

# Clay County, Florida

## Community Development Block Grant

Consolidated Plan FY2021-2025  
Annual Action Plan FY2021-2022

Adopted: July 27, 2021



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# Executive Summary

## ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### 1. Introduction

Clay County, Florida is a new entitlement community and will receive Community Development Block Grant (CDBG) Funds through the U.S. Department of Housing and Urban Development (HUD). As an entitlement community, the County will receive the CDBG grant annually through formula allocation by HUD. Through CDBG funds, Clay County will work to promote affordable housing initiatives and create a suitable living environment for low- to moderate income households. This 5-Year Consolidated Plan identifies the County's priority needs through a community needs assessment and data analysis of the housing market, as well as input from the citizen participation and stakeholder consultation process. The priority needs of the County are addressed through activities developed in the Annual Action Plans that work towards accomplishing the established goals associated with the identified needs. By addressing these priority needs, the County can improve the quality of life of residents in Clay County.

Clay County submitted its first Community Development Block Grant (CDBG) program application to the Department of Housing and Urban Development (HUD) on August 16, 2021. HUD disapproved the application on August 17, 2021. The principle issue identified was a difference in the reported entitlement funding to be received by the County. The initial amount projected to be received by the County was \$1,069,125.00, however on May 13, 2021 the amount was increased to \$1,084,880.00. This substantial amendment to the approved FY2021-2025 Consolidated Plan, FY2021-2022 Annual Action Plan and Citizen Participation Plan addresses the issues identified by HUD.

Clay County has developed its strategic plan based on an analysis of the data presented in this plan and an extensive community participation and consultation process. Through these efforts, the County has identified the following priority needs with associated goals to address the needs. The priority needs are:

1. Housing rehabilitation including homes owned by low- and moderate-income individuals and replacement of mobile homes owned by low- and moderate-income individuals.
2. Code enforcement in distressed neighborhoods defined as more than 51% low- and moderate-income in the County.
3. Infrastructure projects in distressed neighborhoods defined as more than 51% low- and moderate-income in the County.

### 2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

#### Summary of the objectives and outcomes identified in the Plan

Clay County has established several goals that will guide funding decisions through the course of the Consolidated Plan five-year term. These goals are:

### **Preservation of housing**

- Objective: Decent Housing (DH)-Provide funding for the acquisition and/or rehabilitation/preservation of housing affordable to low- and moderate-income residents.
- Outcome: Affordability-Housing Rehabilitated: 15 Households/Housing Units; Rental Units.
- Affordability for the purpose of providing decent affordable housing.

### **Code enforcement**

- Objective: Suitable Living Environment (SL)-Provide funding for the payment of salaries and overhead costs directly related to the enforcement of local codes in deteriorating or deteriorated areas in Target Areas.
- Outcome: Availability/Accessibility-Housing Code Enforcement/Foreclosed Property Care: 100 Households/Housing Units.
- Accessibility for the purpose of providing decent affordable housing.

### **Neighborhood Improvements**

- Objective: Creating Economic Opportunities (EO)-Provide funding for public facility improvements, physical improvements, and comprehensive neighborhood planning activities in Target Areas, and HUD designated Low-Mod Areas to improve the quality of life and health of neighborhood residents.
- Outcome: Sustainability: Promoting Livable or Viable Communities-Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted.
- Sustainability for the purpose of creating suitable living environments.

### **Administration**

- Objective: General planning and administration costs associated with administering Federal CDBG and State SHIP funds; and other local funding sources.
- Outcome: Other: Administration as needed.

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

Not Applicable. Clay County is a first-time applicant.

### **4. Summary of citizen participation process and consultation process**

Clay County staff conducted two citizen participation sessions with key stakeholders (e.g., housing organizations, social service organizations) and conducted a survey of County residents.

The County held a public comment period that was open from June 8, 2021 through July 27, 2021 so the public could review the Consolidated Plan and first year Annual Action Plan. The Plan could be downloaded and viewed from the County's website. Written comments could be returned to the County Planning Department. Furthermore, a public hearing was held on July 27, 2021 to review and approve the Consolidated Plan and first year Annual Action Plan.

## **5. Summary of public comments**

A summary of comments can be viewed in the PR-15 Citizen Participation. All comments were accepted.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments and views related to housing, code enforcement and infrastructure improvements were accepted. Other comments and views, particularly those related to public services, were noted, and will be considered in future action plans.

## **7. Summary**

Through data analysis, the County is able to make a complete assessment of the needs in its low- and moderate-income communities. Primary data sources for the Consolidated Plan include: 2014-2018 American Community Survey (ACS) 5-Year Estimates, Bureau of Labor Statistics, and other pertinent and related public data sources.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

**1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source**

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

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	CLAY COUNTY	Grants Management

Table 1 – Responsible Agencies

### Narrative

Clay County, Florida's Planning Department, is the lead agency for the Department of Housing and Urban Development (HUD) entitlement Community Development Block Grant (CDBG) program. The County will be a recipient of CDBG formula grant entitlement funds. The Planning Department in conjunction with the Grants Management Department oversees the administration and implementation of the County's Consolidated Plan and Annual Action Plan and is also responsible for all reporting and plans required by the program.

### Consolidated Plan Public Contact Information

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## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)**

### **1. Introduction**

As part of Consolidated Plan and first-year Annual Action Plan, local agencies, service providers, and public documents pertaining to the County were consulted to gain a better understanding of the needs, services, and resources available to Clay County residents. The Citizen Participation Plan was developed in coordination with the County, public, and consultants. After the Citizen Participation Plan was drafted, the public had an opportunity to comment and give input on the final version of the plan. The final CPP shall be made public and formatted as ADA compliant.

The Citizen Participation Plan (CPP) provides guidance for citizens and organizations in Clay County (County) to voice their opinions and participate in all phases of the development of the Consolidated Plan including the Five-Year Consolidated Plan, the Annual Action Plan, the Citizen Participation Plan, the Analysis of Impediments to Fair Housing, the Residential Anti-Displacement Plan, the Consolidated Annual Performance and Evaluation Report and any amendments to these plans. The Consolidated Plan, along with its supporting plans, provides a guiding framework for Clay County's management of programs and funds related to the Community Development Block Grant (CDBG) program administered by the US Department of Housing and Urban Development (HUD).

The CPP establishes the procedures for citizen participation in development and updating of the Consolidated Plan and its supporting plans. These procedures are designed to maximize transparency and opportunities for public engagement. The CPP emphasizes public outreach to low- and moderate-income residents through non-profits, faith-based organizations, and philanthropic organizations to bolster the voices of under-represented demographics. Residents living in blighted neighborhoods and areas that qualify for CDBG funds are strongly encouraged to participate. The CPP is developed in accordance with U.S. Department of Housing and Urban Development's rule 24 CFR 91.105.

**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)).**

The list of providers reviewed includes housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS, and their families, and homeless persons. Phone and email contacts were also made to key non-profits and agencies that work with these specific groups to obtain a better understanding of their service or potential service to Clay County residents.

**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**



Northeast Florida Continuum of Care is the agency responsible on a regional level for the Continuum of Care. Clay County is one of three counties in the region. The Planning Department will continue to seek their input and coordinate CDBG and other housing related programs (e.g., State of Florida SHIP funds) with the agency.

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

Clay County is not a direct recipient of ESG funding. The Northeast Florida Continuum of Care is the lead agency for the regional (northeast Florida including Duval, Nassau, and Clay Counties) Continuum of Care and distributes ESG funds.

**2. Describe Agencies, groups, organizations, and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities.**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Habitat for Humanity of Jacksonville
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Invited to citizen participation meetings and sent survey for input into CP and Action Plan.
2	<b>Agency/Group/Organization</b>	Health Planning Council of Northeast Florida, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Invited to citizen participation meetings and sent survey for input into CP and Action Plan. Participated in preparing needs assessments and coordinated overall citizen participation process.
3	<b>Agency/Group/Organization</b>	Changing Homelessness, Inc.
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless

		Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided email correspondence and data during plan development
4	<b>Agency/Group/Organization</b>	JACKSONVILLE HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided email correspondence and data during plan development
5	<b>Agency/Group/Organization</b>	Palatka Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided email correspondence and data during plan development
6	<b>Agency/Group/Organization</b>	MacClenny Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided email correspondence and data during plan development

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

All relevant local agencies were consulted in the formation of the Consolidated Plan with the exception of Broadband Service providers as the County is currently exploring options to ensure all residents will have adequate access to a minimum broadband coverage of 25mbps download/3mbps upload capabilities. Additionally, no resilience specific agencies were contacted as the County is awaiting results of the Resilient Florida Grant with Florida Department of Environmental Protection that would enable the whole County to be assessed for flooding and sea rise levels.

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Changing Homelessness, Inc.	This collaborative group addresses homeless issues including chronic homelessness, homelessness prevention, and discharge coordination policies on a regional basis in Duval, Nassau, and Clay Counties.

State Housing Initiative Program (SHIP)	Clay County BCC	Increase the availability of affordable housing in Clay County. Availability of affordable housing includes homeowner rehabilitation programs, purchase assistance programs and partnerships with non-profit organizations assisting those with "special needs" housing.
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**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

The Citizen Participation Plan (CPP) provides guidance for citizens and organizations in Clay County (County) to voice their opinions and participate in all phases of the development of the Consolidated Plan including the Five-Year Consolidated Plan, the Annual Action Plan, the Citizen Participation Plan, the Analysis of Impediments to Fair Housing, the Residential Anti-Displacement Plan, the Consolidated Annual Performance and Evaluation Report and any amendments to these plans.

The Consolidated Plan, along with its supporting plans, provides a guiding framework for Clay County’s management of programs and funds related to the Community Development Block Grant (CDBG) program administered by the US Department of Housing and Urban Development (HUD). The CPP establishes the procedures for citizen participation in development and updating of the Consolidated Plan and its supporting plans. These procedures are designed to maximize transparency and opportunities for public engagement. The CPP emphasizes public outreach to low- and moderate-income residents through non-profits, faith-based organizations, and philanthropic organizations to bolster the voices of under-represented demographics. Residents living in blighted neighborhoods and areas that qualify for CDBG funds are strongly encouraged to participate.

The CPP is developed in accordance with U.S. Department of Housing and Urban Development’s rule 24 CFR 91.105. The CPP encourages citizens to participate in all stages of the planning process including the identification of needs, establishing community priorities, funding allocation, and the implementation and eventual evaluation of program activities. Accordingly, the County makes provision for citizens to participate in the development of the Citizen Participation Plan, the Consolidated Plan, each related Annual Action Plan, and any substantial amendments to these plans. The County also makes provision for citizens to comment on the Consolidated Annual Performance Evaluation Report (CAPER) that evaluates activities and projects implemented each year.

**Process**

The CPP shall be developed in coordination with the County, public, and consultants. After the CPP is drafted, the public shall have an opportunity to comment and give input on the final version of the plan. The final CPP shall be made public and formatted as ADA compliant.

**Narrative (optional): N/A**

## **PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**

### **1. Summary of Citizen Participation Process/Efforts made to broaden citizen participation**

#### **Summarize citizen participation process and how it impacted goal setting**

The Citizen Participation Plan (CPP) provides guidance for citizens and organizations in Clay County (County) to voice their opinions and participate in all phases of the development of the Consolidated Plan including the Five-Year Consolidated Plan, the Annual Action Plan, the Citizen Participation Plan, the Analysis of Impediments to Fair Housing, the Residential Anti-Displacement Plan, the Consolidated Annual Performance and Evaluation Report and any amendments to these plans.

The Consolidated Plan, along with its supporting plans, provides a guiding framework for Clay County's management of programs and funds related to the Community Development Block Grant (CDBG) program administered by the US Department of Housing and Urban Development (HUD). The CPP establishes the procedures for citizen participation in development and updating of the Consolidated Plan and its supporting plans. These procedures are designed to maximize transparency and opportunities for public engagement. The CPP emphasizes public outreach to low- and moderate-income residents through non-profits, faith-based organizations, and philanthropic organizations to bolster the voices of under-represented demographics. Residents living in blighted neighborhoods and areas that qualify for CDBG funds are strongly encouraged to participate. The CPP is developed in accordance with U.S. Department of Housing and Urban Development's rule 24 CFR 91.105.

The CPP encourages citizens to participate in all stages of the planning process including the identification of needs, establishing community priorities, funding allocation, and the implementation and eventual evaluation of program activities. Accordingly, the County makes provision for citizens to participate in the development of the Citizen Participation Plan, the Consolidated Plan, each related Annual Action Plan, and any substantial amendments to these plans. The County also makes provision for citizens to comment on the Consolidated Annual Performance Evaluation Report (CAPER) that evaluates activities and projects implemented each year.

The CPP shall be developed in coordination with the County, public, and consultants. After the CPP is drafted, the public shall have an opportunity to comment and give input on the final version of the plan. The final CPP shall be made public and formatted as ADA complainant.

#### **Prior to Development of the Consolidated Plan**

Before developing adopting the initial Consolidated Plan, the County will give citizens, public agencies, and other interested parties the information on the amount of assistance the County expects to receive from the CDBG program, the range of activities that can be funded through the grant, and how these projects will benefit low- and moderate-income residents. The County will achieve these goals by conducting two public meetings. The meetings will involve the following:

- **Public Meeting #1** - Public Meeting #1 will focus on engaging stakeholders in the County. A survey will be utilized to provide additional feedback.

- **Public Meeting #2** - Public Meeting #2 shall be a Community Participation Workshop where the public shall be invited to provide their opinions and ideas for the CDBG funds. This meeting shall be advertised on public forums and social media accounts as well as have a website dedicated to the project that shall be available to the public. An online survey will be conducted before, during, and after the workshop to garner additional input from the public who could not attend the meeting.

### 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	Public Hearing	Non-targeted / broad community	Held on June 8 at County Commission. Approximately 60 persons in attendance.	No public comments.	N/A	<a href="https://clayfl.newswagit.com/videos/122596?ts=4271">https://clayfl.newswagit.com/videos/122596?ts=4271</a>
2	Public Hearing	Non-targeted / broad community	Held on June 27 at County Commission. Approximately 100 persons in attendance.	No public comments.	N/A	<a href="https://clayfl.newswagit.com/videos/129642?ts=8777">https://clayfl.newswagit.com/videos/129642?ts=8777</a>
3	Public Meeting	Nonprofit housing and community organization	15 persons attended.	Much of the discussion at the public meeting held in June 2020 were related to housing affordability and the needs of low- and moderate-income homeowners and tenants.	N/A	<a href="https://clayfl.newswagit.com/videos/122596?ts=4271">https://clayfl.newswagit.com/videos/122596?ts=4271</a>
4	Public Meeting	Non-targeted / broad community	2 persons attended along with staff and consultants.	Residents focused on the need for affordable housing and infrastructure improvements		
5	Survey	Non-targeted / broad community	45 responses to detailed survey.	Comments primarily focused on the need for affordable housing for both homeowners and tenants as	N/A	<a href="https://www.claycountygov.com/business/economic-development/community-development-block-grant">https://www.claycountygov.com/business/economic-development/community-development-block-grant</a>

				well as the need for improvements to homes owned by l/m residents.		
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**Table 4 – Citizen Participation Outreach**

# **Needs Assessment**

## **NA-05-Overview**

### **Needs Assessment Overview**

During the Consolidated Planning process Clay County identified a number of needs that grant funds will be used to address. These needs were identified through numerous methods including consultation with key stakeholders, public forums, quantitative research, and institutional knowledge of previous successful programs. The NA-50 discusses public facilities, public improvements, and public service needs in the community. At this time, the County has identified the need to preserve and develop affordable housing in the County through housing rehabilitation as well as the improvement of low- and moderate-income "distressed" areas (i.e., more than 51% l/m income) with code enforcement activities and infrastructure.



## **NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)**

### **Summary of Housing Needs**

#### **Introduction**

Every five years, in order to be eligible for grant funding from the U.S. Department of Housing & Urban Development (HUD), local governments must prepare and submit a strategic plan. Known as the Consolidated Plan, its purpose is to guide the use of all federal grants and funding given to local governments for housing and community development. In addition to the Consolidated Plan, local governments must also submit to HUD an Analysis of Impediments to Fair Housing Choice (AI), which examines potential barriers to housing choice based on membership in a legally protected class. Federally protected classes include race, color, religion, sex, disability, familial status, and national origin.

The grant funds that HUD provides Clay County that are covered by the Consolidated Plan include the Community Development Block Grant (CDBG) Program. The County must also submit a separate Annual Action Plans for each of the five years during the Consolidated Plan period. The Annual Action Plans serve as the County's yearly application to HUD, through which the County receives mandated annual allocations. Annual grant award amounts are determined by a formula administered by HUD and may change slightly from year to year.

When preparing a Consolidated Plan and related Action Plans, grantees must assess housing and community development needs of individuals and families in their jurisdiction, including persons experiencing homelessness. This Needs Assessment will serve as background for Clay County as it identifies funding priorities and related projects for the upcoming program year. Needs Assessment findings will also be incorporated into the 2021-2025 Consolidated Plan as a means of identifying potential barriers that affect housing choice and developing goals surrounding affordable housing, community development, and preventing/ending homelessness over the five-year term.

The Needs Assessment relies on demographic, economic, and housing data to identify top needs in Clay County. It also draws heavily upon substantial community input collected through public meetings, focus groups, interviews, and a survey. Summaries of quantitative and qualitative research findings are provided, along with a synthesis of the greatest housing, community development, and homeless needs.

In summary, low- and moderate-income populations in Clay County experience higher rates of housing problems, such as housing cost burden and overcrowding. This can result in these populations having an increased risk of homelessness. The data herein will demonstrate the need for the production of affordable housing for both renters and owners, housing assistance, and continued economic development to increase the median income of low- and moderate-income households countywide.

#### **Socioeconomic Overview**

Table 1 displays the population, number of households, and median income for the base year, the most recent year, and the percentage of change over time. This data set shows an overall population increase of 14% between the years 2009 and 2017. During this time, the number of households

increased 11%. These numbers show moderate growth within the County. In contrast, the countywide median income increased just 3% during this time, indicating that population growth has outpaced economic growth.

	<b>Base Year: 2009</b>	<b>Most Recent Year: 2017</b>	<b>% Change</b>
Population	162,635	185,130	14%
Households	58,753	65,130	11%
Median Income	\$60,352.00	\$61,971.00	3%

**Table 5 - Housing Needs Assessment Demographics**

Data Source:  
2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

### Population Dynamics

Clay County is the 25th largest county—out of 67 counties—by population in the State of Florida, containing approximately 1% of the state’s overall population. As displayed below in Table 1, Clay County’s estimated population from the U.S. Census Bureau’s 2015-2019 American Community Survey (ACS) was 211,405. Specifically, Clay County’s population increased at a rate of 58.1% between 1990 and 2000, 35.5% between 2000 and 2010, and by 10.8% between 2010 and the latest ACS (2015-2019) estimates.

### **Number of Households Table**

	<b>0-30% HAMFI</b>	<b>&gt;30-50% HAMFI</b>	<b>&gt;50-80% HAMFI</b>	<b>&gt;80-100% HAMFI</b>	<b>&gt;100% HAMFI</b>
Total Households	5,570	6,580	10,410	7,575	34,985
Small Family Households	2,475	2,345	4,215	3,650	20,085
Large Family Households	395	590	1,100	820	3,845
Household contains at least one person 62-74 years of age	1,293	1,580	2,695	1,805	8,455
Household contains at least one-person age 75 or older	379	1,040	1,300	921	2,415
Households with one or more children 6 years old or younger	1,094	1,388	2,219	1,288	4,850

**Table 6 - Total Households Table**

Data Source:  
2013-2017 CHAS

	<b>1990</b>	<b>2000</b>	<b>2010</b>	<b>2015-2019 ACS</b>
Population	105,986	140,814	190,865	211,405
Growth Rate	58.1%	32.9%	35.5%	10.8%

**Table 7 - Total Population in Clay County: Source: U.S. Census and American Community Survey 2015-2019 5-Year**

### **Housing Needs Summary Tables**

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	0	0	60	0	60	90	0	29	25	144
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	10	0	10	0	20	0	0	10	15	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	100	235	170	25	530	35	44	135	90	304
Housing cost burden greater than 50% of income (and none of the above problems)	1,565	1,140	330	0	3,035	1,635	1,275	769	209	3,888
Housing cost burden greater than 30% of income (and none of the above problems)	85	950	1,295	344	2,674	555	890	1,884	1,180	4,509
Zero/negative Income (and none of the above problems)	235	0	0	0	235	349	0	0	0	349

**Table 8 – Housing Problems Table**

Data 2013-2017 CHAS

Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,670	1,380	575	25	3,650	1,750	1,330	940	339	4,359

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having none of four housing problems	339	1,185	2,595	1,914	6,033	1,225	2,710	6,300	5,300	15,535
Household has negative income, but none of the other housing problems	235	0	0	0	235	349	0	0	0	349

**Table 9 – Housing Problems 2**

Data 2013-2017 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,035	1,090	739	2,864	959	878	1,190	3,027
Large Related	155	345	325	825	200	110	193	503
Elderly	245	337	264	846	609	875	810	2,294
Other	325	545	400	1,270	485	319	478	1,282
Total need by income	1,760	2,317	1,728	5,805	2,253	2,182	2,671	7,106

**Table 10 – Cost Burden > 30%**

Data 2013-2017 CHAS  
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,015	605	164	1,784	729	633	445	1,807
Large Related	100	155	0	255	155	50	40	245
Elderly	235	193	55	483	409	395	105	909
Other	325	270	105	700	380	200	189	769
Total need by income	1,675	1,223	324	3,222	1,673	1,278	779	3,730

**Table 11 – Cost Burden > 50%**

Data 2013-2017 CHAS  
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	110	195	65	15	385	19	24	75	95	213
Multiple, unrelated family households	0	40	74	0	114	15	20	70	35	140
Other, non-family households	0	0	30	10	40	0	0	0	0	0
Total need by income	110	235	169	25	539	34	44	145	130	353

**Table 12 – Crowding Information – 1/2**

Data 2013-2017 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

**Table 13 – Crowding Information – 2/2**

Alternate Data Source Name:  
2013-2017 CHAS  
Data Source  
Comments:

**Describe the number and type of single person households in need of housing assistance.**

The Clay County average household size is 2.48. It is estimated that there are approximately 11,000 single person households and approximately 3,500 are in need of housing assistance.

There are a number of households with less than 1 or equal to 1 in the household by tenure and HUD Adjusted Median Family Income (HAMFI) according to the default 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

Within Clay County there are 11,230 renters that are single households. Of the renter population there are 2,590 households in the 0-30% HAMFI range. There are 21,820 owners that are single households. Of the owner population there are 3,555 households in the 0-30% HAMFI range. The most affected populations within the renter and owner populations are in the (renter) >50-80% HAMFI (3,515) and (owner) >50-80% (7,745).

The highest number of total households is in the greater than 50-80% HAMFI group for renter and owner with 3,515 and 7,745 households respectively. Nearly 7,000 households (6,995) or approximately 22% of all Single households in Clay County earn below 30% of HAMFI.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

Based on Florida Clerks' data, approximately 500 families in need of assistance.

There are a number of households with a disability status that has 1 or more of 4 housing unit problems in the household by tenure and HUD Adjusted Median Family Income (HAMFI) according to the default 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD. Those disability statuses are a household member has a hearing or vision impairment, household member has an ambulatory limitation, household member has a cognitive limitation, or household member has a self-care or independent living limitation.

Households with a disability status totals are: household member has a hearing or vision impairment (renter, 785) (owner, 2,310); household member has an ambulatory limitation (renter, 1,780) (owner, 4,055); household member has a cognitive limitation (renter, 1,295) (owner, 2,850); or household member has a self-care or independent living limitation (renter, 1,205) (owner, 2,760).

The highest number of total households with a disability status is in the category of households that have a member having an ambulatory limitation and households that have a member that has cognitive limitations following in second. Nearly 2,000 renter households (1,620) or approximately 32% and nearly 4,000 owner households (3,630) or approximately 30% in Clay County earn below 30% of HAMFI.

## **What are the most common housing problems?**

### **Housing Affordability & Need**

In addition to the Shimberg Center for Housing, The National Low-Income Housing Coalition publishes an annual report called "Out of Reach," which examines rental housing rates relative to income levels for counties and metro areas throughout the United States.

In August of 2020, the University of Florida Shimberg Center provided brief updates on key findings from its 2019 Rental Market Study. With those updates, Clay County is officially home to 4,591 cost-burdened renters, who collectively represent 23% of all Clay County renters.

To afford a one-bedroom rental unit at the Clay County fair market rate (FMR) of \$872/month without being cost burdened requires an annual income of at least \$34,880. This amount translates to a 40-hour work week at an hourly wage of \$16.77, a 78-hour work week at the minimum wage of \$8.56, or a 44-hour work week at the average renter wage of \$13.69. The two-bedroom FMR of \$1,059/month translates to an hourly wage of \$20.37, a 95-hour work week at minimum wage, or a 60-hour work week at the average renter wage. Statewide, a minimum wage employee would need to work 92 hours per week at minimum wage to afford a one-bedroom FMR unit and 114 hours per week for a two-bedroom unit (FMR).

## **Are any populations/household types more affected than others by these problems?**

Homeowners are a key household type affected by housing affordability.

Looking at all households in Clay County regardless of income or tenure, a total of 19,350 households spent more than 30% of their income on housing costs, with 8,571 (or 11.55% of all households) facing severe cost burdens.

A total of 11,402 owner-occupied households in Clay County are cost burdened or severely cost burdened. Specifically, 6,846 households are cost burdened, meaning they pay anywhere from 30.1% to 50% of their income on housing costs. Another 4,556 households are severely cost-burdened—meaning they spend at least 50% of their income on housing costs—while 43,476 are not cost burdened. In terms of overall percentages, 12.5% are cost burdened, 8.3% are severely cost burdened, and 79.2% are without cost burdens as defined in this report.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

Cost-burdened households are at higher risk of losing existing housing. Clay County works with Changing Homelessness, Inc., the lead regional HUD Continuum of Care agency to help prevent homelessness for very low-income renters at imminent risk of becoming homeless. Funds are made available to rapidly re-house very low-income persons currently experiencing homelessness. Rapid re-housing and homeless service providers identified the following characteristics and needs of low-income individuals and families with children who are currently housed but are at imminent risk of becoming homeless:

- Cost-burdened – paying more than 30 percent of their income on housing.
- Working low-wage jobs.
- Precariously housed
- Lack of access to transportation.
- Higher utility costs due to substandard housing.
- Lack of access to childcare.
- Unmet health and mental health needs.
- Untreated substance abuse issues; and
- Lack of safety net.
- Identified needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance include:
  - Finding affordable housing, including landlords that accept vouchers.

- Long-term housing support such as vouchers.
- Access to transportation.
- Access to childcare.
- Access to health and mental health care; and
- Better paying jobs.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

A total of 67 persons in Clay County experienced homelessness in 2019. 67 were sheltered and 7 were not. HUD estimates that renter households in the 0-30% AMI group paying over 50% of their income for rent are the most at-risk for becoming homeless. According to 2013-2017 CHAS data, all households in Clay County regardless of income or tenure, a total of 19,350 households spent more than 30% of their income on housing costs, with 8,571 (or 11.55% of all households) facing severe cost burdens. A total of 11,402 owner-occupied households in Clay County are cost burdened or severely cost burdened. Specifically, 6,846 households are cost burdened, meaning they pay anywhere from 30.1% to 50% of their income on housing costs. Another 4,556 households are severely cost-burdened—meaning they spend at least 50% of their income on housing costs—while 43,476 are not cost burdened. In terms of overall percentages, 12.5% are cost burdened, 8.3% are severely cost burdened, and 79.2% are without cost burdens as defined in this report. In contrast to owner-occupied households, there are 11,373 renter households without cost burdens in Clay County, followed by 3,933 renter households being cost burdened, and 4,015 households facing severe cost burdens. Furthermore, unemployed persons or persons with only part-time employment, elderly persons on limited or fixed incomes, and persons with other special needs are at a greater risk of homelessness.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

Over the past five years, homelessness in the greater Jacksonville, Duval, and Clay County region has slightly decreased to a total of 1,665 individuals.

According to data from the U.S. Census Bureau 2014-2018 ACS, an estimated 983 homeless students attend K-12 schools in Clay County, with 131 of those students classified as unaccompanied youth.

An additional vulnerable population is migrant/seasonal farmworkers are populations with special needs. As of 2019, there is a total of 10 unaccompanied farmworkers in Clay County, with a corresponding need for 10 single worker beds. In addition, there are 11 accompanied migrant and seasonal farmworkers who need a total of 11 multifamily units.



Many factors, including limited supply of affordable housing, substandard and crowded housing, lack of employment opportunities, and substance abuse and/or mental or behavioral health issues are linked to an increased risk of homelessness. The most recent point-in-time (PIT) survey, was conducted in 2019. The 2019 PIT data shows that 1,146 sheltered and 508 unsheltered totaling 1,654 throughout Northeast Florida (NE FL). Of that number 67 sheltered and 7 unsheltered totaling 74 were within Clay County. The report also found that there were 289 families with children experiencing homelessness and 118 veterans experiencing homelessness throughout NE FL. The most vulnerable persons, are chronically homeless and are a smaller portion of the total population of people experiencing homelessness (19%). Families with children make up a smaller portion of the total population (18%). The all other people, which represents individuals, accounts for more than ½ the total population (56%). The percent who are veterans is 7% and was a decrease from the 27% from 2009.

## **Discussion**

As of the drafting of this report, the impacts of the COVID-19 Pandemic on homelessness and housing instability have likely not been fully realized. The Northeast Florida 2020 Point in Time homeless count was conducted on January 22, 2020, which was the day after the first case of coronavirus was reported in the United States. The count tallied 1,452 people experiencing homelessness in Duval, Clay, and Nassau counties, a 52 percent decrease over the past decade. The economic impacts of the COVID-19 pandemic, which led to many job losses and evictions, have significantly increased homelessness, including those living with family and friends and in motels. COVID-19 has demonstrated that the primary factor leading to homelessness is the lack of affordable housing for low-wage earning families.

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

To assess affordability and other housing needs, HUD identifies four housing problems:

1. A household is cost burdened if monthly housing costs (including property taxes, insurance, energy payments, water/sewer service, and trash collection for owners and utilities for renters) exceed 30% of monthly household income. A severe cost burden occurs when more than 50% of monthly household income is spent on monthly housing costs.
2. A household is overcrowded if there is more than 1.0 persons per room, not including kitchens and bathrooms. A household is severely overcrowded if there are more than 1.5 persons per room, not including kitchens or bathrooms. A housing unit lacks complete kitchen facilities if it lacks one or more of the following facilities: cooking facilities, a refrigerator, or a sink with piped water.
3. A housing unit lacks complete plumbing facilities if it lacks one or more of the following facilities: hot and cold piped water, a flush toilet, and a bathtub or shower.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,050	928	584
White	3,265	628	494
Black / African American	429	85	55
Asian	55	35	19
American Indian, Alaska Native	25	0	4
Pacific Islander	0	0	0
Hispanic	229	165	10

**Table 14 - Disproportionally Greater Need 0 - 30% AMI**

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**30%-50% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,545	2,035	0
White	3,505	1,865	0
Black / African American	429	4	0
Asian	150	25	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	395	130	0

**Table 15 - Disproportionally Greater Need 30 - 50% AMI**

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**50%-80% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,700	5,705	0
White	3,120	4,895	0
Black / African American	674	370	0
Asian	184	58	0
American Indian, Alaska Native	8	8	0
Pacific Islander	10	0	0
Hispanic	525	344	0

**Table 16 - Disproportionally Greater Need 50 - 80% AMI**

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

## 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,899	5,704	0
White	1,474	4,479	0
Black / African American	230	510	0
Asian	39	39	0
American Indian, Alaska Native	0	14	0
Pacific Islander	4	0	0
Hispanic	135	415	0

**Table 17 - Disproportionally Greater Need 80 - 100% AMI**

Data 2013-2017 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

## Discussion

CDBG funds will be used for qualified applicants whose homes in need of repair. Repairs may include roofing, electrical, plumbing, heating/air conditioning, accessibility modifications, health/sanitary problems, safety code violations, and or interior/exterior damage or deterioration to the structure. Under this strategy, failing septic systems and old wells can be replaced by paying for connection fees, abandoning private wells and closing septic tanks, as well as other related plumbing costs may be funded under this program.

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

To assess affordability and other housing needs, HUD identifies four housing problems:

1. A household is cost burdened if monthly housing costs (including property taxes, insurance, energy payments, water/sewer service, and trash collection for owners and utilities for renters) exceed 30% of monthly household income. A severe cost burden occurs when more than 50% of monthly household income is spent on monthly housing costs.
2. A household is overcrowded if there is more than 1.0 persons per room, not including kitchens and bathrooms. A household is severely overcrowded if there are more than 1.5 persons per room, not including kitchens or bathrooms. A housing unit lacks complete kitchen facilities if it lacks one or more of the following facilities: cooking facilities, a refrigerator, or a sink with piped water.
3. A housing unit lacks complete plumbing facilities if it lacks one or more of the following facilities: hot and cold piped water, a flush toilet, and a bathtub or shower.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,420	1,564	584
White	2,695	1,199	494
Black / African American	404	115	55
Asian	55	35	19
American Indian, Alaska Native	25	0	4
Pacific Islander	0	0	0
Hispanic	214	180	10

**Table 18 – Severe Housing Problems 0 - 30% AMI**

Data 2013-2017 CHAS

Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,710	3,895	0
White	2,160	3,220	0
Black / African American	195	240	0
Asian	140	35	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	174	355	0

**Table 19 – Severe Housing Problems 30 - 50% AMI**

Data 2013-2017 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

### 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,515	8,895	0
White	1,014	7,005	0
Black / African American	355	689	0
Asian	25	213	0
American Indian, Alaska Native	0	18	0
Pacific Islander	0	10	0
Hispanic	100	775	0

**Table 20 – Severe Housing Problems 50 - 80% AMI**

Data 2013-2017 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

## 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	364	7,214	0
White	269	5,674	0
Black / African American	35	705	0
Asian	25	53	0
American Indian, Alaska Native	0	14	0
Pacific Islander	4	0	0
Hispanic	15	540	0

**Table 21 – Severe Housing Problems 80 - 100% AMI**

Data 2013-2017 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## Discussion

In Clay County, at the 0-30% AMI, 30-50% AMI, 50-80% AMI, and 80-100% AMI levels, white households have the highest amount of housing problems, followed by Black/African American households.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction:

A household is cost burdened if monthly housing costs (including property taxes, insurance, energy payments, water/sewer service, and trash collection for owners and utilities for renters) exceed 30% of monthly household income. A severe cost burden occurs when more than 50% of monthly household income is spent on monthly housing costs.

### Housing Cost Burden

Housing Cost Burden		<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole		47,944	9,245	7,293	614
White		38,700	6,745	5,695	509
Black / African American		3,960	880	905	55
Asian		913	384	230	19
American Indian, Alaska Native		110	12	25	4
Pacific Islander		49	10	0	0
Hispanic		3,170	955	410	35

**Table 1 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2013-2017 CHAS

### Discussion:

Being severely cost-burdened refers to when a household must spend at least 50% of its income on housing costs. Looking at all households in Clay County regardless of income or tenure, there are approximately 8,571 (or 11.55% of all households) facing severe cost burdens.



## **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

### **Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

Several racial/ethnic groups are disproportionately affected by housing problems (1 or more of the 4 housing unit problems) and consequently have an excessively greater housing need in comparison to the County overall. This includes the following groups: White alone, non-Hispanic, Black or African American alone, non-Hispanic, and Hispanic, any race.

The White alone, non-Hispanic category experiences the following issues:

- Housing problems in the 0-30% HAMFI group for renters where they account for 64% of the group
- Housing problems in the 0-30% HAMFI group for owners where they account for 66% of the group

The Black or African American alone, non-Hispanic category experiences the following issues:

- Housing problems in the 0-30% HAMFI group for renters where they account for 16% of the group
- Housing problems in the 0-30% HAMFI group for owners where they account for 5% of the group

The Hispanic, any race category experiences the following issues:

- Housing problems in the 0-30% HAMFI group for renters where they account for 5% of the group
- Housing problems in the 0-30% HAMFI group for owners where they account for 4% of the group

These three groups account for 85% of the renters in the 0-30% HAMFI group and 75% of the owners in the 0-30% HAMFI group.

### **If they have needs not identified above, what are those needs?**

There is a need for quality and affordable housing units for low- and moderate-income households, including but not limited to households of minority racial and ethnic groups that are disproportionately affected by severe housing problems and cost burden.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

White alone, non-Hispanic in the Middleburg and Keystone Heights area, Black or African American alone in the Green Cove Springs and Orange Park areas, and Hispanic, any race throughout the entire County.

## NA-35 Public Housing – 91.205(b)

### Introduction

Clay County does not have a Housing Authority division, but the County does partner with Flagler County Housing Authority to manage Clay County's Section 8 Voucher program. The County will continue to explore and groom additional partnerships with local housing authorities that are close to the locale, such as Jacksonville, Palatka, and MacClenny.

The data below is for the Jacksonville Housing Authority.

### Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	515	2,632	6,624	352	6,074	154	0	0

**Table 23 - Public Housing by Program Type**

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

### Characteristics of Residents

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	3,986	9,606	11,081	8,626	11,188	10,805	0	
Average length of stay	0	2	4	4	2	5	0	0	
Average Household size	0	1	2	2	2	2	1	0	
# Homeless at admission	0	21	2	3	1	2	0	0	

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# of Elderly Program Participants (>62)	0	69	531	661	73	572	12	0
# of Disabled Families	0	105	659	1,273	38	1,137	87	0
# of Families requesting accessibility features	0	515	2,632	6,624	352	6,074	154	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 24 – Characteristics of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

### Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	134	352	749	10	700	33	0	0
Black/African American	0	376	2,259	5,825	337	5,335	117	0	0
Asian	0	2	11	24	3	18	1	0	0
American Indian/Alaska Native	0	2	4	17	2	12	3	0	0
Pacific Islander	0	1	6	9	0	9	0	0	0
Other	0	0	0	0	0	0	0	0	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 25 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

### Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	11	114	241	7	225	8	0	0
Not Hispanic	0	504	2,518	6,383	345	5,849	146	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

**Table 26 – Ethnicity of Public Housing Residents by Program Type**  
Data Source: PIC (PIH Information Center)

### Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

N/A

### Most immediate needs of residents of Public Housing and Housing Choice voucher holders

N/A

### How do these needs compare to the housing needs of the population at large

When asked to elaborate on housing needs, the public emphasized that affordable public housing is the most important need right now and several factors have contributed to the issue.

### Discussion

The public indicated that there is a major issue with rent-to-own properties in the county. Allegedly, several of these units are operated illegally and the person or entity that owns the property is not correctly identified or documented, preventing the handover of ownership to tenants.

- The prevalence of landlords not maintaining their property and creating sub-standard living conditions in rental units was also identified by the public.
- Finally, it was emphasized that indigenous Clay County residence are getting priced out of the county due to the influx of new residence moving into the area.

## **NA-40 Homeless Needs Assessment – 91.205(c)**

### **Introduction:**

Florida's Council on Homelessness prepared recommendations for reducing homelessness in the 2019 Annual Report. The report summarizes the extent of homelessness and characteristics of the men, women, and children who do not have a home; and outlines best practices for ending homelessness. Although the 2019 Report shows that Florida's rate of "literal homelessness" continues to decline, the impacts of the COVID-19 Pandemic were not fully realized. The Northeast Florida's 2020 Point in Time homeless count was conducted on January 22, 2020, which was the day after the first case of coronavirus was reported in the United States. The count tallied 1,452 people experiencing homelessness in Duval, Clay, and Nassau counties, a 52 percent decrease over the past decade. The economic impacts of the COVID-19 pandemic, which led to many job losses and evictions, have significantly increased homelessness, including those living with family and friends and in motels. COVID-19 has exasperated that the primary factor leading to homelessness is the lack of affordable housing for low-wage earning families. A demonstrated solution to ending homelessness is housing. In Florida, for every 100 extremely low-income renter households, there are only 23 affordable and available rental units, according to Florida's Council on Homelessness. The annual Point-In-Time (PIT) Count, completed over 24 hours in January 2019, offers a snapshot of homelessness in North Florida, including Clay County.

## Homeless Needs Assessment

Population	Estimate the # of persons experiencing homel on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	289	1,654	500	250	30
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	508	857	2,000	450	260	30
Chronically Homeless Individuals	5	20	35	22	24	30
Chronically Homeless Families	2	10	20	15	15	30
Veterans	30	88	125	30	25	30
Unaccompanied Child	53	82	400	200	150	30
Persons with HIV	1	5	10	12	10	30

**Table 2 - Homeless Needs Assessment**

Data Source  
Comments:

### Homelessness

#### Individuals & Families Experiencing Homelessness

Over the past five years, homelessness in the greater Jacksonville, Duval, and Clay County region has slightly decreased to a total of 1,665 individuals as of the January 2020 Point-in-Time (PIT) count results.

Table 17. Jacksonville, Duval, and Clay County Persons Experiencing Homelessness (PIT Count)  
Source: Clay County Homeless Services Directory, 2019

According to data from the U.S. Census Bureau 2014-2018 ACS and the U.S. Department of Education, an estimated 983 homeless students attend K-12 schools in Clay County, with 131 of those students classified as unaccompanied youth.

Table 18. Homelessness Among Schoolchildren K-12, Clay County  
Source: U.S. Census Bureau 2014-2018 ACS and U.S. Department of Education

#### Farmworker Housing Needs

In addition to individuals and families experiencing homelessness, an additional vulnerable population is migrant/seasonal farmworkers are populations with special needs include migrant/seasonal farmworkers. As shown in the table below, as of 2019, there is a total of 10 unaccompanied farmworkers in Clay County, with a corresponding need for 10 single worker beds. In addition, there are 11 accompanied migrant and seasonal farmworkers who need a total of 11 multifamily units.

Indicate if the homeless population is:                      Has No Rural Homeless

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

#### Individuals & Families Experiencing Homelessness

Over the past five years, homelessness in the greater Jacksonville, Duval, and Clay County region has slightly decreased to a total of 1,665 individuals as of the January 2020 Point-in-Time (PIT) count results.

Jacksonville, Duval, and Clay County Persons Experiencing Homelessness (PIT Count)  
Source: Clay County Homeless Services Directory, 2019

According to data from the U.S. Census Bureau 2014-2018 ACS and the U.S. Department of Education, an estimated 983 homeless students attend K-12 schools in Clay County, with 131 of those students classified as unaccompanied youth.

Homelessness Among Schoolchildren K-12, Clay County  
Source: U.S. Census Bureau 2014-2018 ACS and U.S. Department of Education

#### Farmworker Housing Needs

In addition to individuals and families experiencing homelessness, an additional vulnerable population is migrant/seasonal farmworkers are populations with special needs include migrant/seasonal farmworkers. As shown in the table below, as of 2019, there is a total of 10 unaccompanied farmworkers in Clay County, with a corresponding need for 10 single worker beds. In addition, there are 11 accompanied migrant and seasonal farmworkers who need a total of 11 multifamily units.



**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	0	0
Not Hispanic	0	0

Data Source  
Comments:

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

The 2019 PIT data shows that 1,146 sheltered and 508 unsheltered totaling 1,654 throughout Northeast Florida (NE FL). Of that number 67 sheltered and 7 unsheltered totaling 74 were within Clay County. The report also found that there were 289 families with children experiencing homelessness and 118 veterans experiencing homelessness throughout NE FL. The most vulnerable persons, are chronically homeless and are a smaller portion of the total population of people experiencing homelessness (19%). Families with children make up a smaller portion of the total population (18%). The all other people, which represents individuals, accounts for more than ½ the total population (56%). The percent who are veterans is 7% and was a decrease from the 27% from 2009.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

Data is not available for Clay County by race and ethnicity. The County contacted the CoC to confirm this.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

The 2019 PIT data shows that 1,146 sheltered and 508 unsheltered totaling 1,654 throughout Northeast Florida (NE FL). Of that number 67 sheltered and 7 unsheltered totaling 74 were within Clay County. The report also found that there were 289 families with children experiencing homelessness and 118 veterans experiencing homelessness throughout NE FL. The most vulnerable persons, are chronically homeless and are a smaller portion of the total population of people experiencing homelessness (19%). Families with children make up a smaller portion of the total population (18%). The all other people, which represents individuals, accounts for more than ½ the total population (56%). The percent who are veterans is 7% and was a decrease from the 27% from 2009.

**Discussion:**

The social service agencies listed in the table below provide resources for the homeless in Clay County and create a robust crisis response system. Crises response offers a plan to identify, assess, shelter

quickly, and permanently house individuals and families who are experiencing homelessness. Resources in Clay County include:

- Emergency Shelters are places where the homeless can find a safe place to stay in case of the sudden loss of housing. There are about 848 emergency shelter beds in Clay County.
- Transitional Housing are shelters intended to care for the displaced or chronically homeless population temporarily. There are about 540 Transitional Housing beds in Clay County.
- Permanent Supportive Housing is a long-term housing service for the elderly or vulnerable population struggling to stay above the poverty line. There are about 1398 Permanent Supportive Housing beds in Clay County.
- Rapid Re-Housing is a short-term rental assistance service to help people obtain housing quickly, increase self-sufficiency, and stay housed. There are about 439 Rapid Re-Housing beds in Clay County.

## **NA-45 Non-Homeless Special Needs Assessment – 91.205(b, d)**

Clay County encompasses 644 square miles in northeastern Florida bordered by Duval County to the north, St. Johns County in the east, Putnam County to the south, and Bradford County to the west. The County Seat is located in Green Cove Springs. Clay County utilizes zip codes 32068 and 32073 for the four municipalities: Green Cove Springs, Keystone Heights, Orange Park, and Penney Farms.

According to the 2019 American Community Survey (ACS) 5-year estimates, approximately 211,405 people live in Clay County. Although the population of Clay County is relatively high, most of the county remains rural with large farming and agricultural activities.

### **Describe the characteristics of special needs populations in your community:**

The elderly population (65 and over) makes up 15.4% of the total population in Clay County and is expected to increase exponentially over the next 10 years. 31% of the elderly population has a disability. Approximately 5,037 of low-income elderly households are housing cost burdened and will sacrifice necessities to pay housing costs. There are local service providers who offer a multitude of in-home services for the elderly but there is always an extensive wait list due to a lack of funds.

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

Elderly persons over the age of 65 mainly reside with their spouse (59.1%) and 21.2% live alone. However, 4.5% live with their grandchildren which is higher than the Florida State comparison at 3.7%.

Of those grandparents living with their grandchildren, 1.7% of them are the caretakers of their grandchildren.

### **Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

Persons with HIV/AIDS

The Florida Department of Health (DOH) in Clay County has a program for testing, education and community outreach, case management services, AIDS Drug Assistance Program, and a linkage to care program.

While the overall percentage of Clay County residents reporting being infected with a total number of 426 persons with HIV in 2019. According to Florida Health Charts, there were 285 males (gender at birth) with HIV and 141 females (gender at birth) in Clay County. There were 185 white, 188 black/African Americans, and 40 Hispanic persons with HIV in Clay County during 2019.

### **Discussion:**

The supportive service needs of these populations include job training, financial counseling, mental health counseling, education assistance, substance abuse treatment options, transportation, in home health services, in home meal services, and home repair services.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction's need for Public Facilities**

Non-Housing Community Development is a broad category of spending that covers many types of public facilities such as community centers and parks. In addition to upgrades to existing facilities, new recreational facilities are proposed countywide, and there are ongoing efforts to collocate educational facilities with community centers. Based on the needs assessment and input received through the citizen participation process, including stakeholder and community meetings, a deficiency in recreational opportunities was identified for the entire county. In response to these deficiencies, it was determined that additional public recreational facilities were needed to meet the County's present and future needs. Without the addition of a new inventory, the county will be deficient in the provision of several types of recreational facilities by the year 2040, and all planning districts are currently deficient in recreational facilities.

### **How were these needs determined?**

Public facility needs for Clay County were determined using public survey and analysis of the 2017 EAR Report for the Clay County Comprehensive Plan. An additional public survey was conducted with responses that largely corroborated the needs that were analyzed through research of data.

### **Describe the jurisdiction's need for Public Improvements:**

Non-housing Community Development is a broad category of spending that covers many types of public improvements such as roads, water/sewer improvements, lighting, drainage, and other capital projects. Most proposed transportation, roadway, and drainage improvements are concentrated in the northeast corner of the county which is an area with the highest population density. Capital projects related to water/sewer improvements may be divided into a range of subcategories including potable water, sanitary sewer, water supply facilities, stormwater drainage, and aquifer recharge. It is anticipated that the county will be able to meet most water and sewer capacity needs until 2040. Based on the needs assessment and input received through the citizen participation process, including stakeholder and community meetings, it was determined that infrastructure tended to lag behind development and transportation networks (e.g., car, bike, and pedestrians, public improvements identified include) were disconnected. As such, public improvements are necessary to ensure concurrency for new development and to improve transportation infrastructure connectivity.

### **How were these needs determined?**

Public improvements need for Clay County were determined using public survey and analysis of the 2017 EAR Report for the Clay County Comprehensive Plan. An additional public survey was conducted with responses that largely corroborated the initial public survey referenced in the 2017 EAR Report.

### **Describe the jurisdiction's need for Public Services:**

The need for public services in Clay County includes access to quality health care, education, and job training as well as family safety net resources. The community surveys and other citizen feedback indicate a need for continuing infrastructure improvements, providing improvements, access to public facilities or neighborhood facilities, and public/homeless services.

**How were these needs determined?**

Public service needs for Clay County were determined using the Consolidated Plan public survey and analysis of the 2017 EAR Report for the Clay County Comprehensive Plan. An additional public survey was conducted with responses that largely corroborated the initial public survey referenced in the 2017 EAR Report.

## **Housing Market Analysis**

### **MA-05 Overview**

#### **Housing Market Analysis Overview:**

##### Housing Market Area Description

Clay County has an estimated population of 211,405 people. Encompassing just over 600 square miles and containing approximately one percent of Florida's population, Clay County is the state's 25th most populous out of the 67 total counties.

Technically falling within the Jacksonville Metropolitan Service Area (MSA), a portion of Clay County residents commute to the City of Jacksonville for its employment centers, goods and services, recreation, and entertainment. Clay County is also home to many active-duty military families stationed at Jacksonville Naval Air Station and Naval Station Mayport.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

According to the U.S. Census Bureau, there were 82,617 housing units in Clay County in 2019, with a 91.7% occupancy rate. Most of the housing is owner-occupied (79.5%) compared to a current national homeownership rate of 67.9%. Most housing units in Clay County (74.9%) are single family detached, with mobile homes making up a notable 12.7% of the housing stock.

Single-family detached units are the most prevalent housing type in Clay County, followed by mobile homes and multi-family units. Approximately 72% percent of the total housing units are single-family detached units. Clay County has an aged housing stock.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	51,435	72%
1-unit, attached structure	2,280	3%
2-4 units	1,978	3%
5-19 units	3,884	5%
20 or more units	1,427	2%
Mobile Home, boat, RV, van, etc.	10,055	14%
<b>Total</b>	<b>71,059</b>	<b>100%</b>

Table 28 – Residential Properties by Unit Number  
 Data 2013-2017 ACS  
 Source:

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	54	0%	180	1%
1 bedroom	230	0%	1,590	10%
2 bedrooms	3,925	8%	4,350	28%
3 or more bedrooms	45,100	91%	9,692	61%
<b>Total</b>	<b>49,309</b>	<b>99%</b>	<b>15,812</b>	<b>100%</b>

Table 29 – Unit Size by Tenure  
 Data 2013-2017 ACS  
 Source:

### Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Clay County does not have HOME funds as of this date. CDBG funds will be leveraged through partnerships it has with other governmental agencies and nonprofit organizations. Sources of leverage primarily include Low-income Housing Tax Credits, New Markets Tax Credits, Opportunity Zone Funds, State of Florida SHIP funds (State Housing Initiatives Program), State of Florida



HOME funds and Federal Home Loan Bank Board funding, United Way funding, private foundations and donation funding.

Clay County will continue to use HUD and local funds to fund a variety of eligible projects to meet high-priority needs and goals.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

No units are expected to be lost.

**Does the availability of housing units meet the needs of the population?**

Affordable units are those for which a household at the given income limit (% AMI) would pay no more than 30% of income for gross rent, and affordable/available units are affordable at that income level and either vacant or occupied by a household below the income threshold. The availability of (affordable) housing units does not meet the needs of the Clay County population living at 0-80% AMI.

**Describe the need for specific types of housing:**

Specifically, according to the University of Florida Shimberg Center for Housing Studies analysis of 2019 American Community Survey PUMS, in the Jacksonville MSA + Putnam (which includes Baker, Clay, Duval, Nassau, Putnam, and St. Johns counties), for every 100 renters at 0-30% AMI, there are 28 available and affordable units; for every 100 households at 0-40% AMI, there are 36 available and affordable units; for every 100 households at 0-50% AMI, there are 51 available and affordable units; for every 100 households at 0-60% AMI, there are 70 available and affordable units; for every 100 households at 0-80% AMI, there are 97 available and affordable units; and finally, for every 100 households at 0-120% AMI, there are 108 available and affordable units.

**Discussion**

According to the UF Shimberg Center for Housing Studies analysis of 2019 American Community Survey PUMS, only the 0-120% AMI category has a surplus of available units (13,043), while the total deficit for the lower AMI categories are as follows: -29,100 for 0-30% AMI; -34,238 for 0-40% AMI; -36,869 for 0-50% AMI; -27,912 for 0-60% AMI, and -4,181 for 0-80% AMI.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

While the housing market slowed in spring 2020 due to the COVID-19 pandemic, it bounced back remarkably just months later. Low mortgage interest rates and greater flexibility in work settings (i.e., through remote work) produced strong buyer demand that continues. In contrast, seller activity continued to lag behind buyer demand. The following charts were produced by the Northeast Florida Association of Realtors and represent realtor-brokered activity of single-family residential, condo, and townhome sales combined.

### Home Sales Market

#### Current Conditions

In 2020, the Northeast Florida region saw a 12.2% increase in new listings, a 25.7% increase in pending sales, and a 46.9% decrease in inventory level. Clay County's home sales market is also very strong. Clay's median home sales price in December 2020 of \$249,900 constitutes an increase of 11.1% from December 2019. There was a very slight decrease (-0.3%) in closed sales in December 2020 compared to December 2019, and a significant decrease in inventory, with 462 homes for sale in December 2020 compared to 928 in December 2019. Further, in December 2020, there was only 1.2 months' supply of inventory, down from 2.7 months in December 2019.

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	187,000	165,300	(12%)
Median Contract Rent	779	871	12%

Table 30 – Cost of Housing

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	1,668	10.6%
\$500-999	8,352	52.8%
\$1,000-1,499	4,814	30.4%
\$1,500-1,999	764	4.8%
\$2,000 or more	205	1.3%
<b>Total</b>	<b>15,803</b>	<b>99.9%</b>

Table 31 - Rent Paid

Data Source: 2013-2017 ACS

## Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	419	No Data
50% HAMFI	1,854	4,319
80% HAMFI	7,440	11,875
100% HAMFI	No Data	17,983
<b>Total</b>	<b>9,713</b>	<b>34,177</b>

Table 32 – Housing Affordability

Data 2013-2017 CHAS

Source:

Data 2013-2017 CHAS

Source:

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	749	921	1,113	1,455	0
High HOME Rent	0	0	0	0	1,852
Low HOME Rent	0	0	0	0	0

Table 33 – Monthly Rent

Data Source

Comments:

### Is there sufficient housing for households at all income levels?

Strong buyer demand, sustained by low interest rates, continues to drive healthy home sales trends despite the continued presence of the COVID-19 pandemic and a less secure jobs market. In 2020, the Northeast Florida region saw a 12.2% increase in new listings to 2,453. Pending sales also increased by 25.7% to a total of 2,685. Additionally, inventory levels fell 46.9% to 4,549 units in Clay County.

With continued low mortgage rates and high demand, Clay County's 2021 housing market is expected to continue these upward trends. Low inventory and multiple offers are likely to remain common while the market waits and hopes for a boost in new construction.

### How is affordability of housing likely to change considering changes to home values and/or rents?

#### Home Prices

As displayed below, the median (real) sales price of a home in Clay County in 2018 was \$210,000. This price was up 15 percent compared with the median price of \$182,844 during 2010.

Table 57 - Clay County Single Family Median and Mean Sales Prices, 2014-2018

<b>Geography</b>	<b>Year</b>	<b>Sales</b>	<b>Median Price (real)</b>	<b>Median Price (normal)</b>	<b>Mean Price (real)</b>	<b>Mean Price (normal)</b>
Clay County	2018 (partial)	2,495	\$210,000	\$210,000	\$228,564	\$228,564
Clay County	2017	4,010	\$208,462	\$205,000	\$226,608	\$222,844
Clay County	2016	3,632	\$201,469	\$194,000	\$220,607	\$212,429
Clay County	2015	3,116	\$199,812	\$190,000	\$216,864	\$206,214
Clay County	2014	2,602	\$190,641	\$181,050	\$210,143	\$199,571

Note: Reflects partial sales data for most recent year. Sale prices in 2018 dollars. Arm's length, single family sales only. 2018 sales reflect partial year data. Download Excel file with Median and Mean Single Family Sales Prices, 1990-2018 for Florida and all counties.

Source: Shimberg Center analysis of Florida Department of Revenue Sales Data Files and Name-Address-Legal Files.

## Delinquent Mortgages

### **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

Increasing rental demand from population growth has contributed to rising rents in Clay County over the last decade.

At the start of the COVID-19 pandemic, the Florida Housing Finance Corporation issued an executive order discouraging rent increases. However, renters across Clay County, the Northeast Florida region, and the State of Florida have faced continued increases in rent.

## Housing Affordability – Renter

Table 60 - Renter Households, Cost Burden by Income, 2020 Estimate (Summary)

<b>Geography</b>	<b>Household Income</b>	<b>≤30%</b>	<b>30.01-50%</b>	<b>&gt;50%</b>
Clay County	≤30% AMI	331	187	2,037
Clay County	30.01-50% AMI	348	1,363	1,588
Clay County	50.01-80% AMI	1,861	1,743	390
Clay County	80.01-100% AMI	2,053	390	-
Clay County	>100% AMI	6,780	250	-

Note: Refers to housing cost burdens before pandemic; current needs are likely greater. See Shimberg Center's COVID-19 & Housing Resources page for additional information.

Source: U.S. Census Bureau, 2015-2019 and 2019 American Community Survey; University of Florida Shimberg Center for Housing Studies, Florida Housing Data Clearinghouse.

## **Discussion**

Clay County is rapidly growing with increasing home sale prices and rents. The preservation of existing affordable housing is key to help stabilize housing needs of existing low- and moderate-income homeowners. With the coordination of other resources such as Florida's SHIP program, Clay County will continue to address affordable housing needs.

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

Clay County housing stock is aging with much of it constructed in the 1990s or earlier. The aged housing stock indicates a need for housing repairs to preserve and maintain the condition of the housing stock and prevent decline. Lower-income households are more likely to reside in housing that is older or has housing problems such as overcrowding, lack of complete plumbing or kitchen facilities. While economic conditions are slowly recovering; with state funding levels and smaller reductions in federal funding from previous years, the needs of the low-income communities still typically outpace the funds available to provide services.

### Definitions

The U.S. Bureau of Census defines substandard housing as units that are:

- 1) Overcrowded (more than 1.01 persons per room;
- 2) Lacking complete kitchen or plumbing facilities or
- 3) Where no heating fuel is used.

“Standard Condition” is housing that meets HUD Quality Standards (HQS) and all applicable state and local codes. “Substandard Condition, but suitable for rehabilitation” is housing that does not comply with standard criteria or has minor defects that require a certain amount of correction but can still provide safe and adequate shelter or has major defects requiring a great deal of correction and will be safe and adequate once repairs are completed.

“Substandard Condition”, not suitable for rehabilitation is housing that if a cost estimate of repairs, based on the needs identified at a work write-up exceeds 65 percent of the just value as determined by the property appraiser. Such units are not eligible for repairs. Additionally, the term “abandoned vacant unit” is defined by HUD as:

- A housing unit that has been foreclosed upon and vacant for at least 90 days.
- A housing unit where no mortgage or tax payments have been made by the property owner for at least 90 days.
- A housing unit where a code enforcement inspection has determined that the property is not habitable, and the owner has taken no corrective actions within 90 days of the notification of the deficiencies.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	10,710	22%	6,130	39%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With two selected Conditions	145	0%	495	3%
With three selected Conditions	50	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	38,425	78%	9,185	58%
<b>Total</b>	<b>49,330</b>	<b>100%</b>	<b>15,810</b>	<b>100%</b>

Table 1 - Condition of Units

Data 2013-2017 ACS  
Source:

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	19,039	39%	5,228	33%
1980-1999	20,305	41%	6,455	41%
1950-1979	9,480	19%	3,810	24%
Before 1950	473	1%	304	2%
<b>Total</b>	<b>49,297</b>	<b>100%</b>	<b>15,797</b>	<b>100%</b>

Table 2 - Year Unit Built

Data 2013-2017 CHAS  
Source:

### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	9,953	20%	4,114	26%
Housing Units build before 1980 with children present	9,222	19%	5,863	37%

Table 3 - Risk of Lead-Based Paint

Data 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)  
Source:

### Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 4 - Vacant Units

Data 2005-2009 CHAS  
Source:

### Vacancy Status

## Vacancy and Occupancy Status, 2015-2019 5-Year Estimates

Sources: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates

Substandard Housing, 2015-2019 5-Year Estimates								
Geography ▲	Overcrowded (1.01 or More Persons per Room)	% of Occupied Units Overcrowded	No Fuel Used	% of Occupied Units without Fuel	Lacking Complete Kitchen Facilities	% of Occupied Units without Complete Kitchen Facilities	Lacking Complete Plumbing Facilities	% of Occupied Units without Complete Plumbing Facilities
Clay County	1439	2.0	762	1.0	1124	1.4	477	0.6

Sources: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates

### Substandard Housing, Clay County

#### Need for Owner and Rental Rehabilitation

Clay County has an aging housing stock and rapidly growing population. According to the American Community Survey, a little more than half of them were built in the 1990s or earlier, which may indicate a need for housing rehabilitation and minor emergency repairs to prevent homes from falling into disrepair. Older housing stock indicates a need for housing repairs to keep affordable homes in good condition and prevent decline.

#### Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

The actual number of housing units in Clay County with lead-based paint is not available, an assumption must be made. For the purposes of this plan, a housing unit built before 1980 is presumed to have a higher risk of lead-based paint. 20% of all units, approximately 10,000 units, in Clay were built before 1980.

#### Discussion

Much of the funding earmarked to improve the quality of life of low and moderate-income households, revitalize deteriorating infrastructure /neighborhoods and offer opportunities for safe, decent affordable housing has been provided by Federal Community Development Block Grant (CDBG) Program Funds, Florida's State Housing Initiatives Partnership (SHIP) Program, and the Emergency Shelter Grant (ESG) Program (regional consortium) which supports services for homeless persons. These programs provide rehabilitation of substandard units, emergency repairs, infrastructure improvements, elimination of slum and blighting influences, delivery of county-wide public and homeless services, and construction of community meeting places and centers.



## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

The information below is based on the Jacksonville Housing Authority. Clay County does not have a Housing Authority.

Although, Clay County does not have a Housing Authority division, the County does partner with Flagler County Housing Authority to manage Clay County's Section 8 Voucher program. There are 190 families that took part in the voucher program in Clay County. Currently, 68 of the 190 families moved to Flagler County under HCV portability. The rest remain from the baseline voucher program. The total baseline for both Counties is 352.

There is one waiting maintained for both Counties and is not broken down or set aside any specific number of vouchers by County.

When the waiting list is opened, it is for anyone who wishes to apply and to be housed in either jurisdiction (Flagler or Clay).

### Totals Number of Units

Program Type	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	498	2,687	7,030	355	6,675	1,331	0	0
# of accessible units									
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

Table 38 – Total Number of Units by Program Type

Data PIC (PIH Information Center)

Source:

**Describe the supply of public housing developments:**

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

N/A

**Public Housing Condition**

Public Housing Development	Average Inspection Score

Table 39 - Public Housing Condition

**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

N/A

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

N/A

**Discussion:**

N/A

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

Critical to the success of homeless services is the capacity to coordinate systems of care beyond sheltering, healthcare, mental health counseling, employment, etc. and the ability to follow a case through a myriad of providers to ensure that an individual or family is transitioned out of homelessness.

Meeting homelessness challenges in Clay County is a collaborative effort comprising numerous individuals, agencies and organizations. The Continuum of Care (CoC) Lead Agency for collecting homeless data, conducting homeless needs assessments, and developing community supported homelessness strategies is Changing Homelessness, Inc. They are the regional Continuum of Care (CoC) organization, is the coordinating agency for North East FL that includes the counties of Nassau, Duval, and Clay. Changing Homelessness, Inc. assists the County and its municipalities and supports a cross-jurisdictional CoC that convenes service providers, community leaders, law enforcement, government, and homeless individuals to collaborate and coordinate services for the homeless.

Additionally, there is Mercy Support Services located in Middleburg that assists with coordinating services within the County and helping facilities like Quigley House and others.

### Facilities and Housing Targeted to Homeless Households

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	0	0	0	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 40 - Facilities and Housing Targeted to Homeless Households

**Data Source  
Comments:**

Data Source: Changing Homelessness, Inc. (PIT Count Report 4/30/19) HUD and the State of Florida publish CoC and statewide PIT findings annually. Clay County is within HUD CoC Northeast Florida region (Nassau, Duval, and Clay Counties) for reporting purposes. Data related to facilities and housing targeted to homeless households are shown for the entire NE Florida region. In Clay County, by comparison only 74 total homeless individuals were documented (67 sheltered and 7 unsheltered) out of 1,654 for the entire region. The count of all beds available, the largest share was targeted to permanent support housing (1,398). Emergency Shelter Beds (848), Transitional Housing (540), Permanent Support Housing (1,398), and Rapid Re-Housing (439). This information is not further broken down by Households with Adults and Children, Households with Only Adults, Chronically Homeless Households, Veterans, and Unaccompanied Youth. And Emergency Shelter Beds is not broken down further in to year-round beds and voucher/seasonal/overflow beds for the above categories, Transitional Housing Beds, and Permanent Supportive Housing Beds.

## **Facilities and Housing Targeted to Homeless Households**

HUD and the State of Florida publish CoC and statewide PIT findings annually. Clay County is within HUD CoC Northeast Florida region (Nassau, Duval, and Clay Counties) for reporting purposes. Data related to facilities and housing targeted to homeless households are shown for the entire NE Florida region. In Clay County, by comparison only 74 total homeless individuals were documented (67 sheltered and 7 unsheltered) out of 1,654 for the entire region. The count of all beds available, the largest share was targeted to permanent support housing (1,398). Emergency Shelter Beds (848), Transitional Housing (540), Permanent Support Housing (1,398), and Rapid Re-Housing (439). This information is not further broken down by Households with Adults and Children, Households with Only Adults, Chronically Homeless Households, Veterans, and Unaccompanied Youth. And Emergency Shelter Beds is not broken down further in to year-round beds and voucher/seasonal/overflow beds for the above categories, Transitional Housing Beds, and Permanent Supportive Housing Beds.

## **Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

Several mainstream providers offer services to the homeless population as well as low-and moderate-income populations in Clay County and its municipalities. These services are described as follows:

Medical/Healthcare Resources such as The Way Free Medical Clinic who provide medical services to low income, individuals that don't have medical insurance and companies that can't afford to covers their employees. Mental Health Resources are provided by Clay Behavioral Health Center. Employment Resources are provided by CareerSource Northeast Florida. And Mercy Support Services offer assistance/referrals to people in crisis as well using their network of resources.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Several non-profit providers and faith-based organizations offer services and facilities to the homeless population, which include emergency shelter, transitional housing, and permanent supportive housing. These are listed and described as follows:

**Chronically Homeless:** The needs of chronically homeless persons in Clay County are met through programs that combine housing with supportive services. In Clay County, the CoC would assist in this function. Mercy Support Services and the Salvation Army can assist with this. Additionally, not all services are located directly in Clay County but are a short distance away in Jacksonville such as the Sulzbacher Center who also provides services.

**Families with Children:** Several organizations in Clay County provide services and facilities for homeless families with children. Emergency shelter for homeless families with children is provided by Quigley House, Mercy Support Services, Northeast Florida Community Action Agency, and the Salvation Army.

**Veterans:** Emergency shelter for veterans is provided by the either a VA Medical Respite organization and VA Emergency Shelter. There are many services available for veterans in the County that are mainly managed by the VA but CoC is available to assist as well.

**Unaccompanied Youth:** Several organizations in Clay County provide services and facilities for unaccompanied youth. Kids First Florida provides youth homeless shelters, along with counseling and life skills. They also provide Emergency shelter for unaccompanied youth.

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

These are facilities and services that assist persons who are not homeless but require supportive housing and programs. These populations may include elderly and frail elderly, persons with disabilities, persons with alcohol or drug addictions, persons with HIV/AIDS, or other groups. Such facilities and services include units that are barrier-free and physically accessible, units with on-site supportive services such as case management, counseling and healthcare, and units that are affordable to persons on a fixed or limited income.

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs.**

Elderly & Frail Elderly: According to American Community Survey (ACS) data, 28,207 (approximately 13.5%) Clay County residents are disabled. About thirty-two percent of the total elderly population is disabled; 11.4% of citizens aged 18-64 are disabled; and 4.8% of citizens under the age of 18 years are disabled. (2014 ACS). The elderly population with housing needs continue to be an area of focus in Clay County. The elderly, and particularly the frail elderly, require supportive housing, including units that are barrier-free and accessible to the disabled, units with on-site supportive services, and units that are affordable to persons on a fixed-income.

Persons with Disabilities (Mental, Physical, Developmental): Disabled persons require barrier-free housing that is also affordable. Accessibility retrofits tend to be expensive and homes with such features tend to be higher in value. In contrast, income levels for the disabled (mentally, physically or developmentally) tend to be lower than median area income, resulting in affordability concerns.

Persons with Alcohol or Drug Addictions: Persons with addictions may require temporary housing and treatment. In Clay County, services for persons with alcohol or drug addictions are coordinated by the Clay Behavioral Health Center. Additionally, there are other organizations in Clay County that provide substance abuse counseling and treatment services.

Persons with HIV/AIDS: Persons living with HIV/AIDS face particular challenges with regard to supportive housing. Many are experiencing physical disability, loss of employment, and lack of income resulting in a need for more stable housing. Clay County does not receive an annual allocation of Housing Opportunities for People with AIDS (HOPWA); however, Mercy Support Services can assist with help.

Other Groups: An additional vulnerable population is migrant/seasonal farmworkers. In 2019, there is a total of 10 unaccompanied farmworkers in Clay County, with a corresponding need for 10 single worker beds. In addition, there are 11 accompanied migrant and seasonal farmworkers who need a total of 11 multifamily units.

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.**

Households with mental or physical health issues face barriers to safe, decent and affordable housing. Often, persons with mental or physical health issues are discharged from institutions but are then unable to find independent housing that they can afford or reasonably maintain. Many homeless people are discharged from institutions with no other housing options. Changing Homelessness, Inc. and other homeless service providers are empowered to implement a cohesive, community-wide discharge coordination policy that can be successfully implemented to ensure that persons being discharged from publicly funded agencies and institutions do not become homeless upon release. Providers supplying permanent supportive housing or transitional services include Mercy Support Services and the Salvation Army.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The County seeks to assist low-and moderate-income households with their housing and community development needs, the following FY 2021/2022 activities support persons with special needs such as the elderly or persons with disabilities. These activities include:

- Improvements to facilities that serve persons with special needs, including persons with disabilities and persons with drug or alcohol addictions.
- Housing rehabilitation for income eligible homeowners, which may include accessibility retrofits for the elderly or persons with disabilities. The maximum award to any homeowner is \$30,000.
- Demolition & Replacement of Mobile Homes: funding for the replacement of an existing mobile home dwelling that has been determined not economically feasible to rehabilitate the existing mobile home. This will only be available to persons over 65, disabled or those who have special needs.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

Not applicable to Clay County.

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

Generally, within Clay County overall, median home values have outpaced median incomes and median contract rents (i.e., according to the 2013-2017 ACS: 21% increase versus 13% increase). Clay County is particularly concerned with incentivizing affordable housing developments.

Every few years, Clay County and other recipients of State Housing Initiative Partnership Program (SHIP) funds must prepare a Local Housing Incentives Strategy (LHIS), driven by an Affordable Housing Advisory Committee (AHAC), that identifies barriers to and incentives for affordable housing in their jurisdictions. The LHIS requires jurisdictions receiving SHIP funds to regularly review zoning laws and policies to review their impact on affordable housing and residential investment. In the most recent Local Housing Assistance Plan (LHAP) prepared by Clay County, the following incentives were identified to address barriers to affordable housing:

- Expedited permitting
- Ongoing review process
- Allowance for increased density levels
- Street design (modification of street requirements)
- Affordable housing development (mixed-use developments)

Additionally, and most importantly, the County is currently working with municipalities to link new affordable housing developments to major employment centers within the community.



## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

The Consolidated Plan provides a concise summary of Clay County’s priority non-housing community development needs that are eligible for assistance. This section provides data regarding the local economic condition of the jurisdiction and compares the ability of the local workforce to satisfy the needs of local businesses. Clay County is home to a diverse economy that capitalizes on the region’s strategic advantages. As a suburb of Jacksonville, its regional military presence facilitates Clay County’s strong aviation and defense sector. Additionally, the First Coast Expressway is expanding Clay County’s strong logistics capabilities.<sup>1</sup>

Most recently, in late 2020, the Florida Department of Economic Opportunity awarded more than two million dollars to Northeast Florida governments for military-related programs through the Defense Reinvestment Grant Program and the Defense Infrastructure Grant Program.<sup>1</sup> Specifically, the Clay County Economic Development Corporation (EDC) received \$64,500 from the Defense Reinvestment Grant Program to develop Clay County Economic Development’s five-year strategic plan to seek alignment with Clay County, Camp Blanding Joint Training Center, Clay County Development Authority, Keystone Heights, Keystone Heights Airport Authority, Green Cove Springs, Orange Park, and utility partners to grow the nondefense economy.

Moreover, Clay County’s \$129 million-dollar Bonded Transportation Program (BTP) involves the design and construction of seven different roadway improvement projects in Clay County over the next five years.<sup>13</sup> These roadway projects will take place on six existing roadways and one extension to the First Coast Expressway in Clay County. Roadway bonds will be repaid using the one-cent Infrastructure Sales Surtax.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	321	208	0	1	1
Arts, Entertainment, Accommodations	9,410	6,492	14	18	4
Construction	6,076	3,687	9	10	1
Education and Health Care Services	12,562	7,449	19	20	1
Finance, Insurance, and Real Estate	6,133	1,350	9	4	-5
Information	1,318	1,058	2	3	1
Manufacturing	3,356	1,426	5	4	-1
Other Services	2,461	1,304	4	4	0
Professional, Scientific, Management Services	6,720	4,133	10	11	1
Public Administration	0	0	0	0	0
Retail Trade	10,831	8,276	16	23	7
Transportation and Warehousing	3,703	321	6	1	-5
Wholesale Trade	3,126	711	5	2	-3

<b>Business by Sector</b>	<b>Number of Workers</b>	<b>Number of Jobs</b>	<b>Share of Workers %</b>	<b>Share of Jobs %</b>	<b>Jobs less workers %</b>
<b>Total</b>	66,017	36,415	--	--	--

Table 41 - Business Activity

Data 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Source:

## Labor Force

Total Population in the Civilian Labor Force	92,222
Civilian Employed Population 16 years and over	84,645
Unemployment Rate	8.19
Unemployment Rate for Ages 16-24	23.39
Unemployment Rate for Ages 25-65	4.95

Table 42 - Labor Force

Data 2013-2017 ACS

Source:

<b>Occupations by Sector</b>	<b>Number of People</b>
Management, business and financial	18,165
Farming, fisheries and forestry occupations	4,269
Service	8,725
Sales and office	22,485
Construction, extraction, maintenance and repair	9,130
Production, transportation and material moving	5,800

Table 43 - Occupations by Sector

Data 2013-2017 ACS

Source:

## Travel Time

<b>Travel Time</b>	<b>Number</b>	<b>Percentage</b>
< 30 Minutes	33,635	42%
30-59 Minutes	35,020	44%
60 or More Minutes	10,980	14%
<b>Total</b>	<b>79,635</b>	<b>100%</b>

Table 44 - Travel Time

Data 2013-2017 ACS

Source:

**Education:**

**Educational Attainment by Employment Status (Population 16 and Older)**

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	4,355	368	3,229
High school graduate (includes equivalency)	20,415	1,520	7,665
Some college or Associate's degree	26,675	2,005	7,760
Bachelor's degree or higher	18,615	1,017	3,810

Table 45 - Educational Attainment by Employment Status

Data 2013-2017 ACS  
Source:

**Educational Attainment by Age**

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	98	449	610	885	1,262
9th to 12th grade, no diploma	2,365	1,200	1,643	3,185	1,679
High school graduate, GED, or alternative	5,410	6,335	6,470	16,965	9,670
Some college, no degree	5,105	6,765	5,630	12,890	5,575
Associate's degree	1,179	3,480	2,975	5,710	1,999
Bachelor's degree	1,124	3,167	5,345	8,470	3,431
Graduate or professional degree	95	1,105	1,734	4,060	1,904

Table 46 - Educational Attainment by Age

Data 2013-2017 ACS  
Source:

**Educational Attainment – Median Earnings in the Past 12 Months**

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	264,580
High school graduate (includes equivalency)	379,635
Some college or Associate's degree	434,180
Bachelor's degree	585,975
Graduate or professional degree	720,595

Table 47 – Median Earnings in the Past 12 Months

Data 2013-2017 ACS  
Source:

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

The current top three private employers in Clay County, as measured by number of employees, are Orange Park Medical Center, Wal-Mart, and Publix Super Markets. The largest employment

sectors in Clay County are Health Care & Social Assistance (14,779 people), Retail Trade (13,774 people), and Educational Services (7,713 people).

**Describe the workforce and infrastructure needs of the business community:**

There may be more jobs than workers in some business sectors: Arts, Entertainment, Accommodations; Education and Health Care Services; Professional, Scientific, Management Services; and Wholesale Trade. This means that there may not be enough workers to fulfill jobs in these sectors and that workers from outside the County may be meeting the job market needs/demand for these sectors. Some of the County's population lacks a college education, there may be a demand for adult basic education, workforce training and other education opportunities to better match the needs of employers with employees skilled in areas such as arts/entertainment, hospitality, education, healthcare, scientific research, professional and management services, and wholesale trade. While some jobs in education, healthcare, scientific research, and professional and management services may require a Bachelor's degree or higher; many jobs in the hospitality, arts/entertainment, and wholesale trade sectors only require a high school diploma or equivalency, some college, or an Associate's degree.

While there are a number of educational institutions and workforce training initiatives, available in the County to address this need for the adult population; such initiatives are lacking for the youth population. There is a need for workforce training initiatives for youth in the County to support economic opportunity after high school.

Additionally, infrastructure needs of the business community includes a more flexible public transportation system. Even though Clay County has Clay Community Transportation (CCT), it only operates from 6 a.m. to 7 p.m. Monday through Friday and the services are not available Saturdays, Sundays or holidays. For broadband services requiring speeds greater than 25/3 Mbps (e.g. 100/10 or 250/25), service is less available and more area dependent. For example, while most of the north County is served by three or more providers that offer speeds of 100/10 Mbps, many areas of the south County are served by only one or two providers that offer less reliable efforts.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

While the unemployment rate is subject to rapid changes due to COVID-19 policy responses, various infrastructure projects in Clay County will generate short-and long-term economic growth. The First Coast Expressway, which will connect I-10 in Duval County to I-95 in St. Johns County, passing directly through Clay County and a new 4-lane Shand's bridge with a 65' height restriction

including seven new interchanges are being constructed in Clay County, stimulating a high volume of development activity. Additionally, Clay County's \$129 million Bonded Transportation Program (BTP) will involve the design and construction of seven different roadway improvement projects in Clay County over the next five years. Clay County tends to compete for business and jobs within the greater Jacksonville area. Thus, the County must position itself to facilitate economic development. Several economic development organizations, initiatives, and incentives exist within Clay County. The Clay County Economic Development Board coordinates with participating jurisdictions, area chambers of commerce, and business development boards on efforts to expand existing businesses and attract new companies. Target industries are identified and incentivized by programs offered at the state and County levels to draw them in.

**How do the skills & education of the current workforce correspond to employment opportunities in the jurisdiction?**

There are more skilled workers than jobs in some business sectors. Workers in those sectors may have more difficulty finding a job in the County that matches their skillset due to either competition or there being no jobs in those sectors. The greatest employment opportunities in the County are within Health Care & Social Assistance, Retail Trade, and Educational Services. While some jobs in the education, healthcare, and professional or scientific sectors may require a Bachelor's degree or higher; many jobs in the retail and hospitality sectors only require a high school diploma or equivalency, some college, or an Associate's degree.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

First Coast Workforce Development, Inc., dba CareerSource Northeast Florida, forges working partnerships with local communities, elected officials, business, labor, and education leaders to improve workforce education, employment, and training opportunities in Northeast Florida, including the counties of Baker, **Clay**, Duval, Nassau, Putnam, and St. Johns.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

Yes

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

The Northeast Florida Regional Council (NEFRC) is planning organization (as defined in 13 C.F.R. § 303.2) serving the seven counties of Baker, Clay, Duval, Flagler, Putnam, Nassau, and St. Johns and their 26 municipalities. The Council is a designated U.S. Department of Commerce Economic Development Administration Economic Development District, and leads the economic development planning process (EDA, 2019) to establish a strategy-driven plan for regional economic development known as the Comprehensive Economic Development Strategy (CEDS). Economic Development Districts (EDDs) are entities, commonly composed of multiple counties, and leverage public involvement across sectors for regional collaboration. Invest in infrastructure to open up business sites in Clay County. For example, continue investing in infrastructure and road improvements around and through at the 740-acre Challenger Center and continue to plan for the long-term development of Reynolds Park. Work with local landowners to acquire new properties for development in partnership with utility providers and developers. Continue investing in infrastructure and site readiness at Cecil Commerce Center.

## Discussion

According to U.S. Census data, since 2010, the six counties that comprise Florida’s First Coast have averaged between 1.5 – 2.0% growth, with the highest local rates of growth in the suburban counties of **Clay**, Nassau, and St. Johns. Further, Clay County is expected to experience double-digit growth in the talent pipeline through 2025.

Workers In Affected Industries, 2020													
County	HUD 2-Bedroom Fair Market Rent	Leisure & Hospitality, # of Workers	Leisure & Hospitality, % of Total Workers	Leisure & Hospitality, Average Wage	Leisure & Hospitality, Max. Affordable Rent	Retail Trade, # of Workers	Retail Trade, % of Total Workers	Retail Trade, Average Wage	Retail Trade, Max. Affordable Rent	Health Care & Social Assistance, # of Workers	Health Care & Social Assistance, % of Total Workers	Health Care & Social Assistance, Average Wage	Health Care & Social Assistance, Max. Affordable Rent
Clay	\$1,059	7,215	5.1%	\$10.45	\$522	8,336	5.9%	\$15.29	\$764	9,461	6.7%	\$25.16	\$1,258

**Notes:** Worker counts and wage data for industry sectors heavily affected by economic slowdown and layoffs (Leisure and Hospitality, Retail Trade) and increased responsibilities due to COVID-19 (Health Care and Social Assistance). Counts include all jobs in each industry in 2020, not only those affected by current layoffs. Wage indicators based on average annual wages for industry sector, converted to hourly wages by dividing by 2000 (assumes 40-hour work week, 50 weeks per year). Maximum affordable rent is set at 30% of income for full-time worker. See Shimberg Center’s COVID-19 & Housing Resources page for additional information.

**Sources:** Florida Department of Economic Opportunity, 2018 Quarterly Census of Employment and Wages; 2018 HUD Fair Market Rent.

## Skills and Education of Current Workforce

## **MA-50 Needs and Market Analysis Discussion**

**Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

No. The county is filled primarily with single family residences which are spread out throughout the county. An area of concentration is defined as an area where a certain group (racial, ethnic, or income) comprises a percentage of the population that is higher than the jurisdiction as a whole. There are no Census Tracts within Clay County where racial minority groups are concentrated at 20 percentage points higher than the County overall.

Most Clay County residents (81.8%) identify as White. 9.9% identify as Black and 7.7% identify as Hispanic/Latino. Further, 3.1% are Asian; 0.2% are Native Hawaiian, and 0.1% are American Indian/Alaska Native. Finally, 3.3% of the Clay County population identify with two or more races. In terms of birthplace, an estimated 7% of Clay County residents were born outside of the U.S. Approximately 19,083 renter households, or 44.1% of renter households, and 56,875 owner households (or 20.6%) were facing housing cost burdens before the COVID-19 pandemic.

There are a number of households that has 1 or more of the 4 housing unit problems (lacks a kitchen or plumbing, more than 1 person per room, or cost burden greater than 30%) by tenure and HUD Adjusted Median Family Income (HAMFI) according to the default 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD. Within Clay County there are 7,465 renters that experiences 1 or more of the 4 housing unit problems. Of the renter population there are 2,105 households in the 0-30% HAMFI range. There are 9,710 owners that experiences 1 or more of the 4 housing unit problems. Of the owner population there are 2,495 households in the 0-30% HAMFI range. The most affected populations within the renter and owner populations are in the (renter) >30-50% HAMFI (2,780) and (owner) >50-80% (3,070).

Amongst the "housing problem" categories, almost 8,000 renter households and almost 10,000 homeowners within Clay County are impacted by 1 or more of the 4 housing unit problems. In comparison, there are just a little over 16,000 renters and homeowners that experience no issues. The most effected portions of the County's population for renters and owners in the 0-30% HAMFI category are White alone, non-Hispanic, (renter, 1,540) (owner, 2,115); Black or African American alone, non-Hispanic (renter, 390) (owner, 155); and Hispanic, any race (renter, 110) (owner, 135).

Although no particular concentrations exist, the data provided shows that all residents of low- and moderate-income, regardless of race or ethnicity, may have significant housing needs related to cost burden and affordability.

**Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

No.

**What are the characteristics of the market in these areas/neighborhoods?**

N/A

**Are there any community assets in these areas/neighborhoods?**

N/A

**Are there other strategic opportunities in any of these areas?**

N/A



## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

**Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

According to the Federal Communications Commission (FCC) Fixed Broadband Deployment Map, as an urban and rural County, Clay County is served by broadband providers. The broadband technology available in Clay County includes ADSL, cable, fiber, fixed wireless, satellite, and other mediums. As defined by the FCC, broadband capability requires consumers to have access to actual download speeds of at least 25 Mbps and actual upload speeds of at least 3 Mbps (i.e., 25/3 Mbps). The following zip codes 32003, Fleming Island; 32030, Doctors Inlet; 32043, Green Cove Springs; 32050, Middleburg; 32065, Orange Park; 32067, Orange Park; 32068, Middleburg; 32073, Orange Park; 32079, Penney Farms; 32160, Lake Geneva; 32656, Keystone Heights have some combination of cable, DSL, or fiber services. For 32003, Cable coverage provided by Comcast is 96.75% available, DSL by AT&T is 87.31% available, fiber by AT&T is 45.57% available, and HughesNet Satellite is 100% available with high latency. For 32030, Cable coverage provided by Comcast is 99.91 available, DSL by AT&T is 99.77% available, fiber by AT&T is 27.18% available and HughesNet Satellite is 100% available with high latency. For 32043, Cable coverage provided by Comcast is 88.16% available, DSL by AT&T is 88.03% available, fiber by AT&T is 33.87% available, fixed wireless by AT&T is 9.05% available, and HughesNet Satellite is 100% available with high latency. For 32050, Cable coverage provided by Comcast is 91.69% available, DSL by AT&T is 94.16% available, fiber by AT&T is 41.73% available, fixed wireless by AT&T is 6.83% available, and HughesNet Satellite is 100% available with high latency. For 32065, Cable coverage provided by Comcast is 99.85% available, DSL by AT&T is 86.51% available, fiber by AT&T is 51.03%, and HughesNet Satellite is 100% available with high latency. For 32067, Cable coverage provided by Comcast is 97.06% available, DSL by AT&T is 98.48% available, fiber by AT&T is 15.26% available, and HughesNet Satellite is 100% available with high latency. For 32068, Cable coverage provided by Comcast is 91.35% available, DSL by AT&T is 94.22% available, fiber by AT&T is 42.59% available, fixed wireless by AT&T is 7.16% available, and HughesNet Satellite is 100% available with high latency. For 32073, Cable coverage provided by Comcast is 96.68% available, DSL by AT&T is 97.21% available, fiber by AT&T is 36.18% available, and HughesNet Satellite is 100% available with high latency. For 32079, DSL by AT&T is 100% available, fiber by AT&T is 6.70% available, and HughesNet Satellite is 100% available with high latency. For 32160, Cable coverage provided by Comcast is 68.81% available, DSL by AT&T is 53.66% available, fiber by AT&T is 9.06% available, DSL by Windstream is 21.78% available, and HughesNet Satellite is 100% available with high latency. For 32656, Cable coverage provided by Comcast is 70.36% available, DSL by AT&T is 55.44% available, fiber by AT&T is 6.74% available, DSL by Windstream is 19.72% available, and HughesNet Satellite is 100% available with high latency.

In Clay County some residents have to drive 10 to 15 miles to check email, join a Zoom meeting, or help a child complete homework. Nearly 100,000 people in North Florida don't have access to reliable internet service. Parents describe homeschooling and working at home as impossible during the pandemic. In areas such as southwest Clay County you may only have a single provider such as HughesNet or ViaSat with a cost of \$100 a month for something that can't really be used especially for low-and-to moderate income families. Limited access to reliable high-speed internet

also plagues the community of Clay Hill and residents living west of Middleburg on County Road 218. The County is pursuing state and federal grants to provide funding for the infrastructure.

**Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

For speeds greater than 25/3 Mbps (e.g. 100/10 or 250/25), service is less available and more area dependent. For example, while most of the north County is served by three or more providers that offer speeds of 100/10 Mbps, many areas of the south County are served by only one or two providers that offer less reliable efforts.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

Florida's large coastline, low elevation, and reliance on drainage systems contribute to making it highly vulnerable to flooding. Research by First Street Foundation quantifying the financial impact of flood risk from climate change shows the Jacksonville area is near the top nationally for the greatest number of properties at substantial risk and the greatest proportion of properties at risk from flooding due to climate change. Clay County maintains a Local Mitigation Strategy plan to track high priority projects; the majority of projects are related to flooding.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

As sea levels continue to rise and weather patterns change, flood risks in Clay County as a whole will increase. Research on FloodFactor.com shows that in the zip code 32043 (in which Clay County government is located), approximately 1,601 properties are already at risk, and within 30 years, about 1,933 properties will be at risk. Fortunately, however, while flood risk cannot ever be completely eliminated, communities that work to adapt to these risks through sustainable, climate-friendly infrastructure can limit flood damage and help decrease the cost of flood insurance.

## **Strategic Plan**

### **SP-05 Overview**

There are three priority needs identified here within. Those needs are affordable housing, public infrastructure improvements, and code enforcement. This plan outlines the goals and a variety of outcome indicators to address the identified needs. Those goals and outcomes are as follows:

1. Housing Activities - Housing Rehabilitation and Reconstruction
  - i. Outcome 1: Homeowner Housing Rehabilitated: 40 units
  - ii. Outcome 2: Mobile home (owner-occupied) replaced 15 units
  
2. Infrastructure Improvements
  - i. Outcome 1: Infrastructure Activities (other than housing): 2,000 persons
  
3. Code Enforcement
  - i. Outcome 1: Homes inspected: 150

The first year Action Plan details all three of these activities for FY 2021-2022. Over the five-year Strategic Plan period, Clay County will continue to focus on housing rehabilitation, mobile home replacement, code enforcement and infrastructure improvements (each subsequent One-Year Action Plan will detail specific infrastructure projects).

## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 48 - Geographic Priority Areas

1	<b>Area Name:</b>	County wide low-and moderate-income CTS
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Housing
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Clay County consists of unincorporated Clay County, as well as 4 municipalities (cities and towns). The Countywide area is comprised of low- and moderate-income areas within Clay County.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Clay County has limited land available for growth. Due to its built-out character, the housing stock is older and competition for housing is significant. Therefore, both the quality and affordability of housing is a concern. Although parts are rural and urbanized with many economic assets, Clay County has a limited supply of housing that is affordable to low-and moderate-income residents. Clay County has commercial and industrial areas located throughout the County; however, the stock of commercial and industrial structures is also aging or substandard and many do not meet building code, which contributes to areas of potential blight throughout the County.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	The Plan was available for a 30-day public review and comment period and two (2) public hearings were held during the Clay County Board of County Commissioners (BCC) meetings. Survey and meeting results provided input as well as County staff input.

<p><b>Identify the needs in this target area.</b></p>	<p>The needs of Clay County's low-and moderate-income, special needs, and homeless populations include preservation/production of affordable housing; housing assistance; mental and behavioral health services; homeless shelters, facilities, and services; special needs housing, facilities, and services; public facilities and improvements; public services; code enforcement/blight removal, and economic development. Within Clay County and cooperating cities and towns, there are numerous low-and moderate-income areas that are eligible for activities such as those listed above. These needs are also universal to low-and moderate-income residents of Clay County on a client-basis.</p>																
<p><b>What are the opportunities for improvement in this target area?</b></p>	<p>Opportunities for improvement include the preservation and rehabilitation of affordable housing, homeownership, economic development, neighborhood and roadway infrastructure improvements, public services, and code enforcement/blight elimination.</p>																
<p><b>Are there barriers to improvement in this target area?</b></p>	<p>Barriers to improvement include limited resources and funding given the broad extent of low-and moderate-income areas and residents in Clay County and cooperating cities and towns, limited land availability, widening gaps between income levels and market-rate housing costs, unemployment and other economic challenges, and unforeseen natural and human-made disasters. The COVID-19 public health crisis is expected to exacerbate existing economic challenges in these areas.</p>																
<p><b>2</b></p>	<table border="1"> <tr> <td data-bbox="203 1255 771 1325"> <p><b>Area Name:</b></p> </td> <td data-bbox="787 1255 1489 1325"> <p>County wide low-and moderate-income areas Code Enforcement</p> </td> </tr> <tr> <td data-bbox="203 1325 771 1360"> <p><b>Area Type:</b></p> </td> <td data-bbox="787 1325 1489 1360"> <p>Local Target area</p> </td> </tr> <tr> <td data-bbox="203 1360 771 1396"> <p><b>Other Target Area Description:</b></p> </td> <td data-bbox="787 1360 1489 1396"> </td> </tr> <tr> <td data-bbox="203 1396 771 1432"> <p><b>HUD Approval Date:</b></p> </td> <td data-bbox="787 1396 1489 1432"> </td> </tr> <tr> <td data-bbox="203 1432 771 1467"> <p><b>% of Low/ Mod:</b></p> </td> <td data-bbox="787 1432 1489 1467"> </td> </tr> <tr> <td data-bbox="203 1467 771 1503"> <p><b>Revital Type:</b></p> </td> <td data-bbox="787 1467 1489 1503"> <p>Comprehensive</p> </td> </tr> <tr> <td data-bbox="203 1503 771 1539"> <p><b>Other Revital Description:</b></p> </td> <td data-bbox="787 1503 1489 1539"> </td> </tr> <tr> <td data-bbox="203 1539 771 1667"> <p><b>Identify the neighborhood boundaries for this target area.</b></p> </td> <td data-bbox="787 1539 1489 1667"> <p>Clay County consists of unincorporated Clay County, as well as 4 municipalities (cities and towns). The Countywide area is comprised of low- and moderate-income areas within Clay County.</p> </td> </tr> </table>	<p><b>Area Name:</b></p>	<p>County wide low-and moderate-income areas Code Enforcement</p>	<p><b>Area Type:</b></p>	<p>Local Target area</p>	<p><b>Other Target Area Description:</b></p>		<p><b>HUD Approval Date:</b></p>		<p><b>% of Low/ Mod:</b></p>		<p><b>Revital Type:</b></p>	<p>Comprehensive</p>	<p><b>Other Revital Description:</b></p>		<p><b>Identify the neighborhood boundaries for this target area.</b></p>	<p>Clay County consists of unincorporated Clay County, as well as 4 municipalities (cities and towns). The Countywide area is comprised of low- and moderate-income areas within Clay County.</p>
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<p><b>Other Revital Description:</b></p>																	
<p><b>Identify the neighborhood boundaries for this target area.</b></p>	<p>Clay County consists of unincorporated Clay County, as well as 4 municipalities (cities and towns). The Countywide area is comprised of low- and moderate-income areas within Clay County.</p>																

<p><b>Include specific housing and commercial characteristics of this target area.</b></p>	<p>Clay County has limited land available for growth. Due to its built-out character, the housing stock is older and competition for housing is significant. Therefore, both the quality and affordability of housing is a concern. Although parts are rural and urbanized with many economic assets, Clay County has a limited supply of housing that is affordable to low-and moderate-income residents. Clay County has commercial and industrial areas located throughout the County; however, the stock of commercial and industrial structures is also aging or substandard and many do not meet building code, which contributes to areas of potential blight throughout the County.</p>
<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>The Plan was available for a 30-day public review and comment period and two (2) public hearings were held during the Clay County Board of County Commissioners (BCC) meetings. Survey and meeting results provided input as well as County staff input.</p>
<p><b>Identify the needs in this target area.</b></p>	<p>The needs of Clay County's low-and moderate-income, special needs, and homeless populations include preservation/production of affordable housing; housing assistance; mental and behavioral health services; homeless shelters, facilities, and services; special needs housing, facilities, and services; public facilities and improvements; public services; code enforcement/blight removal, and economic development. Within Clay County and cooperating cities and towns, there are numerous low-and moderate-income areas that are eligible for activities such as those listed above. These needs are also universal to low-and moderate-income residents of Clay County on a client-basis.</p>
<p><b>What are the opportunities for improvement in this target area?</b></p>	<p>Opportunities for improvement include the preservation and rehabilitation of affordable housing, homeownership, economic development, neighborhood and roadway infrastructure improvements, public services, and code enforcement/blight elimination.</p>
<p><b>Are there barriers to improvement in this target area?</b></p>	<p>Barriers to improvement include limited resources and funding given the broad extent of low-and moderate-income areas and residents in Clay County and cooperating cities and towns, limited land availability, widening gaps between income levels and market-rate housing costs, unemployment and other economic challenges, and unforeseen natural and human-made disasters. The COVID-19 public health crisis is expected to exacerbate existing economic challenges in these areas.</p>

<b>3</b>	<b>Area Name:</b>	Cattail Street in Middleburg
	<b>Area Type:</b>	CDFI area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	73
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Clay County consists of unincorporated Clay County, as well as 4 municipalities (cities and towns). The Countywide area is comprised of low- and moderate-income areas within Clay County. Cattail St. is an unpaved road that is bounded by US-301, SR-21, and CR-218.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Clay County has limited land available for growth. Due to its built-out character, the housing stock is older and competition for housing is significant. Therefore, both the quality and affordability of housing is a concern. Although parts are rural and urbanized with many economic assets, Clay County has a limited supply of housing that is affordable to low-and moderate-income residents. Clay County has commercial and industrial areas located throughout the County; however, the stock of commercial and industrial structures is also aging or substandard and many do not meet building code, which contributes to areas of potential blight throughout the County.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	The Plan was available for a 30-day public review and comment period and two (2) public hearings were held during the Clay County Board of County Commissioners (BCC) meetings. Survey and meeting results provided input as well as County staff input.
<b>Identify the needs in this target area.</b>	The needs of Clay County's low-and moderate-income, special needs, and homeless populations include preservation/production of affordable housing; housing assistance; mental and behavioral health services; homeless shelters, facilities, and services; special needs housing, facilities, and services; public facilities and improvements; public services; code enforcement/blight removal, and economic development. Within Clay County and cooperating cities and towns, there are numerous low-and moderate-income areas that are eligible for activities such as those listed above. These needs are also universal to low-and moderate-income residents of Clay County on a client-basis.	



	<b>What are the opportunities for improvement in this target area?</b>	Opportunities for improvement include the preservation and rehabilitation of affordable housing, homeownership, economic development, neighborhood and roadway infrastructure improvements, public services, and code enforcement/blight elimination.
	<b>Are there barriers to improvement in this target area?</b>	Barriers to improvement include limited resources and funding given the broad extent of low-and moderate-income areas and residents in Clay County and cooperating cities and towns, limited land availability, widening gaps between income levels and market-rate housing costs, unemployment and other economic challenges, and unforeseen natural and human-made disasters. The COVID-19 public health crisis is expected to exacerbate existing economic challenges in these areas.
4	<b>Area Name:</b>	Louie Carter Road in Middleburg
	<b>Area Type:</b>	CDFI area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	57
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Clay County consists of unincorporated Clay County, as well as 4 municipalities (cities and towns). The Countywide area is comprised of low- and moderate-income areas within Clay County. Louie Carter Rd. is an unpaved road that is bounded by the north fork of Black Creek, US-301, and CR-218.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Clay County has limited land available for growth. Due to its built-out character, the housing stock is older and competition for housing is significant. Therefore, both the quality and affordability of housing is a concern. Although parts are rural and urbanized with many economic assets, Clay County has a limited supply of housing that is affordable to low-and moderate-income residents. Clay County has commercial and industrial areas located throughout the County; however, the stock of commercial and industrial structures is also aging or substandard and many do not meet building code, which contributes to areas of potential blight throughout the County.
<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	The Plan was available for a 30-day public review and comment period and two (2) public hearings were held during the Clay County Board of County Commissioners (BCC) meetings. Survey and meeting results provided input as well as County staff input.	

<p><b>Identify the needs in this target area.</b></p>	<p>The needs of Clay County's low-and moderate-income, special needs, and homeless populations include preservation/production of affordable housing; housing assistance; mental and behavioral health services; homeless shelters, facilities, and services; special needs housing, facilities, and services; public facilities and improvements; public services; code enforcement/blight removal, and economic development. Within Clay County and cooperating cities and towns, there are numerous low-and moderate-income areas that are eligible for activities such as those listed above. These needs are also universal to low-and moderate-income residents of Clay County on a client-basis.</p>
<p><b>What are the opportunities for improvement in this target area?</b></p>	<p>Opportunities for improvement include the preservation and rehabilitation of affordable housing, homeownership, economic development, neighborhood and roadway infrastructure improvements, public services, and code enforcement/blight elimination.</p>
<p><b>Are there barriers to improvement in this target area?</b></p>	<p>Barriers to improvement include limited resources and funding given the broad extent of low-and moderate-income areas and residents in Clay County and cooperating cities and towns, limited land availability, widening gaps between income levels and market-rate housing costs, unemployment and other economic challenges, and unforeseen natural and human-made disasters. The COVID-19 public health crisis is expected to exacerbate existing economic challenges in these areas.</p>

**General Allocation Priorities**

*Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA).*

The geographic area focus will be all low- and moderate-income areas of Clay County.

## SP-25 Priority Needs – 91.215(a)(2)

### Priority Needs

Table 49 – Priority Needs Summary

1	<b>Priority Need Name</b>	Housing rehabilitation
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	County wide low-and moderate-income CTS
	<b>Associated Goals</b>	Affordable Housing
	<b>Description</b>	CDBG funds will be used for qualified applicants whose homes in need of repair. Repairs may include roofing, electrical, plumbing, heating/air conditioning, accessibility modifications, health/sanitary problems, safety code violations, and or interior/exterior damage or deterioration to the structure. Under this strategy, failing septic systems and old wells can be replaced by paying for connection fees, abandoning private wells and closing septic tanks, as well as other related plumbing costs may be funded under this program.
	<b>Basis for Relative Priority</b>	The County's home repair program addresses building and code violations, interior and exterior building, electrical and plumbing problems, health and safety issues, and the retrofit of special items for those with special needs. This project also provides for staff costs and related expenses required for outreach efforts for marketing the program, rehabilitation counseling, screening potential applicant households and structures, preparing work specifications and bid packages, inspections, eligibility determinations and other services related to assisting owners, contractors and other entities who are participating in eligible rehabilitation activities. The home repair program is limited to low- to moderate-income homeowners and is available on a "first-eligible, first-served" basis. The maximum award to any homeowner is \$30,000.
2	<b>Priority Need Name</b>	Demolition and Replacement of Mobile Homes
	<b>Priority Level</b>	High

<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families
<b>Geographic Areas Affected</b>	County wide low-and moderate-income CTS
<b>Associated Goals</b>	Affordable Housing
<b>Description</b>	This strategy provides funding for the replacement of an existing mobile home dwelling that has been determined not economically feasible to rehabilitate the existing mobile home. This strategy will only be available to persons over 65, disabled or those who have special needs.

	<b>Basis for Relative Priority</b>	<p>Applicants will be ranked for assistance based on a first-qualified, first-served basis with priorities for the elderly and disabled or special needs.</p> <ul style="list-style-type: none"> <li>• The applicant has legally owned and resided in the mobile home continuously for a maximum of one year prior to applying for assistance and must be able to provide proof of ownership to the CDBG Program.</li> <li>• The applicant's mortgage payment is not more than 30 days delinquent at the time of application.</li> <li>• The applicant's property taxes are not delinquent.</li> <li>• The applicant may not be delinquent on any debt owed to Clay County.</li> <li>• The applicant must provide proof of filing Federal Income Tax return for the previous year or provide proof of exemptions.</li> <li>• The assessed value of the home may not exceed \$200,000.</li> <li>• The applicant may not have assets (excluding retirement and IRA accounts) exceeding \$25,000.</li> <li>• The applicant may not have been convicted of a felony.</li> </ul> <p><b>Additional Information:</b> Replacements are prioritized to provide safe and sanitary living conditions. The maximum repair amount will not be awarded in all cases.</p> <p><b>Target Beneficiaries:</b> Low- to moderate-income persons  <b>Geographic Distribution:</b> County-wide and/or eligible neighborhoods  <b>National Objective:</b> 570.208 (a) (3) Low/Mod Housing  <b>Eligible Category:</b> 570.202 (a) (1) Eligible rehabilitation and preservation activities  <b>Objective Category:</b> Low- and moderate income benefit national objective  <b>Proposed Outcome:</b> Availability/Accessibility  <b>Performance Measure:</b> 4 households assisted.</p>
3	<b>Priority Need Name</b>	Public Infrastructure
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Persons with Mental Disabilities Non-housing Community Development
	<b>Geographic Areas Affected</b>	County wide low-and moderate-income CTS
	<b>Associated Goals</b>	Infrastructure improvements

	<p><b>Description</b></p> <p>Clay County CDBG funds will be used to improve streets in low- and moderate-income areas. The following projects were selected based on identified need and ability of the entire project to be completed within the funding amount allocated:</p> <ul style="list-style-type: none"> <li>• FY 2021-2022: convert Cattail Street in Middleburg (Hibiscus Avenue to private road) to a paved road. (\$300,000)</li> <li>• FY 2021-222. resurface Louie Carter Road. (\$50,000)</li> <li>• FYs 2022-2025: Streets, sidewalks and drainage improvements will be identified specifically on an annual basis.</li> </ul>
	<p><b>Basis for Relative Priority</b></p> <p>Clay County CDBG funds will be used to improve streets in low- and moderate-income areas. The following projects were selected based on identified need and ability of the entire project to be completed within the funding amount allocated:</p> <ul style="list-style-type: none"> <li>• FY 2021-2022: convert Cattail Street in Middleburg (Hibiscus Avenue to private road) to a paved road. (\$300,000)</li> <li>• FY 2021-222. resurface Louie Carter Road. (\$50,000)</li> <li>• FYs 2022-2025: Streets, sidewalks and drainage improvements will be identified specifically on an annual basis.</li> </ul> <p><b>PROJECT DESCRIPTION:</b> Street improvements</p> <p><b>Target Beneficiaries:</b> Low-to moderate-income areas and persons.</p> <p><b>Geographic Distribution:</b> County wide, areas (i.e. unincorporated areas) that are low- and moderate-income</p> <p><b>National Objective:</b> Low- and moderate-income benefit as An Area Benefit.</p> <p><b>Eligible Category:</b> 570.201(c), 570.207, 570.208</p> <p><b>Objective Category:</b> Public improvements (General)</p> <p><b>Proposed Outcome:</b> Street reconstruction</p> <p><b>Performance Measure:</b> Number of new/reconstructed streets by length.</p>
4	<p><b>Priority Need Name</b></p> <p>Code Enforcement</p>
	<p><b>Priority Level</b></p> <p>High</p>
	<p><b>Population</b></p> <p>Extremely Low Low Moderate Non-housing Community Development</p>
	<p><b>Geographic Areas Affected</b></p> <p>County wide low-and moderate-income CTS</p>
	<p><b>Associated Goals</b></p> <p>Code Enforcement</p>
	<p><b>Description</b></p> <p>Code enforcement of properties in low- and moderate-income areas that contribute to conditions of slum and blight.</p>

<p><b>Basis for Relative Priority</b></p>	<p>Clay County will use federal CDBG funding to fund enhanced code enforcement efforts in specific areas.</p> <p>According to HUD, CDBG grantees can use CDBG funding for code enforcement when the areas in which the enforcement occurs meet one of the three national objectives:</p> <ol style="list-style-type: none"> <li>1) low and moderate income (LMI) area benefit,</li> <li>2) prevention or elimination of slum/blight, or</li> <li>3) activities designed to meet community needs by having a particular urgency.</li> </ol> <p>In Clay County, those areas with similar criteria will be targeted for CDBG-funded code enforcement. These areas will include “slum and blight” conditions including:</p> <ul style="list-style-type: none"> <li>• At least 25 percent of properties throughout the area experience one or more of the following conditions: Physical deterioration of buildings or improvements; Abandonment of properties; Chronic high occupancy turnover rates or chronic high vacancy rates in commercial or industrial buildings; Significant declines in property values or abnormally low property values relative to other areas in the community; or Known or suspected environmental contamination.</li> </ul> <p><b>Target Beneficiaries:</b> Low- and moderate-income communities  <b>Geographic Distribution:</b> N/A  <b>National Objective:</b> § 570.208(a)(1) Low- and Moderate-Income Benefit  <b>Eligible Category:</b> 24 CFR 570.202(c); Section 105(a)(3) of the HCDA  <b>Objective Category:</b> Slum and Blight national objective  <b>Proposed Outcome:</b> Improved housing conditions  <b>Performance Measure:</b> Number of housing units inspected – 75</p>
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**Narrative (Optional)**

There are three priority needs identified here within. Those needs are affordable housing, public infrastructure improvements, and code enforcement. This plan outlines the goals and a variety of outcome indicators to address the identified needs. Those goals and outcomes are as follows:

1. Housing Activities - Housing Rehabilitation and Reconstruction
2. Infrastructure Improvements
3. Code Enforcement

The first year Action Plan details all three of these activities for FY 2021-2022. Over the five-year Strategic Plan period, Clay County will continue to focus on housing rehabilitation, mobile home replacement, code enforcement and infrastructure improvements (each subsequent One-Year Action Plan will detail specific infrastructure projects).

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Tenant-based vouchers can be used in Clay County. This voucher is critical for persons with extremely low-incomes who are severely cost-burdened. It is estimated that approximately 190 TBRA vouchers are in use in the area.
TBRA for Non-Homeless Special Needs	Non-Homeless special needs populations have a high need for TBRA, while at the same time needing improved accessibility within housing. Due to their limited income, housing needs for persons with non-homeless special needs include affordability, availability of assistance, accessibility improvements and Fair Housing options. All families are requesting accessibility features.
New Unit Production	Over 45% of the County’s housing units were constructed prior to 1990 and are over 30 years old. With an estimated median home value of \$185,400 and median contract rent of \$1,148 in Clay County, there is also a shortage of affordable housing for lower income groups, including both renter and owner households earning less than 50% HAMFI.
Rehabilitation	Many renter-occupied housing units have at least one housing problem (7,465), while a higher number (9,710) of owner-occupied housing units have at least one housing problem (2013-2017 ACS). Generally, these characteristics point toward the need for the County to continue to facilitate housing rehabilitation to improve the condition of housing within the jurisdiction.
Acquisition, including preservation	Housing preservation and production in low-and moderate-income neighborhoods were identified during the citizen participation process, particularly regarding the need for rehabilitation or redevelopment of aging or potentially blighted properties for affordable housing given limited land availability.

Table 50 – Influence of Market Conditions

### Population Dynamics

Clay County is the 25th largest county—out of 67 counties—by population in the State of Florida, containing approximately 1% of the state’s overall population. As displayed below in Table 1, Clay County’s estimated population from the U.S. Census Bureau’s 2015-2019 American Community Survey (ACS) was 211,405. Specifically, Clay County’s population increased at a rate of 58.1% between 1990 and 2000, 35.5% between 2000 and 2010, and by 10.8% between 2010 and the latest ACS (2015-2019) estimates.



## SP-35 Anticipated Resources – 91.215(a)(4), 91.220(c)(1,2)

### Introduction

Clay County does not have HOME funds as of this date. CDBG funds will be leveraged through partnerships it has with other governmental agencies and nonprofit organizations. Sources of leverage primarily include Low-income Housing Tax Credits, New Markets Tax Credits, Opportunity Zone Funds, State of Florida SHIP funds (State Housing Initiatives Program), State of Florida HOME funds and Federal Home Loan Bank Board funding, United Way funding, private foundations and donation funding.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,084,880	0	0	1,084,880	4,300,000	This will be the first year of CDBG allocation and the "expected amount" is the anticipated five-year average.

Table 3 - Anticipated Resources

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

Much of the funding earmarked to improve the quality of life of low and moderate-income households, revitalize deteriorating infrastructure /neighborhoods and offer opportunities for safe, decent affordable housing has been provided by Federal Community Development Block Grant (CDBG) Program Funds, Florida's State Housing Initiatives Partnership (SHIP) Program, and the Emergency Solutions Grant (ESG) Program (regional CofC) which supports services for homeless persons. These programs provide rehabilitation of substandard units, emergency repairs, infrastructure improvements, elimination of slum and blighting influences, delivery of Countywide public and homeless services, and construction of community meeting places and centers.

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

There are no publicly owned lands or properties that are currently identified for projects in this plan.

### **Discussion**

Clay County will continue to use HUD and local funds to fund a variety of eligible projects to meet high-priority needs and goals.

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
CLAY COUNTY	Government	Ownership Planning neighborhood improvements	Other

Table 52 - Institutional Delivery Structure

### Assessment of Strengths and Gaps in the Institutional Delivery System

Clay County is the lead agency in administering the CDBG grant funds. Clay County’s Planning office has a strong support system internally and externally. The Public Works Department work with various neighborhood/resident committees to obtain requests for projects such as sidewalks, parks improvements, areas in need of improved drainage, road improvements, and other community development needs. Clay County works closely with local nonprofit organizations to implement various public services activities.

In terms of specific gaps, most needs are generally met in some way through these community partners; however, the amount of need almost always outweighs the available funding. More specific deficits in the quantity and quality of affordable housing were identified during the citizen participation process. Affordable housing continues to be a concern for Clay County, primarily due to the widening gap between median income and median home values and rents, and due to limited land availability. Related to housing affordability, homelessness also continues to be an area of concern. Underserved populations in Clay County include the elderly; mental illness, or substance abuse/addiction challenges; and persons with disabilities. The County continues to coordinate with a network of community partners and the Continuum of Care (CoC) to address these needs as funding allows.

### Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X	X	X
Mobile Clinics	X	X	X

<b>Street Outreach Services</b>			
Other Street Outreach Services	X	X	X
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
<b>Other</b>			
	X	X	

**Table 53 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

All services described above are provided by the regional Continuum of Care organization - Changing Homelessness, Inc.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

The strength of Clay County’s service delivery system is its diversity of public and private partners and the wide array of services offered countywide. Virtually all service types are available in the County and most are available to homeless persons or persons at-risk of homelessness through the CoC. Although the current programming offered by community partners is diverse, the level of need far outweighs the amount of funding available. There is simply too much demand, and due to economic conditions, this demand continues to grow each year as Clay County develops (and redevelops). As identified previously, affordable housing continues to be a concern for Clay County, primarily due to the widening gap between median income and median home values and rents, and due to limited land availability. Related to housing affordability, homelessness also continues to be an area of concern as individuals and families are not able to keep pace with the cost of housing. Underserved populations in Clay County include the elderly; mental illness, or substance abuse/addiction challenges; and persons with disabilities. There are several community partners with programs tailored to the needs of the elderly; the need for mental and behavioral health services; and the needs of persons with disabilities; however, there is not enough funding to address all these needs countywide.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

Clay County will continue to network with participating cities and towns, elected officials, citizens, non-profit and for-profit stakeholders, and the Continuum of Care (CoC) to identify community needs, make these needs widely known to stakeholders, and identify projects or programs and funding opportunities to address these needs. In order to improve the preservation and production of affordable housing within Clay County, the County plans to emphasize a transit-oriented/activity center development framework that will foster affordable housing proximate to transportation and employment opportunities. The County will also utilize leveraging and matching of federal funding, particularly with state and local funding sources such as SHIP that are specifically designated for housing and/or economic development activities. The preservation and production of affordable housing, as well as housing/rental assistance, is overseen by the Clay County Planning Department's Community Development Division and implemented through a network of non-profit and for-profit housing developers and organizations.

In order to improve the funding of public services, particularly for homeless and special needs populations, the County will support the CoC member organizations in the development of projects or programs that address priority needs, and encourage applicant subrecipients to leverage and match federal funding with state and local funding sources to address priority needs. Such investment will be focused in areas of concentrated poverty, such as the Target Areas identified previously. The provision of public services will be overseen by the Community Development Division.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2021	2025	Affordable Housing	County wide low-and moderate-income CTS County wide low- and moderate-income areas Code Enforcement	Housing rehabilitation Demolition and Replacement of Mobile Homes	CDBG: \$1,750,000	Homeowner Housing Rehabilitated: 40 Household Housing Unit
2	Code Enforcement	2021	2025	Non-Housing Community Development	County wide low-and moderate-income CTS	Code Enforcement	CDBG: \$2,000,000	Housing Code Enforcement/Foreclosed Property Care: 600 Household Housing Unit
3	Infrastructure improvements	2021	2025	Non-Housing Community Development		Public Infrastructure	CDBG: \$1,500,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 100 Households Assisted

**Table 1 – Goals Summary**

### Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	Affordable housing is needed for all income levels and in all areas of the jurisdiction. The preservation of existing homeownership units including mobile homes is a priority activity for Clay County.
2	<b>Goal Name</b>	Code Enforcement
	<b>Goal Description</b>	Housing both owner-occupied and non-owner-occupied in qualified area have numerous safety code issues. Through this targeted effort, housing quality both owner-occupied and rental will be improved. Data, consultation, and public input all reveal a need for housing improvements.
3	<b>Goal Name</b>	Infrastructure improvements
	<b>Goal Description</b>	Infrastructure improvements including street paving's and water system hookups in low- and moderate-income areas.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

Clay County estimates that 55 affordable housing units for extremely low-income, low-income, and moderate-income households will be preserved or produced over the five-year period covered by the Consolidated Plan. CDBG, and SHIP funding sources will be allocated to specific affordable housing activities such as acquisition, development, new construction, and rehabilitation.

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

Lost Properties Inventory refers to formerly subsidized properties that now operate as market-rate housing, another land use category (for example, commercial) or have been demolished, according to the University of Florida Shimberg Center on Housing's Assisted Housing Inventory, which utilizes data from the U.S. Department of Housing and Urban Development (HUD), Florida Housing Finance Corporation (FHFC), and USDA RD.

### **Activities to Increase Resident Involvements**

When developing the Consolidated Plan, Clay County held Public hearings and conducted outreach through listening sessions and a citizen survey to gauge the activities and projects that Clay County residents deemed important. Going forward, it is a priority of Clay County to ensure that when implementing and putting into practice these proposed housing activities (i.e., rehabilitation and mobile home replacement, code enforcement, and infrastructure improvements), these changes will take place in low- and moderate-income areas of Clay County are critical to sustaining the quality of life of residents and businesses in the area.

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

N/A

### **Plan to remove the 'troubled' designation**

N/A - No public housing agency is in Clay County.



## **SP-55 Barriers to Affordable Housing – 91.215(h)**

### **Barriers to Affordable Housing**

Generally, within Clay County overall, median home values have outpaced median incomes and median contract rents (i.e., according to the 2013-2017 ACS: 21% increase versus 13% increase). Clay County is particularly concerned with incentivizing affordable housing developments.

Every few years, Clay County and other recipients of State Housing Initiative Partnership Program (SHIP) funds must prepare a Local Housing Incentives Strategy (LHIS), driven by an Affordable Housing Advisory Committee (AHAC), that identifies barriers to and incentives for affordable housing in their jurisdictions. The LHIS requires jurisdictions receiving SHIP funds to regularly review zoning laws and policies to review their impact on affordable housing and residential investment. In the most recent Local Housing Assistance Plan (LHAP) prepared by Clay County, the following incentives were identified to address barriers to affordable housing:

- Expedited permitting
- Ongoing review process
- Allowance for increased density levels
- Street design (modification of street requirements)
- Affordable housing development (mixed-use developments)

Additionally, and most importantly, the County is currently working with municipalities to link new affordable housing developments to major employment centers within the community.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

Identified barriers to affordable housing include lack of funding (federal, state, local) for affordable housing, limited land availability, high utility/maintenance costs in older housing units, cost prohibitive tree/landscaping requirements, aging mobile home parks, smaller units in demand but not cost feasible to construct, and tenant barriers including Fair Housing issues. In terms of specific gaps, most needs are generally met in some way through community partners; however, the amount of need almost always outweighs the available funding. More specific deficits in the quantity and quality of affordable housing were identified during the citizen participation process. Affordable housing continues to be a concern for Clay County, primarily due to the widening gap between median income and median home values and rents, and due to limited land availability. Related to housing affordability, homelessness also continues to be an area of concern. Underserved populations in Clay County include the elderly; mental illness, or substance abuse/addiction challenges; and persons with disabilities. The County continues to coordinate with a network of community partners and the Continuum of Care (CoC) to address these needs as funding allows.

## **SP-60 Homelessness Strategy – 91.215(d)**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Clay County will continue to work with the regional Continuum of Care organization to provide services to the homeless. Homeless shelter, facilities, and services are priority needs identified during the Consolidated Plan process. Clay County will partner with Changing Homelessness, Inc and other local partners such as Mercy Support Services, Quigley House, and the Salvation Army to identify and fund activities that will benefit homeless persons and those at-risk of becoming homeless.

Changing Homelessness, Inc is a 501(c)(3) non-profit and serves as the Lead Agency for the Northeast Florida region as the Continuum of Care (CoC). The CoC Board includes representatives of local governments, other community leaders, and appointed seats. Membership is comprised of non-profit homeless assistance providers, victim service providers, faith-based organizations, businesses, advocates, public housing agencies, school districts, workforce agencies, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, veteran service organizations, healthcare agencies, and persons who are, or have experienced, homelessness.

The mission of Changing Homelessness, Inc is to coordinate all community partners, systems and resources available with the goal of helping individuals and families to prevent, divert, and end homelessness in Clay County. Annually, the CoC coordinates the Point-in-Time (PIT) homeless count to identify the number and characteristics of homeless persons within Clay County. This information is reviewed and analyzed against five-year trend data collected by the HMIS.

- Engage homeless individuals and families living on the street;
- Improve the number and quality of emergency shelters for homeless individuals and families;
- Help operate emergency shelters;
- Provide essential services to shelter residents;
- Prevent families and individuals from becoming homeless (e.g. financial assistance, utility assistance, rental assistance, etc.).

### **Addressing the emergency and transitional housing needs of homeless persons**

To address the emergency and transitional housing needs of homeless persons, the County, CoC, and other local partners such as Mercy Support Services, Quigley House, and the Salvation Army provide funding for efforts to quickly re-house homeless individuals and families to minimum trauma and dislocation, promotes access to and effective utilization of mainstream programs, and optimizes self-sufficiency among individuals and families.

The CoC maintains an inventory of emergency, transitional, and permanent supportive housing beds/units provided by its network of homeless shelters and housing providers. Emergency and transitional housing needs are determined by these providers.

CDBG funds may be used for emergency shelter facilities because of the recognized need to have shelter beds for families with children and chronically homeless persons to get these populations off the street and placed into more permanent housing. Families with children, in particular, are also eligible for Rapid Re-Housing. Each year, based on applications received for funding, the County may allocate a portion of CDBG funds toward homeless shelter and transitional housing activities.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

The CoC also competitively awards grants for new construction, acquisition, rehabilitation, and leasing of affordable housing; rental assistance; supportive services and operating costs for housing units; homeless management information systems; project administration costs; and Continuum of Care planning costs.

The County can coordinate with Mercy Support Services, which provides a range of homeless prevention assistance to families with children, including short-term shelter, case management, and housing placement. The Flagler County Housing Authority works on behalf of Clay County to match families and individuals with more permanent housing opportunities. The transitional and permanent supportive needs of veterans are addressed local veteran organizations. The Flagler County Housing Authority works on behalf of Clay County also administers Housing Choice Vouchers (Section 8).

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education, or youth needs**

Mercy Support Services works with participants to create Individual Training and Service Plan that includes employment goals and identifies training or education needs to improve their financial situation and eliminate their dependence on public housing assistance.

The CoC also works with appropriate local and State agencies to ensure that persons leaving publicly funded institutions or systems of care and are discharged to the community have a specific pathway to housing and supportive services. The CoC Board continues to provide the oversight of discharge planning, including benchmarking. Input received during the Consolidated Plan process identified the need for more affordable and readily available housing for low-to and moderate-income individuals. These needs will be addressed as required.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The Florida Department of Health (DOH) is the primary agency for addressing lead-based paint (LBP) hazards in Clay County. Budgetary constraints have limited lead screening and case management activities; however, the DOH still responds to reported cases of lead poisoning as determined by local pediatricians and health care providers.

The DOH, authorized under the Florida Lead Poisoning Prevention Screening & Education Act, Section 381.985, F.S., and Chapter 64D-3, F.A.C., conducts surveillance of Blood Lead Level (BLL) testing and poisonings in the County, promotes BLL screening for high-risk populations, and provides information to health care providers, individuals, and businesses on lead poisoning prevention. Program activities include surveillance and epidemiology, lead poisoning investigations, primary prevention, and coordinate of care if a person or family is found to have high BLL. The DOH also disseminates information to parents and caregivers, healthcare providers, and renovators and contractors about LBP hazards and screening options. This information includes brochures on keeping children safe from LBP hazards, sources of lead, remediation tactics, and adult lead poisoning prevention at home and in the workplace.

To address LBP hazards, the DOH in Clay County performs BLL testing and coordinates follow-up care if elevated BLL is detected. For children identified with elevated BLL, a lead assessment of the home is recommended. A specialist performs inspections and risk assessments at no charge for families with children having elevated BLL, family day care homes, and day care centers. The DOH in Clay County also works to identify LBP hazards in the environment in conjunction with housing demolition, rehabilitation, and redevelopment activities in older neighborhoods. The primary source of lead exposure among children is LBP in older, deteriorating buildings.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

Lead poisoning often occurs with no obvious symptoms, frequently goes unrecognized, and can cause learning disabilities, behavioral problems, and, at very high levels, seizures, coma, and even death. No safe blood lead level has been identified; however, a BLL above 5 micrograms of lead per deciliter of blood is the reference level at which the Centers for Disease Control and Prevention (CDC) recommends that public health actions be taken and a BLL of 10 micrograms is the CDC's level of concern.

Dwellings built prior to 1980 are assumed to have a higher risk of LBP hazards. Clay County, during the five-year planning period, will prioritize the preservation and production of affordable housing, which will include the rehabilitation of renter- and owner-occupied housing. This goal will address the need for affordable housing units while also improving the quality and safety of the County's housing stock. If LBP hazards are identified in this endeavor, the County will take appropriate actions in coordination with the DOH in Clay County.

### **How are the actions listed above integrated into housing policies and procedures?**

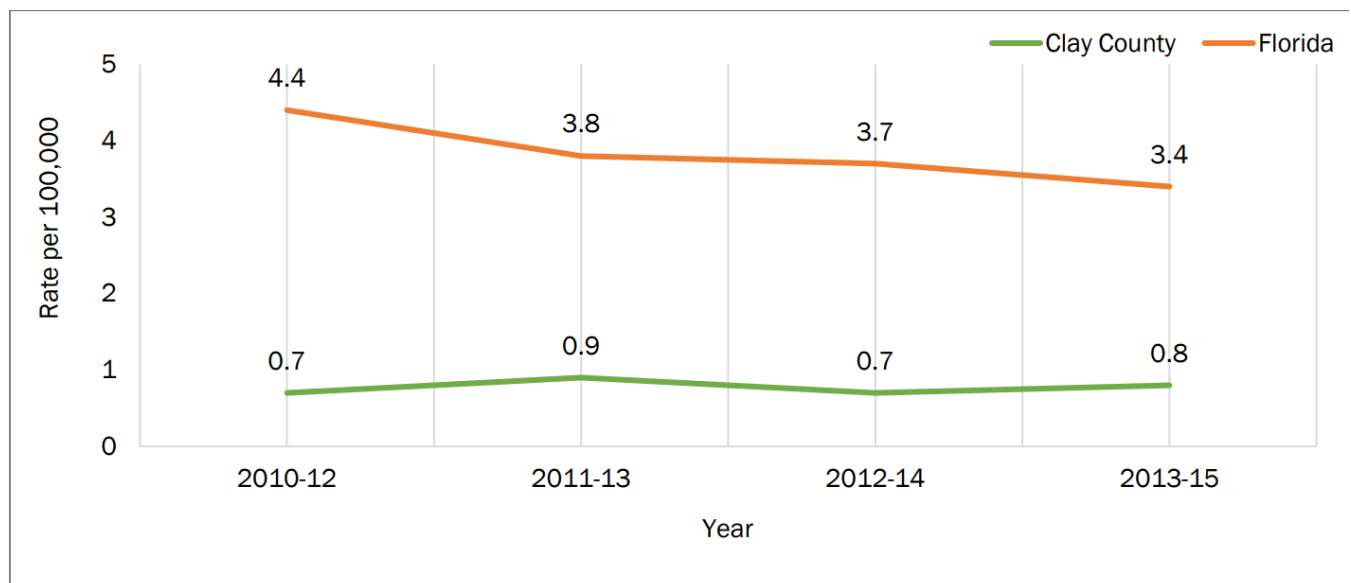
The Clay County Planning Department/Community Development Division will follow specified procedures and applicable regulations. Staff provides all required notifications to owners and occupants and inspect for defective paint surfaces of pre-1978 properties. Any defective paint conditions found are included in the scope of work and treatment provided to the defective areas. Staff members with architectural or Risk Assessor training/experience orders and reviews paint inspections, risk assessments and clearance testing of suspect properties done by licensed testing professionals. Utilization of trained and certified lead professionals assures that lead hazard control and abatement work is done safely and effectively.

All houses built prior to 1978, rehabilitated by the County are subject to the Lead-Safe Housing Rule Checklist, and associated guidance to assure compliance with the Lead-Safe Housing Rule.

Recent budget difficulties have eliminated and limited some of the efforts to expand screening programs and environmental investigations. Early identification through BLL screening, testing and case follow up of lead poisoning reduces the risk that children will suffer permanent damage.

Additionally, the DOH health planners will work with Clay County’s Planning Department and regularly advise on County policies that may affect public health, including matters related to the supply and quality of housing in Clay County in relation to health and environmental risks such as LBP hazards.

**FIGURE 42. LEAD POISONING, CLAY COUNTY & FLORIDA, 2010 TO 2015**



**Trends, Lead Based Paint Hazards in Clay County, FL**

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

Clay County's strategy to reduce the number of poverty-level families is multi-faceted and relies on the cooperation of numerous partners throughout the County and greater Jacksonville region. These partners include County departments, economic development partners such as the Economic Development Corporation and the regional JAXUSA, public service providers, the Continuum of Care, housing authorities, public and private organizations (e.g. non-profits and community development corporations), and other stakeholders in community development activities. These stakeholders will work in concert to address a variety of interrelated social issues, including disparities in education and training, unemployment, limited access to healthcare, family instability, criminal background, inadequate housing, deteriorating neighborhoods, and transportation disadvantage.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?**

The County's goals are to address the categories of affordable housing, homelessness, non-homeless special needs, and non-housing community development are all anti-poverty strategies.

Clay County will connect poverty-level individuals and families with publicly available services, including healthcare resources, emergency financial assistance, housing assistance, justice coordination, senior/elderly services, and social security and disability benefits. These programs support social and economic stability for residents, particularly those with special needs.

Economic Development Partners – Offer employment and job skills/workforce training programs for low- and moderate-income individuals. Such partners include Clay CareerSource.

The Salvation Army, Goodwill Industries, among others can also connect poverty-level persons and persons with disabilities with employment opportunities.

Beyond any Countywide program or initiative, Clay County also supports HUD's Office of Economic Resilience strategies for enhancing equity and inclusion. Within Clay County, there is a disproportionate percentage of poverty-level individuals among minority racial and ethnic groups (2013-2017 ACS). Therefore, anti-poverty strategies must also address equity, inclusion, and fair housing. HUD's equity and inclusion strategies include building inclusive government structures; identifying regional barriers to opportunity; prioritizing investments to equalize opportunity; and improving the location of transportation assets to improve access to employment.

## **SP-80 Monitoring – 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

## Expected Resources

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

#### Introduction

Clay County does not have HOME funds as of this date. CDBG funds will be leveraged through partnerships it has with other governmental agencies and nonprofit organizations. Sources of leverage primarily include Low-income Housing Tax Credits, New Markets Tax Credits, Opportunity Zone Funds, State of Florida SHIP funds (State Housing Initiatives Program), State of Florida HOME funds and Federal Home Loan Bank Board funding, United Way funding, private foundations and donation funding.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,084,880	0	0	1,084,880	4,300,000	This will be the first year of CDBG allocation and the "expected amount" is the anticipated five-year average.

**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.**

Much of the funding earmarked to improve the quality of life of low and moderate-income households, revitalize deteriorating infrastructure /neighborhoods and offer opportunities for safe, decent affordable housing has been provided by Federal Community Development Block Grant (CDBG) Program Funds, Florida’s State Housing Initiatives Partnership (SHIP) Program, and the Emergency Solutions Grant (ESG) Program (regional CofC) which supports services for homeless



persons. These programs provide rehabilitation of substandard units, emergency repairs, infrastructure improvements, elimination of slum and blighting influences, delivery of Countywide public and homeless services, and construction of community meeting places and centers.

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

There are no publicly owned lands or properties that are currently identified for projects in this plan.

### **Discussion**

Clay County will continue to use HUD and local funds to fund a variety of eligible projects to meet high-priority needs and goals.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2021	2025	Affordable Housing	County wide low-and moderate-income CTS	Housing rehabilitation	CDBG: \$367,904	Homeowner Housing Rehabilitated: 15 Household Housing Unit
2	Code Enforcement	2021	2025	Non-Housing Community Development	County wide low-and moderate-income areas Code Enforcement	Code Enforcement	CDBG: \$200,000	Housing Code Enforcement/Foreclosed Property Care: 100 Household Housing Unit
3	Infrastructure improvements	2021	2025	Non-Housing Community Development	County wide low-and moderate-income CTS	Public Infrastructure	CDBG: \$300,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted

**Table 5 – Goals Summary**

#### Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	The first project is a housing rehabilitation project that will be implemented by Clay County Economic and Development Services Department in eligible low- and moderate-income areas of the county. The project will focus on emergency repairs and code compliance. An additional housing activity will be assistance to eligible owners of mobile homes to replace their units.
2	<b>Goal Name</b>	Code Enforcement
	<b>Goal Description</b>	The project will focus on emergency repairs and code compliance. An additional housing activity will be assistance to eligible owners of mobile homes to replace their units.
3	<b>Goal Name</b>	Infrastructure improvements
	<b>Goal Description</b>	The County will provide for infrastructure improvements in low and moderate-income eligible communities particularly the paving of dirt roads, as well as corresponding housing property code enforcement.

## AP-35 Projects – 91.220(d)

### Introduction

The FY 2021-2022 Action Plan includes four projects to be funded under the CDBG Program. The first project is a housing rehabilitation project that will be implemented by Clay County Economic and Development Services Department in eligible low- and moderate-income areas of the county. The project will focus on emergency repairs and code compliance. An additional housing activity will be assistance to eligible owners of mobile homes to replace their units. The County will also utilize 20% of the CDBG funds for administrative costs needed to oversee new and underway projects and provide general management of the CDBG funds. The County will also provide for infrastructure improvements in low and moderate-income eligible communities particularly the paving of dirt roads as well as corresponding, housing property code enforcement.

\*\*\*AMENDMENT: Clay County submitted its first Community Development Block Grant (CDBG) program application to the Department of Housing and Urban Development (HUD) on August 16, 2021. HUD disapproved the application on August 17, 2021. The principal issue identified was a difference in the reported entitlement funding to be received by the County. The initial amount projected to be received by the County was **\$1,069,125.00**, however on May 13, 2021 the amount was increased to **\$1,084,880.00**. This substantial amendment to the approved FY2021-2025 Consolidated Plan, FY2021-2022 Annual Action Plan and Citizen Participation Plan addresses the issues identified by HUD.

### Projects

#	Project Name
1	Housing Activities - Rehabilitation and Mobile Home Replacement
2	Planning and Administration
3	Code Enforcement
4	Public infrastructure

Table 57 – Project Information

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

The Consolidated Plan goals described in the Goals section represent high priority needs for Clay County and serve as the basis for the strategic actions the County will use to meet those needs. It is our goal that meeting these needs will expand and preserve the affordable housing stock in Clay County, as well as provide public infrastructure improvements that will strengthen low- and moderate-income neighborhood revitalization. The Clay County Consolidated Plan preparation coincides with the development of the first year Action Plan. The County will implement all CDBG funded projects in-house.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	Housing Activities - Rehabilitation and Mobile Home Replacement
	<b>Target Area</b>	County wide low- and moderate-income CTS
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Housing rehabilitation Demolition and Replacement of Mobile Homes
	<b>Funding</b>	CDBG: \$367,904
	<b>Description</b>	Rehabilitation - National Objective: 570.208 (a) (3) Low/Mod Housing; Eligible Category: 570.202 (a) (1) Eligible rehabilitation and preservation activities; Objective Category: Low- and moderate-income benefit; Proposed Outcome: Availability/Accessibility. Matrix Code: 14H Mobile Home Replacement - National Objective: 570.208 (a) (3) Low/Mod Housing Units; Eligible Category: 570.202 (a) (1) Objective Category: Low- and moderate-income benefit; Proposed Outcome: Availability/Accessibility. Matrix Code: 14H
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	12 low-and moderate-income households will benefit.
	<b>Location Description</b>	Clay County consists of unincorporated Clay County, as well as 4 municipalities (cities and towns). The Countywide area is comprised of low- and moderate-income areas within Clay County.
<b>Planned Activities</b>	For the Home Repair program, repairs will be completed to homes of qualified applicants with dwellings in need of repairs, which may include roofing, electrical, plumbing, heating/air conditioning, accessibility modifications, health/sanitary problems, safety code violations, and/or interior/exterior damage or deterioration to the structure. Additionally, under this strategy, failing septic systems and old wells can be replaced by paying for connection fees, abandoning private wells, and closing septic tanks, as well as other related plumbing costs may be funded under this program. Performance Measure: 8 households assisted Demolition and replacement of homeowner mobile homes found to be uninhabitable by code enforcement. Awards are available up to \$30,000. Performance Measure: 4 households assisted.	
2	<b>Project Name</b>	Planning and Administration
	<b>Target Area</b>	County wide low-and moderate-income CTS County wide low- and moderate-income areas Code Enforcement
	<b>Goals Supported</b>	Affordable Housing Code Enforcement Infrastructure improvements

	<b>Needs Addressed</b>	Housing rehabilitation Demolition and Replacement of Mobile Homes Public Infrastructure Code Enforcement
	<b>Funding</b>	CDBG: \$216,976
	<b>Description</b>	General planning and administration costs for Federal CDBG program.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable. Grant administration is necessary for all projects that are identified in the first year Action Plan
	<b>Location Description</b>	Not applicable.
	<b>Planned Activities</b>	General planning and administration costs for Federal CDBG
<b>3</b>	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	County wide low-and moderate-income areas Code Enforcement
	<b>Goals Supported</b>	Code Enforcement
	<b>Needs Addressed</b>	Code Enforcement
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	Conduct code enforcement of properties in low-and moderate-income areas that contribute to conditions of slum and blight. National Objective: 570.208 (a) (1) Low/Mod; Eligible Category: 570.202 (c) Section 105(a)(3); Objective Category: Slum and Blight national objective. Proposed Outcome: Improved housing conditions. Matrix Code: 15
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Housing units inspected - 75
	<b>Location Description</b>	Clay County consists of unincorporated Clay County, as well as 4 municipalities (cities and towns). The Countywide area is comprised of low- and moderate-income areas within Clay County.
	<b>Planned Activities</b>	Eligible code enforcement expenses that support the County's CDBG activities Performance Measure: 75 housing units inspected.
<b>4</b>	<b>Project Name</b>	Public infrastructure
	<b>Target Area</b>	County wide low-and moderate-income areas Code Enforcement Cattail Street in Middleburg Louie Carter Road in Middleburg
	<b>Goals Supported</b>	Infrastructure improvements
	<b>Needs Addressed</b>	Public Infrastructure
	<b>Funding</b>	CDBG: \$300,000
	<b>Description</b>	Street improvements - National Objective: Low and moderate-income benefit as an area benefit; Eligible Category: 570.201(c), 570.207, 570.208 Objective Category: Public improvements (General). Proposed Outcome: improve streets in low- and moderate-income areas; Matrix Code: 03K
	<b>Target Date</b>	9/30/2022

<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 low-and moderate-income families.
<b>Location Description</b>	Clay County consists of unincorporated Clay County, as well as 4 municipalities (cities and towns). The Countywide area is comprised of low-and moderate-income areas within Clay County. Cattail St. is an unpaved road that is bounded by US-301, SR-21, and CR-218. Louie Carter Rd. is an unpaved road that is bounded by the north fork of Black Creek, US-301, and CR-218.
<b>Planned Activities</b>	Performed required infrastructure upgrades. Performance Measure: number of new streets by length.

## **AP-50 Geographic Distribution – 91.220(f)**

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

All Activities supported by the County's Five-Year Consolidated Plan strive to improve the quality of life for Clay County low-to-moderate income residents located within Clay County's unincorporated areas, as well as 4 municipalities (Town of Orange Park, City of Green Cove Springs, Town of Penney Farms, City of Keystone Heights). It also includes the census-designated places of Asbury Lake, Bellair-Meadowbrook Terrace, Fleming Island, Lakeside, Middleburg, Oakleaf Plantation and the unincorporated areas of Bellair, Clay Hill, Doctors Inlet, Fleming Island, Hibernia, Kingsley Lake, Lake Asbury, Lake Geneva, McRae, Meadowbrook Terrace, Melrose, and Virginia Village.

The Countywide area is comprised of low-and moderate-income areas within Clay County. Cattail St. is an unpaved road that is bounded by US-301, SR-21, and CR-218. Louie Carter Rd. is an unpaved road that is bounded by the north fork of Black Creek, US-301, and CR-218. The County's focus is placed on eligible programs targeting low-and moderate-income persons on a county-wide basis. During FY 2021-2022, the County will utilize CDBG funds for housing rehabilitation, code enforcement, and public facilities and infrastructure improvements in target areas that have a high concentration of low- and moderate-income persons, substandard housing, and blight. The census tracts meet an area benefit national objective.

Targeted areas consist of low-and moderate-income concentration areas with several of those areas at 62% Low/Mod and incomes at or below 80% of Area Median Income determined through HUD generated Low-and Moderate-Income Summary Data. Additionally, the targeted areas spread of Cattail St. is 73% Low/Mod and Louie Carter Rd. is 57% Low/Mod. "White alone" and "non-Hispanic" are the most affected racial/ethnic groups based on population density. According to the data the County evaluated, there is not a substantial minority concentration in one specific area of the county.

### **Geographic Distribution**

#### **Target Area**

County wide low-and moderate-income CTS  
County wide low-and moderate-income areas Code Enforcement

**Percentage  
of Funds**  
80%

#### **Table 58 - Geographic Distribution**

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

#### **Geographic Distribution**

Target Area: Clay County Low and Moderate-Income areas

Percentage of Funds: 80.0%

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

Funding is being targeted to areas that demonstrate a community development need and where there is a concentration of low- and moderate-income persons and minority population. The geographic allocation of the CDBG funds is also a factor of program requirements that at least 70% of CDBG funds benefit low- and moderate-income persons.

**Discussion**

Clay County's goal is to improve the quality of life for Clay County residents and aim to have local municipalities, engaged citizens, and the County working together to better align resources, to revitalize and redevelop communities, and protect natural resources.



## AP-55 Affordable Housing – 91.220(g)

### Introduction

Providing access to affordable housing for all residents continues to be a high priority for Clay County. Affordable housing will be provided through the use of Federal CDBG, and State SHIP funds. Priorities include the rehabilitation of new and/or existing owner, rental, homeless and special needs housing for low-and moderate-income households.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	150
Special-Needs	0
Total	150

**Table 59 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	15
Acquisition of Existing Units	0
Total	15

**Table 60 - One Year Goals for Affordable Housing by Support Type**

### Discussion

The County seeks to assist low-and moderate-income households with their housing and community development needs, activities support persons with special needs such as the elderly or persons with disabilities.

These activities include:

- Improvements to facilities that serve persons with special needs, including persons with disabilities and persons with drug or alcohol addictions.
- Housing rehabilitation for income eligible homeowners, which may include accessibility retrofits for the elderly or persons with disabilities. The maximum award to any homeowner is \$30,000.
- Demolition & Replacement of Mobile Homes: funding for the replacement of an existing mobile home dwelling that has been determined not economically feasible to rehabilitate the existing mobile home. This will only be available to persons over 65, disabled or those who have special needs.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

Clay County does not have a Housing Authority division, the County does partner with Flagler County Housing Authority to manage Clay County's Section 8 Voucher program. There are 190 families that took part in the voucher program in Clay County. Currently, 68 of the 190 families moved to Flagler County under HCV portability. The rest remain from the baseline voucher program. The total baseline for both Counties is 352.

There is one waiting maintained for both Counties and is not broken down or set aside any specific number of vouchers by County. When the waiting list is opened, it is for anyone who wishes to apply and to be housed in either jurisdiction (Flagler or Clay).

### **Actions planned during the next year to address the needs to public housing**

N/A

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

N/A

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

N/A

### **Discussion**

Clay County does not have a Housing Authority division, the County does partner with Flagler County Housing Authority to manage Clay County's Section 8 Voucher program. The County will continue to explore and groom additional partnerships with local housing authorities that are close to the locale such Jacksonville, Palatka, and MacClenny.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(I)**

### **Introduction**

Clay County does not receive funding specifically to assist the homeless population. Clay County is an active member of the regional Continuum of Care (FMCoC), which is the organization that acts as the regional planning body to address homelessness in the region. This collaborative group addresses homeless issues including chronic homelessness, homelessness prevention, and discharge coordination policies on a regional basis in Duval, Nassau, and Clay Counties. Through active membership, Clay County supports the CoC's plan to achieve net zero for chronic homelessness.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Clay County will work with and support regional organizations that address the needs of the homeless population.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Clay County will continue to monitor the number of homeless in the county and will evaluate the need for a homeless facility or shelter in the future.

### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

Clay County will work with and support regional organizations that address the needs of the homeless population.

### **Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

Clay County will work with and support regional organizations that address the needs of the homeless population.

### **Discussion**

## **AP-75 Barriers to Affordable Housing – 91.220(j)**

### **Introduction:**

Clay County faces barriers to affordable housing that are common across housing markets, including limited supply of developable (e.g., zoned) land particularly for multi-family rental housing, which increases the cost of acquisition and development of the land. Also, few resources exist beyond Low Income Housing Tax Credits to provide the appropriate subsidy for development of affordable rental housing. Another common barrier is negative reaction from neighbors regarding affordable housing development based upon a misconception that property values will decline and an increase in parking and traffic. Finally, while the economy is strong in Clay County, incomes are not rising high and fast enough to meet the cost of single-family homeownership.

**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**

Clay County has identified several governmental constraints to the development, maintenance, and improvement of housing and affordable housing, as follows: Zoning Code Amendments, Lot Consolidation, and Monitoring of Planning and Development Fees. Nongovernmental constraints were identified as follows: Land Costs, Construction Costs, and Availability of Financing. Clay County will continue to review and examine all real and perceived barriers to affordable housing and seek to remove or ameliorate them.

### **Discussion:**

Please see discussion above.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Listed below are the actions planned to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

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

The obstacles that Clay County faces are barriers to affordable housing include lack of funding (federal, state, local) for affordable housing, limited land availability, high utility/maintenance costs in older housing units, cost prohibitive tree/landscaping requirements, aging mobile home parks, smaller units in demand but not cost feasible to construct, and tenant barriers including Fair Housing issues. In terms of specific gaps, most needs are generally met in some way through community partners; however, the amount of need almost always outweighs the available funding. More specific deficits in the quantity and quality of affordable housing were identified during the citizen participation process. Affordable housing continues to be a concern for Clay County, primarily due to the widening gap between median income and median home values and rents, and due to limited land availability. Related to housing affordability, homelessness also continues to be an area of concern. Underserved populations in Clay County include the elderly; mental illness, or substance abuse/addiction challenges; and persons with disabilities. The County continues to coordinate with a network of community partners and the Continuum of Care (CoC) to address these needs as funding allows.

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

Fostering and maintaining affordable housing that may be lost from the assisted housing inventory is a high priority for the County. The County will use CDBG and other funding to:

- State SHIP funds will also be used to aid households. Provide Housing Counseling and Education to low-to moderate-income households.
- Preservation of the existing housing stock through acquisition and/or rehabilitation of owner or renter housing for low-to moderate-income households using CDBG funds. State SHIP will also be used to preserve additional units.
- Production of new affordable housing through rehabilitation.

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

The Florida Department of Health (DOH) is the primary agency for addressing lead-based paint (LBP) hazards in Clay County. Budgetary constraints have limited lead screening and case management activities; however, the DOH still responds to reported cases of lead poisoning as determined by local pediatricians and health care providers.

The DOH, authorized under the Florida Lead Poisoning Prevention Screening & Education Act, Section 381.985, F.S., and Chapter 64D-3, F.A.C., conducts surveillance of Blood Lead Level (BLL) testing and poisonings in the County, promotes BLL screening for high-risk populations, and provides information to health care providers, individuals, and businesses on lead poisoning prevention. Program activities include surveillance and epidemiology, lead poisoning investigations, primary prevention, and coordinate of care if a person or family is found to have high BLL. The DOH also disseminates information to parents and caregivers, healthcare providers, and renovators and contractors about LBP hazards and screening options. This information includes brochures on keeping children safe from LBP hazards, sources of lead, remediation tactics, and adult lead poisoning prevention at home and in the workplace.

To address LBP hazards, the DOH in Clay County performs BLL testing and coordinates follow-up care if elevated BLL is detected. For children identified with elevated BLL, a lead assessment of the home is recommended. A specialist performs inspections and risk assessments at no charge for families with children having elevated BLL, family day care homes, and day care centers. The DOH in Clay County also works to identify LBP hazards in the environment in conjunction with housing demolition, rehabilitation, and redevelopment activities in older neighborhoods. The primary source of lead exposure among children is LBP in older, deteriorating buildings.

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

Clay County's strategy to reduce the number of poverty-level families is multi-faceted and relies on the cooperation of numerous partners throughout the County and greater Jacksonville region. These partners include County departments, economic development partners such as the Economic Development Corporation and the regional JAXUSA, public service providers, the Continuum of Care, housing authorities, public and private organizations (e.g. non-profits and community development corporations), and other stakeholders in community development activities. These stakeholders will work in concert to address a variety of interrelated social issues, including disparities in education and training, unemployment, limited access to healthcare, family instability, criminal background, inadequate housing, deteriorating neighborhoods, and transportation disadvantage.

The County's goals are to address the categories of affordable housing, homelessness, non-homeless special needs, and non-housing community development are all anti-poverty strategies. Clay County will connect poverty-level individuals and families with publicly available services, including healthcare resources, emergency financial assistance, housing assistance, justice coordination, senior/elderly services, and social security and disability benefits. These programs support social and economic stability for residents, particularly those with special needs. Economic Development Partners – Offer employment and job skills/workforce training programs for low- and moderate-income individuals. Such partners include Clay CareerSource. The Salvation Army, Goodwill Industries, among others can also connect poverty-level persons and persons with disabilities with employment opportunities. Beyond any Countywide program or initiative, Clay County also supports HUD's Office of Economic Resilience strategies for enhancing equity and inclusion. Within Clay County, there is a disproportionate percentage of poverty-level individuals among minority racial and ethnic groups (2013-2017 ACS). Therefore, anti-poverty strategies must also address equity, inclusion, and fair housing. HUD's equity and inclusion strategies include building inclusive government structures; identifying regional barriers to opportunity; prioritizing

investments to equalize opportunity; and improving the location of transportation assets to improve access to employment.

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

Clay County is the lead agency in administering the CDBG grant funds. Clay County's Planning office has a strong support system internally and externally. The Public Works Department work with various neighborhood/resident committees to obtain requests for projects such as sidewalks, parks improvements, areas in need of improved drainage, road improvements, and other community development needs. Clay County works closely with local nonprofit organizations to implement various public services activities.

In terms of specific gaps, most needs are generally met in some way through these community partners; however, the amount of need almost always outweighs the available funding. More specific deficits in the quantity and quality of affordable housing were identified during the citizen participation process. Affordable housing continues to be a concern for Clay County, primarily due to the widening gap between median income and median home values and rents, and due to limited land availability. Related to housing affordability, homelessness also continues to be an area of concern. Underserved populations in Clay County include the elderly; mental illness, or substance abuse/addiction challenges; and persons with disabilities. The County continues to coordinate with a network of community partners and the Continuum of Care (CoC) to address these needs as funding allows.

Clay County will continue to network with participating cities and towns, elected officials, citizens, non-profit and for-profit stakeholders, and the Continuum of Care (CoC) to identify community needs, make these needs widely known to stakeholders, and identify projects or programs and funding opportunities to address these needs. In order to improve the preservation and production of affordable housing within Clay County, the County plans to emphasize a transit-oriented/activity center development framework that will foster affordable housing proximate to transportation and employment opportunities. The County will also utilize leveraging and matching of federal funding, particularly with state and local funding sources such as SHIP that are specifically designated for housing and/or economic development activities. The preservation and production of affordable housing, as well as housing/rental assistance, is overseen by the Clay County Planning Department's Community Development Division and implemented through a network of non-profit and for-profit housing developers and organizations.

In order to improve the funding of public services, particularly for homeless and special needs populations, the County will support the CoC member organizations in the development of projects or programs that address priority needs, and encourage applicant subrecipients to leverage and match federal funding with state and local funding sources to address priority needs. Such investment will be focused in areas of concentrated poverty, such as the Target Areas identified previously. The provision of public services will be overseen by the Community Development Division.

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

Key agencies that are additional resources that may be available are described below. The County's Community and Social Services Division works with private sector partners to coordinate actions and address the public's requests for assistance.

#### *Public Sector*

The Community and Social Services Division which includes Veterans Services, Animal Services, Volunteer/SWEAT Coordinator, and Rental Assistance Lead will assist as needed in getting those in need the assistance that they require. Clay County Health Department offers a variety of services and programs to residents such as childcare licensing, childhood lead poisoning, family planning, WIC and women's health, among others. Flagler County Housing Authorities administers Clay County's Section 8 Voucher Program. A host of non-profit agencies that serve target income households within the County. A coordinated effort is necessary to facilitate service provisions to varying groups throughout the County. As members of the Consortium, Cooperating Cities will be instrumental in accomplishing identified goals and activities.

#### *Private Sector*

The private sector is an important collaborator bringing additional resources and expertise that can be used to supplement existing services or fill gaps in the system. Lenders, affordable housing developers, business and economic development organizations, and private service providers offer a variety of assistance to residents such as health care, small business assistance, residential mortgage programs, commercial lending and assisted housing, among others.

#### **Discussion:**

The County is committed to continuing its participation and coordination with Federal, State, municipal and local agencies, as well as with the private and non-profit sector, to serve the needs of target income individuals and families in the County. In particular, the County will continue to work in close coordination with County departments regarding infrastructure improvements and the provision of services.

The allocation of priorities for housing activities (i.e., rehabilitation and mobile home replacement), code enforcement and infrastructure improvements were determined through several processes including but not limited to public hearings, outreach and listening sessions and a citizen survey to gauge the activities and projects the public deemed important.

The proposed housing activities (i.e., rehabilitation and mobile home replacement), code enforcement and infrastructure improvements that will take place in low- and moderate-income areas of Clay County are critical to sustaining the quality of life of residents and businesses in the area. This decision allows improvements to be directed to a concentrated area utilizing the limited CDBG resources available. The limiting factor in addressing underserved needs in Clay County are the lack of sufficient CDBG funding allocations as well as other resources to address all the needs.



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

### Introduction:

The County under section AP-20 "Annual Goals and Objectives" have identified its targeted activities planned with respect to all CDBG funds expected to be available during the program year (including program income that will have been received before the start of the next program year). Unfortunately, the County does not receive HOME/American Dream Down Payment Initiative (ADDI) or Emergency Shelter Grant (ESG) funds.

Clay County submitted its first Community Development Block Grant (CDBG) program application to the Department of Housing and Urban Development (HUD) on August 16, 2021. HUD disapproved the application on August 17, 2021. The principle issue identified was a difference in the reported entitlement funding to be received by the County. The initial amount projected to be received by the County was \$1,069,125.00, however on May 13, 2021 the amount was increased to \$1,084,880.00.

This substantial amendment to the approved FY2021-2025 Consolidated Plan, FY2021-2022 Annual Action Plan and Citizen Participation Plan addresses the issues identified by HUD.

### 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>	<b>0</b>

### Other CDBG Requirements

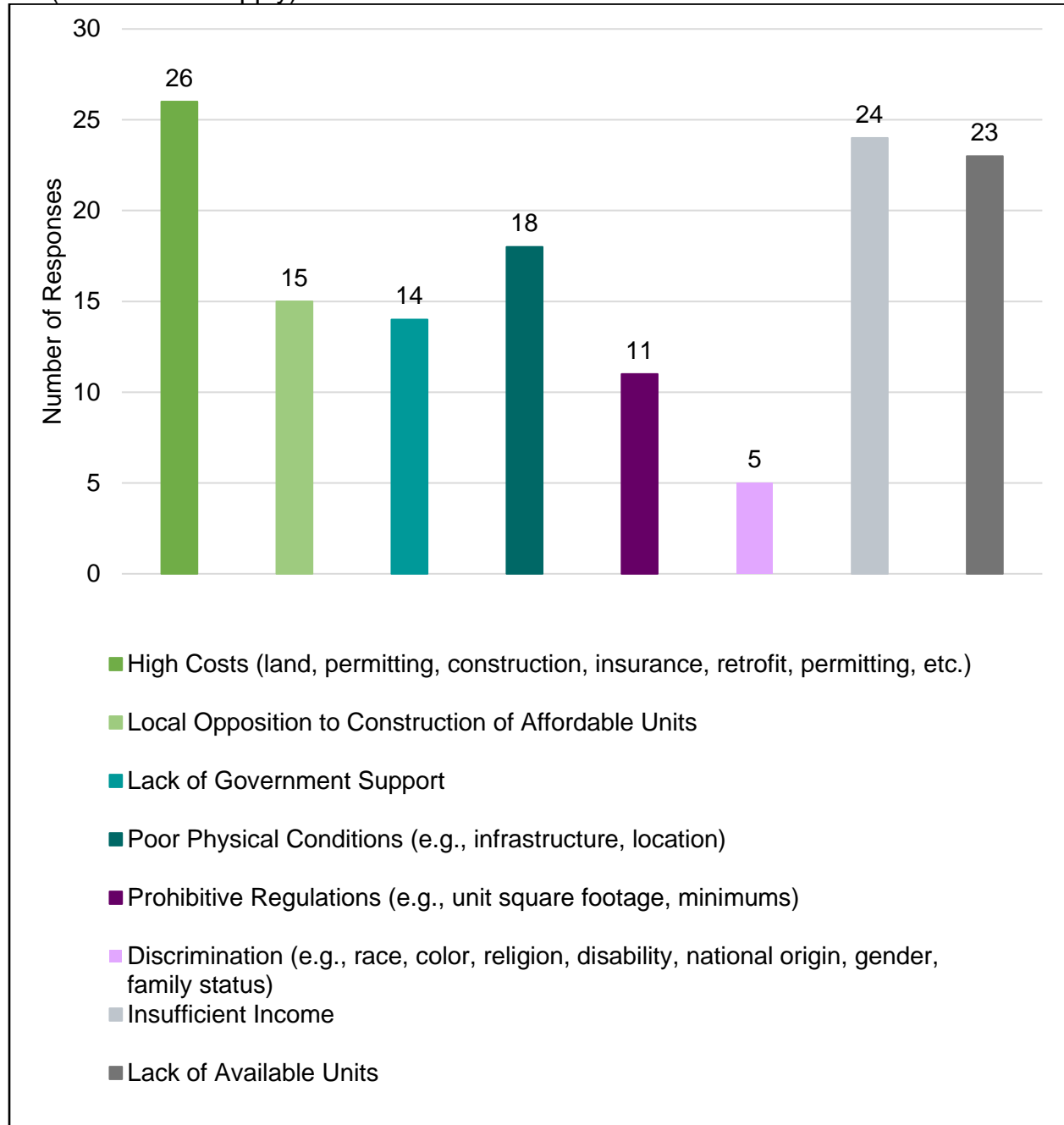
1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

One hundred percent of activities funded in the 2019-2020 Annual Action Plan focus on Clay County's CDBG target area which encompasses the residential core of the County. The County does not anticipate the receipt of any program income since it is a first year CDBG Entitlement Community.

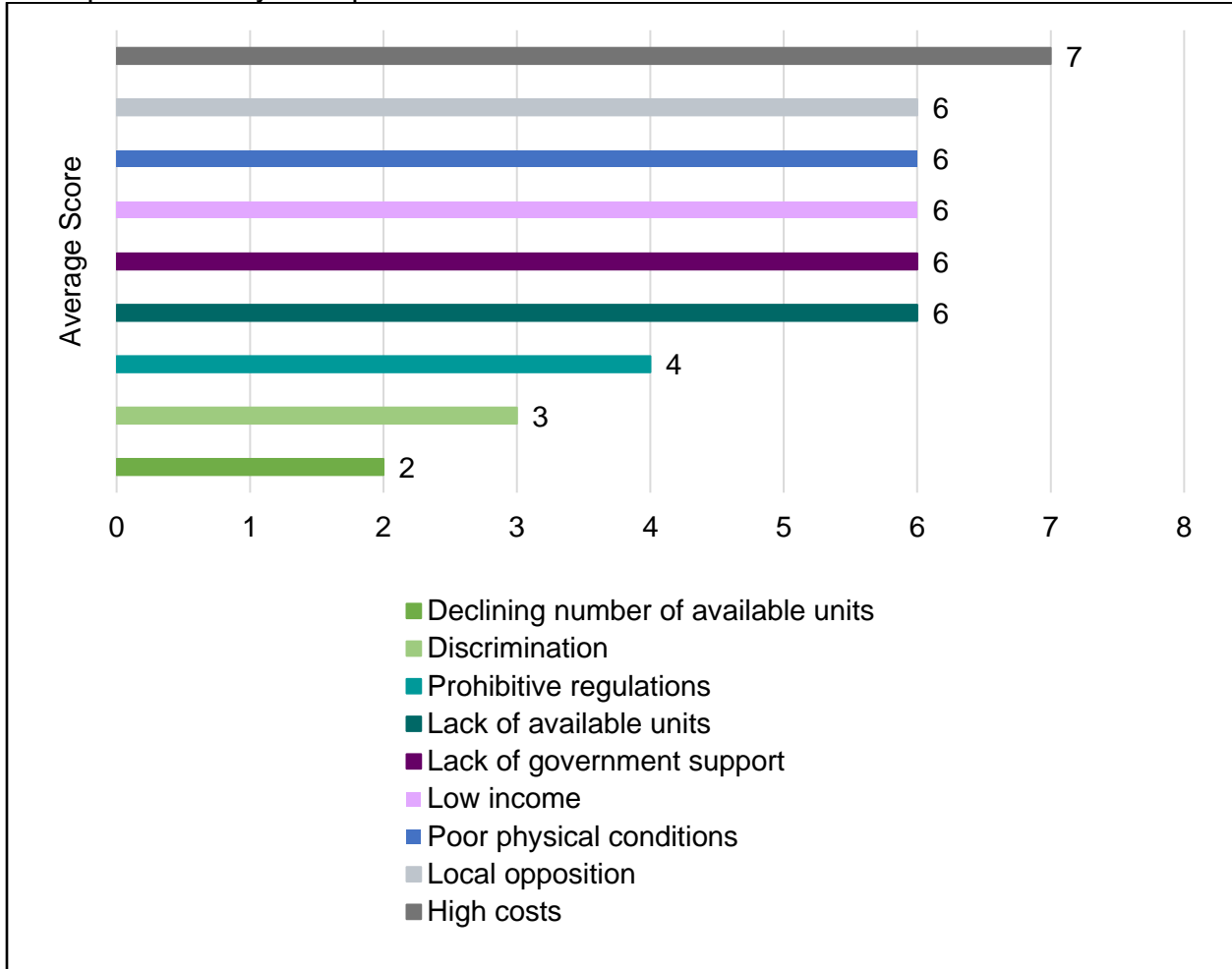
## Appendix

### Survey Results

1. Have you experienced or observed any of the barriers to fair housing listed below (check all that apply)?



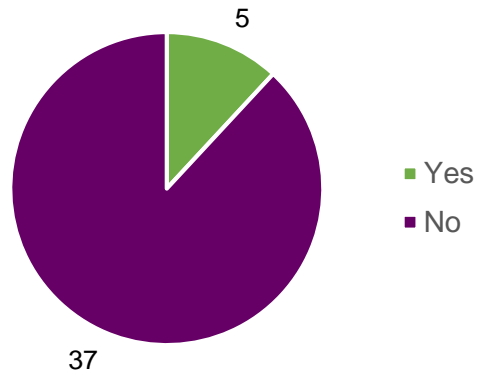
2. Of the options listed below, what three, if addressed, would have the greatest impact? Rank your top 3 choices.



3. Please describe other barriers (if any) to fair housing you have experience or observed.

Workforce  
 Affordable County  
 Clay  
**Housing**  
 Lack Homes  
 Public High  
 Fees Rent

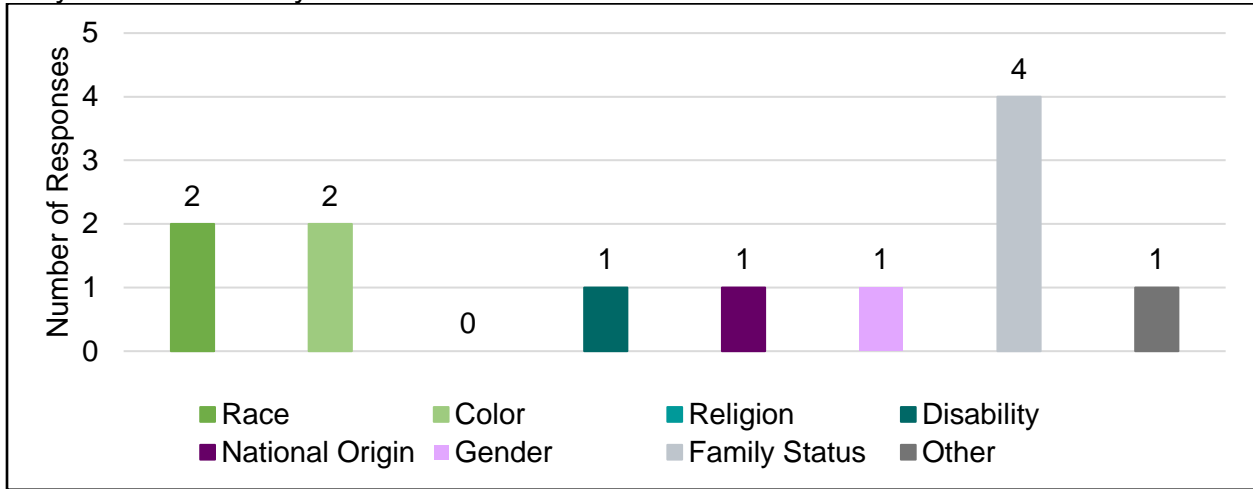
4. Have you encountered housing discrimination in Clay County?



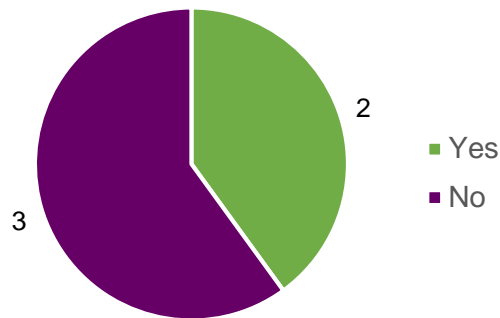
5. You answered "Yes" to Question 4. Please identify the type(s) of discrimination you or someone you know.



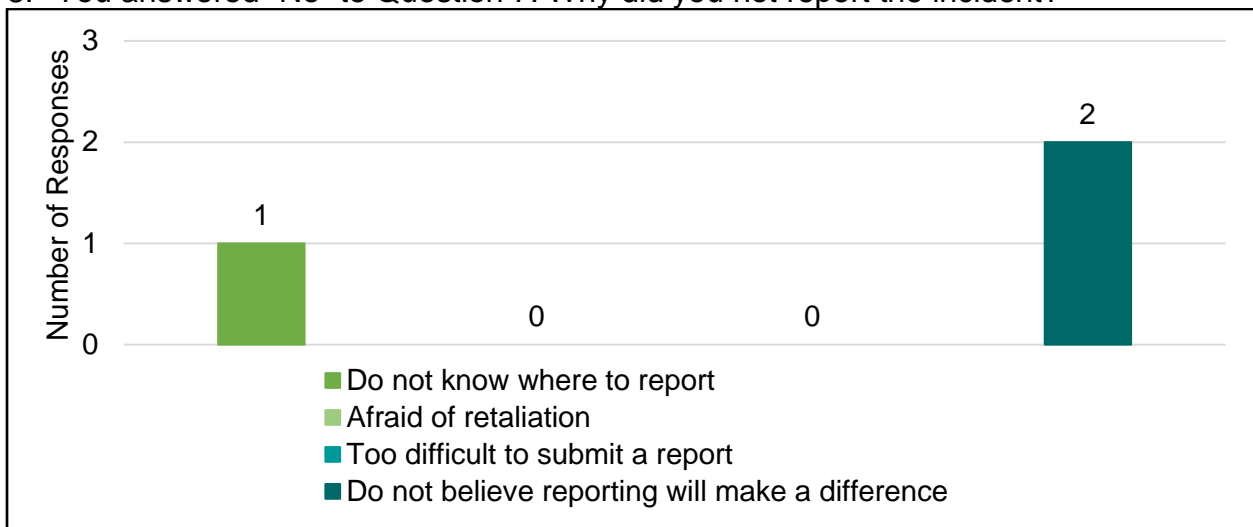
6. You answered “Yes” to Question 4. Please identify the basis of the discrimination you or someone you know.



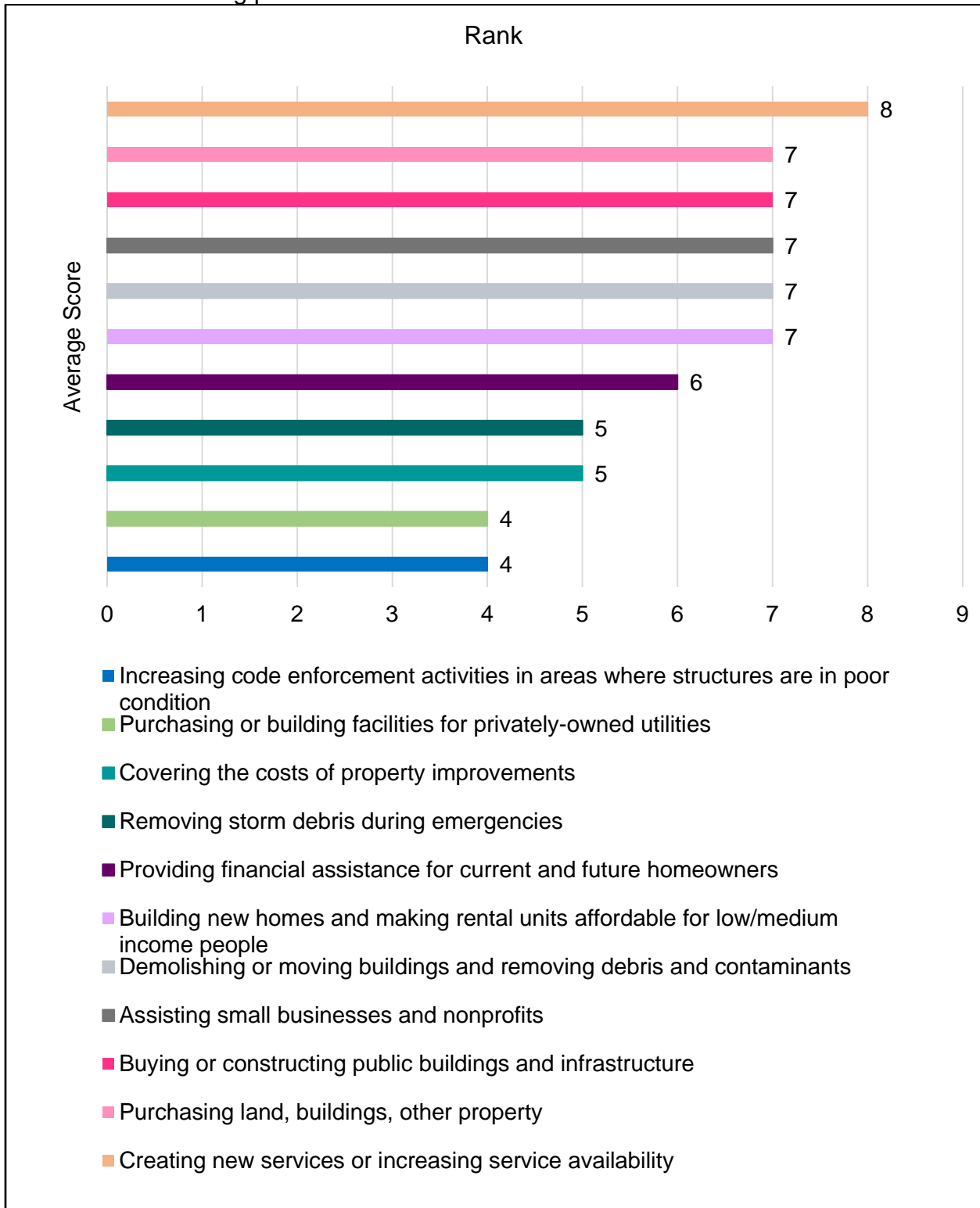
7. You answered “Yes” to Question 4. Did you report the incident?



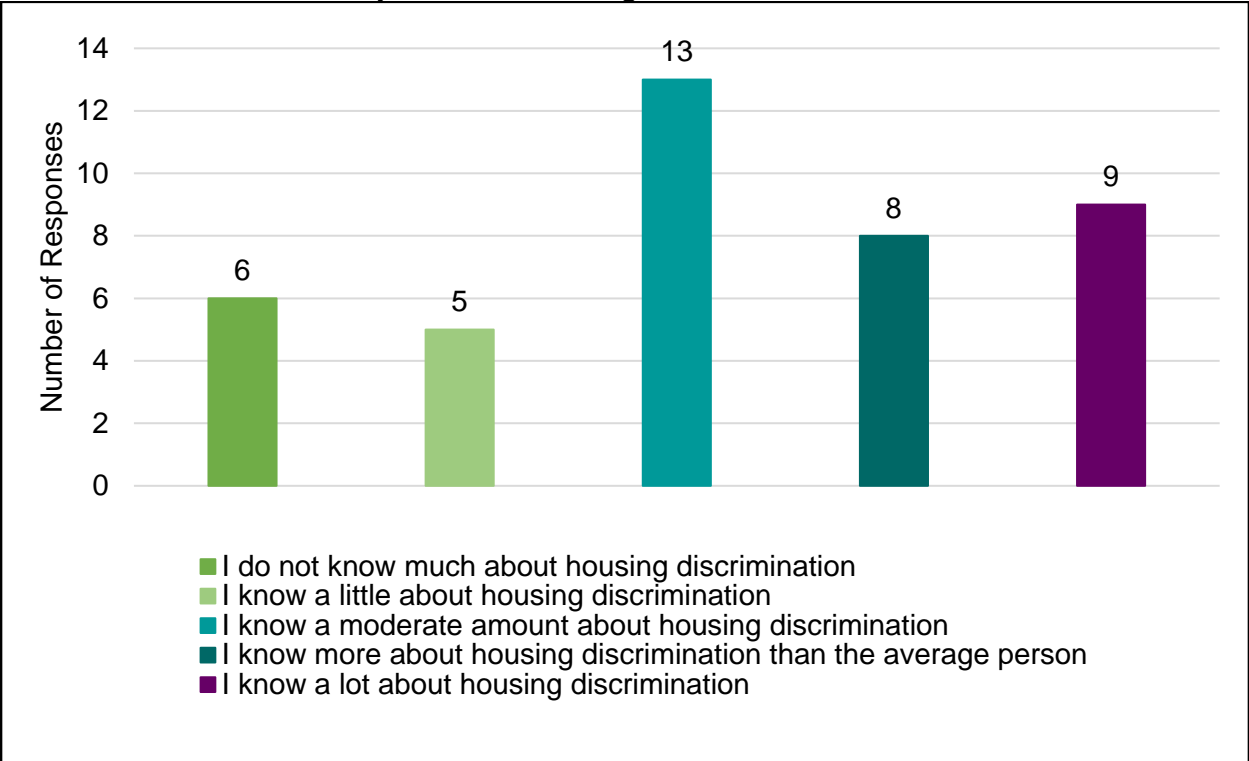
8. You answered “No” to Question 7. Why did you not report the incident?



9. Rank the following potential actions.



10. How well-informed are you about housing discrimination?



11. What would you do if you encountered housing discrimination? Describe your actions in brief below.

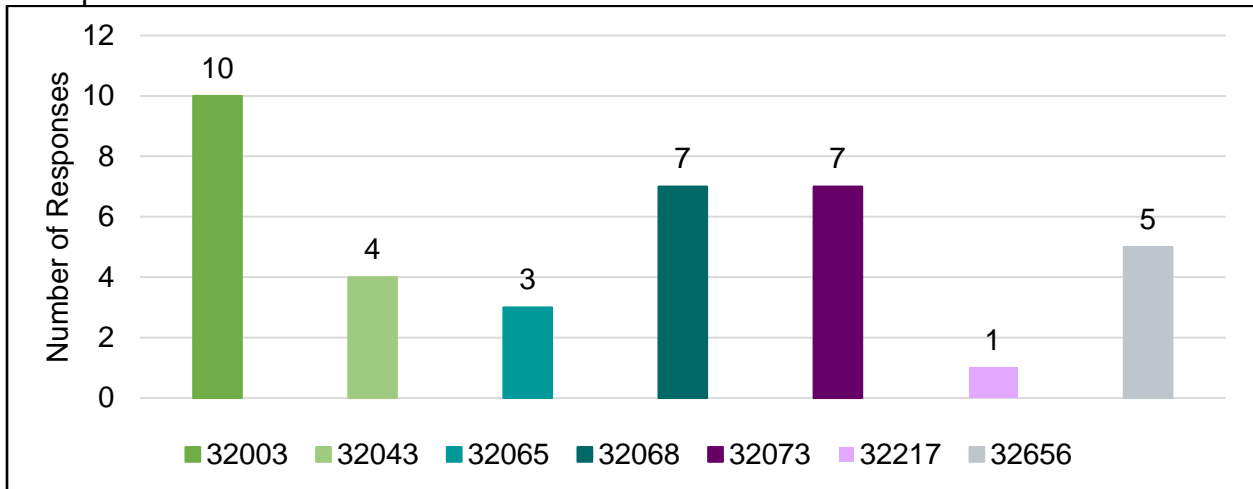
- *“Based on type of discrimination, [I would] try to locate correct agency for assistance.”*
- *“I educate people if I know about available options that can help.”*
- *“Document and report to the Fair Housing Advocate in Clay County.”*
- *“Take legal action. There are laws in place both at the Federal and State level that prohibit housing discrimination.”*
- *“Report it to HUD and local government elected officials.”*

12. Is there any additional feedback you would like to provide regarding the Clay County Community Development?

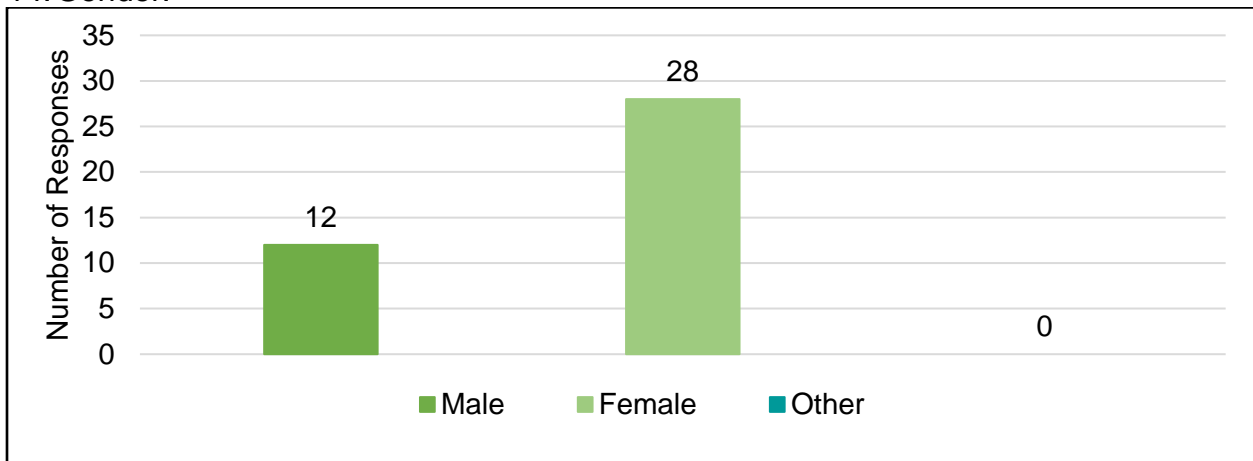
- *“Make sure workforce housing is considered as part of low-income housing.”*
- *“There are several blighted areas around Clay County, specifically Blanding Boulevard, Wells Road, and College Drive. I would be in favor of allocating those abandoned houses, buildings, and other structures so that affordable housing could be built.”*
- *“I would like to see communities created for small, affordable housing.”*



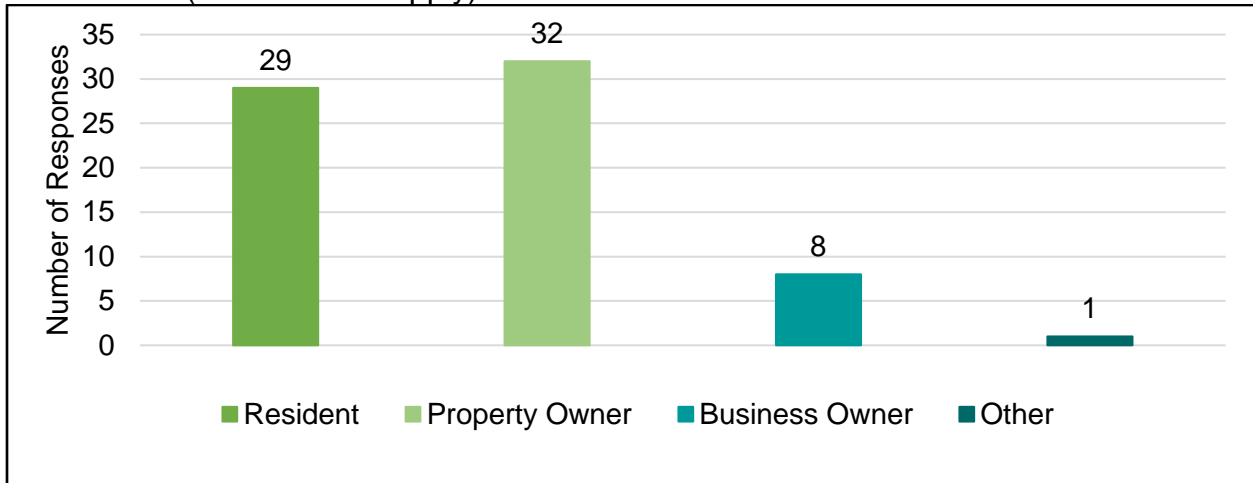
### 13. Zip Code.



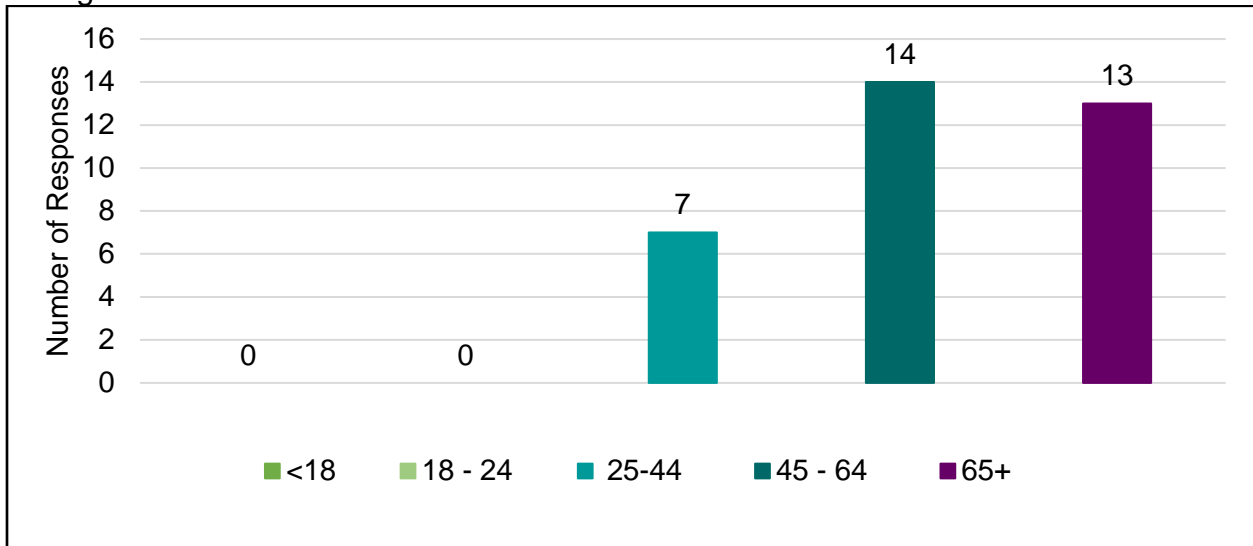
### 14. Gender.



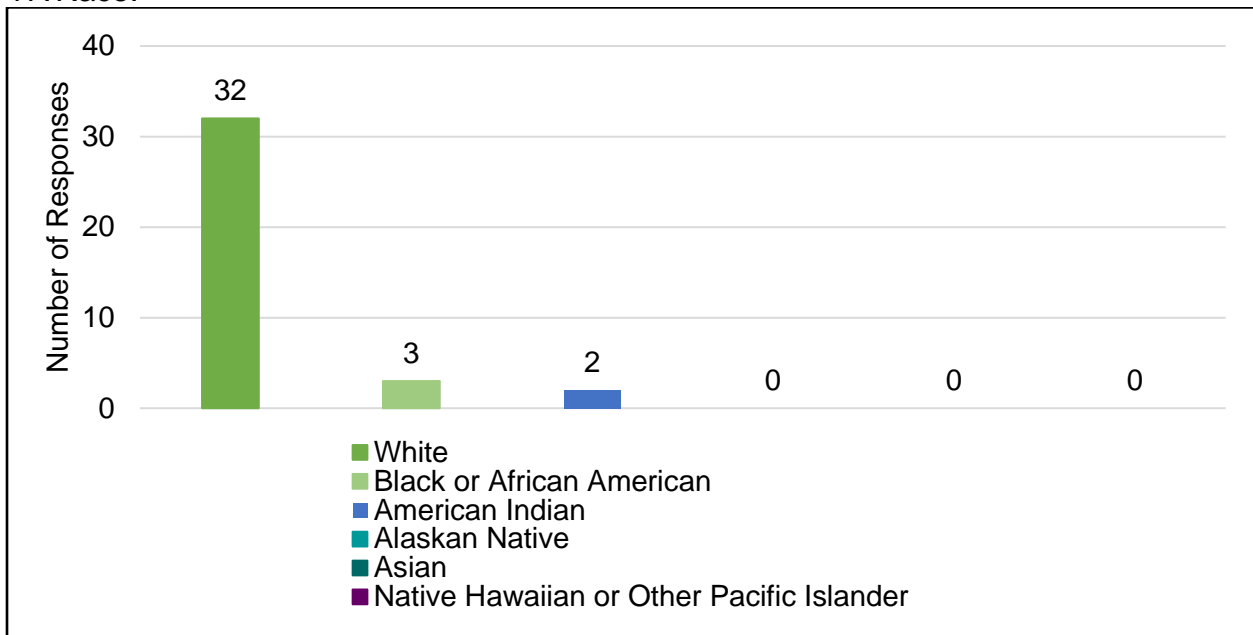
### 15. I am a... (select all that apply).



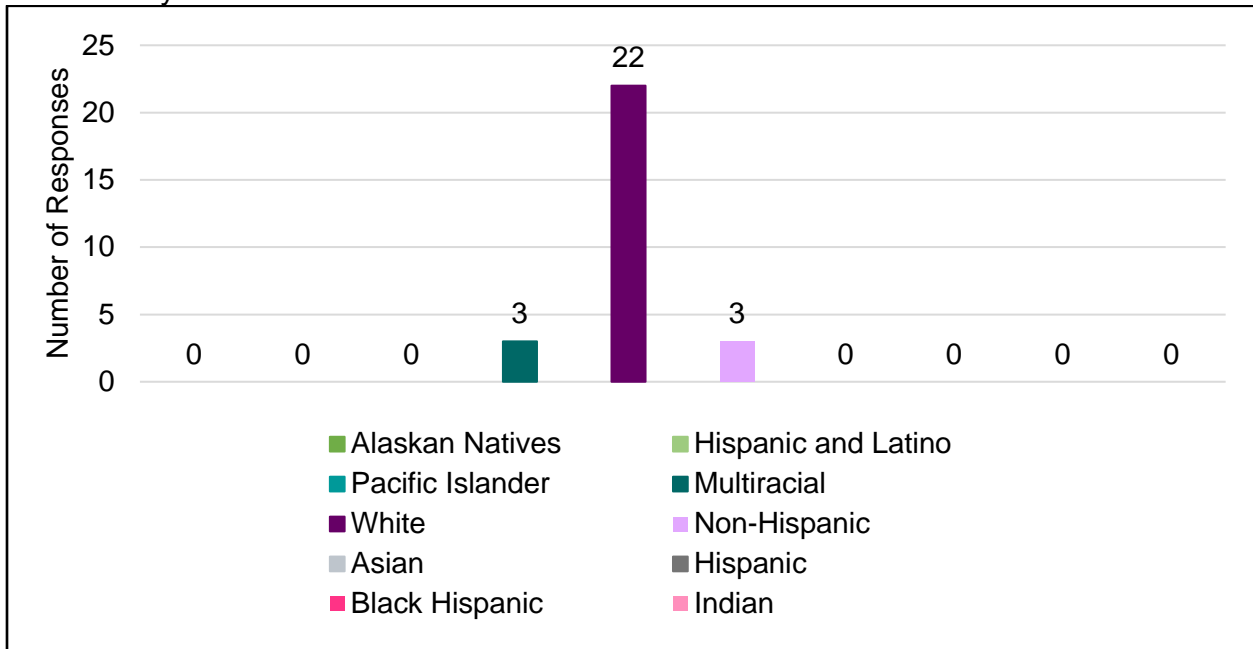
16. Age.



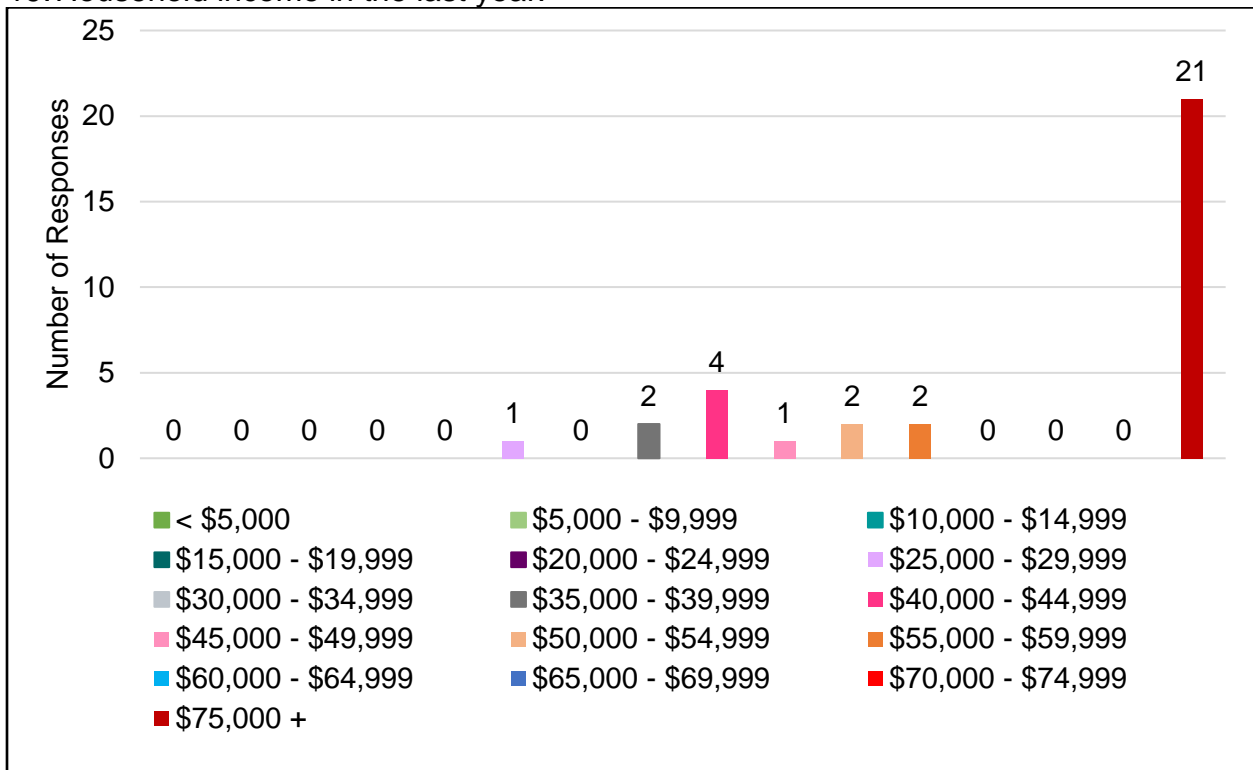
17. Race.



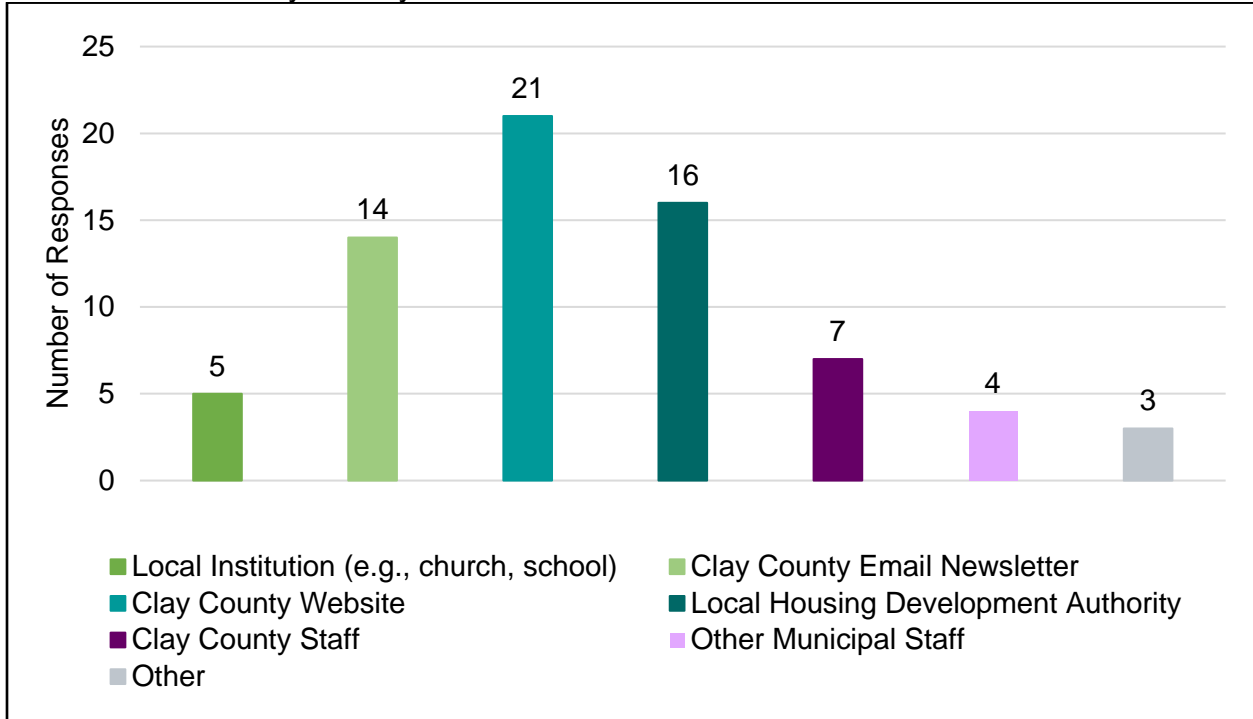
18. Ethnicity.



19. Household income in the last year.



20. From whom would you prefer to receive further information about fair housing incentives in Clay County?



21. Where did you hear about this survey?

- "Email."
- "Text message."
- "Facebook."
- "News."
- "Friend."
- "A local realtor sent it to me."

# **Public Participation**

## **Meeting Minutes – July 23, 2020**

### **RE: Clay County CDBG Consolidated Plan Stakeholder**

- **Meeting Date: July 23, 2020**
- **Time: 9:00 am– 11:00 am**
- **Location: Live interactive video via**
- **Zoom Attendees: Consultant Team**
  - Edward Lehman - *Clay County Planning and Zoning*
  - Susan Grich - *Health Planning Council of Northeast Florida*
  - Pia Julia Geisselmaier - *Health Planning Council Health of Northeast Florida*
  - James Carras - *Carras Community Investment*
  - Chad Riddle - *WGI, Inc.*
  - Heather Danforth - *WGI, Inc.*
- **Attendees: Stakeholders**
  - Chereese Stewart - *Clay County, Economic and Development Services*
  - Howard Wanamaker - *Clay County, County Manager*
  - Patricia Cepeda - *Clay County Health Department*
  - Courtney Ellis - *Florida Department of Health in Clay County*
  - Debbie Sileo - *Clay County*
  - Theresa Sumner - *Clay County, SHIP program*
  - Dale Smith - *Clay County, County Engineer*
  - Don Fann - *The Way Free Medical Clinic*
  - Andrea Atran - *Florida Department of Transportation*
  - Corey Harris - *Neighborhood Housing & Development Corporation (NHDC)*
  - Crystal Moore - *Quigley House*
  - Susan Atwell - *Quigley House*
  - Sherri Cheshire - *Northeast Florida AHEC*
- **Agenda: See Attached**

### **Summary of Meeting Remarks**

This meeting was held with stakeholders and local agencies in Clay County to solicit their input on the housing and community needs of the county. This was a publicly noticed meeting which was specifically geared towards obtaining feedback from key community stakeholders and leadership.

Background of the Community Development Block Grant (CDBG) program was presented to the attendees. The CDBG program is a U.S. Department of Housing (HUD) program which grants money to viable urban communities by expanding economic opportunities and providing housing and suitable living environments, specifically for low- and moderate-income populations. For Clay County to be eligible for this funding, they must first develop a Consolidated Plan. This is a 5-year strategic plan

which assess housing needs and market conditions, makes data-driven and place-based investment decisions, and coordinates county resources. The Consolidated Plan also requires a yearly action plan and reporting, a Citizen Participation Plan, and Analyses of Impediments to Fair Housing.

To date, the county has reached out to incorporated municipalities within the county to invite them to participate in the program. All four municipalities opted out so therefore this plan will only include the unincorporated areas of Clay County. Over the next several months, the consultant team will conduct an analysis to identify impediments as well as how to overcome those challenges. Part of this process is soliciting public feedback on the housing and community needs.

The meeting was broken into smaller groups to discuss needs identified by individual group members, needs of their organization's resources and programs and what their organization brings to the table to address these needs. The groups were asked to identify their top three Clay County community needs and provide recommendations on strategies to address those needs.

### **Summary of Key Findings**

The following is a summary of the top three priorities the attendees identified for Clay County:

- Infrastructure/Transportation/Access
  - Prioritize the built environment.
- Public Health
  - Social determinates of health that affect public safety and access to healthcare; healthcare is a subset of this.
- Housing
  - Affordable housing, rental vs purchase options for low- and moderate-income populations and housing for vulnerable population (seniors, veterans, children/students).

### **Key Findings in Detail**

The following is a detailed description of the priorities for Clay County that each group identified.

Breakout Group #1 – The focus should be on affordable housing, senior needs and infrastructure.

1. Assist in the provision of affordable housing including senior housing.
2. Access and infrastructure needs related to affordable housing – childcare access, safe walkability to healthy places and shopping, drainage/utilities/roadway/internet infrastructure.
3. Road paving – roads may be in poor condition which would inhibit the ability to get public safety to those populations as well as inhibit those populations from accessing health services.

Breakout Group #2 – Discussion included quality of life, health, safety, transportation for seniors, affordable housing, fire rescue, veterans’ services, volunteers, and access to healthcare.

1. COVID 19 – short term and long-term effects are going to affect everything.
2. Economy – Falsely supported thru PPP and CARES grants, employment benefits, long term effects to jobs, housing, manufacturing, tourism. The effects are yet to be seen.
3. Services – Infrastructure and roads aging thorough out county, IT services and fiber.

Breakout Group #3 – The discussion included the balance between accepting grant money and using it wisely and how to balance infrastructure development and support services.

1. Housing – not just new affordable housing but support increasing rental housing.
2. Transportation – voucher or specific route systems.
3. Healthcare and social services – Investment and reinvestment in public health infrastructure through public health department.

**Next Steps**

The team will synthesize the feedback received and continue with various methods of public outreach to obtain more information. Milestone dates for completion of the plan are as follows:

- Prepare Draft Consolidated Plan..... Winter 2020-2021
- Public Comment Period..... Winter- Spring 2021
- Adoption by Clay County..... Spring-Summer 2021

# Clay County

## Community Development Block Grant Consolidated Plan



### Stakeholder Input Agenda

Thursday, July 23, 2020  
9:00am – 11:00am

*Live interactive video via zoom*

#### 1. Introductions

- a. Community Development Block Grant program (CDBG)
- b. The Consolidated Plan
- c. Analysis of Impediments to Fair Housing
- d. Best Practices
- e. Citizen Participation Plan

#### 2. Clay County

- a. Background
- b. Eligible Communities and Households
- c. Some Identified Needs
- d. Best Practices

#### 3. Questions & Discussions

#### 4. Break-out Groups

- a. Instructions
- b. Introduction of Participant Resources and Programs
- c. Identify Clay County Community Needs
- d. Recommendations

#### 5. Report Back

#### 6. Closing

- a. Survey
- b. Outreach
- c. Communication



## Meeting Minutes – February 18, 2021

**RE: Clay County CDBG Consolidated Plan Public Meeting**

**Date: February 18, 2021**

**Time: 6:00 pm – 7:00 pm**

**Location: Live interactive video via Zoom**

**Attendees: Consultant Team**

Edward Lehman / Clay County Planning and Zoning

Susan Grich / Health Planning Council

Valerie Feinberg / Health Planning Council Health

James Carras / Carras Community Investment

Angela Biagi / WGI, Inc.

Andrew Crozier / WGI, Inc.

- **Agenda: See Attached**

### Summary of Meeting Remarks

This meeting was open to the public of Clay County to solicit their input on the housing and community needs of the county, specifically the unincorporated areas. The meeting was advertised on the project website, the Clay County Planning Department website, the Health Planning Council of Northeast Florida website, and social media. In addition, a press release was distributed to 2,078 people registered to receive County press releases, including the media and public information officers. There were 14 RSVPs for the meeting and two attendees from the public.

Background of the Community Development Block Grant (CDBG) program was presented to the public. The CDBG program is a U.S. Department of Housing (HUD) program which grants money to viable urban communities by expanding economic opportunities and providing housing and suitable living environments, specifically for low- and moderate- income populations. For Clay County to be eligible for this funding, they must first develop a Consolidated Plan. This is a 5-year strategic plan which assesses housing needs and market conditions, makes data-driven and place-based investment decisions, and coordinates county resources. The Consolidated Plan also requires a yearly action plan and reporting, a Citizen Participation Plan, and Analyses of Impediments to Fair Housing.

The public was informed of their role in the meeting and after introducing the types of projects that were eligible for funding, they were asked to participate through live polling and open discussions. Final polling data was displayed and recorded by the consultant team.

Over the next several months, the consultant team will analyze public and stakeholder feedback from the public meetings and online surveys to identify the county's preferred priorities and strategies for investing the CDBG funds into the community.

### Summary of Key Findings

The public was informed on what types of projects the block grant funds invested into. These projects were sorted into 3 different classifications (Housing Services, Public Facilities, and Public Services). After further analysis of these classifications, a list of possible areas of investment were presented for each classification. The public was asked via poll to identify which areas of investment should be funded with the block grant. The options that topped each poll were:

- Housing Services: *Acquiring & Developing Property for Affordable Housing*
- Public Facilities: *Broadband Access*
- Public Services: *Childcare and Healthcare*

### **Key Findings in Detail**

The following is a detailed description of the priorities for Clay County identified for each section.

#### **Housing Services**

- The public was asked to choose the following housing services they would like to see the grant money invested.
  - Rehabilitation
  - Emergency Repairs
  - Acquiring & Developing Property for Affordable Housing
- “Acquiring & Developing Property for Affordable Housing” was selected as the top priority.
- When asked to elaborate on their reasonings, the public emphasized that affordable public housing is the most important need right now and several factors have contributed to the issue.
  - The public indicated that there is a major issue with rent-to-own properties in the county. Allegedly, several of these units are operated illegally and the person or entity that owns the property is not correctly identified or documented, preventing the handover of ownership to tenants.
  - The prevalence of landlords not maintaining their property and creating sub-standard living conditions in rental units was also identified by the public.
  - Finally, it was emphasized that indigenous Clay County residence are getting priced out of the county due to the influx of new residence moving into the area.

#### **Public Facilities**

- The public was polled on the following public facility options to prioritize investment of the grant money.
  - Parks
  - Senior Care
  - Streets
  - Sidewalks
  - Water & Sewer Upgrades
  - Broadband Access
- “Broadband Access” was chosen as the top priority.

- The public informed the team that even pre-Covid there were issues in accessing broadband in the unincorporated areas of the county. People do not have the option of broadband even if they are able to afford it because the infrastructure does not cover several rural areas. A member of the public testified that the lack of broadband access is a well-known issue and aggravation in the areas around Keystone Heights.
- Post-Covid has seen the problem exacerbated with people working and schooling from home. Children not having broadband to access their online classes was emphasized as a major problem that could have further ramifications with students getting left behind during Covid.
- Another resident brought up the growing divide in the county and country-at-large between people who have broadband access and those who do not. In 2021, broadband has become a necessity for work and school.
- Other issues that were mentioned as a high priority, but below broadband, including the conditions of the local roads. Several roads in the rural areas of the county are not paved and privately owned. The dirt roads can become hazardous during rainstorms and there are issues of school buses not being able to transverse them during inclement weather conditions.
- Another issue discussed was the poor condition of the county's water and sewer infrastructure in unincorporated areas.

### **Public Services**

- The following public services were presented, and the public was polled on where they wanted the grant money invested:
  - Childcare
  - Healthcare
  - Recreation Programs
  - Education
- There was a tie in the poll with "Childcare" and "Healthcare" taking the top spot.
- Childcare
  - A resident emphasized that childcare has become a major financial burden and the cost of daycare can discourage people from seeking employment because it is more financially feasible to stay home with a child than to have a job and pay for daycare.
  - Another resident stated that there are a lot of resources for people in the county dealing with childcare, but the public may not be aware of them. A better investment may be to increase the public awareness of existing resources than investing in new programs.
- Healthcare
  - A resident who works with the healthcare industry in the county believes that healthcare, and more specifically mental healthcare, should be the priority in this list. There are current resources in the county, but these programs do not have the resources or capacity to adequately help residents dealing with mental health issues. Some resources have resorted to waiting lists.

- It was stated that it was a 30 – 40-minute drive for people living in the Keystone Heights area to access any mental health facility

**Next Steps**

The team will synthesize the feedback received and continue with various methods of public outreach to obtain more information including advertising the survey and project website to the public. Milestone dates for completion of the plan are as follows:

- Prepare Draft Consolidated Plan ..... May 2021
- Public Comment Period..... June 2021
- Adoption by Clay County..... July 2021

# Clay County

## Community Development Block Grant Consolidated Plan



**Public Input Meeting Agenda**  
**Date: February 18, 2021**  
**Time: 6:00 pm – 7:00 pm**

*Live interactive video via zoom*

### **1. Introductions**

- a. Community Development Block Grant program (CDBG)
- b. The Consolidated Plan
- c. Analysis of Impediments to Fair Housing
- d. Best Practices
- e. Citizen Participation Plan

### **2. Clay County**

- a. Background
- b. Eligible Communities and Households
- c. Some Identified Needs
- d. Best Practices

### **3. Discussion & Poll Questions on Clay County Needs**

- a. Eligible housing services
- b. Eligible public facilities
- c. Eligible public services

### **4. Closing**

- a. Online Survey
- b. Future Outreach
- c. Communication



## Public Comments Received

### Public Comment 1

To whom it may concern:

I would like to submit the following public comments in regards to the CDBG plans. I am the pastor at Mission of the Dirt Road, a small church that functions like a community center and is intentionally located in High Ridge Estates, a low-income neighborhood in the unincorporated area near Keystone Heights. I grew up in Keystone Heights, but my family recently moved into High Ridge. I'm very familiar with the neighborhood and the struggles that people in the neighborhood face.

I've done some research and discovered the following information:

In 2002, North East Florida Regional Council labeled High Ridge Estates (Keystone Heights, FL) as an antiquated subdivision and stated that it was at risk of becoming an area of blight. I've attached the white paper to this email. While some neighborhood roads have been paved, there have been few improvements to the infrastructure of the neighborhood. High Ridge Estates may be an area of blight. Many roads remain unpaved and a few roads are even impossible to traverse without four wheel drive. In addition, many of the wells in the neighborhood are shallow wells and are in need of being replaced; however many of the residents are unable to afford the cost of a new, deeper well. In 2019, while a family was trying to replace their well, a sinkhole formed in the neighborhood, creating a dangerous situation for neighbors and compromising other wells near them.

Mission of the Dirt Road estimates that 43% of families in High Ridge Estates live on \$25,000 or less and 14% live on \$10,000 or less. These estimates are based on data from the 2010 Census.

High Ridge is larger than the Keystone Heights city limits in land mass, and I believe the population is about the same.

There are still many roads (Notre Dame, Antioch, Cambridge, Harvard to name a few), which depending on the weather are impassable without driving into someone's yard to avoid the extremely soft sand or the puddles that cover the whole width of the road. Puddles can be 10 feet across and a couple of feet deep at their lowest points.

I have at times known between 5-7 families without water because their shallow well went bad and they couldn't afford to replace it. I know of at least one family, towards the front of the neighborhood (FL-100), who have already connected to CCUA's lines that run along the front of the neighborhood. Another section of the neighborhood is adjacent to CCUA lines that run on Triest Circle, an area within KH city limits. It seems

that developing CCUA infrastructure to insure that the residents of this neighborhood would have access to clean water would be a great use of funds.

Rent in our neighborhood is usually about \$750/month for a mobile home that often doesn't meet code. Sometimes it doesn't have water, electricity, or just isn't up to code. People rent these places because they are just desperate for something to rent. In the last month, I've been in conversations with 3 different families who needed a place to rent, since the beginning of the pandemic the rental inventory has seen even less availability. All three families, even though they had sources of income and proof of their ability to pay rent, couldn't find a place to rent in Keystone. All three families ended up moving out of Clay County. I spoke to two realtors in the Keystone area about the lack of rental inventory. Both realtors agreed that our area could easily support a 50 unit apartment complex.

I would estimate that about 90% of the homes in High Ridge are mobile homes, meaning they don't qualify for assistance through SHIP in Clay County, even though many of these homes are older and in disrepair.

I would be happy to talk further or drive/walk some of the neighborhood with anyone who might be interested in seeing this neighborhood and the challenges that we face.

--

Rev. Carey Morford  
Mission of the Dirt Road, Pastor  
[missionofthedirtroad.com](http://missionofthedirtroad.com)  
office: 601-LOVE-473  
cell: 352-215-9379

## **Public Comment 2**

Concerning the Clay County GDBG Grant Proposal:

1. Skimming 20% of the grant for 'Administrative Expenses' may be a common practice but it is not necessary and way out of line with actual costs. This figure probably includes most of the expenses for the Department and thereby shifts most of the cost from the County to the Feds.
2. It would be nice if there were more detail as to where the grant money was actually going to be spent and what for so there is no shell game of shifting the money around after the fact so that it never gets to where it is most needed, namely, the rural roads and housing of western Clay County which usually is not considered when allocations for roads and bridges are made.
3. High Ridge Estates in Unincorporated Keystone Heights is seriously in need of a Taskforce approach to remediation if and when CDBG funds become available. I hope that the County will seriously look at this area for some help.

4. Please note that there are more Zip Codes in use in Clay County than just the two you have in your application.

Thank you for your hard work. This is an excellent grant application packet.

Cheryl Owen  
[cjhooveroween@att.net](mailto:cjhooveroween@att.net)  
352-235-4161  
7980 St. Rd. 100  
Keystone Heights, Fl. 32656

### **Public Comment 3**

Working for a ministry that receives calls daily regarding housing has really provided me with first hand knowledge of the housing crisis we face here in Clay County. Prior to working here, I worked with the Homeless Education Program with CCDS for 12 years, and the crisis was already apparent at that time. Coming into Mercy was just a natural progression from that position and the problems have remained the same.

It's always been understood that no one here wanted a homeless shelter, but homelessness is here and soon it will be in our faces more. Providing dignity and respect to those who are less fortunate than many of us is paramount in making real life change. Providing immersive communities where families who would otherwise be very low income can feel part of a larger community and have that community provide some encouragement and desire for lifelong change would be great and less intrusive than the "projects" that most think of when they think low income.

Clay County, please consider affordable housing here! We are trying to meet the need, but with nowhere to send people, the work we are trying to do is very difficult. Imagine the helplessness these individuals and families feel.

With gratitude,  
*Melissa Whitaker*  
Program Manager  
Mercy Support Services

### **Public Comment 4**

In working for Mercy Support Services as a Call Center Care Agent and Program Associate, 80% of our calls are clients who are in desperate need of affordable housing (most are the working poor level) and unfortunately, we have to tell them that there isn't any affordable housing in Clay County and those that are working above that level finds



it difficult to identify affordable housing as well. This is a real need in the county and hope that as a community we can help those that are less fortunate than others.

Phyllis Simpson  
Mercy Support Services Call Center Care Agent

### **Public Comment 5**

Please help Clay County to better service the citizens of our community who are most in need! The greatest heartbreak in what we as an organization hear on a daily basis is the need for housing yet the lack of anything available that is affordable for lower income and workforce families in our community. There is nothing more disheartening than having to refer our very own Clay county citizens (many who have grown up here for generations) to other counties in order to find a home. This just isn't right. We need to be building our communities and providing opportunities FOR ALL families to thrive!

Peace & Blessings,

Dena Collins  
Mercy Support Services Director of Operations

### **Public Comment 6**

Sirs:

In regards to affordable/workforce housing, there is a woefully inadequate supply of both single family and multifamily dwellings available for purchase or rental. The average price for housing has increased to the level that first responders, teachers, nurses and other essential workers can no longer afford to live within the county limits. State funding for affordable housing available from the Sadowski Trust Fund has been "swept" into general revenue for purposes other than affordable housing. The original intention of the Trust Fund has been ignored by the legislature and the residents of our county and other counties throughout the state have suffered as a result.

10.6% of Clay residents live at or below the federal poverty level and an additional 26% live at or below the ALICE (Asset Limited, Income Constrained, but Employee, i.e., the working poor) level. 21% of Clay residents pay more than 50% of their income for housing, well above the national average.

While non-profit private organizations, such as ours, are attempting to help the situation, we can not do it alone. We have 10 years of success with our self-sufficiency program, but struggle to find adequate, safe and affordable housing for our graduates who are often in entry level jobs. With over 900 unaccompanied youth in the Clay County School System, we, like others, are trying to end the cycle of poverty by housing and mentoring high school seniors to lead them onto a path of self-sufficiency.

Your attention to affordable/workforce housing is urgently needed.

Respectfully,

Dr. Robert R. Cowie  
Chair, Board of Directors  
Mercy Support Services  
515 College Drive  
Middleburg, FL 32068904/297-4052

## **Public Comments Received – Substantial Amendment**

**Comment period: August 30 through September 28, 2021; No comments from the public were received in response to this Substantial Amendment.**