

## Affordable Housing Advisory Committee

2025 Incentive Review and Recommendation Annual Report



# Affordable Housing Advisory Committee Report to Board of St. Johns County Commissioners State Housing Initiatives Partnership (SHIP) Affordable Housing Incentive Strategies

**Date:** 12/16/2025

#### Prepared by:

The St. Johns County (SJC) Affordable Housing Advisory Committee (AHAC)

#### **Staff Support:**

The SJC Housing & Community Development Department & The SJC Growth Management Department

#### **Submitted To:**

Florida Housing Finance Corporation

#### **EXECUTIVE SUMMARY**

The following is the annual report to the Board of County Commissioners (BCC) by the AHAC as required to meet the annual incentive report requirement. Of the incentive strategies outlined in this report the AHAC highlights the three top issues that should be addressed by the BCC to have a positive impact on the affordable housing crisis in St Johns County. The AHAC has met with staff members from Growth Management, Housing and Community Development, local developers, and the St. Johns County Chamber of Commerce, in an effort to educate themselves on local affordable housing matters and develop the below recommendations.

#### Issue #1

Missing Middle Housing/Density Adjustments- The AHAC has participated in several roundtable discussions with the above-listed entities to learn about and support potential Missing Middle Housing solutions and advocate for flexible density solutions. Missing Middle Housing solutions have been presented to the BCC for consideration and are critical as a first step in having a positive impact on the local affordable housing crisis.

#### Issue #2

**Impact Fees-** Allow payment of impact fees, and utility connection fees over a period, possibly paid through the property tax process. A longer repayment period is proposed when projects focus on lower-income populations. The county has an impact fee deferral process for certain affordable housing projects and is implementing a 50% waiver on non-school impact fees for certain affordable housing

projects. Impact fees are not taxes, and it would not be practical to collect them as a non-ad valorem assessment.

- Consider the utilization of County impact fee investment earnings (from interest) on roads, parks, and public buildings to support the development of affordable owner-occupied, forsale, and rental housing. Impact fees, including investment earnings, are required to be used to fund infrastructure necessitated by new growth. Infrastructure as defined in the statute is limited to construction, reconstruction, or improvement of public facilities.
- Allow holders of impact fee credits to transfer or sell at a discount, impact credits to other developments; in the same impact fee zone for the development of housing that is for sale or rent. -This is already available if it occurs in the same Impact Fee zone.

At the time of this writing, the BCC is reviewing the modification of impact fees to incentivize the development of affordable housing. AHAC encourages the BCC to continue to examine this issue as well as monitor the successes of these changes.

#### Issue #3

**Definitions-** Recommend the County clearly differentiate between Affordable Housing and Workforce Housing as they are defined in various documents such as the County's Land Development Regulations, Comprehensive Plan, grant documents, etc. The County could also issue articles and/or marketing materials to educate the general public on the difference between the two concepts and hopefully, at the same time, reduce the stigma associated with the two terms. Continue to use the Income and Rent guideline chart provided by the Florida Housing Finance Corporation when defining affordability, unless specified by a particular fund source

#### **Justification:**

The St Johns County Chamber of Commerce (SJCCC) recently produced an independent housing analysis that that took a deep look at the housing challenges faced by some of St Johns County leading/major employers. (https://www.sjcchamber.com/attainable-housing/)

"Attainable workforce housing is a critical issue in St. Johns County, impacting not only the local economy but also the fabric of the community. Essential workers — teachers, law enforcement, nurses, manufacturing workers and service industry employees — are the backbone of our economy and contribute to the high quality of life we enjoy in St. Johns County. However, many of these workers are unable to afford to live in the very county they serve due to a severe lack of housing within an attainable price range."

"Attainable workforce housing refers to housing that is affordable for middle-income workers who often earn too much to qualify for traditional affordable housing but still struggle to afford market-rate homes. Affordable housing, on the other hand, is typically designed for low-income individuals and families and is often supported by government subsidies or income-based programs." ii

"One single solution will not solve the complex housing crisis in St. Johns County: A comprehensive, multi-faceted plan that includes zoning reform, targeted incentives, increased public investment and strategic land use must be urgently crafted to ensure housing is accessible to our workforce before the issue spirals further out of control."

"Of St. Johns County's 140,000 households, nearly 23%, or 20,000 property-owners households and 12,000 renter households, were considered "cost burdened", spending more than 30% of their gross income on housing expenses."

"As essential industries in St. Johns County, such as health care, education and public safety, continue to grow, our community faces **a current and projected housing deficit exceeding 13,000 units** for the workforce of our largest local employers". "

As St. Johns County continues to grow, it is imperative that we take immediate and proactive steps to address the affordable housing crisis facing our residents-who are the very backbone of our community and who help make this County such a desirable place to live.

In the absence of any actions to address the housing crisis, we will see a significant reduction in the quality of essential industries: education, health, safety, hospitality, and manufacturing. These reductions will almost certainly have a negative impact on the quality of life for all residents in St. Johns County.

#### AFFORDABLE HOUSING INCENTIVES

Staff and other local professionals presented the latest affordable housing practices and recommendations that are commonly used to incentivize affordable housing. Each of the affordable housing incentives requiring review by the State were thoroughly examined and discussed with AHAC members. This presented report is a result of the recommendations from the AHAC and meetings held with county staff to determine the feasibility of the recommendations. If approved by the BCC, the recommendations may be used to amend the County's Land Development Regulations and/or the local Comprehensive Plan-Housing Element.

### \*\*AHAC PRIMARY RECOMMENDATIONS\*\*

#### **FLEXIBLE DENSITIES**

• Missing Middle Housing/Density Adjustments- The AHAC has met with staff members from Growth Management, Housing and Community Development, local developers, and the St. Johns County Chamber of Commerce, to continue to advocate for flexible density patterns. The AHAC has participated in several roundtable discussions with the above-listed entities to learn about and support potential Missing Middle Housing solutions. Missing Middle Housing solutions have been presented to the BCC for consideration and are critical as a first step in having a positive impact on the local affordable housing crisis.

#### IMPACT FEE CREDIT TRANSFER

• **Impact Fees-** Allow payment of impact fees, and utility connection fees over a period, possibly paid through the property tax process. A longer repayment period is proposed when projects focus on lower-income populations.

- Consider the utilization of County impact fee investment earnings (from interest) on roads, parks, and public buildings to support the development of affordable owner-occupied, for-sale, and rental housing.
- Allow holders of impact fee credits to transfer or sell at a discount, impact credits to other developments; in the same impact fee zone for the development of housing that is for sale or rent.

#### **DEFINITIONS**

• **Definition-** Recommend the County clearly differentiate and codify definitions associated with Affordable Housing and Workforce Housing as they are found in various documents such as the County's Land Development Regulations, Comprehensive Plan, grant documents, etc.

#### ADDITIONAL AHAC CONTINUING RECOMMENDATIONS

#### MODIFICATION OF IMPACT FEE POLICY

- Allow payment of impact fees, and utility connection fees over a period of 5 or 10 years (?) possibly paid through the property tax process. Longer repayment period proposed when projects focus on lower income populations.
- Consider the utilization of County impact fee investment earnings (from interest) on roads, parks and public buildings to be used for a variety of affordable housing initiatives.
- Allow holders of impact fee credits to transfer or sell at a discount, impact credits to other
  developments; in the same impact fee zone for the development of housing that is for sale or rent.
  Housing that is 'affordable" to moderate, low or very low-income families under section 420.9071,
  Florida Statute, which generally evaluates an ability to be based on income. These impact credits
  reflect dollars previously invested by a developer in County or School district infrastructure and are
  recognized as being usable against impact fees.

#### PUBLIC LAND INVENTORY

- Staff should continue the implementation of the distribution of the public lands for affordable housing.
- Utilize the Housing Finance Authority (HFA) as housing experts to assist in evaluating proposals and financing proformas.
- Link the HFA directly with the County's Land Management Division to optimize the possibilities of developing the Public Land Inventory into more affordable housing units.

#### NEGATIVE ECONOMIC IMPACT

• The Housing and Community Development Department has procured a consultant firm to conduct a Housing Need Assessment and Market Study/Plan. This study will provide vital and essential data

on the actual housing needs in St. Johns County. In addition, the needs assessment data collected will assist in the preparation of future plans regarding affordable housing in St. Johns County. We are expecting to have a full report by the end of 2025.

• Consider using private funds, such as DRI contributions or impact fee interest credits, for lower interest rate enticements.

#### **CORPORATE INCENTIVES**

- Have a policy that any large corporations or businesses receiving incentives to relocate and/or build in St. Johns County, pay a specific dollar amount, based on the incentive received, into an Affordable Housing Fund. An example of a way to make this more attractive to the companies receiving the incentives would be to give their qualified employees priority to the affordable housing being built. A policy could also set out that a percentage of the affordable housing being built be set aside or reserved for other qualified residents of St. Johns County. Some type of Affordable Housing impact or linkage fee on larger or commercial developments could also be considered.
- Research into whether it is possible for firms potentially receiving incentives could also receive
  incentives that could go towards providing affordable housing for their own employees? This
  incentive could go towards housing subsidies, rent subsidies, or firms could own and operate their
  own lodging.

#### **EXPEDITED PERMITTING**

- Continue to use the Income and Rent guideline chart provided by the Florida Housing Finance Corporation when defining affordability, unless specified by a particular fund source. Consider more incentives/subsidy for projects that target lower income populations.
- Codify or set into policy that all affordable housing developments go to the front of the permitting and planning review queues.
- Affordability is defined by one of two benchmarks; subsidy or funding provided to the recipient/builder and verified income by family. In their previously referenced report, the Chamber defined the difference between attainable and affordable.
- Continue to formally designate a "Point of Contact" to assist affordable housing developers in navigating the County development process. This representative should also reach out to market-rate developers to promote all incentives and review other possibilities to endorse the development of affordable housing.

#### **LOWER INTEREST RATE ENTICEMENTS**

• Consider using private funds, such as DRI contributions or impact fee interest credits, for lower interest rate enticements.

#### AFFORDABLE ACCESSORY RESIDENTIAL UNITS

• These accessory dwellings must include limited onsite parking, perhaps restricting parking maximums/minimums to one vehicle per dwelling. If possible, perhaps limited on-site parking with a valid parking pass could be used in conjunction with onsite parking or in lieu of onsite parking.

#### FLEXIBLE LOT CONFIGURATIONS

- Require developers to include some percentage of affordable housing as part of their developments
  or ask that they contribute to a housing fund when requesting variances or waivers to the existing
  codes.
- Work with the HFA to determine how to utilize the lot inventory.
- Require builders to construct 20 percent of the affordable/workforce units prior to constructing the market-rate units.

#### RESERVATION OF INFRASTRUCTURE CAPACITY

- Both City and County Utility and Road Departments could work more closely with affordable development efforts to reduce infrastructure costs.
- Consider allowing a developer to utilize existing storm water capacity retention ponds within the
  development's area rather than having to construct new storm water retention ponds and lift-stations
  or allow developer to divert storm water to adjacent County-owned properties, when feasible. The
  AHAC realizes new legislation may make this recommendation difficult to implement due to new
  stormwater rules going into effect Jan 2026 which are no longer capacity based and have an emphasis
  on nutrient-load design.
- Consider that when lift stations are required on infill efforts, affordable housing developers can ask
  the utility company to incorporate the construction costs into their capital improvement plans or
  finance the costs over an affordable period.
- Staff will invite and encourage attendance by County Utility and Road and Bridge departments at the monthly AHAC meetings.

#### SUPPORT DEVELOPMENT NEAR TRANSPORTATION HUBS

• The AHAC should meet with County departments periodically to discuss long term planning efforts that will incorporate plans that utilize affordable developments and emphasize differing modes of transportation. This is an important recommendation as it coincides with the development of future multimodal transportation in the near future.

#### **ECONOMIC IMPACT**

• Consider an ordinance to be presented to the BCC regarding a new zoning category that will have additional development initiatives to better address affordable housing. Initiatives within this new

zone may be to allow for flexibility in street requirements to work in conjunction with other site standards to address design, density, and affordability.

#### BACKGROUND

As a recipient of SHIP funds, the BCC established the AHAC in 1993 as required by the Florida Statute section 420.9076. The AHAC is responsible for reviewing policies, land development regulations, the Comprehensive Plan Policy, and other aspects of the County's policies and procedures that affect the cost of housing. In addition, the AHAC is responsible for making recommendations to encourage affordable housing.

To receive funding for affordable housing through the SHIP program, the AHAC is required to submit an incentive report annually. The AHAC report includes recommendations by the Committee, as well as comments on the implementation of incentives for at least the following eleven distinct areas:

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

#### **COMMITTEE COMPOSITION**

Section 420.9076 of the Florida Statutes lists the categories from which committee members must be selected. There must be one locally elected official from the county and one representative from at least six of the following categories.

- Citizen actively engaged in the residential home building industry in connection with affordable housing.
- Citizen actively engaged in the banking or mortgage banking industry in connection with affordable housing.
- Citizen Representative of those areas of labor actively engaged in home building in connection with affordable housing.
- Citizen actively engaged as an advocate for low-income persons in connection with affordable housing.
- Citizen actively engaged as a for-profit provider of affordable housing.
- Citizen actively engaged as a not-for-profit provider of affordable housing.
- Citizen actively engaged as a real estate professional in connection with affordable housing.
- Citizen actively serving on the local planning agency pursuant to s.163.3174.
- Citizen residing within the jurisdiction of the local governing body making appointments.
- Citizen who represents employers within the jurisdiction.
- Citizen who represents essential services personnel, as defined in the local housing assistance plan
- Locally elected official.

#### The current appointed AHAC members are:

Name	Category Represented	Date Appointed
Taylor, Ann	Locally elected official	11/25/2024
Geisel, Andrew	County Resident	08/06/2024
Burke, Gregory	Residential Home Building Industry	03/18/2025
Dothage, Orville	County Resident	02/21/2023
Lazar, Bill	Not-for-Profit provider	09/02/2025
Mansur, Alexander	Labor Engaged in Home Building	05/17/2022
Maxwell, Harry	For-profit provider	09/02/2025
O'Donnell, Michael	HFA Chair/Advocate for Low-Income	02/20/2024
Spiegel, Judy	Local Planning Agency	05/07/2024
Sax, Tracie	County Resident	09/02/2025
Crabtree, Polly	Essential Service Personnel	03/18/2025

## **Appendix**

#### AFFORDABLE HOUSING DEFINITION

As defined by Florida Statutes, "Affordable" means that monthly rents or monthly mortgage payments including taxes and insurance do not exceed 30 percent of that amount which represents the percentage

of the median annual gross income for the households as indicated in subsection (20), subsection (21), or subsection (30). However, it is not the intent to limit an individual household's ability to devote more than 30 percent of its income for housing, and housing for which a household devotes more than 30 percent of its income shall be deemed affordable if the first institutional mortgage lender is satisfied that the household can afford mortgage payments in excess of the 30 percent benchmark.

#### Link to Florida Statute:

Statutes & Constitution : Search Statutes : Online Sunshine

https://www.floridahousing.org/owners-and-managers/compliance/income-limits

<sup>&</sup>lt;sup>i</sup> St. Johns County Chamber of Commerce/Attainable Housing Coalition. WORKFORCE HOUSING IN ST. JOHNS COUNTY Progress, Challenges, and Strategies for Solutions (2025), 1.

ii Ibid., 3.

iii Ibid., 3.

iv Ibid., 4.

<sup>&</sup>lt;sup>v</sup> Ibid., 7.



## **AHAC Committee Meeting**

November 19, 2025

## 3pm Muscovy Conference Room

#### St. Johns County Year End Updates-Dating back to 12/24

- Down Payment Assistance has assisted a large number of households: 45 purchased/6 encumbered.
- The Housing Department has rehabilitated 35 homes-with both SHIP and Emergency Repair dollars.
- Housing Counselors have assisted 137 households w/ 49 of those households moving on to homeownership.
- Community Development Block Grant funds have been utilized on a veteran homeowner rehabilitation that led to a great deal of positive recognition.
  - Habitat for Humanity has started the construction process for the infrastructure of 4 homes in the Elkton area.
  - o Alpha Omega's project which combined with the City of St. Augustine, provided infrastructure for their 20 multi-family units and 1 SFR.
- The BCC approved a 50% waiver of non-school impact fees for households between 50 and 80% and a full waiver for households below the 50% AMI
- The BCC approved Cypress Village rezoning for Habitat- 17 SFRs
- In March 2025, affordable housing funds were used to acquire and rehabilitate a pair of condominiums for Apha Omega.
- Housing recently had a meeting w/ Habitat on 10/31 looking at 2 of their projects, Kings Crossing and Cypress Village, reviewing how the County can provide additional support.
- This month Housing had a meeting with Builder's Care the non-profit arm of the NE Florida Builder's Association. Currently in the process of better serving both of our clients and building a referral network between the two agencies.