

Clay County Board of County Commissioners
FY 2021 – 2022 Consolidated Annual Performance and Evaluation Report (CAPER)

Clay County
477 Houston St.
Green Cove Springs, Florida 32043

Table of Contents

CR-05 – Goals and Outcomes

CR-10 – Racial and Ethnic composition of families assisted

CR-15 – Resources and Investments 91.520(a)

CR-20 – Affordable Housing 91.520(b)

CR-25 – Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

CR3-30 – Public Housing 91.220(h); 91.320(j)

CR-35 – Other Actions 91.220(j)-(k); 91.320(i)-(j)

CR-40 – Monitoring 91.220 and 91.230

CR-45 – CDBG 91.520(c)

CR-65 – Persons Assisted

CR-75 – Expenditures

CR-05 – Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Major accomplishments during this year's action plan included the initial review of 188 applications for home rehabilitation and code enforcement assistance and approval of 118 applications for home rehabilitation and code enforcement assistance in low to moderate income areas of the County.

An applicant had the ability to request assistance for more than one eligible activity. The application breakdown for individual assistance included:

108 home rehabilitation projects (10 of these projects were also inspected during the funding period.)

25 mobile home replacement projects

9 code enforcement projects

The County also resurfaced Louie Carter Road in Middleburg, Florida, which benefited a residential area of 100 low to moderate income families.

Additionally, two community clean-up days to resolve code enforcement issues were organized in High Ridge Estates. These projects aligned with the High Ridge Initiative, a community led effort to improve the quality of life in one of the County's low to moderate income areas.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

FY22 was the first year of CDBG Entitlement Funding for Clay County. As such, County staff had to develop a new process for receiving applications for assistance, reviewing, and approving applications, identifying or hiring new staff to manage the day-to-day activities of the program, and finding area contractors to assist with the activities outlined in the Annual Action Plan.

The County achieved its predicted outcomes for the resurfacing of Louie Carter Road. However, due to national inflation and higher than expected costs of resurfacing Louie Carter, infrastructure funding was not available to pave Cattail Street, which was identified as a secondary infrastructure project in the Annual Action Plan.

Additionally, the County was transitioning out of the COVID-19 public health emergency during the 2021 – 2022 Annual Action Plan period.

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

CDBG funds were used to make progress towards achieving the following objectives outlined in the Annual Action Plan –

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

FY22 Activities – 188 applications for assistance were reviewed for housing rehabilitation and/or preservation projects

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.

FY22 Activities – Two clean-up projects were organized by the County’s Community Services Division in the High Ridge Estates Neighborhood in Keystone Heights, Florida. The County selected a contractor to provide on-going services for approved CDBG code enforcement projects.

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.

FY22 Activities – Resurfaced Louie Carter Road in Middleburg, Florida to benefit 100 Low-Mod income residents.

Administration:

Objective: General planning and administration costs associated with administering Federal CDBG and State SHIP funds; and other local funding sources.

FY22 Activities – County staff managed the programmatic and financial aspects of CDBG funding.

CR-10 – Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

This data was not collected during the application process but will be incorporated into the FY23 application for assistance.

CR-15 – Resources and Investments 91.520(a)

Identify the resources made available

CDBG Activity	Actual Expenditures
Infrastructure – Louie Carter Road	\$250,706.16
Code Enforcement	\$1,044.83
Home Rehabilitation – Inspections	\$5,000
Total	\$256,750.99

Narrative

The majority of this year’s funding supported investments in infrastructure. The County anticipates that infrastructure will continue to be a high priority activity in the FY23 Annual Action Plan. Investments in code enforcement and home rehabilitation projects are expected to be much higher in FY23, now that a process has been established to review proposed projects and local contractors have been identified to perform work.

Identify the geographic distribution and location of investments

Narrative

The majority of eligible applicants for home rehabilitation and code enforcement resolution came from Middleburg (37 eligible applicants) and Keystone Heights (21 eligible applicants). Orange Park and Green Cove Springs each had 18 eligible applicants. Jacksonville, Melrose, and Lawtey each had 1 eligible applicant; portions of these zip codes are located geographically in Clay County.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

No matching funds are required for the County’s CDBG Entitlement Funding. However, the County does receive federal funding to assist with homelessness stabilization through the U.S. Treasury’s Emergency Rental Assistance Program. This funding helps support the

goals and objectives outlined in the Consolidated Plan and Annual Action Plan. Indirect administrative costs (i.e., legal, procurement, budget) are not charged to CDBG.

CR-20 – Affordable Housing 91.520(b)

Evaluation of the jurisdiction’s progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

The average median income of all approved applicants for housing rehabilitation projects was \$25,674. Inspection services and need assessments for the most qualified applicants began in FY22. Housing rehabilitation projects will begin during the FY23 Annual Action Plan.

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Outcomes for FY22 were less than expected for two key reasons: (1) As a first-year applicant, new administrative processes and procedures had to be established and approved before CDBG activities could begin, and (2) Procurement of services proved to be challenging with limited local vendors available and increased costs of goods and services.

Discuss how these outcomes will impact future annual action plans. Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

The County’s Community Services Division identified 118 low to moderate income persons, who will benefit from CDBG funded home rehabilitation or code enforcement projects in future annual action plans. This pool of qualified applicants will serve as a starting point for FY23 Annual Action Plan activities.

The breakdown of “Approved Applicant Income Percentiles” was as follows: households earning 30% or less of the area median income (29 applicants), households earning 50% or less of the area median income (41 applicants), and households earning 80% or less of the area median income (48 applicants).

CR-25 – Homeless and Other Special needs 91.220(d, e); 91.320(d, e); 91.520©

Evaluate the jurisdiction’s progress in meeting its specific objectives for reducing and ending homelessness through:

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

The County's Community Services Division oversees homelessness stabilization assistance programs and conducts needs assessments to pair individuals with resources. As part of the outreach process for the Consolidated Plan and Annual Action Plan, local non-profits who provide homelessness services are consulted for feedback in setting CDBG goals and developing activities.

Addressing the emergency shelter and transitional housing needs of homeless persons

There are about 848 emergency shelter beds accessible to Clay County. Several non-profit providers and faith-based organizations offer services and facilities to the homeless population, which include emergency shelter, transitional housing, and permanent support housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education or youth needs.

Though CDBG funds do not directly address this, other federally funded programs within the County do. The Emergency Rental Assistance Program, for example, helps at-risk individuals find transitional and temporary housing until they can find a permanent solution.

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

Please see response above. CDBG funds do not directly provide this kind of assistance, because other programs are currently addressing this need.

CR-30 – Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

Clay County does not have a Public Housing Authority. The Jacksonville Housing Authority and Flagler Housing Authority provide input and data for the County's CDBG Consolidated Plan and Annual Action Plans.

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

Clay County does not have a Public Housing Authority. The Jacksonville Housing Authority and Flagler Housing Authority provide input and data for the County's CDBG Consolidated Plan and Annual Action Plans.

Actions taken to provide assistance to troubled PHAs

Not applicable.

CR-35 – Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

The Consolidated Plan and Annual Action Plan are developed in coordination with the County's Planning Department to ensure that policies related to land use, zoning ordinances, building codes, fees and charges, etc. are not considered barriers to receiving CDBG funding assistance.

The Local Housing Assistance Plan (LHAP) also evaluates potential obstacles.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The Community Services Division provides a representative to walk homeowners through the CDBG application process at no cost. This representative will also connect individuals who applied for CDBG funding with other outside resources to meet their immediate needs. This may include connecting individuals with transportation or health care.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

If lead-based paint is found during the house inspection, it is mitigated as part of the housing rehabilitation project.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Income evaluation is the most heavily weighted factor used for qualifying and ranking applicants for assistance. Poverty-level families are the highest priority for assistance. Community Services will provide a free needs assessment to poverty-level families and help pair them with Career Source and employee training opportunities.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The County formed the Community Services Division in 2021 to provide human services and programmatic support for funding opportunities, like CDBG.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The County's Community Services Division conducts needs assessments and matches individuals with appropriate social service agencies and non-profits to assist them outside of CDBG activities.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The following three key areas were reviewed in the Analysis of Impediments –

1. Definition used for “family” and restrictions on the number of unrelated persons in dwelling units
2. Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single-family districts.
3. Minimum lot size requirements, and the opportunity to develop various housing types including apartments and housing at various densities.

The County is currently contracting with a consulting firm to revise its Land Development Code to address all three of these areas. Recommendations for revisions will be forthcoming in FY23 and presented to the Board of County Commissioners for adoption.

CR-40 – Monitoring 91.220 and 91.230

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing ending homelessness through:

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

The responsibility of monitoring is shared by three primary divisions within the County: Grants, Community Services, and Planning. The Grants Division is responsible for overall compliancy for federal funding received through HUD and the CDBG Program. The Community Services Division is responsible for programmatic oversight of the housing rehabilitation and code enforcement activities, as well as identifying qualified homeowners for the program. The Planning Division is responsible for ensuring that CDBG activities align with comprehensive planning requirements and that infrastructure activities are reasonable and serve a community benefit.

Citizen Participation Plan 91.105(d); 91.115(d)

Description of the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The Draft FY 2021-2022 Consolidated Annual Performance and Evaluation Report is available for review at the County's Website at

www.claycountygov.com/business/economic-development and at the following locations:

Clay County Administration Building, Department of Economic & Development Services between the hours of 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding legal holidays at 477 Houston St., 3rd Floor, Planning & Zoning Division, Green Cove Springs, FL 32043

Clay County Library Locations listed below between the hours of 10:00 a.m. and 8:00 p.m., Monday-Thursday, and 9:00 a.m. to 5:00 p.m., Friday-Saturday.

- Fleming Island Library- 1895 Town Center Blvd., Fleming Island, FL 32003
- Green Cove Springs Library- 403 Ferris Street, Green Cove Springs, FL 32043
- Keystone Heights Library- 175 Oriole Avenue, Keystone Heights, FL 32656
- Middleburg-Clay Hill Library- 2245 Aster Avenue, Middleburg, FL 32068
- Orange Park Library- 2054 Plainfield Avenue, Orange Park, FL 32073

PUBLIC COMMENT PERIOD: The 15-day public review and comment period is **Wednesday, November 23, 2022, through Wednesday, December 7, 2022** at close of business. Comments from the public are encouraged and will be accepted during this period at the Department of Economic & Development Services, 477 Houston St., 3rd Floor, Planning & Zoning Division, Green Cove Springs, FL 32043. Comments can also be given by calling 904-541-3814 or be sent by email to cdbg@claycountygov.com.

PUBLIC MEETING:

Purpose: To announce the Consolidated Annual Report and Evaluation Report for public review and comments and obtain public input on the Draft Consolidated Annual Report and Evaluation Report.

Date: **Wednesday, November 30, 2022**

Time: 7:30 p.m.

Place: Fleming Island Public Library
1895 Town Center Blvd., Fleming Island, FL

Non-English-Speaking Persons:

Special arrangements for a translator will be made by the County. A citizen requiring a translator should send a request at least two (2) business days before the event.

Special Accommodations for Persons with Disabilities:

Special arrangements for a sign language interpreter will be made by the County. A request should be sent to the County at least two (2) business days prior to the event. Recorded events will be posted with closed captioning for those hard of hearing.

Access to records/recordings:

A recording of the public meeting will be made public for those who are not able to attend. Minutes of the public meeting will also be taken. Citizen input will be

summarized and documented in the minutes. The recordings and minutes will be posted on the County's website at <https://www.claycountygov.com/community/community-services/cdbg>.

In accordance with the Americans With Disabilities Act, any person needing a special accommodation to participate in this matter should contact the Clay County ADA Coordinator by mail at Post Office Box 1366, Green Cove Springs, Florida 32043, or by telephone at number (904) 269-6376, no later than three (3) days prior to the proceeding for which this notice has been given. Hearing impaired persons can access the foregoing telephone number by contacting the Florida Relay Service at 1-800-955-8770 (Voice), or 1-800-955-8771 (TDD).

All interested persons are invited to attend the public meeting. Pursuant to Section 286.0105, Florida Statutes, a person deciding to appeal any decision made by the Board with respect to any matter considered at the meeting, or at any subsequent meeting to which the Board has continued its deliberations is advised that such person will need a record of all proceedings and may need to ensure that a verbatim record of all proceedings is made, which must include the testimony and evidence upon which the appeal is to be based.

No public comments were received between Wednesday, November 23, 2022, and Wednesday, December 7, 2022.

CR-45 – CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

At present, there are no substantial changes to the County's program objectives. However, based on public feedback and staff's experience reviewing applications for assistance, there is an opportunity to revisit how the County's CDBG allocation is distributed across activities. Community input indicates that more funding is needed for infrastructure projects in Low-Mod areas of the County. Requests for infrastructure funding include road paving or resurfacing projects, sidewalk repairs, and well replacement.

High Ridge Estates Initiative (LMI community)

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

Not applicable.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

Not applicable.

CR-65 – Persons Assisted

Complete for CDBG Activities

Activity Description	Persons Assisted
Infrastructure Improvements - Resurface Louie Carter Road	100 individuals; 57% Low/Mod Income Households
Affordable Housing – Home inspections for rehabilitation projects	10 households
Code Enforcement – Community clean-up projects	2 neighborhood clean-up projects in High Ridge Estates, benefitting approximately 509 households in the community
Estimated Total Persons Assisted	619

CR-75 – Expenditures

The County qualified for \$1,084,880 in CDBG Entitlement Funds in FY22. Any unspent funds will be re-programmed in the next Annual Action Plan. The table below provides an overview of expenditures between October 1, 2021, and September 30, 2022.

	2021 – 2022 CDBG Program Year
Expenditures for Infrastructure Improvements	\$250,706.16
Expenditures for Affordable Housing – Inspection Services	\$5,000
Expenditures for Code Enforcement	\$1,044.83
Total	\$256,750.99