

Clay County Board of County Commissioners

Fiscal Year (FY) 2023-2024 Consolidated Annual Performance and Evaluation Report (CAPER)



Clay County

477 Houston St.

Green Cove Springs, Florida 32043

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CR-05 – Goals and Outcomes

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

Major accomplishments during this year’s action plan included repaving two dirt roads in a LMI neighborhood, which will create safe access for the residents and allow needed pathways for emergency services to assist those residents when needed. We also completed eight limited home rehabilitation projects during this plan year.

The road paving infrastructure project benefitted over 291 homes in a low to moderate income area.

The application period for the limited home rehabilitation program in FY24-25 was opened in September 2024. Our improved methods of outreach to the communities in need resulted in record numbers of applicants.

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)

The County completed eight of the fifteen limited home rehabilitation projects in FY23-24. The remaining seven rehabilitation projects are currently in process with the hopes of completing those in FY24-25 along with any eligible projects approved in that grant year.

The County intended to bring the sidewalk replacement program in-house to make more efficient use of CDBG funds. However, the County was unable to successfully recruit the needed skilled staff for that project. The sidewalk replacement project was set aside for the immediate future and focus was placed on obtaining bids for the road repaving in High Ridge Estates, a LMI neighborhood in Keystone Heights, Florida. Bids were advertised and a road construction company was selected to proceed with the work of repaving Dennison Avenue and Baylor Avenue.

The County provided Neighborhood Cleanups in three separate LMI neighborhoods throughout the year with over three tons of trash removed from these communities.

With regard to Administration projects, the County began use of the Neighborly software for tracking CDBG projects, per the National Community Development Association’s recommendations. The County software implementation was finalized prior to the release of FY23-24 applications and has been successfully used to track the progress of each project.

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

In FY23-24, the Clay County Community and Social Services Division completed eight of fifteen eligible home rehabilitation projects in low to moderate income areas within the County, exceeding the Annual Plan's 10 projected homes. The remaining seven home rehabilitation projects that were not able to be completed within the FY23-24 will be moved to the FY24-25 project list and will take priority.

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.

In FY24, there were three neighborhood clean-ups organized by the County's Community Services Division in the High Ridge Estates Neighborhood in Keystone Heights, Florida and the Tanglewood community in Orange Park, FL. This clean-up also included clean-up of Tanglewood Park, which is a public park also located in Orange Park, FL.

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.

In FY23-24, Clay County Community Services Division partnered with their Engineering and Public Works Departments to complete the paving of two roads in a historically LMI neighborhood. These improvements effected roughly 291 homes in a low to moderate income area.

Administration:

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

Throughout FY23-24, Clay County staff managed the programmatic and financial aspects of CDBG funding along with conducting post-application home inspections. This proved to be more problematic than anticipated so the decision was made to request bids for outsourced contractors to conduct the necessary inspections.

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)

Families assisted during the FY23-24 fell within a wide range of socio, racial and ethnic ranges. Of those that applied, single women outnumbered the men, and racial and ethnic statuses were more heavily white (50%) and black/African American (35%) with roughly 4% of those that reported the information, stating they were of Hispanic ethnicity.

CR-15 – Resources and Investments 91.520(a)

Identify the resources made available

CDBG Activity	Actual Expenditures
Infrastructure	\$1,044,203.00
Code Enforcement	\$0
Home Rehabilitation	\$99,973.62
Administration	\$97,177.00
Total	\$1,241,353.62

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 FY24-25 Annual Action Plan. With the newly established process for review of proposed projects and the identification of local contractors able and willing to perform the required work, investments in home rehabilitation projects are expected to increase in FY24-25.

Identify the geographic distribution and location of investments

Narrative

The majority of eligible applicants for home rehabilitation came from Orange Park (53%), Green Cove Springs (24%), Middleburg (18%) and Fleming Island (5%). Keystone Heights was served through the repaving of both Dennison and Baylor Avenues and through 3 Neighborhood clean-ups.

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 did receive federal funding to assist with homelessness stabilization through the U.S. Treasury's Emergency Rental Assistance Program. This funding helped 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 \$27,358.17. Inspection services and need assessments for the most qualified

applicants began in FY22-23. Housing rehabilitation projects began during the FY23-24 Annual Action Plan and will continue into FY24-25

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

Outcomes for FY23-24 were on par with the expected goals and outcomes. Management of projects was streamlined which resulted in the ability to secure appropriate contractors for specific needs rather than general contractors for a broad range of limited rehabilitation of homes. Eight homes received new roofs using this more specific bid request process. We anticipate more successful rehabilitations using this process in the future.

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.

In FY23-24, large scale projects became problematic with cost increases and limited timelines. In FY24-25, staff intends to focus on completing more rehab projects overall but with a more concentrated project scope (focused on safety projects, for example) to create the greatest benefit for the greatest number of people.

The County's Community and Social Services Division is working with the balance of the eligible resident owners whose home rehabilitation projects were not completed in the FY23-24 program year. It is the intention of the County to initiate these projects within the first quarter of the FY24-25 program year, along with any new eligible 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 and Social 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. It is a goal to also further build out a partnership with the County’s Community Paramedicine program to identify potential individuals in need.

Addressing the emergency shelter and transitional housing needs of homeless persons

Several non-profit providers and faith-based organizations offer services and facilities to the homeless population, which include cold weather shelters, 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, helped 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

The St. Johns Housing Authority runs the State Housing Initiatives Partnership (SHIP) program and assists with Section 108 projects to serve the residents of Clay County.

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

Clay County's SHIP program offers education programs through their various partnerships with County non-profits related to housing, food and waste.

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 State of Florida adopted the Live Local Act in FY23, and accordingly, the County has published their list of affordable housing developments on its website (www.claycountygov.com/government/purchasing/real-estate). The County also uses its SHIP funds to support affordable housing and has allocated a portion of its State and Local Fiscal Recovery Funds (ARPA) for affordable housing projects like Nathan Ridge in Middleburg, Florida.

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

The Community and Social 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 in accordance with the Clay County Community Block Development Grant Policies and Procedures Manual.

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 and Social Services Division conducts needs assessments and matches individuals with appropriate social service agencies and non-profits to assist them outside of CDBG activities. The Division also works with its SHIP office to coordinate the needs of residents.

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 and presented to the Board of County Commissioners for adoption.

Furthermore, the County provides a density incentive program for affordable housing projects.

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 2023-2024 Consolidated Annual Performance and Evaluation Report is available for review at the County's Website at <https://www.claycountygov.com/community/community-development-block-grant> and at the following locations:

Clay County Community & Social Services between the hours of 8:30 am – 12:00 pm and 1:00 pm -4:00 pm, excluding legal holidays, at 420 College Drive, Ste 107, Middleburg, FL 32068 and 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, October 23, 2024, through Thursday, November 14, 2024**, at close of business. Comments from the public are encouraged and will be accepted during this period at the Clay County Community & Social Services between the hours of 8:30 am – 12:00 pm and 1:00 pm -4:00 pm, excluding legal holidays, at 420 College Drive, Ste 107, Middleburg, FL 32068. 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 13, 2024**

Time: 6:30 p.m.

Place: Orange Park Public Library

2054 Plainfield Avenue, Orange Park, FL 32065

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 meetings and hearings will be made public for those who are not able to attend. Minutes of the public meetings and hearings 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.https://www.claycountygov.com/community/community-development-block-grant>

In accordance with the Americans with Disabilities Act, any person needing accommodations to participate in this matter should contact Clay County Risk Management by mail at P.O. Box 1366, Green Cove Springs, Florida 32043, or by telephone at (904) 278-4718, no later than three (3) days prior to the hearing or proceeding for which this notice has been given. Deaf and hard of hearing persons can access the 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 or hearing. Pursuant to Section 286.0105, Florida Statutes, a person deciding to appeal any decision made by the Clay County Board of County Commissioners (Board) with respect to any matter considered at the meeting, hearing, or at any subsequent meeting or hearing 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.

Note: Public comments will be compiled after the Public Comments Period which will run for 15 days, starting Wednesday October 30, 2024 through Thursday November 14, 2024.

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.

In FY23-24, a study conducted on the LMI community of High Ridge Estates Initiative showed that there is a need for infrastructure and home rehab improvements in the southern part of the County. This could become a focus area in future annual action plans.

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	1566 individuals; 57% Low/Mod Income Households
Affordable Housing – rehabilitation projects	8 households
Code Enforcement – Community clean-up projects	0
Estimated Total Persons Assisted	1600

CR-75 – Expenditures

	FY23-24 CDBG Program Year
Expenditures for Infrastructure Improvements	\$1,040,203.30
Expenditures for Affordable Housing – Housing Rehabilitation Program	\$99,973.62
Expenditures for Code Enforcement	\$0
Administration	\$97,177.00
Total	\$1,241,353.62