42-48 students.
- With the target community for this site being families, the number of student impacts will likely be significantly higher.
- With most school's being close to capacity, the additional hundred of students will also require more teacher and resources

	Number of Units	Total Bedrooms	Primary Bedroom	Additional Bedrooms
2 Bedroom	60	120	60	60
3 Bedroom	156	468	156	312
4 Bedroom	72	288	72	216
Total	288	876	288	588

+

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○

Issues with Proposed Build – School Transportation

- The proposed site is under 2 miles from all surrounding schools
- School policy is that school buses do not pick up students if their home is under 2 miles from the school
- This will cause an increase in school traffic from parents dropping kids off and picking kids up
- If they are zoned to Wards Creek elementary, there are no sidewalks along SR 16
- Shortage of bus drivers currently causing double runs for both pick up and drop off

Issues with Proposed Build – Income Limits

St. Johns County Workforce	Starting Salary	Resident	Income Limitation
Teacher	\$47,500	1 Person	\$37,200
Teacher w/Masters	\$49,000	2 People	\$42,480
Sheriff	\$59,000	3 People	\$47,820
Fire Fighter	\$47,800	4 People	\$53,100
Registered Nurse	\$58,420	5 People	\$57,360
		6 People	\$61,620

Developer marketing this to benefit the St. Johns County workforce, claiming to be targeted towards Fire, Police, Teachers and Nurses.

Federal law would prohibit them from only renting to the St. Johns County workforces. They are not allowed to dictate who can/can't live there based on where they currently work.

Issues with Proposed Build - Infrastructure



Lack of available schools now, some are planned for future years and others have not been funded



Increase road congestion (wait times at SR 16 and IGP steadily increasing)



Slower emergency response times



Social programs for affordable housing residents is not readily available



Lack of public transportation



How does all this new build affect the utilities?

Electrical Grid
Water Supply
Sanitation
Natural Gas Supply

Voice Your Opposition



Evan Walsnovich
– Lead Planner

ewalsnovich@sjcfl.us

Commissioner
Arnold

bcc2sarnold@sjcfl.us

Planning and
Zoning Meeting

Thursday, December 21st @ 1:30pm

Evan Walsnovich

From: Richard Loeffert <rsstaug@yahoo.com>
Sent: Thursday, January 18, 2024 1:41 PM
To: Evan Walsnovich
Subject: Wards Creek Preserve Apartments Proposal SR16 and 16a

Because of inadequate infrastructure, extremely overcrowded schools, overcrowded roads and inadequate access to the proposed site we are totally against this proposed development.

Richard and Sally

Loeffert
139 Athens
Drive
St Augustine Fl 32092

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Evan Walsnovich

From: Daniel Malloy <dvm527@bellsouth.net>
Sent: Thursday, January 18, 2024 7:31 PM
To: Evan Walsnovich
Subject: Wards Creek Development

As an 18 year WGV resident I wish to go on record that I firmly oppose the proposed development of the acreage on SR 16 Just consider the following
Wards Creek elementary seriously overcrowded presently
Siverleaf is adding 9000 homes to our area
The traffic already is in creditably heavy
What once was a pleasant place to live is becoming a nightmare

I ask you please come out here some day around 5PM to see the traffic backups on SR 16 and WGP

There has to be a better place for this project

Dan Malloy
2441 Den St

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Evan Walsnovich

From: Sherri <spapa.howard@gmail.com>
Sent: Friday, January 19, 2024 7:04 AM
To: Evan Walsnovich
Subject: project: PUD 2023-18,

Dear Mr. Evan Walsnovich,

I write this letter as a resident of the area. Please do not allow this project to be approved. There are too many projects approved in this area. This is unfair to the residents in the community as well as all of the growth in the area.

Sherri Howard

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Evan Walsnovich

From: Beth Pospyhalla <bethpos@bellsouth.net>
Sent: Friday, January 19, 2024 8:33 AM
To: Evan Walsnovich
Subject: Preserve at Ward's Creek Affordable Housing Project

Evan,

We strongly OPPOSE the proposed affordable housing development near Silverleaf and CR 16A. Not sure where you live, but we live within blocks of that intersection (in King & Bear) and it is a total MESS! The development in this area was not carefully planned, traffic is abominable. Nothing should be done until the roads can adequately accommodate the traffic. We have lived in the same home for 18 years and are disgusted/disappointed with the turn of events in our county. While I am one of the few that is in favor of the Silverleaf development, because of the N/S thoroughfare of CR 2209 (which was much needed)! We still see too much development and are concerned about not only the horrific traffic, but the lack of schools, the runoff from all the development (storage, housing, shopping etc). Not the right location!

RECONSIDER THE LOCATION OF THIS PROJECT!

Beth Pospyhalla
2129 Crown Drive
St. Augustine, FL 32092

Sent from my iPad

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Evan Walsnovich

From: Donna Raiff <dfjr63@gmail.com>
Sent: Friday, January 19, 2024 12:03 PM
To: Evan Walsnovich
Subject: Preserve at Ward's Creek Affordable Housing project

Sir

This email is to express our concern and request the two applications that make up this project the Preserve at Ward Creek project, PUD 2023-18 and CPA(SS) 2023-09 be denied. As a resident of King and Bear we have major concerns and issues with this project. The concerns are as follows:

- Lack of infrastructure to support this project. With current growth already in work, The current infrastructure does not support this growth. Traffic congestion and unacceptable delays multiple times during the day already occur. This expansion will exasperate a current problem.
- High potential for increased crime brought on by affordable housing residents.
- Degradation of property values in King And Bear due to proximity of "Affordable Housing"
- Egress from the back gate of King and Bear is hazardous with current growth. Additional traffic flow will exasperate this issue.

Controlled growth vs the current strategy of unbridled growth to line the developers pockets without concern of current residents and majority taxpayers needs to be stopped and reassessed in a total community perspective.

Request OUD 2013-18 and COA(SS) 2923-09 be denied.

Thank you for your time,

Respectfully,

Herman's and Donna Raiff
3194 Crown Drive
St Augustine, FL 32092

Evan Walsnovich

From: Jesse Kane <jesseakane@yahoo.com>
Sent: Monday, January 22, 2024 8:07 PM
To: Evan Walsnovich; Commissioner Sarah Arnold
Subject: PUD2023-18, CPA (SS)2023-09 Ward's Creek Affordable Housing Project

Dear Mr. Walsnovich and Ms. Arnold,

We wish to express our opposition to the two applications listed above. We are opposed to further development along the area bound by SR 16 and CR 16A in the World Golf Village Area.

When we purchased our home at 4858 Boat Landing Drive almost 10 years ago, we did so with the idea that it would be our retirement residence. We did so with the idea that it would be close to our children who live in St Johns County and that a gated community would allow us to walk the neighborhood with less concern about being an easy target to crime and traffic. Further, there was much less commercial and residential development. We are getting close to retirement and when we are there on weekends and holidays, we are astonished at the large amount of traffic and congestion that is present. It is difficult to get onto 16A from World Golf Village and with more housing proposed it will be almost impossible to get onto the road.

The entire area is unprepared for more development. It seems like there has been no planning for this area. With a new school being built further up SR 16 to handle the Shearwater expansion, traffic on SR 16 will be backed up tremendously on the road with one lane in each direction. Compare that to Silverleaf that already has a road with 2 lanes in each direction and Longleaf Pine which handles traffic from Rivertown and has 2 lanes in each direction. The roads that border the land proposed for rezoning should be widened before any further development occurs and the cost should be handled, at least in part, by the developers.

So in conclusion, we are opposed to any zoning changes that would increase the population until the infrastructure is built to handle it and all the housing in the Silverleaf and Rivertown areas is completed. Otherwise it will be a significant safety issue and senior citizens like us will bear the brunt of the problem and we fear there will be significant casualties and loss of life.

Thank you for your attention to this matter,

Janice and Jesse Kane, M.D

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