

Clay County has identified \$828,129.01 in unused funds from its FY 2021-2022 Community Development Block Grant (CDBG) Annual Action Plan entitlement award that it would like to add to its FY 2023-2024 Annual Action Plan for new infrastructure projects in low- and moderate-income areas of the County. The FY 2021-2025 Consolidated Plan and the FY 2023-2024 Annual Action Plan have been revised to include this additional funding amount under the Public Infrastructure project, which includes street improvements and sidewalks. The Citizen Participation Plan has been revised to identify a change in the point of contact from the Planning and Zoning Director to Community and Social Services. These Plans will be available for 30-day public review and comment period and one public hearing will be held during the Board of County Commissioners meeting on Tuesday, March 26, 2024, as set forth below.

## **Executive Summary**

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

#### **1. Introduction**

Clay County, Florida is a newly entitled community and received Community Development Block Grant (CDBG) Funds through the U.S. Department of Housing and Urban Development (HUD) for the first time on October 1, 2021. With CDBG funds, Clay County will work to promote affordable housing initiatives and create a suitable living environment for low- to moderate- income households. This Annual Action Plan outlines the program goals and funding for various projects for the 2023-24 fiscal year beginning on October 1, 2023. The priority needs of the County are addressed through activities developed in the Annual Action Plan 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.

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

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

#### **Overview**

Clay County has identified the following priority needs with associated goals to address the needs:

#### **Preservation of housing**

Housing rehabilitation including homes owned by low- and moderate-income individuals .

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: 10 Households/Housing Units; Rental Units.

### **Code enforcement**

Code enforcement in distressed neighborhoods defined as more than 51% low- and moderate-income in the County.

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: 15 Households/Housing Units.

### **Neighborhood Improvements**

Infrastructure projects in distressed neighborhoods defined as more than 51% low- and moderate-income in the County.

Objective: 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. Specific projects include street improvements, sidewalks, and neighborhood cleanups.

Outcome: Sustainability: Promoting Livable or Viable Communities-Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted.

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

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Fiscal year 2021-22 was the first year of Clay County entitlement under the CDBG program and emphasis was placed on neighborhood improvement projects and establishing a process for preservation of housing activities (application intake and review, home inspections, etc.). More data will be available by the time the County conducts its second evaluation of past performance in late fall of 2023 during the CAPER (Consolidated Annual Performance and Evaluation Report) process.

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

## Summary from citizen participation section of plan.

Clay County staff conducted three public meetings in various locations of the county to encourage citizen participation in areas of low- and moderate- income residents, as well as those not wishing or able to drive to the County seat.

The County held a public comment period from June 9, 2023, through July 8, 2023, to allow opportunity for the public to review the proposed Annual Action Plan. The Plan was made available on the County's website and social media. The Plan was also available at the five (5) Clay County Public Libraries and at the County Administration Building for those wishing to view the Plan in paper form. The public was invited to submit comments to the County's Planning & Zoning Department by email or phone. Furthermore, two (2) public hearings were held, on June 13, 2023, and on July 25, 2023, during which the public was invited to watch and/or attend and provide comment prior to the adoption of the Annual Action Plan at the July 25th public hearing.

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

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The County received eight emailed comments during the public comment period. However, these comments were not directly related to the County's CDBG activities and were not accepted. There were numerous questions related to the Annual Action plan raised at the three public meetings. Most were related to understanding the plan and the CDBG process. At each public meeting, participants were asked to rank the proposed funding categories in order from what they felt was most important to least important. The public's ranking matched the funding order that staff proposed in the original draft.

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

A summary of the emailed comments that were not directly related to developing the 2023-24 Annual Action Plan and were not accepted into the Plan are provided below:

- Concerns about traffic and lane widening on CR 220
- Concerns about the rising costs of rental properties
- Concerns about preserving the natural environment and slowing new construction
- Concerns about traffic and new construction
- Concerns about new construction and lot sizes; recommend new developers use heat pumps and solar shingles/solar panels
- Concerns about safety in the High Ridge Estates community
- Additional law enforcement for the western part of the county
- Accountability for landlords to maintain rental property to livable standards

## **7. Summary**

Based on feedback received during the public comment period, County staff recommends adopting the proposed CDBG activity/project allocations as follows:

1) Housing rehabilitation \$350,000.00

2) Code Enforcement and Neighborhood Cleanups: \$50,000.00

3) Public Infrastructure \$1,351,579.01

4) Program Administration \$97,177.00

**PR-05 Lead & Responsible Agencies – 91.200(b)**

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

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

| Agency Role        | Name        | Department/Agency |
|--------------------|-------------|-------------------|
| CDBG Administrator | CLAY COUNTY | Grants Management |

**Table 1 – Responsible Agencies**

**Narrative (optional)**

Clay County, Florida's Grants Management Department, is the lead agency for the Department of Housing and Urban Development (HUD) entitlement Community Development Block Grant (CDBG) program. 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**

Megan Covey, Megan.Covey@claycountygov.com (904) 529-4211, 477 Houston Street, Green Cove Springs, FL 32043

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

### **1. Introduction**

As part of the Annual Action Plan development, local agencies, service providers, and public documents pertaining to the County are consulted to gain a better understanding of the needs, services, and resources available to Clay County residents. The process outlined in the Clay County Citizen Participation Plan will be followed during the adoption of the Annual Action Plan.

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(I))**

The list of providers involved in the review process include 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 will also be 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 County 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 for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

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 jurisdiction's consultations with housing, social service agencies and other entities**

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

|   |  |   |
|---|--|---|
| 1 | <b>Agency/Group/Organization</b>   | Mission of the Dirt Road  |
|   | <b>Agency/Group/Organization Type</b>  | Services - Housing  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment   |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence and in-person meetings to discuss infrastructure, home rehab, and code enforcement needs in the High Ridge Estates community.  |
| 2 | <b>Agency/Group/Organization</b>   | The Vineyard Transitional Center  |
|   | <b>Agency/Group/Organization Type</b>  | Services - Housing<br>Services-homeless   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homeless Needs - Chronically homeless  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence and in-person meetings to discuss future potential of using CDBG funding to help establish transitional housing opportunities for LMI individuals coming out of the prison system. |
| 3 | <b>Agency/Group/Organization</b>   | OPERATION NEW HOPE, INC.  |
|   | <b>Agency/Group/Organization Type</b>  | Services-Employment   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Homeless Needs - Chronically homeless   |



|   |  |   |
|---|--|---|
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence and in-person meetings to discuss skills-based training and career preparation for individuals living in transitional housing. |
| 4 | <b>Agency/Group/Organization</b>   | Veterans Council Clay County Florida Inc.   |
|   | <b>Agency/Group/Organization Type</b>  | Services-Veterans   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Homelessness Needs - Veterans   |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence to discuss how CDBG funds can assist the local veterans' population.   |
| 5 | <b>Agency/Group/Organization</b>   | Operation Barnabas  |
|   | <b>Agency/Group/Organization Type</b>  | Services-Veterans   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Homelessness Needs - Veterans   |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence to discuss how CDBG funds can assist the local veterans' population.   |
| 6 | <b>Agency/Group/Organization</b>   | Clay County Sheriff's Office  |
|   | <b>Agency/Group/Organization Type</b>  | Other government - County   |

|   |  |  |
|---|--|--|
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Homelessness Strategy  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence and in-person meetings to discuss community safety concerns and transitional housing for individuals transitioning from prison back into society. |
| 7 | <b>Agency/Group/Organization</b>   | The Way Free Medical Clinic  |
|   | <b>Agency/Group/Organization Type</b>  | Services-Health  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Homelessness Strategy  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence to discuss how CDBG funds can assist the County's LMI residents.  |

**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 except for 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**

| Name of Plan                            | Lead Organization                         | How do the goals of your Strategic Plan overlap with the goals of each plan?   |
|---|---|--|
| 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 Board of County Commissioners | 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. |

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

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

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

#### **Summary of citizen participation process/Efforts made to broaden citizen participation**

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. To reach out to a larger portion of the population, especially those of low- and moderate- income, the notice of all meetings/hearings related to the County’s proposed Action Plan as well as the 30-day public comment period were advertised in the local newspaper, the County’s website and social media in both English and Spanish. Three (3) public meetings were held in various locations of the county to reach a larger portion of the population in a face-to-face format. Sign language and spoken language interpreters were made available to the public for all meetings/hearings and a TDD number was available for any person with a hearing impairment. The meetings/hearings were recorded and made available for the public to watch with closed-captioning through the County’s website for anyone not able to attend any of the in-person meetings.

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

Comments received during the public meetings and by email during the public comment period highlighted new sidewalk locations for County staff to consider in the infrastructure program portion of the FY 2022-23 Annual Action Plan. These were combined with the list provided by staff and reconsidered based on cost, completion time, and projected benefit. The input from residents who are more intimately connected to areas of the county not normally traveled by staff is invaluable to the project selection process.

In the preparation of the FY 2023-24 Annual Action Plan, infrastructure remained the public’s number one funding priority; staff has retained sidewalk replacement projects in its FY 2023-24 Annual Action Plan to provide safe public access to critical services in LMI areas.

**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 | 0                              | N/A  | N/A  | <a href="https://clayfl.new.swagit.com/videos/237315?ts=5847">https://clayfl.new.swagit.com/videos/237315?ts=5847</a> |
| 2          | Public Meeting   | Non-targeted/broad community | 0                              | N/A  | N/A  | <a href="https://www.youtube.com/watch?v=hjIwcHrSUf0">https://www.youtube.com/watch?v=hjIwcHrSUf0</a>                 |
| 3          | Public Meeting   | Non-targeted/broad community | 2                              | Comments about infrastructure improvements needed to the High Ridge Estates community. | N/A  | <a href="https://www.youtube.com/watch?v=jqCbR413M98">https://www.youtube.com/watch?v=jqCbR413M98</a>                 |
| 5          | Public Hearing   | Non-targeted/broad community | 0                              | N/A  | N/A  | <a href="https://clayfl.new.swagit.com/videos/267737?ts=3778">https://clayfl.new.swagit.com/videos/267737?ts=3778</a> |

**Table 4 – Citizen Participation Outreach**

## 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<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | 1,020,627                        | 0                  | 828,129                  | 1,848,756 | 2,239,308   | This will be the County's third year of CDBG funding. The County will do a substantial amendment in Fall 2023 to reallocate Prior Year Resources. |

**Table 5 - 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 publically 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: \$350,000   | Homeowner Housing Rehabilitated: 10 Household Housing Unit  |
| 2          | Code Enforcement            | 2021       | 2025     | Non-Housing Community Development | County wide low and moderate income areas Code Enforcement | Code Enforcement and Neighborhood Cleanups | CDBG: \$5,000     | Housing Code Enforcement/Foreclosed Property Care: 15 Household Housing Unit                                      |
| 3          | Infrastructure improvements | 2021       | 2025     | Non-Housing Community Development | County wide low and moderate income CTS                    | Public Infrastructure                      | CDBG: \$1,351,579 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted |
| 4          | Neighborhood Cleanups       | 2023       | 2025     | Non-Housing Community Development | County wide low and moderate income CTS                    | Code Enforcement and Neighborhood Cleanups | CDBG: \$45,000    | Other: 100 Other  |

Table 6 – Goals Summary

#### Goal Descriptions

|          |                         |   |
|----------|-------------------------|---|
| <b>1</b> | <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 Community and Social Services Department in eligible low- and moderate-income areas of the county. The project will focus on emergency repairs and code compliance. |
| <b>2</b> | <b>Goal Name</b>        | Code Enforcement  |
|          | <b>Goal Description</b> | The project will focus on identification of properties in need of emergency repairs and code compliance and slum and blight assistance.   |
| <b>3</b> | <b>Goal Name</b>        | Infrastructure improvements   |
|          | <b>Goal Description</b> |   |
| <b>4</b> | <b>Goal Name</b>        | Neighborhood Cleanups   |
|          | <b>Goal Description</b> |   |

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The FY 2023-2024 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 Community and Social Services Department in eligible low- and moderate-income areas of the county. The project will focus on emergency repairs and code compliance. The County will also utilize 9.5% 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.

### Projects

| # | Project Name                                |
|---|---|
| 1 | Housing Activities - Rehabilitation         |
| 2 | Planning and Administration                 |
| 3 | Code Enforcement and Neighborhood Clean-ups |
| 4 | Public Infrastructure                       |

Table 7 - 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 County will implement all CDBG funded projects in-house.

**AP-38 Project Summary**  
**Project Summary Information**

|          |  |   |
|----------|--|---|
| <b>1</b> | <b>Project Name</b>  | Housing Activities - Rehabilitation   |
|          | <b>Target Area</b>   | County wide low and moderate income CTS   |
|          | <b>Goals Supported</b>   | Affordable Housing  |
|          | <b>Needs Addressed</b>   | Housing rehabilitation  |
|          | <b>Funding</b>   | CDBG: \$350,000   |
|          | <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  |
|          | <b>Target Date</b>   | 9/30/2024   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 10 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 including minor septic system repair, safety code violations, lead paint remediation, and/or interior/exterior damage or deterioration to the structure including flood damage, termite treatment and removal of trees. 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. Awards are available up to \$35,000. Performance Measure: 10 households assisted |
| <b>2</b> | <b>Project Name</b>  | Planning and Administration   |
|          | <b>Target Area</b>   | County wide low and moderate income CTS   |
|          | <b>Goals Supported</b>   | Affordable Housing<br>Code Enforcement<br>Infrastructure improvements   |

|          |  |  |
|----------|--|--|
|          | <b>Needs Addressed</b>   | Housing rehabilitation<br>Public Infrastructure<br>Code Enforcement and Neighborhood Cleanups  |
|          | <b>Funding</b>   | CDBG: \$97,177   |
|          | <b>Description</b>   | General planning and administration costs for CDBG program.  |
|          | <b>Target Date</b>   | 9/30/2024  |
|          | <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 Action Plan.   |
|          | <b>Location Description</b>  | Not applicable.  |
|          | <b>Planned Activities</b>  | General planning and administration costs for CDBG program.  |
| <b>3</b> | <b>Project Name</b>  | Code Enforcement and Neighborhood Clean-ups  |
|          | <b>Target Area</b>   | County wide low and moderate income areas Code Enforcement   |
|          | <b>Goals Supported</b>   | Code Enforcement<br>Neighborhood Cleanups  |
|          | <b>Needs Addressed</b>   | Housing rehabilitation<br>Code Enforcement and Neighborhood Cleanups   |
|          | <b>Funding</b>   | CDBG: \$50,000   |
|          | <b>Description</b>   | Code Enforcement (\$5,000)Conduct code enforcement and remediation of code enforcement violations 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: 15Neighborhood Cleanups (\$45,000)Provide resources and labor to remove special garbage, trash, and debris from low- and moderate-income areas that contribute to conditions of slum and blight. Proposed Outcome: Improved neighborhood conditions and preservation of low- and moderate-income housing stock. Matrix Code: 05V |
|          | <b>Target Date</b>   | 9/30/2024  |

|          |  |   |
|----------|--|---|
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Housing units inspected - 15 low to moderate income households.<br>Persons Assisted: 100 persons within areas of 51% or more, low to moderate income households .   |
|          | <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.<br><br>Performance Measure: 15 housing units inspected.   |
| <b>4</b> | <b>Project Name</b>  | Public Infrastructure   |
|          | <b>Target Area</b>   | County wide low and moderate income CTS   |
|          | <b>Goals Supported</b>   | Infrastructure improvements   |
|          | <b>Needs Addressed</b>   | Public Infrastructure   |
|          | <b>Funding</b>   | CDBG: \$135,157,901   |
|          | <b>Description</b>   | Street improvements (\$1,000,000)National Objective: Low and moderate-income benefit as an area benefit; Eligible Category: 570.201(c), 570.207, 570.208Objective Category: Public improvements (General). Proposed Outcome: improve streets in low- and moderate-income areas; Matrix Code: 03KSidewalks (\$351,579.01) Improvements to portions of Palmetto Street, Harrison Avenue, Woodside Drive, Canis Drive, Capella Road, and Arora Boulevard. Other low- and moderate-income areas of the County, including areas of Keystone Heights, will also be considered as funding allows; Matrix Code: 03L |
|          | <b>Target Date</b>   | 9/30/2024   |
|          | <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.  |
|          | <b>Planned Activities</b>  |   |

## 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. The County’s focus is placed on eligible programs targeting low-and moderate-income persons on a county-wide basis. During FY 2023-2024, 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. "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  | Percentage of Funds |
|--|---------------------|
| County wide low and moderate income CTS                    | 95                  |
| County wide low and moderate income areas Code Enforcement | 5                   |
| Cattail Street in Middleburg                               | 0                   |
| Louie Carter Road in Middleburg                            | 0                   |

Table 8 - Geographic Distribution

### 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.

## Affordable Housing

### 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 using 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   | 10 |
| Special-Needs  | 0  |
| Total  | 10 |

**Table 9 - 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  | 10 |
| Acquisition of Existing Units  | 0  |
| Total  | 10 |

**Table 10 - 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.

## **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 list 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, 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.

## **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 (CoC), 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 the region wide basis of 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.**

## **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 enough 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 including 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:

- Provide Housing Counseling and Education to low-to moderate-income households. State SHIP funds will also be used to aid 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 and Engineering Departments 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, persons with 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. 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.

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), 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), 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.

## Program Specific Requirements

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

#### Introduction:

The County, under section AP-20 "Annual Goals and Objectives", has 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.

#### 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% |



## Attachments

## Citizen Participation Comments

*Minutes from CDBG FY23-24 Public Meeting #1*

*The Clay County Board of County Commissioner's Grants Division held an open forum for public comment on the proposed plan for the FY23-24 Community Development Block Grant Annual Action Plan at the Fleming Island Public Library, 1895 Town Center Blvd, Fleming Island, Florida, on Tuesday, June 20, 2023, at 6 p.m.*

*There were no attendees and no public comments.*

*The next public meeting will be held at the Keystone Heights Historic Pavilion, 565 S Lawrence Blvd., Keystone Heights, Florida, at 6:00 p.m. on Monday, June 26, 2023.*

The Clay County Board of County Commissioner's Grants Division held an open forum for public comment on the proposed plan for the FY23-24 Community Development Block Grant Annual Action Plan at the Keystone Heights Historic Pavilion, 565 S Lawrence Blvd., Keystone Heights, Florida, on Monday, June 26, 2023, at 6 p.m.

There were two attendees.

Public comments were as follows:

Question: What qualities make up a vibrant neighborhood or community?

Public Comments:

- Quality, affordable housing
- Safety
- Green spaces
- Places for residents to gather: shops, parks, food establishments, parks, libraries, community centers

Question: What kind of neighborhood infrastructure needs to be implemented to create a safer living environment?

Public Comments:

- Paved roads
- Sidewalks
- Lighting
- Cell & internet connectivity

The proposed budget was reviewed. The total proposed budget for FY23-24 is \$1,020,627, broken into four areas:

- Housing rehab - \$350,000
- Code enforcement - \$50,000
- Infrastructure - \$523,450
- Administration - \$97,177

The discussion focused mainly on housing rehab, code enforcement and infrastructure.

The attendees were asked to rank these budget initiatives from 1-3 in order of priority. The results were as follows:

- #1 – Infrastructure
- #2 – Housing rehab
- #3 – Code enforcement

The attendees were asked for comments related to the budget prioritization:

- Infrastructure as the first priority aligns with the earlier comments related to safety
- The proposed budget for housing rehab will not cover the development of new, affordable housing options.

Question:

What types of specific projects would you like to see within these budget categories?

- Related to housing rehab, noting that High Ridge has a large number of mobile homes and at some point, will become more difficult to rehab.

The next public meeting will be held at the Orange Park Public Library, 2054 Plainfield Ave., Orange Park, Florida, at 6:00 p.m. on Thursday, June 29, 2023 at 6:00 p.m.



The Clay County Board of County Commissioner's Grants Division held an open forum for public comment on the proposed plan for the FY23-24 Community Development Block Grant Annual Action Plan at the Orange Park Public Library, 2054 Plainfield Ave., Orange Park, Florida, on Thursday, June 29, 2023, at 6 p.m.

There were four attendees.

Public comments were as follows:

Question: What qualities make up a vibrant neighborhood or community?

Public Comments:

- That it is clean and well kept
- Safety – when at home and when out in the community, from crime and hazards
- Walkability
- Good lighting

Question: What kind of neighborhood infrastructure needs to be implemented to create a safer living environment?

Public Comments:

- Access to police and fire teams/facilities
- Sidewalks
- Maintenance/removal of dead or diseased trees
- Well-designed traffic patterns
- Focused attention to targets areas of need
- Road maintenance
- Bike paths
- Access to public transportation
- Mosquito and animal control
- Facilities for drug rehab and outreach assistance
- Visible police presence
- More projects with lower financial caps (to serve more community members)
- Stay-well facilities, such as YMCA, Big Brothers/Big Sisters Clubs
- Street signage
- Community centers

The proposed budget was reviewed. The total proposed budget for FY23-24 is \$1,020,627, broken into four areas:

- Housing rehab - \$350,000
- Code enforcement - \$50,000
- Infrastructure - \$523,450
- Administration - \$97,177

The discussion focused mainly on housing rehab, code enforcement and infrastructure.

The attendees were asked for comments related to the budget prioritization:

- Appropriate more of the budget to code enforcement activities

This was the final public meeting for this project. Community members may provide comments about this project through the Clay County website or at the County Offices through the close of business on Friday, July 8, 2023.

The proposed plan of action for use of the CDBG Fiscal Year 23-24 funding will be presented to the Board of County Commissioners for approval at the meeting to be held on Tuesday, July 25, at 4:00 p.m. at the Clay County Administration Building located at 477 Houston St., Green Cove Springs, Florida.

**Megan Mosley**

---

**From:** dmsdecorator@gmail.com  
**Sent:** Sunday, June 11, 2023 1:25 PM  
**To:** Community Development Block Grant  
**Subject:** County road 220

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Traffic is bad at times and getting worse. Has been on books to 4 lane for years. All the homes going in we need this done. Please please put back on books to get done. Thank you for your attention in this matter.

Terri McClure  
3026 Apalachicola Blvd Middleburg FL

Sent from my iPhone

**Megan Mosley**

---

**From:** Donna Wheeler <donnaclair1414@gmail.com>  
**Sent:** Sunday, June 11, 2023 1:26 PM  
**To:** Community Development Block Grant

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Yes stop landlords from raising rent on obviously old homes that are not up to standards places that were renting for 600\$ are now 1200 or more n still have same problems as before n homes that are vintage basically n especially mobile homes .this is another problem why homeless can't afford rent . landlords have gotten greedy .n double or triple rent on there good paying tenants,n loose them to the streets .

**Megan Mosley**

---

**From:** Richard @ <rb\_design@hotmail.com>  
**Sent:** Sunday, June 11, 2023 3:31 PM  
**To:** Community Development Block Grant  
**Subject:** County improvements

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Slow down the building thus preserving our trees which cleans the air and also provides places for the wildlife. This county should remain a county style living This is a beautiful country, however building 's destroying this beauty We moved to Cay county for the country style living Keep repairing the roads Do not approve anymore DR Horton building in our county Do not allow any commercial development on Black Creek ... needs to remain as is Thank you Richard

Another day on the Green

**Megan Mosley**

---

**From:** Jim Newyork <newyorkjim@hotmail.com>  
**Sent:** Monday, June 12, 2023 1:24 PM  
**To:** Community Development Block Grant  
**Subject:** QUALITY OF LIFE

**Follow Up Flag:** Follow Up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sent from [Mail](#) for Windows  
STOP BUILDING APIS, PAWN SHOPS, CAR WASHES.  
LIFE WAS BETTER IN CLAY WITH LESS TRAFFIC.  
TAKE A RIDF ON BLANDING BLVD AND SEE FOR YOURSELF.  
JIM SMOLINSKY

**Megan Mosley**

---

**From:** TOM L <laheyth@gmail.com>  
**Sent:** Monday, June 12, 2023 8:22 PM  
**To:** Community Development Block Grant  
**Subject:** Quality wishlist

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

- 1- stop allowing the zero clearance. Subdivisions, go back to normal lot sizes and force the developers to have a 50% green rule.
- 2- Make it mandatory that any new developer uses solar shingles or solar panels on their houses.
- 3- require heat pump, hot water tanks or solar hot water.
- 4- Don't allow any new developments until the roads are in place first

Tom Lahey  
157 Aldersgate St  
Grs, FL 32043

**Megan Mosley**

---

**From:** Janel Harmon <janelwines@gmail.com>  
**Sent:** Sunday, June 18, 2023 6:33 AM  
**To:** Community Development Block Grant

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello. My name is janel harmon. And I live with my mother in law and my husband. We don't have the money to fix our house. It's needs alot of fixing. We are on a fix income. We also have a tree that got hit by lightning. I called our home insurance and a'l we have is w'nd insurance. We real y need help. I was wondering if you or anyone could help us out. Please let me know. Thank you.

**Megan Mosley**

---

**From:** Malarkey Family <malarkeyfam@gmail.com>  
**Sent:** Saturday, July 1, 2023 8:44 AM  
**To:** Community Development Block Grant  
**Subject:** Community Development Block Grant

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

Is there a rough timeline of when applications will be available for the Clay County Community Development Block Grant for housing rehabilitation? Is there a website that has that information listed?

Thank you!

Elizabeth Malarkey  
904.328.9636

*Please excuse any typos, I'm currently shrinking next to a 10 year-old!*



**Megan Mosley**

---

**From:** joey saturno <jocysat47@gmail.com>  
**Sent:** Tuesday, July 4, 2023 9:14 AM  
**To:** Community Development Block Grant  
**Subject:** Tax collar use

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender, and know the content is safe.

i am a recent owner of property in Clay County particularly in highridge estates.there is a huge drug and transient issue witnessed. This leads to all kinds of issues such as home burglaries, drug sales and use and a multitude of other issues. . would like to have the tax collars apportioned to having police patrol and monitor crime that has permeated this nice little community.

Should you like to speak with me my cellphone number is 786-769-3561

Thank you for your time

Sincerely

Joseph Saturno

Grantee Unique Appendices

RESOLUTION NO. - 55

**A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF CLAY COUNTY, FLORIDA, APPROVING THE COUNTY'S COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) ANNUAL ACTION PLAN FOR FY 2023 – 2024; APPROVING THE PROPOSED ALLOCATIONS OF CDBG ENTITLEMENT FUNDS; DIRECTING THE COUNTY MANAGER TO SUBMIT THE ACTION PLAN TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, INCLUDING ANY AMENDMENTS THERETO, AND AUTHORIZING THE COUNTY MANAGER TO EXECUTE ALL REQUIRED DOCUMENTS; PROVIDING FOR CONFLICTS; PROVIDING FOR SEVERABILITY; PROVIDING AN EFFECTIVE DATE.**

**WHEREAS**, Clay County (the County) has been designated an Entitlement Grantee as a "Qualified Urban County" by the United States Department of Housing and Urban Development (HUD), which entitles the County to receive an annual allocation of Community Development Block Grant (CDBG) Funds directly from HUD to implement housing and community development projects throughout the County; and

**WHEREAS**, the County's 2021 – 2025 CDBG Consolidated Plan was adopted by the County and approved by HUD; and

**WHEREAS**, the County's FY 2023-2024 CDBG Annual Action Plan, attached hereto as Exhibit A, was made available for public review and comment and public meetings and hearings were held in accordance with the County's Citizen Participation Plan; and

**WHEREAS**, the County anticipates receiving CDBG funds in the amount of \$1,020,627 during FY 2023-2024; and

**WHEREAS**, the County desires to receive the annual allotment of CDBG funds from HUD so that various community development projects may be completed; and

**WHEREAS**, the County finds that approving the FY 2023-2024 Annual Action Plan is in the best interest of the health, safety, and welfare of the citizens and residents of the County.

**NOW THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF CLAY COUNTY, FLORIDA, AS FOLLOWS:**

**Section 1.** The above recitals are true and correct and are incorporated herein by reference.

**Section 2.** The County's FY 2023-2024 CDBG Annual Action Plan attached hereto as Exhibit A is hereby approved.

**Section 3.** The following proposed allocations of CDBG entitlement funds estimated to be available for FY 2023-2024 totaling \$1,020,627.00 are hereby approved:

- Housing Rehabilitation           \$350,000.00
- Public Infrastructure           \$523,450.00
- Code Enforcement           \$ 50,000.00
- Program Administration       \$ 97,177.00

As the proposed allocations are based upon estimated funding, it is further recognized that the allocations may need to be proportionately adjusted from estimated funding levels to match actual levels.

**Section 4.** The County Manager is hereby authorized and directed to transmit to HUD this Resolution, the County’s FY 2023-2024 Annual Action Plan along with all other required documentation, and is further authorized to execute any and all applications, certifications, grant contracts, agreements, funding approval, amendments, modifications, and other documents on behalf of the County related to the County’s CDBG Program and funding for FY 2023-2024.

**Section 5.** All resolutions inconsistent or in conflict herewith shall be and are hereby repealed insofar as there is conflict or inconsistency.

**Section 6.** If any section, sentence, clause, or phrase of this Resolution is held to be invalid or unconstitutional by any court of competent jurisdiction, then said holding shall in no way affect the validity of the remaining portions of this Resolution.

**Section 7.** This Resolution shall take effect immediately upon its adoption.

**DULY ADOPTED** by the Board of County Commissioners of Clay County, Florida this 25th day of July, 2023.

BOARD OF COUNTY COMMISSIONERS  
CLAY COUNTY, FLORIDA



By: Betsy Condon  
Betsy Condon (Jul 27, 2023 13:06 EDT)  
Betsy Condon, Its Chairman

ATTEST:

Tara S. Green  
Tara S. Green  
Clay County Clerk of Court and Comptroller  
Ex Officio Clerk to the Board

Exhibit A

County's FY 2023-2024 CDBG Annual Action Plan

## Clay County

### Annual Action Plan FY 2023-24

Adopted: July 25, 2023

#### Process

##### ***AP-05 Executive Summary***

###### **1. Introduction**

Clay County, Florida is a newly entitled community and received Community Development Block Grant (CDBG) Funds through the U.S. Department of Housing and Urban Development (HUD) for the first time on October 1, 2021. With CDBG funds, Clay County will work to promote affordable housing initiatives and create a suitable living environment for low- to moderate- income households. This Annual Action Plan outlines the program goals and funding for various projects for the 2023-24 fiscal year beginning on October 1, 2023. The priority needs of the County are addressed through activities developed in the Annual Action Plan 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.

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

Clay County has identified the following priority needs with associated goals to address the needs:

###### **Preservation of housing**

Housing rehabilitation including homes owned by low- and moderate-income individuals and replacement of mobile homes owned by low- and moderate-income individuals.

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: 10 Households/Housing Units; Rental Units.

###### **Code enforcement**

1

Code enforcement in distressed neighborhoods defined as more than 51% low- and moderate-income in the County.

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: 15 Households/Housing Units.

### **Neighborhood Improvements**

Infrastructure projects in distressed neighborhoods defined as more than 51% low- and moderate-income in the County.

Objective: 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.

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

Fiscal year 2021-22 was the first year of Clay County entitlement under the CDBG program and emphasis was placed on neighborhood improvement projects and establishing a process for preservation of housing activities (application intake and review, home inspections, etc.). More data will be available by the time the County conducts its second evaluation of past performance in late fall of 2023 during the CAPER (Consolidated Annual Performance and Evaluation Report) process.

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

Clay County staff conducted three public meetings in various locations of the county to encourage citizen participation in areas of low- and moderate- income residents, as well as those not wishing or able to drive to the County seat.

The County held a public comment period from June 9, 2023, through July 8, 2023, to allow opportunity for the public to review the proposed Annual Action Plan. The Plan was made available on the County's website and social media. The Plan was also available at the five (5) Clay County Public Libraries and at the County Administration Building for those wishing to view the Plan in paper form. The public was invited to submit comments to the County's Planning & Zoning Department by email or phone. Furthermore, two (2) public hearings were held, on June 13, 2023, and on July 25, 2023, during which the public was invited to watch and/or attend and provide comment prior to the adoption of the Annual Action Plan at the July 25<sup>th</sup> public hearing.

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

In addition to attendee participation at the public meetings, the County received eight emailed comments during the public comment period. However, most of these comments were not directly related to the County's CDBG activities and were not accepted; a summary of these comments are provided in the response to question six below.

Comments that were considered and answered by staff include:

- Request for CDBG home rehab assistance; this request was sent to the Community and Social Services Department
- Question regarding application process for CDBG home rehab program; staff responded to this individual.

There were numerous questions related to the Annual Action Plan raised at the three public meetings. Several were related to understanding the plan and the CDBG process. At each public meeting, participants were asked to rank the proposed funding categories in order from what they felt was most important to least important. The public's ranking matched the funding order that staff proposed in the original draft: 1) infrastructure, 2) housing rehabilitation, 3) code enforcement, 4) administration.

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

A summary of the emailed comments that were not directly related to developing the 2023-24 Annual Action Plan and were not accepted into the Plan are provided below:

- Concerns about traffic and lane widening on CR 220
- Concerns about the rising costs of rental properties
- Concerns about preserving the natural environment and slowing new construction
- Concerns about traffic and new construction
- Concerns about new construction and lot sizes; recommend new developers use heat pumps and solar shingles/solar panels
- Concerns about safety in the High Ridge Estates community

#### **7. Summary**

3

Based on feedback received during the public comment period, County staff recommends adopting the proposed CDBG activity/project allocations as follows:

- 1) Housing rehabilitation \$350,000.00
- 2) Code Enforcement \$50,000.00
- 3) Public Infrastructure \$523,450.00
- 4) Program Administration \$97,177.00



**PR-05 Lead & Responsible Agencies – 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 agency is responsible for preparing the Consolidated Plan and for administration of each grant program and funding source.

Table 1 – Responsible Agencies

| Agency Role        | Name        | Department/Agency |
|--------------------|-------------|-------------------|
| CDBG Administrator | CLAY COUNTY | Grants Management |

**Narrative**

Clay County, Florida's Grants Management Department, is the lead agency for the Department of Housing and Urban Development (HUD) entitlement Community Development Block Grant (CDBG) program. 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**

Megan Mosley, [Megan.Mosley@claycountygov.com](mailto:Megan.Mosley@claycountygov.com) (904) 529-4211, 477 Houston Street, Green Cove Springs, FL 32043

## **AP-10 Consultation**

### **1. Introduction**

As part of the Annual Action Plan development, local agencies, service providers, and public documents pertaining to the County are consulted to gain a better understanding of the needs, services, and resources available to Clay County residents. The process outlined in the Clay County Citizen Participation Plan will be followed during the adoption of the Annual Action Plan.

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 involved in the review process include 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 will also be 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 County 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>   | Mission of the Dirt Road  |
|   | <b>Agency/Group/Organization Type</b>  | Faith-Based Social Services   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | All Sections  |
|   | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence and in-person meetings to discuss infrastructure, home rehab, and code enforcement needs in the High Ridge Estates community.  |
| 2 | <b>Agency/Group/Organization</b>   | The Vineyard  |
|   | <b>Agency/Group/Organization Type</b>  | Services – Housing  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | All Sections  |
|   | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence and in-person meetings to discuss future potential of using CDBG funding to help establish transitional housing opportunities for LMI individuals coming out of the prison system. |
| 3 | <b>Agency/Group/Organization</b>   | Operation New Hope  |
|   | <b>Agency/Group/Organization Type</b>  | Employment/Career Services  |

7

|   |  |  |
|---|--|--|
|   | <b>What section of the Plan was addressed by Consultation?</b>   | All Sections   |
|   | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence and in-person meetings to discuss skills-based training and career preparation for individuals living in transitional housing.                    |
| 4 | <b>Agency/Group/Organization</b>   | Veterans Council of Clay County Florida  |
|   | <b>Agency/Group/Organization Type</b>  | Services - veterans  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | All Sections   |
|   | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence to discuss how CDBG funds can assist the local veterans' population.  |
| 5 | <b>Agency/Group/Organization</b>   | Operation Barnabas   |
|   | <b>Agency/Group/Organization Type</b>  | Services – veterans  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | All Sections   |
|   | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence to discuss how CDBG funds can assist the local veterans' population.  |
| 6 | <b>Agency/Group/Organization</b>   | Clay County Sheriff's Office   |
|   | <b>Agency/Group/Organization Type</b>  | Local Government Agency  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | All Sections   |
|   | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence and in-person meetings to discuss community safety concerns and transitional housing for individuals transitioning from prison back into society. |
| 7 | <b>Agency/Group/Organization</b>   | The Way Free Medical Clinic  |
|   | <b>Agency/Group/Organization Type</b>  | Non-Profit medical care  |

|  |   |
|--|---|
| <b>What section of the Plan was addressed by Consultation?</b>   | All Sections  |
| <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Email correspondence to discuss how CDBG funds can assist the County's LMI residents. |

**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 except for 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.

**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(l))**

**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. |

## **AP-12 Participation**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation**

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. To reach out to a larger portion of the population, especially those of low- and moderate- income, the notice of all meetings/hearings related to the County's proposed Action Plan as well as the 30-day public comment period were advertised in the local newspaper, the County's website and social media in both English and Spanish. Three (3) public meetings were held in various locations of the county to reach a larger portion of the population in a face-to-face format. Sign language and spoken language interpreters were made available to the public for all meetings/hearings and a TDD number was available for any person with a hearing impairment. The meetings/hearings were recorded and made available for the public to watch with closed-captioning through the County's website for anyone not able to attend any of the in-person meetings.

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

Comments received during the public meetings and by email during the public comment period highlighted new sidewalk locations for County staff to consider in the infrastructure program portion of the FY 2022-23 Annual Action Plan. These were combined with the list provided by staff and reconsidered based on cost, completion time, and projected benefit. The input from residents who are more intimately connected to areas of the county not normally traveled by staff is invaluable to the project selection process.

In the preparation of the FY 2023-24 Annual Action Plan, infrastructure remained the public's number one funding priority; staff has retained sidewalk replacement projects in its FY 2023-24 Annual Action Plan to provide safe public access to critical services in LMI areas.

10

| 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 13, 2023, at Board of County Commissioners meeting. Approximately 12 persons in attendance. | No public comments.  | N/A  | <a href="#">Jun 13, 2023 BCC Agenda (swagit.com)</a>  |
| 2                              | Public Meeting   | Location chosen to reach residents in the central part of the county      | Held on June 20, 2023, at the Fleming Island Public Library. No attendees.                               | No public comments.  | N/A  | <a href="https://www.youtube.com/watch?v=hjIwchR5Uf0">https://www.youtube.com/watch?v=hjIwchR5Uf0</a> |
| 3                              | Public Meeting   | Location chosen to reach residents in the southwest part of the county    | Held on June 26, 2023, at the Keystone Heights Historic Pavilion. 2 people attended.                     | Comments about infrastructure improvements needed to the High Ridge Estates community. | N/A  | <a href="https://www.youtube.com/watch?v=jgCbR413M98">https://www.youtube.com/watch?v=jgCbR413M98</a> |
| 4                              | Public Meeting   | Location chosen to reach residents in the west-central part of the county | Held on June 29, 2023, at the Orange Park Public Library. 5 persons attended.                            | Residents focused on infrastructure improvements, removing hazardous tree              | N/A  | <a href="https://www.youtube.com/watch?v=Zl2QMGJ_yA">https://www.youtube.com/watch?v=Zl2QMGJ_yA</a>   |

11

| 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) |
|                                |                  |                                |  | limbs, and home rehab budget. |  |                     |
| 5                              | Public Hearing   | Non-targeted / broad community | Held on July 25, 2023, at Board of County Commissioners meeting. |                               |  |                     |



## 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 2 |                    |                          |              | Expected Amount Available Remainder of ConPlan \$ | Narrative Description   |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|--------------|---|---|
|         |                  |  | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$    |   |   |
| CDBG    | public - federal | Acquisition<br>Administration<br>Housing<br>Public Improvements<br>Public Services | 1,020,627                        | 0                  | 828,129.01               | 1,848,756.01 | 2,239,308   | This will be the County's third year of CDBG funding. The County will do a substantial amendment in Fall 2023 to reallocate Prior Year Resources. |

Table 3 - 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 – 91.220(c)(3)&(e)

#### Goals Summary Information

| Sort Order | Goal Name                   | Start Year | End Year | Category                          | Geographic Area   | Needs Addressed        | Funding         | Goal Outcome Indicator  |
|------------|-----------------------------|------------|----------|-----------------------------------|---|------------------------|-----------------|---|
| 1          | Affordable Housing          | 2022       | 2025     | Affordable Housing                | County wide low- and moderate-income CTS                    | Housing rehabilitation | CDBG: \$350,000 | Homeowner Housing Rehabilitated: 10 Household Housing Unit  |
| 2          | Code Enforcement            | 2022       | 2025     | Non-Housing Community Development | County wide low- and moderate-income areas Code Enforcement | Code Enforcement       | CDBG: \$50,000  | Housing Code Enforcement / Foreclosed Property Care: 15 Household Housing Unit                                    |
| 3          | Infrastructure improvements | 2022       | 2025     | Non-Housing Community Development | County wide low- and moderate-income CTS                    | Public Infrastructure  | CDBG: \$523,450 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted |

Table 4 – 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 Community and Social Services Department in eligible low- and moderate-income areas of the county. The project will focus on emergency repairs and code compliance. |
| 2 | <b>Goal Name</b>        | Code Enforcement  |
|   | <b>Goal Description</b> | The project will focus on identification of properties in need of emergency repairs and code compliance.  |
| 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.  |

## Projects

### **AP-35 Projects – 91.220(d)**

#### **Introduction**

The FY 2023-2024 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 Community and Social Services Department in eligible low- and moderate-income areas of the county. The project will focus on emergency repairs and code compliance. The County will also utilize 9.5% 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.

#### **Projects**

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

Table 5 – 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 County will implement all CDBG funded projects in-house.

**AP-38 Project Summary**

**Project Summary Information**

|                     |  |   |
|---------------------|--|---|
| <b>1</b>            | <b>Project Name</b>  | Housing Activities - Rehabilitation   |
|                     | <b>Target Area</b>   | County wide low- and moderate-income areas  |
|                     | <b>Goals Supported</b>   | Affordable Housing  |
|                     | <b>Needs Addressed</b>   | Housing rehabilitation  |
|                     | <b>Funding</b>   | CDBG: \$350,000   |
|                     | <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  |
|                     | <b>Target Date</b>   | 9/30/2024   |
|                     | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 10 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 including minor septic system repair, safety code violations, lead paint remediation, and/or interior/exterior damage or deterioration to the structure including flood damage, termite treatment and removal of trees. 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. Awards are available up to \$35,000. Performance Measure: 10 households assisted |
| <b>Project Name</b> | Planning and Administration  |   |

19

|   |  |  |
|---|--|--|
| 2 | <b>Target Area</b>   | County wide  |
|   | <b>Goals Supported</b>   | Administration   |
|   | <b>Needs Addressed</b>   | Administration of CDBG related programs and projects   |
|   | <b>Funding</b>   | CDBG: \$97,177   |
|   | <b>Description</b>   | General planning and administration costs for CDBG program.  |
|   | <b>Target Date</b>   | 9/30/2024  |
|   | <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 Action Plan.   |
|   | <b>Location Description</b>  | Not applicable.  |
|   | <b>Planned Activities</b>  | General planning and administration costs for CDBG program.  |
| 3 | <b>Project Name</b>  | Code Enforcement   |
|   | <b>Target Area</b>   | County wide low- and moderate-income areas   |
|   | <b>Goals Supported</b>   | Code Enforcement   |
|   | <b>Needs Addressed</b>   | Code Enforcement   |
|   | <b>Funding</b>   | CDBG: \$50,000   |
|   | <b>Description</b>   | Conduct code enforcement and remediation of code enforcement violations 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>   | 9/30/2024  |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Housing units inspected - 15   |



|          |  |  |
|----------|--|--|
|          | <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 including junk car removal.<br><br>Performance Measure: 15 housing units inspected.   |
| <b>4</b> | <b>Project Name</b>  | Public infrastructure  |
|          | <b>Target Area</b>   | County wide low- and moderate-income areas   |
|          | <b>Goals Supported</b>   | Infrastructure improvements  |
|          | <b>Needs Addressed</b>   | Public Infrastructure  |
|          | <b>Funding</b>   | CDBG: \$523,450  |
|          | <b>Description</b>   | Street improvements<br><br>National Objective: Low and moderate-income benefit as an area benefit; Eligible Category: 570.201(c), 570.207, 570.208Objective Category: Public improvements (General). Proposed Outcome: improve streets in low- and moderate-income areas; Matrix Code: 03K<br><br>Sidewalk improvements to portions of – Palmetto Street, Harrison Avenue, Woodside Drive, Canis Drive, Capella Road, and Arora Boulevard. Other low- and moderate-income areas of the County, including areas of Keystone Heights, will also be considered as funding allows. |
|          | <b>Target Date</b>   | 9/30/2024  |
|          | <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.   |
|          | <b>Planned Activities</b>  | Perform selected infrastructure upgrades. Performance Measure: number of new streets by length and/or number of new sidewalk segments 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. The County’s focus is placed on eligible programs targeting low-and moderate-income persons on a county-wide basis. During FY 2023-2024, 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. "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                          | Percentage of Funds |
|--------------------------------------|---------------------|
| County wide low- and moderate-income | 85                  |
|                                      |                     |

Table 6 - Geographic Distribution

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

**Geographic Distribution**

Target Area: Clay County Low and Moderate-Income areas

Percentage of Funds: 90.5%

**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.

## Affordable Housing

### **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 using 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   | 10 |
| Special-Needs  | 0  |
| Total  | 10 |

**Table 7 - 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  | 10 |
| Acquisition of Existing Units  | 0  |
| Total  | 10 |

**Table 8 - 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.

## **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 list 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, 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.

## ***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 (CoC), 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 the region wide basis of 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**

26

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

## ***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 enough 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 including 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:

- Provide Housing Counseling and Education to low-to moderate-income households. State SHIP funds will also be used to aid 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**

29

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 and Engineering Departments 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, persons with 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. 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.

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), 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), 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.

## Program Specific Requirements

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

#### **Introduction:**

The County, under section AP-20 "Annual Goals and Objectives", has 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.

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

##### **Reference 24 CFR 91.220(l)(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% |

34

## Appendix

1. Minutes from Public Meetings:
  - a. June 20, 2023
  - b. June 26, 2023
  - c. June 29, 2023
2. Emails received during the Public Comment Period (June 9, 2023 – July 8, 2023)

*Minutes from CDBG FY23-24 Public Meeting #1*

*The Clay County Board of County Commissioner's Grants Division held an open forum for public comment on the proposed plan for the FY23-24 Community Development Block Grant Annual Action Plan at the Fleming Island Public Library, 1895 Town Center Blvd, Fleming Island, Florida, on Tuesday, June 20, 2023, at 6 p.m.*

*There were no attendees and no public comments.*

*The next public meeting will be held at the Keystone Heights Historic Pavilion, 565 S Lawrence Blvd., Keystone Heights, Florida, at 6:00 p.m. on Monday, June 26, 2023.*



The Clay County Board of County Commissioner's Grants Division held an open forum for public comment on the proposed plan for the FY23-24 Community Development Block Grant Annual Action Plan at the Keystone Heights Historic Pavilion, 565 S Lawrence Blvd., Keystone Heights, Florida, on Monday, June 26, 2023, at 6 p.m.

There were two attendees.

Public comments were as follows:

Question: What qualities make up a vibrant neighborhood or community?

Public Comments:

- Quality, affordable housing
- Safety
- Green spaces
- Places for residents to gather: shops, parks, food establishments, parks, libraries, community centers

Question: What kind of neighborhood infrastructure needs to be implemented to create a safer living environment?

Public Comments:

- Paved roads
- Sidewalks
- Lighting
- Cell & internet connectivity

The proposed budget was reviewed. The total proposed budget for FY23-24 is \$1,020,627, broken into four areas:

- Housing rehab - \$350,000
- Code enforcement - \$50,000
- Infrastructure - \$523,450
- Administration - \$97,177

The discussion focused mainly on housing rehab, code enforcement and infrastructure.

The attendees were asked to rank these budget initiatives from 1-3 in order of priority. The results were as follows:

- #1 – Infrastructure
- #2 – Housing rehab
- #3 – Code enforcement

The attendees were asked for comments related to the budget prioritization:

- Infrastructure as the first priority aligns with the earlier comments related to safety
- The proposed budget for housing rehab will not cover the development of new, affordable housing options.

Question:

What types of specific projects would you like to see within these budget categories?

- Related to housing rehab, noting that High Ridge has a large number of mobile homes and at some point, will become more difficult to rehab.

The next public meeting will be held at the Orange Park Public Library, 2054 Plainfield Ave., Orange Park, Florida, at 6:00 p.m. on Thursday, June 29, 2023 at 6:00 p.m.

The Clay County Board of County Commissioner's Grants Division held an open forum for public comment on the proposed plan for the FY23-24 Community Development Block Grant Annual Action Plan at the Orange Park Public Library, 2054 Plainfield Ave., Orange Park, Florida, on Thursday, June 29, 2023, at 6 p.m.

There were four attendees.

Public comments were as follows:

Question: What qualities make up a vibrant neighborhood or community?

Public Comments:

- That it is clean and well kept
- Safety – when at home and when out in the community, from crime and hazards
- Walkability
- Good lighting

Question: What kind of neighborhood infrastructure needs to be implemented to create a safer living environment?

Public Comments:

- Access to police and fire teams/facilities
- Sidewalks
- Maintenance/removal of dead or diseased trees
- Well-designed traffic patterns
- Focused attention to targets areas of need
- Road maintenance
- Bike paths
- Access to public transportation
- Mosquito and animal control
- Facilities for drug rehab and outreach assistance
- Visible police presence
- More projects with lower financial caps (to serve more community members)
- Stay-well facilities, such as YMCA, Big Brothers/Big Sisters Clubs
- Street signage
- Community centers

The proposed budget was reviewed. The total proposed budget for FY23-24 is \$1,020,627, broken into four areas:

- Housing rehab - \$350,000
- Code enforcement - \$50,000
- Infrastructure - \$523,450
- Administration - \$97,177

The discussion focused mainly on housing rehab, code enforcement and infrastructure.

The attendees were asked for comments related to the budget prioritization:

- Appropriate more of the budget to code enforcement activities

This was the final public meeting for this project. Community members may provide comments about this project through the Clay County website or at the County Offices through the close of business on Friday, July 8, 2023.

The proposed plan of action for use of the CDBG Fiscal Year 23-24 funding will be presented to the Board of County Commissioners for approval at the meeting to be held on Tuesday, July 25, at 4:00 p.m. at the Clay County Administration Building located at 477 Houston St., Green Cove Springs, Florida.

**Megan Mosley**

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**From:** dmsdecorator@gmail.com  
**Sent:** Sunday, June 11, 2023 1:25 PM  
**To:** Community Development Block Grant  
**Subject:** County road 220

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Traffic is bad at times and getting worse. Has been on books to 4 lane for years. All the homes going in we need this done. Please please put back on books to get done. Thank you for your attention in this matter.

Terri McClure  
3026 Apalachicola Blvd Middleburg FL

Sent from my iPhone

**Megan Mosley**

---

**From:** Donna Wheeler <donnaclair1414@gmail.com>  
**Sent:** Sunday, June 11, 2023 1:26 PM  
**To:** Community Development Block Grant

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Yes stop landlords from raising rent on obviously old homes that are not up to standards places that were renting for 600\$ are now 1200 or more n still have same problems as before n homes that are vintage basically n especially mobile homes .This is another problem why homeless can't afford rent . landlords have gotten greedy .n double or triple rent on there good paying tenants,n loose them to the streets .

**Megan Mosley**

---

**From:** Richard @ <rb\_design@hotmail.com>  
**Sent:** Sunday, June 11, 2023 3:31 PM  
**To:** Community Development Block Grant  
**Subject:** County improvements

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Slow down the building thus preserving our trees which cleans the air and also provides places for the wildlife. This county should remain a county style living This is a beautiful country, however building 's destroying this beauty We moved to Cay county for the country style living Keep repairing the roads Do not approve anymore DR Horton building in our county Do not allow any commercial development on Black Creek ... needs to remain as is Thank you Richard

Another day on the Green

**Megan Mosley**

---

**From:** Jim Newyork <newyorkjim@hotmail.com>  
**Sent:** Monday, June 12, 2023 1:24 PM  
**To:** Community Development Block Grant  
**Subject:** QUALITY OF LIFE

**Follow Up Flag:** Follow Up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sent from [Mail](#) for Windows  
STOP BUILDING APIS, PAWN SHOPS, CAR WASHES.  
LIFE WAS BETTER IN CLAY WITH LESS TRAFFIC.  
TAKE A RIDF ON BLANDING BLVD AND SLL FOR YOURSELF.  
JIM SMOLINSKY

**Megan Mosley**

---

**From:** TOM L <laneyt@gmail.com>  
**Sent:** Monday, June 12, 2023 8:22 PM  
**To:** Community Development Block Grant  
**Subject:** Quality wishist

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

- 1- stop allowing the zero clearance. Subdivisions, go back to normal lot sizes and force the developers to have a 50% green rule.
- 2- Make it mandatory that any new developer uses solar shingles or solar panels on their houses.
- 3- require heat pump, hot water tanks or solar hot water.
- 4- Don't allow any new developments until the roads are in place first

Tom Lahey  
157 Aldersgate St  
Grs, FL 32043

**Megan Mosley**

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**From:** Janel Harmon <janelwines@gmail.com>  
**Sent:** Sunday, June 18, 2023 6:33 AM  
**To:** Community Development Block Grant

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello. My name is janel harmon. And I live with my mother in law and my husband. We don't have the money to fix our house. It's needs alot of fixing. We are on a fix income. We also have a tree that got hit by lightning. I called our home insurance and a'l we have is w'nd insurance. We real y need help. I was wondering if you or anyone could help us out. Please let me know. Thank you.



**Megan Mosley**

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**From:** Malarkey Family <malarkeyfam@gmail.com>  
**Sent:** Saturday, July 1, 2023 8:44 AM  
**To:** Community Development Block Grant  
**Subject:** Community Development Block Grant

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

Is there a rough timeline of when applications will be available for the Clay County Community Development Block Grant for housing rehabilitation? Is there a website that has that information listed?

Thank you!

Elizabeth Malarkey  
904.328.9636

*Please excuse any typos, I'm currently shrinking next to a 10 year-old!*

**Megan Mosley**

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**From:** joey saturno <jocysat47@gmail.com>  
**Sent:** Tuesday, July 4, 2023 9:14 AM  
**To:** Community Development Block Grant  
**Subject:** Tax collar use

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender, and know the content is safe.

i am a recent owner of property in Clay County particularly in highridge estates.there is a huge drug and transient issue witnessed. This leads to all kinds of issues such as home burglaries, drug sales and use and a multitude of other issues. . would like to have the tax collars apportioned to having police patrol and monitor crime that has permeated this nice little community.

Should you like to speak with me my cellphone number is 786-769-3561

Thank you for your time

Sincerely

Joseph Saturno











# 2022-2023-55 CDBG Adopting Resolution and FY23-24 Annual Action Plan BCC#17

Final Audit Report

2023-07-31

|                 |  |
|-----------------|--|
| Created:        | 2023-07-27                                   |
| By:             | Lisa Osha (Lisa.Osha@claycountygov.com)      |
| Status:         | Signed                                       |
| Transaction ID: | CBJCHBCAABAAj6VsL4L4z5zbVAbL8U64Wvxz00zhS5CS |

## "2022-2023-55 CDBG Adopting Resolution and FY23-24 Annual Action Plan BCC#17" History

-  Document created by Lisa Osha (Lisa.Osha@claycountygov.com)  
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-  Signer bccdocs@clayclerk.com entered name at signing as Tara S Green  
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-  Document e-signed by Tara S Green (bccdocs@clayclerk.com)  
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-  Agreement completed.  
2023-07-31 - 3:00:54 PM GMT



