



Community  
Development Block Grant  
(CDBG)  
Program

DRAFT  
2024 ACTION PLAN

# Executive Summary

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

### 1. Introduction

The Jefferson County, Missouri Consolidated Plan is a strategic planning instrument prepared in accordance with and required by the U.S. Department of Housing and Urban Development (HUD) that guides the investment of federal housing and community development funds. The Consolidated Plan helps the County of Jefferson identify key community issues and the resources to address those identified issues. The Annual Action Plan process requires that the grantee outline an action plan which addresses the priority needs and local objectives of the community for a one-year period.

Jefferson County, as part of the St. Louis HOME Consortium, operates on a current five-year Consolidated Plan cycle which covers the years of 2021 through 2025. This Annual Action Plan document outlines the intended use of our Community Development Block Grant (CDBG) funds for the 2024 program year of January 1, 2024, to December 31, 2024, and represents Year 4 of the current Consolidated Plan cycle.

### 2. Summarize the objectives and outcomes identified in the Plan

Programs and activities outlined in this plan are intended to primarily benefit low-to moderate-income residents of Jefferson County, neighborhoods with high concentrations of low to moderate-income residents, and the County as a whole. Jefferson County with this plan and its identified programs will continue to address the stated objectives of providing Decent Housing, A Suitable Living Environment and Expanded Economic Opportunities.

Specific program goals, objectives and outcomes for the Five-Year Consolidated Plan are as follows:

- Maintain homeownership opportunities and prevent homelessness for low-to-moderate income residents through the established sustainability program of the Homeowner Rehabilitation forgivable loan program: Objective-Decent Housing/Outcome-Sustainability
- Maintain homeownership opportunities and prevent homelessness for low-to-moderate income residents through the established sustainability program of the Private Sanitary Sewer System Replacement forgivable loan program: Objective-Suitable Living Environment/Outcome-Sustainability
- Expand homeownership opportunities to low-to-moderate income residents through the existing HOME Down Payment Assistance 5-year forgivable loan program: Objective-Decent housing/ Outcome-Affordability
- Expand homeownership opportunities to low-to-moderate income and disabled residents through support of Habitat for Humanity and the Disability Resource Association: Objective-Decent Housing/ Outcome-Affordability

- Expand local services, available affordable housing, accessibility, and prevent homelessness by providing funding to the CHDO in Jefferson County via HOME funds: Objective-Decent Housing/Outcome-Availability/Accessibility
- Expand education on fair housing to residents of Jefferson County through structured activities, delivered either in-house or in cooperation with outside agencies to address and reduce discrimination issues: Objective-Suitable Living Environment/Outcome-Accessibility
- Expand homelessness prevention efforts through coordination with the Missouri Balance of State Continuum of Care: Objective-Suitable Living Environments/Outcome-Sustainability
- Partner with both for-profit and not-for profit organizations to assist in delivering services to low-to-moderate income residents: Objective-Suitable Living Environments /Outcome-Sustainability
- Make needed public infrastructure improvements that benefit low-to-moderate income residents within the participating municipalities and unincorporated Jefferson County: Objective-Suitable Living Environments/Outcome-Availability/Accessibility
- Use available funding and local resources to help stabilize the local community and create job opportunities: Objective-Economic Opportunities/Outcome-Sustainability

### **3. Evaluation of past performance**

Jefferson County has a consistently acceptable performance record and as of the end of 2023, was on track to meet all performance goals for its identified active programs.

Jefferson County will continue to strive to meet its yearly expenditure ratio and continue its consultation with the public, affiliate organizations and entities to continue to identify and address issues of our low-to-moderate income residents.

### **4. Summary of Citizen Participation Process and consultation process**

In accordance with Jefferson County’s Citizen Participation Plan, the process for the development of all plans, including this Annual Action Plan, consists of publishing and posting the notice of the public hearing, length of public comment period and availability of the draft plan at least two weeks prior to such hearings and comment periods per current HUD regulations, conducting the public hearing, holding a public comment period of not less than 30 days for public viewing of documents (or required days per plan/document, or as requirements are amended by HUD), acceptance of public comment and adoption of the plan by the governing body of Jefferson County prior to submission to HUD.

Jefferson County made this plan available to the public at various public facilities located throughout the entire County which are available to all citizens including persons with disabilities, minorities, and any non-English speaking citizens. All plans and public notices are posted on the administrator’s web site (with optional language translator available to improve outreach to non and limited English-speaking persons) and provided in hard copy or individually emailed to all citizens upon request.

In addition to providing public notice and hard copies of all written plans to all participating municipalities and all public libraries to be posted and available to citizens, to encourage public participation, Public Notices are also sent to numerous public service agencies representing special interest groups, citizens with disabilities, protected classes, and low-to-moderate income individuals: Pony Bird, Disability Resource Association, Compass Health Network, Festus Housing Authority, Habitat for Humanity, Jefferson County Community Partnership, Jefferson County Family Services, Jefferson County Rescue Mission, Jefferson-Franklin Community Action Corp., St. Vincent DePaul Society, Salvation Army, Jefferson County Health Department, Peace Pantry, Hillsboro Food Pantry, Ozark Food Pantry, Arnold Food Pantry, and Feed My People Food Pantry. Additional organizations are added as identified.

- 5. Summary of public comments**
- 6. Summary of comments or views not accepted and the reasons for not accepting them**
- 7. Summary**

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

| Agency Role        | Name | Department/Agency                             |
|--------------------|------|---|
| CDBG Administrator |      | Economic Development Corp of Jefferson County |

Table 1 – Responsible Agencies

### Narrative

The Economic Development Corporation of Jefferson County, a public not-for-profit corporation is contracted by the County of Jefferson and is responsible for administration of the yearly allocation of Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) funds. The EDC directly administers the CDBG funding in house. The HOME funds are administered through the St. Louis HOME Consortium of which Jefferson County is a participating member.

### Consolidated Plan Public Contact Information

Ms. Rosalie Buchanan  
Assistant Executive Director/CDBG Administrator  
Economic Development Corporation of Jefferson County  
P.O. Box 623  
5217 Highway B  
Hillsboro, MO 63050  
rbuchanan@jeffcomo.org  
(636) 797-5336

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

### **1. Introduction**

This section describes the consultation process that Jefferson County follows in developing its CDBG plans and programs. Jefferson County takes a County-wide approach to issues affecting our low-to-moderate income populations and engages in ongoing coordination between all providers of service whether public or private, at all given opportunities.

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

Jefferson County Entitlement staff work very closely with and set on the Board of Director's and several subcommittees of the Jefferson-Franklin Community Action Corporation, one of two public housing authorities in the county, and the County's lead public housing assistance provider (HUD Section 8 Housing Vouchers, WIC, Head Start, Weatherization and numerous other public programs). Staff promote and "team up applicants" when eligible, for the CDBG & HOME programs through this coordination with the existing JFCAC programs.

Jefferson County continually provides program information and application packets to several public service agencies representing special interest groups, citizens with disabilities and agencies providing services to senior citizens and predominately low-to-moderate income individuals. The County also has a working relationship with Compass Health (formerly Comtrea) who provide comprehensive medical care for both LMI citizens and serve as the lead provider of mental health care and resources in the county.

Additionally, to enhance continued coordination, staff participate, when available, in meetings of the Balance of State Continuum of Care, attends St. Louis HOME Consortium meetings and meets with other County Departments regularly to ensure coordination and availability of services to LMI clientele.

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

Jefferson County is a member of the Missouri Balance of State Continuum of Care (CoC) and supports its efforts to conduct outreach and assessment of the homeless in region one but does not receive direct homeless funding itself from either the CoC or HUD. Entitlement staff participate in the regional meetings of the CoC and meetings of the local coalition for the unhoused volunteer group, when possible. All local plans are made available to the CoC for comment and input.

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

Jefferson County does not receive ESG funds. Staff participate in the Balance of State CoC meetings and utilize the regional information gathered from the meetings to help identify needs, service gaps and areas for improvement when completing its CDBG plans.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

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

There were no agencies purposefully left out or not consulted during the preparation of this plan.

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

| Name of Plan                       | Lead Organization                              | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|------------------------------------|--|--|
| Balance of State Continuum of Care | Missouri Housing Development Commission (MHDC) | In line but not directly related   |

**Table 2 - Other local / regional / federal planning efforts**

**Narrative**

Jefferson County participates in the Balance of State Continuum of Care, is a member of the St. Louis HOME Consortium, cooperates and coordinates with all Jefferson County and municipal local government offices as well as all interested individuals on an on-going basis to collect and receive as much input as possible thru its consultation processes.

## **AP-12 Participation - 91.401, 91.105, 91.200(c)**

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

The Jefferson County Citizens Participation Plan and its processes are constructed in a manner developed in accordance with Sections 104 (a) (2) and (3) of the Housing and Community Development Act of 1974 as amended, and 24 CFR Part 91, etal. The plan process consists of public notice of all public hearings and comment periods being published/posted for no less than Hud's required two weeks' prior notice, public comment periods of not less than 30 days for public viewing of documents (or required days per plan/document, or as requirements are amended by HUD), acceptance of public comment, public hearings, needs assessments and final adoption by the governing body of Jefferson County.

Jefferson County continues to make all plans and documents available to the public at various public facilities located throughout the County which are available to all citizens including persons with disabilities, minorities, non-English speaking citizens and residents of public and Assisted Housing. All plans and public notices are posted on the administrator's web site in addition to hard copies being distributed to better provide the information to all citizens.

In addition to providing public notice and copies of all written plans to the participating municipalities and all public libraries, to encourage public participation, Public Notice was also sent to the following public service agencies representing special interest groups, citizens with disabilities and low-to-moderate income individuals: Pony Bird, Disability Resource Association, Compass Health Network, Festus Housing Authority, Habitat for Humanity, Jefferson County Community Partnership, Jefferson County Family Services, Jefferson County Rescue Mission, Jefferson-Franklin Community Action Corporation, St. Vincent De Paul Society, Salvation Army, Jefferson County Health Department, Peace Pantry, Hillsboro Food Pantry, Ozark Food Pantry, Arnold Food Pantry and Feed My People. Additional organizations are added as identified.

Jefferson County continues to take all public comments into consideration and incorporate the stated needs into its goal setting for all programs and plans.



## Citizen Participation Outreach

| Sort Order | Mode of Outreach  | Target of Outreach            | Summary of response/ attendance   | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable)  |
|------------|---|-------------------------------|---|------------------------------|--|----------------------|
| 1          | Newspaper Ad & Posting of Notice of Public Hearing and Comment Period | Non-targeted/ broad community | Notice of Public hearing (4/22/24) and comment period (04/23/24, to 5/22/24) was posted at all participating municipalities, public libraries, various housing & social service agencies, ad run in newspaper and posted on administrator's web site. |                              |  | www.jeffcountymo.org |
| 2          | Public Hearing  | Non-targeted/ broad community | Public hearing to be held at Administrators office on April 22, 2024  |                              |  | www.jeffcountymo.org |
| 3          | Public Comment Period   | Non-targeted/ broad community | Copies of Draft Plans were provided to all participating municipalities, government offices and public libraries as well as notice published in newspaper and electronic version of the plan posted on admin website.                                 |                              |  | www.jeffcountymo.org |

**Table 3 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

Jefferson County estimates that it will receive \$1,123,504 for 2024 and anticipates receiving yearly allocations equal or less than this for the remaining years of the current consolidated plan period. Accordingly, this funding amount has been used to calculate the expected resources for 2024.

#### Anticipated Resources

| Program | Source of Funds  | Uses of Funds  | Expected Amount Available Year 1 |                    |                          |           | Expected Amount Available Remainder of Con Plan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|-----------|--|-----------------------|
|         |                  |  | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$ |  |                       |
| CDBG    | public - federal | Acquisition<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | 1,123,504                        | 0                  | 0                        | 1,123,504 | 4,983,107  | annual award amount   |

Table 4 - Expected Resources – Priority Table

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

While Jefferson County does not require matching funds on infrastructure projects, it is highly encouraged, and past projects have shown a significant amount of “in-kind” labor injected into projects by the entities receiving funds.

Regarding leveraging, both the Homeowner Rehabilitation and Private Sanitary Sewer Replacement programs provide funds for needed home repairs to LMI residents, who could not otherwise afford them, allowing them to sustain the value of their individual homes. The Public Sewer and Storm Water Infrastructure programs provide funding to allow municipalities to make needed infrastructure improvements that typically may not be carried out because of budgetary constraints. By funding these activities, the municipalities can either reduce or maintain the current overall operating costs of such systems resulting in a reduction of required cost increases which significantly burden LMI households.

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

At this point in time, the Jefferson County CDBG program does not have any programs that purchase or directly use publicly owned land or property. If a need is identified in future years this option may be considered.

**Discussion**

The Jefferson County CDBG program utilizes partnerships with other programs, when possible (i.e., weatherization, volunteer groups, local churches, etc.), to assist our LMI households in obtaining the maximum needed repairs available to them. The infrastructure programs by not requiring “matching funds” have resulted in a higher number of public improvements being completed as projects of this magnitude, especially in predominately LMI areas are often not funded by municipalities due to budgetary constraints or other higher priority needs.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

| Sort Order | Goal Name   | Start Year | End Year | Category   | Geographic Area  | Needs Addressed  | Funding 2024    | Goal Outcome Indicator  |
|------------|---|------------|----------|--|------------------|--|-----------------|---|
| 1          | Home Rehabilitation Program                       | 2021       | 2025     | Affordable Housing   | Jefferson County | Affordable Housing   | CDBG: \$75,000  | Homeowner Housing Rehabilitated: 5 Household Housing Unit   |
| 2          | Private Sanitary Sewer System Replacement Program | 2021       | 2025     | Affordable Housing   | Jefferson County | Affordable Housing   | CDBG: \$60,000  | Homeowner Housing Rehabilitated: 3 Household Housing Unit   |
| 3          | Handicap/ADA Public Facility Assistance Program   | 2021       | 2025     | Non-Housing Community Development  | Jefferson County | Non-Housing Community Development Suitable Living Environments                       | CDBG: \$13,803  | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted |
| 4          | Residential Public Sewer Tap-on Program           | 2021       | 2025     | Affordable Housing<br>Non-Housing Community Development  | Jefferson County | Affordable Housing<br>Non-Housing Community Development                              | CDBG: \$1       | Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 10 Households Assisted    |
| 5          | Sewer Infrastructure Program                      | 2021       | 2025     | Non-Housing Community Development  | Jefferson County | Non-Housing Community Development  | CDBG: \$500,000 | Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 250 Households Assisted   |
| 6          | Stormwater Infrastructure Program                 | 2021       | 2025     | Non-Housing Community Development  | Jefferson County | Non-Housing Community Development  | CDBG: \$250,000 | Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 250 Households Assisted   |
| 7          | Administration                                    | 2021       | 2025     | Affordable Housing<br>Homeless<br>Non-Homeless<br>Special Needs<br>Non-Housing Community Development | Jefferson County | Affordable Housing<br>Non-Housing Community Development Suitable Living Environments | CDBG: \$224,700 | Other: 1 Other  |

Table 5 – Goals Summary

## Goal Descriptions

|   |                         |   |
|---|-------------------------|---|
| 1 | <b>Goal Name</b>        | Home Rehabilitation Program   |
|   | <b>Goal Description</b> | This is a two-year forgivable loan of up to \$15,000 available to LMI owner occupied residents' that are at or below 80% of median income for the repair of health and safety issues to their existing owner-occupied home. Homes must be in either unincorporated Jefferson County or within a participating municipality  |
| 2 | <b>Goal Name</b>        | Private Sanitary Sewer System Replacement Program   |
|   | <b>Goal Description</b> | This is a two-year forgivable loan of up to \$20,000 available to LMI owner occupied residents' that are at or below 80% of median income for the repair or total replacement of failing private on-site sanitary sewer systems of owner-occupied homes. Failing Status must be able to be verified through the Jefferson County Building Department or by licensed sewer inspectors. All repairs, replacements, and associated engineering work must be completed by a licensed professional verified on file with the Jefferson County Building Department. Homes must be located within unincorporated Jefferson County or within a participating municipality |
| 3 | <b>Goal Name</b>        | Handicap/ADA Public Facility Assistance Program   |
|   | <b>Goal Description</b> | This program is designed to assist Jefferson County and its participating municipalities in handicap accessing its public facilities and public service areas, primarily parks, sidewalks including curb cuts and other areas of public egress. Funds to offset costs will be made available for application in the amount of up to \$20,000 per barrier removed. Projects in predominately LMI areas will receive a higher priority rating.  |
| 4 | <b>Goal Name</b>        | Residential Public Sewer Tap-on Program   |
|   | <b>Goal Description</b> | This is a onetime grant equal to the amount of the sewer tap-on fee charged by the public sewer district available to LMI owner occupied residents' that are at or below 80% of median income for the fees/costs associated with residential new service hook-up to a centralized sewer collection service. Homes must be located within unincorporated Jefferson County or within a participating municipality   |

|   |                         |   |
|---|-------------------------|---|
| 5 | <b>Goal Name</b>        | Sewer Infrastructure Program  |
|   | <b>Goal Description</b> | This program is available to participating municipalities and all public sewer districts/departments located within unincorporated Jefferson County and participating municipalities. The program is designed to offset costs incurred by such districts/departments for the replacement or upgrading of public sewer service to a predominately low- to moderate-income areas. Eligible costs include but are not limited to installation or renovation of existing “main” sewer lines. These funds are awarded on a competitive basis yearly. Application amount divided by \$5,000 per LMI home/overall project, maximum of \$250,000 per project.   |
| 6 | <b>Goal Name</b>        | Stormwater Infrastructure Program   |
|   | <b>Goal Description</b> | This program is available to all participating municipalities and public sewer districts/departments located within unincorporated Jefferson County and participating municipalities. The program is designed to offset costs incurred by such districts/departments for the replacement or upgrading of public storm water service to a predominately low- to moderate-income areas. Eligible costs include but are not limited to installation or renovation of existing “main” retention-elimination system lines and for repairs needed to eliminate storm water erosion in predominately low- to moderate-income areas. These funds are awarded on a competitive basis yearly. Application amount divided by \$5,000 per LMI home/overall project, maximum of \$250,000 per project. |
| 7 | <b>Goal Name</b>        | Administration  |
|   | <b>Goal Description</b> | These funds will pay the expenses for the general administration of the CDBG programs described in this application (i.e., salaries, benefits, operating costs, etc.) These administration funds are reimbursed to the contracted CDBG administrator, the EDC of Jefferson County.  |

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

The table below lists the seven (7) projects that Jefferson County plans to fund and undertake in PY2024 to address the priority needs identified during this Consolidated Plan period.

| # | Project Name   |
|---|--|
| 1 | 2024 HOMEOWNER REHABILITATION PROGRAM                  |
| 2 | 2024 PRIVATE SANITARY SEWER SYSTEM REPLACEMENT PROGRAM |
| 3 | 2024 HANDICAP/ADA PUBLIC FACILITY ASSISTANCE PROGRAM   |
| 4 | 2024 Residential Sewer Tap-on Program                  |
| 5 | 2024 SEWER INFRASTRUCTURE PROGRAM                      |
| 6 | 2024 STORM WATER INFRASTRUCTURE PROGRAM                |
| 7 | 2024 CDBG Grant Administration                         |

Table 6 – Project Information

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

The primary national objective of the Consolidated Plan is to assist and benefit low-income and moderate-income residents, Jefferson County’s grant program funds will be targeted to low-income and moderate-income residents, neighborhoods and activities that benefit these residents as a whole.

The Jefferson County Entitlement program is comprised of County-wide programs which include, but are not limited to housing rehabilitation, sanitary sewer infrastructure (both individual residential and municipal), storm water infrastructure (municipal), removal of architectural barriers/Americans with Disabilities Act and any similar, low-to-moderate-income activities deemed a priority in the community needs identification portion of the program planning process. 100% of the Entitlement funds are available to residents of all unincorporated areas of the County as well as within the jurisdictions of the participating municipalities.

During the past three years, the primary obstacles that our program has endured are the lasting negative effects of the COVID pandemic and an unprecedented difficulty in carrying out day-to-day activities. Continuing staff shortage, reduced availability of supplies resulting from supply chain delays and the continued increased price of construction supplies/components has resulted in a significant impact to the Jefferson County CDBG programs. While no services have been cut or reduced, longer delivery times (windows, HVAC systems, siding, etc.) and increased material costs are estimated to affect our program for the foreseeable future. Job completion dates have been significantly delayed because of contractor staffing issues, decreased material availability, or extended delivery timeframes.

Additionally, some state and federal budget cuts which affect local agencies that traditionally deliver services to low-moderate income individuals and families have had an equally significant impact on Jefferson County LMI residents. In addition, some needs are not met because of choices to fund one set of priority needs over another. Jefferson County will continue to seek out additional areas of funding and investigate leveraging opportunities if available.

## AP-38 Project Summary

### Project Summary Information

|   |  |  |
|---|--|--|
| 1 | <b>Project Name</b>  | 2024 HOMEOWNER REHABILITATION PROGRAM  |
|   | <b>Target Area</b>   | Jefferson County   |
|   | <b>Goals Supported</b>   | Home Rehabilitation Program  |
|   | <b>Needs Addressed</b>   | Affordable Housing   |
|   | <b>Funding</b>   | CDBG: \$75,000   |
|   | <b>Description</b>   | This project is a two-year forgivable loan for up to a maximum of \$15,000 per LMI, owner-occupied, single-family residences to repair or replace health and safety issues.                      |
|   | <b>Target Date</b>   | 12/31/2024   |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | It is estimated that 5 LMI owner occupied homes will be assisted   |
|   | <b>Location Description</b>  | Entire County of Jefferson   |
|   | <b>Planned Activities</b>  | Rehabilitation of health and safety items of existing owner-occupied single-family units   |
| 2 | <b>Project Name</b>  | 2024 PRIVATE SANITARY SEWER SYSTEM REPLACEMENT PROGRAM   |
|   | <b>Target Area</b>   | Jefferson County   |
|   | <b>Goals Supported</b>   | Private Sanitary Sewer System Replacement Program  |
|   | <b>Needs Addressed</b>   | Affordable Housing   |
|   | <b>Funding</b>   | CDBG: \$60,000   |
|   | <b>Description</b>   | This project is a two-year forgivable loan for up to a maximum of \$20,000 per LMI, owner-occupied, single-family residences to replace existing failing on-site private sanitary sewer systems. |
|   | <b>Target Date</b>   | 12/31/2024   |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | It is estimated that 3 owner occupied homes will be assisted.  |
|   | <b>Location Description</b>  | Entire County of Jefferson   |



|          |  |   |
|----------|--|---|
|          | <b>Planned Activities</b>  | Replace existing failing on-site septic systems to LMI owner occupied homes.  |
| <b>3</b> | <b>Project Name</b>  | 2024 HANDICAP/ADA PUBLIC FACILITY ASSISTANCE PROGRAM  |
|          | <b>Target Area</b>   | Jefferson County  |
|          | <b>Goals Supported</b>   | Handicap/ADA Public Facility Assistance Program   |
|          | <b>Needs Addressed</b>   | Non-Housing Community Development   |
|          | <b>Funding</b>   | CDBG: \$13,803  |
|          | <b>Description</b>   | This project is designed to assist Jefferson County and its participating municipalities in handicap accessing their public facilities and public service areas. Projects will remove architectural barriers in parks, public facilities, sidewalks, and other areas as designated acceptable/eligible.   |
|          | <b>Target Date</b>   | 12/31/2024  |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Estimated that at least one public facility will receive ADA improvements to architectural barriers.  |
|          | <b>Location Description</b>  | Entire County of Jefferson  |
|          | <b>Planned Activities</b>  | To remove architectural barriers from public facilities (parks, sidewalks, curb cuts, etc.)   |
| <b>4</b> | <b>Project Name</b>  | 2024 Residential Sewer Tap-on Program   |
|          | <b>Target Area</b>   | Jefferson County  |
|          | <b>Goals Supported</b>   | Residential Public Sewer Tap-on Program   |
|          | <b>Needs Addressed</b>   | Affordable Housing<br>Non-Housing Community Development   |
|          | <b>Funding</b>   | CDBG: \$1   |
|          | <b>Description</b>   | This is a onetime grant equal to the current tap-on fee charged by the identified public entity, available to LMI owner occupied residents that are at or below 80% of median income for the fees/costs associated with residential new service hook-up to a centralized public or municipal sewer collection service. Homes must be located within unincorporated Jefferson County or within a participating municipality. |
|          | <b>Target Date</b>   | 12/31/2024  |

|   |  |   |
|---|--|---|
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Estimated 10 LMI owner-occupied single-family homes will be assisted utilizing prior year funding still available.  |
|   | <b>Location Description</b>  | Entire County of Jefferson  |
|   | <b>Planned Activities</b>  | To pay for tap-on fees and may install lateral lines for new connection to public sewer service for LMI owner-occupied single-family homes  |
| 5 | <b>Project Name</b>  | 2024 SEWER INFRASTRUCTURE PROGRAM   |
|   | <b>Target Area</b>   | Jefferson County  |
|   | <b>Goals Supported</b>   | Sewer Infrastructure Program  |
|   | <b>Needs Addressed</b>   | Non-Housing Community Development   |
|   | <b>Funding</b>   | CDBG: \$500,000   |
|   | <b>Description</b>   | This program is available to participating municipalities and all public sewer districts/departments located within unincorporated Jefferson County and participating municipalities. The program is designed to offset the costs incurred by such district/departments for the replacement or improving/upgrading of substandard public sewer service to predominately low-to-moderate areas. Eligible costs include but are not limited to installation or renovation of existing “main” sewer lines. Application amount divided by \$5,000 per LMI home/overall project. Maximum of \$250,000 per project. |
|   | <b>Target Date</b>   | 12/31/2024  |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Estimated minimum of 250 LMI homes assisted 2 projects  |
|   | <b>Location Description</b>  | Entire County of Jefferson  |
|   | <b>Planned Activities</b>  | Replace or repair public sewer lines to LMI owner-occupied single-family homes  |
| 6 | <b>Project Name</b>  | 2024 STORM WATER INFRASTRUCTURE PROGRAM   |
|   | <b>Target Area</b>   | Jefferson County  |
|   | <b>Goals Supported</b>   | Stormwater Infrastructure Program   |
|   | <b>Needs Addressed</b>   | Non-Housing Community Development   |
|   | <b>Funding</b>   | CDBG: \$250,000   |

|          |  |  |
|----------|--|--|
|          | <b>Description</b>   | This program is available to participating municipalities and all public sewer or water districts/departments located within un-incorporated Jefferson County and participating municipalities. The program is designed to offset the costs incurred by such district/departments for the replacement or improving/upgrading of substandard public storm water service to predominately low-to-moderate areas. Eligible costs include but are not limited to installation or renovation of existing “main” retention elimination system lines and for repairs needed to eliminate storm water erosion. Application amount divided by \$5,000 per LMI home/overall project. Maximum of \$250,000 per project. |
|          | <b>Target Date</b>   | 12/31/2024   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Estimated minimum of 250 LMI homes assisted 1 project  |
|          | <b>Location Description</b>  | Entire County of Jefferson   |
|          | <b>Planned Activities</b>  | Replace or repair public storm water sewer lines to LMI owner-occupied single-family homes   |
| <b>7</b> | <b>Project Name</b>  | 2024 CDBG Grant Administration   |
|          | <b>Target Area</b>   | Jefferson County   |
|          | <b>Goals Supported</b>   | Administration   |
|          | <b>Needs Addressed</b>   | Affordable Housing<br>Non-Housing Community Development<br>Suitable Living Environments  |
|          | <b>Funding</b>   | CDBG: \$224,700  |
|          | <b>Description</b>   | General program administration 20% of total funding  |
|          | <b>Target Date</b>   | 12/31/2024   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | N/A Administration of program  |
|          | <b>Location Description</b>  | Entire County of Jefferson   |
|          | <b>Planned Activities</b>  | Administration of the program  |

## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

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

Because Jefferson County qualifies as an Urban County as defined by the U.S. Department of Housing and Urban Development (HUD), the size of its entitlement (CDBG and HOME funding) is determined by both unincorporated residents and residents of the participating municipalities. Currently 13 out of 15 municipalities have joined Jefferson County in meeting the requirements necessary to receive funding.

The primary national objective of the Consolidated Plan is to assist and benefit low-income and moderate-income residents, Jefferson County's grant program funds are available to all qualified low-income and moderate-income residents, neighborhoods and activities that benefit such qualifying residents and are not limited to a specific area.

### **Geographic Distribution**

| <b>Target Area</b> | <b>Percentage of Funds</b> |
|--------------------|----------------------------|
| Jefferson County   | <b>100</b>                 |

**Table 7 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The Jefferson County Entitlement program is comprised of County-wide programs which include but are not limited to housing rehabilitation, sanitary sewer infrastructure (both individual residential and municipal), storm water infrastructure (municipal), removal of architectural barriers/Americans with Disabilities Act and any similar, low-to-moderate-income activities deemed a priority in the community needs surveys received by the Entitlement program during the planning process. 100% of the Entitlement funds are available to residents of all unincorporated areas of the County as well as within the jurisdictions of the participating municipalities.

### **Discussion**

No further discussion

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

The Analysis of Impediments to Fair Housing Choice (AI) is a comprehensive review of a jurisdiction's laws, regulations, and administrative policies, procedures and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin. Policies, practices, or procedures that appear neutral on their face, but which operate to deny or adversely the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

Jefferson County, along with the other members of the St. Louis HOME Consortium (St. Louis County, St. Charles County, City of Florissant, and the City of O'Fallon) and the Housing Authority of St. Louis County during 2020 retained Mosaic Community Planning, LLC to conduct and prepare a Regional Analysis of Impediments to Fair Housing Choice study. This study, while regional, has specific recommendations for each of the consortium members. Jefferson County will address any and all barriers identified within its jurisdiction and act accordingly.

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

Many of the Impediments to Fair Housing identified in the AI report as being applicable to Jefferson County are also Barriers to Affordable Housing. These barriers are largely systemic & will require effort from both private & public sectors across the entire regional area to correct. Jefferson County will strive to undertake the stated strategies recommended. Specific action items will be dependent upon future community & governmental engagement, planning, coordination, and available funding. The barriers identified as applicable & the actions planned to be taken during 2024 include: Barrier: Low labor market engagement & limited incomes restrict housing choice & access to opportunity among protected classes;2024 Action: Jefferson County EDC will continue to work to increase access to workforce development & employment opportunities thru its affiliations with Jefferson College, SBA, SBDC, Workforce Development Board-Jefferson/Franklin County Employment Consortium & regional site developers to bring new industry which will offer more employment opportunities. Barrier: Insufficient housing for people with disabilities;2024 Actions: Jefferson County will continue to provide funding opportunities to encourage/incentivize the construction of new accessible housing units for people with disabilities thru its HOME allocation. Staff will continue to partner with the Disability Resource Association to help identify areas where additional handicap accessible housing units can be implemented. No new funding requests have been received. Barrier: Ongoing need for fair housing outreach, education, & enforcement;2024 Action: Jefferson County will participate in training & info

from HUD Fair Housing department for further information/technical assistance & will continue to provide information/education via its website, regarding fair housing rights, recognizing discrimination, & how & where to file a housing discrimination complaint.

While all these barriers affect Jefferson County, many are regional issues as well that Jefferson County cannot address on its own. Jefferson County is sensitive to the effects that public policies have on the cost (including development, maintenance, rehabilitation, or management) of affordable housing within its jurisdiction. In the AI Study, none of the impediments listed were related to public policies that would or could hinder the development, maintenance or rehabilitation of affordable housing or add to the cost of existing affordable units within Jefferson County. Since Jefferson County does not believe that any local policy or regulation exists to create a significant barrier to the development, maintenance, or improvement of any affordable housing within its jurisdiction, there is no need currently to development a strategy to address such policies.

## **Discussion**

As a member of the St. Louis HOME Consortium, Jefferson County is served by several local fair housing, affordable housing, and homeless service organizations (EHOC-Equal Housing Opportunity Council, Beyond Housing, Legal Services of Eastern Missouri, Jefferson-Franklin Community Action Corp, Better Family Life, The Housing Partnership, United Way, and Catholic Charities). Activities of these organizations include fair housing testing, complaint investigation, fair housing education, transitional housing, rent and mortgage assistance, and other housing-related assistance.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

This section identifies other actions to be taken by Jefferson County during 2024.

### **Actions planned to address obstacles to meeting underserved needs**

Over the past several plan years the obstacle of transportation for LMI individuals in Jefferson County has been identified yet to be overcome. Staff has identified a possible and potential program being executed by the local community action organization. During PY24 staff will investigate a possible collaboration to utilize CDBG funds to address this long-term need.

During PY2024 Jefferson County will continue to address the previously identified primary obstacles in meeting underserved needs of obtaining qualified applicants for its existing programs and continuing to bare the increased cost burden of building supplies still resulting from the pandemic verses reducing the quantity of work to applicant homes under our programs.

### **Actions planned to foster and maintain affordable housing**

During PY24 Jefferson County will continue to be a member of the St. Louis HOME Consortium who provide funds for the Jefferson County Down Payment Assistance program. This program provides up to \$7,000 to eligible first-time home buyers who meet the income requirement stated by HUD, for down payment assistance to purchase affordable housing. EDC as the CDBG administrator, will also continue to utilize the Jefferson County Industrial Development Authority, under its umbrella agency, to encourage and fund affordable housing unit development under its multi-family revenue bond issuance program. Additionally, Jefferson County will continue to administer its home rehabilitation program to provide funding to be used towards repairing or replacing deteriorated health and safety issues for LMI residents creating a level of affordable housing sustainability for the applicants.

### **Actions planned to reduce lead-based paint hazards**

Jefferson County will continue its existing efforts to reduce the Lead Paint Hazards in the County. This goal is achieved through the County's Home Rehabilitation Programs in which contractors comply with all applicable Federal and State regulations. Jefferson County administration staff and contractors utilized are trained in Lead Safe Work Practices as required by our current funding levels per housing unit and provide all applicants with the required EPA printed information pamphlets "Protecting Yourself from Lead in Your Home" and "Renovate Right" on lead hazards and require signatures of recipients to ensure compliance.

Jefferson County follows Federal and State of Missouri regulations in testing for lead and mitigating its effects. All housing units that are assisted with CDBG or HOME funding are inspected for deteriorated paint. Further, Jefferson County utilizes the services of Herlacher Angleton Associates, LLC, Barnhart, MO to execute lead-based paint risk assessments/lead testing for all homes constructed prior to 1978. All surfaces are treated using lead safe work practices and activity clearance is obtained, if necessary, from the assessment authorities. Jefferson County does not receive any additional funding

for direct lead remediation.

### **Actions planned to reduce the number of poverty-level families**

Jefferson County does not have any direct programs or policies with regards to reducing the number of poverty-level families but supports other local social service agencies that assist LMI residents by coordinating services and utilizes referrals when possible. Several governmental agencies and private organizations operate programs within Jefferson County to reduce public funding dependency and poverty among its residents. Primarily among those agencies are the Missouri Division of Family Services and the Jefferson Franklin Community Action Corporation, both of which are state and federally funded. They offer broad based assistance to primarily federal/state assistance recipients and the extremely low to low-income residents. Assistance includes but is not limited to food stamps, Medicaid health insurance, aid to dependent children, Section 8 housing vouchers, WIC, counseling, family self-sufficiency programs and several other programs which provide direct assistance to our low-income residents. Jefferson County seeks to reduce the number of poverty level families by investing its CDBG and HOME funds into programs and projects that support affordable housing overall and foster self-sufficiency and sustainability.

Existing small “Starter” type housing units that tend to be more affordable for LMI families are typically not readily available in all areas of Jefferson County. New housing tends to be of a larger size and in a higher price range. Units of this size and price range coming “online” in the past couple of years remains limited. These trends put an additional burden on individuals and families at and below the poverty level. In many cases, low-income families are forced to pay a disproportionate amount of their incomes for safe and affordable housing which in turn affects all aspects of an individual or family’s success in life.

During PY 2024 the Jefferson County Entitlement program, to enhance but not duplicate service, will continue to utilize referrals (in addition to its own outside applicants) to and from all other known local agencies to help provide additional services to assist these individuals on their track from dependency to independency. This will be accomplished through programs/activities offered by Jefferson County.

The first-time home buyer program operated through the County’s HOME funds provides financial assistance to LMI residents wishing to achieve their goal of home ownership. The homeowner rehabilitation program provides funds to alleviate health and safety issues to existing housing units (most Jefferson County LMI residents locate in older homes needing repairs due to their affordability). Job training/economic development is provided through the County’s various business funding programs offered primarily through the Economic Development Corp, the Industrial Development Authority, local banks, and through support of the County’s workforce development program which utilizes Jefferson College’s extensive workforce development programs and the Missouri Career Center System which serves as a labor exchange for both businesses and job seekers.

### **Actions planned to develop institutional structure**

During 2024 the institutional structure through which Jefferson County will carry out its housing and community development activities will continue to be through its contracted administrator, The



Economic Development Corporation of Jefferson County with final adoption/approval of the Jefferson County Council. The EDC is a not-for-profit organization funded by the County and its participating municipalities to carry out general economic development programs including but not limited to programs available through the Small Business Administration (SBA), State of Missouri (DED), Economic Development Administration (EDA), Industrial Development Authority (IDA), and various other economic incentive programs as available. As a result of the range of tools and diversity that the EDC has available to it, Jefferson County relies upon the EDC for in-house administration of its countywide CDBG programs and activities, which benefit low-to-moderate income residents, eliminate slum and blighted conditions, or address an urgent need. The administrator has and will continue to continually communicate with the County governmental offices, participating municipalities, other service providers within the County and all citizens to ensure and foster participation equally throughout the urban county.

Additional needs of the participating municipalities and non-profit organizations that benefit our LMI residents are determined at a local level and reported to the administrator for execution if deemed a priority need and funded. This organizational structure for delivery has been chosen because each municipal government can focus on the needs within its area of the County and the non-profit organizations can specialize on specific areas of service within all communities.

Jefferson County receives yearly HOME funding through its participation with the St. Louis HOME Consortium. St. Louis County Office of Community Development is the administrator of these funds. Members of the St. Louis HOME Consortium oversee project activity, create policy, develop housing strategy, and implement activities directed under the HOME program. Each member holds public hearings to make the public aware of their proposed use of HOME funds.

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

Jefferson County takes a County-wide approach to issues affecting our low-to-moderate populations and engages in ongoing coordination between all providers of service whether public or private, at all given opportunities.

CDBG staff will continue to attend meetings of organizations, groups and social service agencies that address issues and provide services that revolve around both public and private housing, homelessness, community and social services and persons with disabilities. Additionally, to enhance continued coordination, Jefferson County will continue to participate in the St. Louis HOME Consortium, Balance of State Continuum of Care meetings, set on the Board of Directors of Jefferson/Franklin Community Action Corp and meet with other County Departments regularly to ensure coordination and availability of services to our LMI clientele.

### **Discussion**

No further discussion

## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

#### Introduction

#### SOURCE OF FUNDS

#### Estimated 2024 BUDGET

(Actual 2023 CDBG Allocation Amounts)

\*All activities' budgets will be proportionally increased or decreased from the estimated funding levels to match actual 2024 allocation amounts when announced by HUD.

|                                    |                      |
|------------------------------------|----------------------|
| Estimated CDBG Formula Grant Award | \$ 1,123,504.00      |
| 20% HUD Approved Administration    | <\$ 224,700.00>      |
| <b>Sub-Total</b>                   | <b>\$ 898,804.00</b> |

|   |               |
|---|---------------|
| Homeowner Rehabilitation                  | \$ 75,000.00  |
| Private Sanitary Sewer System Replacement | \$ 60,000.00  |
| Handicap/ADA Public Facility Assistance   | \$ 13,803.00  |
| Residential Sewer Tap-On Fee              |               |
| *Prior year funding exists                | \$ 1.00       |
| Sewer Infrastructure (Public)             | \$ 500,000.00 |
| Storm Water Infrastructure (Public)       | \$ 250,000.00 |

Total CDBG Funds utilized **\$ 1,123,504.00**

#### Community Development Block Grant Program (CDBG)

#### Reference 24 CFR 91.220(I)(1)

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

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

#### Other CDBG Requirements

|   |   |
|---|---|
| 1. The amount of urgent need activities | 0 |
|---|---|

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. 100.00%

**Discussion**

No further discussion.