

**INTERGOVERNMENTAL
COORDINATION ELEMENT
SUPPORT DOCUMENT**

Data, Inventory & Analysis

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A. Introduction

Chapter 163 Florida Statute (FS) provides the statutory authority for local governments to establish an Intergovernmental Coordination Element as part of their comprehensive plan. This Element is required to provide an inventory and analysis of existing intergovernmental coordination mechanisms and identify areas in the comprehensive plan that could benefit through additional coordination. This plan has been designed to meet the requirements of the growth management legislation, as well as the expectations of the elected and appointed officials and citizens of Clay County.

The first section of the element inventories characteristics and conditions of existing intergovernmental coordination mechanisms in the County. The inventory identifies all units of local, regional, State, and federal government; school board; utility companies; and special districts with which Clay County coordinates governmental activities.

The second section analyzes the effectiveness of existing intergovernmental coordination mechanisms. Specific problems and needs within each of the elements of the Clay County Comprehensive Plan have been identified that would benefit from improved or additional intergovernmental coordination. It also evaluates the need for improved or additional intergovernmental coordination with local, regional, or state units of local government, and provides a comparison with the Northeast Florida Regional Policy Plan to determine the need for additional coordination with that agency.

Finally goals, Objectives, and Policies have been established to alleviate some of the more serious problems identified herein. This policy framework establishes the long-term end toward which intergovernmental coordination programs are ultimately directed.

B. Intergovernmental Coordination Inventory

The inventory identifies units of local government providing services, but not having regulatory authority over the use of the land. Included are independent special districts, adjacent municipalities and counties, the Clay County School Board, and utility companies, which provide services within the County. The inventory also identifies regional or State agencies with land use or environmental regulatory authority with whom Clay County coordinates (e.g., St. Johns River Water Management District, the Northeast Florida Regional Council, and the Department of Environmental Protection).

Inventory of Intergovernmental Coordination Mechanisms

Tables 1-8 identify all units of local, regional, state, and federal agencies, school boards, utility companies, and special districts with which Clay County coordinates. The table describes the existing coordination mechanisms, indicating the subject, the nature of the relationship, and the office with primary responsibility for coordination.

Table 1 – Intergovernmental Coordination Matrix - Municipalities

CLAY COUNTY INTERGOVERNMENTAL COORDINATION MUNICIPALITIES			
Government Function/Service		Nature of Relationship	Coordinating Office
The City of Green Cove Springs	Fire Protection	Informal Agreement	Dept. of Public Safety
	Road Maintenance	Formal Agreement	Dept. of Engineering and Public Works
	Police Protection	Informal Agreement	Sheriff's Office
	Plans Review & Building Inspection	Formal Agreement	Dept. of Economic and Development Services
	Solid Waste (Non- Ad Valorem Assessment)	Formal Agreement	BCC ¹ /Dept. of Environmental Services
	Local Option Fuel Tax	Formal Agreement	County Attorney
The City of Keystone Heights	Fire Protection	Informal Agreement	Dept. of Public Safety
	Road Maintenance	Formal Agreement	Dept. of Engineering and Public Works
	Police Protection	Informal Agreement	Sheriff's Office
	Aviation	Informal Agreement	BCC / Dept. of Engineering and Public Works
	Solid Waste Disposal Funding	Formal Agreement	BCC / Dept. of Environmental Services
	Local Option Fuel Tax	Formal Agreement	County Attorney
The Town of Penney Farms	Fire Protection	Informal Agreement	Dept. of Public Safety
	Road Maintenance	Formal Agreement	Dept. of Engineering and Public Works
	Police Protection	Informal Agreement	Sheriff's Office
	Plans Review & Building Inspection	Formal Agreement	Dept. of Economic and Development Services
	Local Option Fuel Tax	Formal Agreement	County Attorney
The Town of Orange Park	Fire Protection	Informal Agreement	Dept. of Public Safety
	Road Maintenance	Formal Agreement	Dept. of Engineering and Public Works
	Police Protection	Informal Agreement	Sheriff's Office
	Plans Review & Building Inspection	Formal Agreement	Dept. of Economic and Development Services
	Solid Waste (Non- Ad Valorem Assessment)	Formal Agreement	BCC / Dept. of Environmental Services
	Local Option Fuel Tax	Formal Agreement	County Attorney
	Recreation Funding	Formal Agreement	BCC
City of Starke	Fire Protection	Formal Agreement	Dept. of Public Safety

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Table 2 – Intergovernmental Coordination Matrix - Counties

CLAY COUNTY INTERGOVERNMENTAL COORDINATION MATRIX			
COUNTIES			
Government Function/Service		Nature of Relationship	Coordinating Office
Baker	Development Review	Informal Agreement	Dept. of Economic and Development Services
Bradford	Aviation	Informal Agreement	Keystone Heights
	Road Maintenance	Formal Agreement	Dept. of Engineering and Public Works
	Development Review	Informal Agreement	Dept. of Economic and Development Services
	Fire Protection	Formal Agreement	Dept. of Public Safety
	Plans Review & Building Inspection	Formal Agreement	Dept. of Economic and Development Services
Duval	Transportation	Formal Agreement	BCC ¹ and County Administration Office through TPO ²
	Development Review	Informal Agreement	Dept. of Economic and Development Services
	Fire Protection	Formal Agreement	Dept. of Public Safety
	Aviation	Formal Agreement	BCC
Flagler	Office Space and Building Inspection	Formal Agreement	Dept. of Economic and Development Services
Putnam	Development Review	Informal Agreement	Dept. of Economic and Development Services
	Fire Protection	Informal Agreement	Dept. of Public Safety
St. Johns	Development Review	Informal Agreement	Dept. of Economic and Development Services
	Fire Protection	Informal Agreement	Dept. of Public Safety

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² North Florida Transportation Planning Organization

Table 3 – Intergovernmental Coordination Matrix – School Board

CLAY COUNTY INTERGOVERNMENTAL COORDINATION MATRIX			
EDUCATION / PERFORMING ARTS			
Government Function/Service		Nature of Relationship	Coordinating Office
Clay County School Board	Education (Safety)	Formal Agreement	Sheriff's Office / BCC ¹
	Recreation	Formal / Informal Agreement	Dept. of Facilities and Maintenance
	Diesel Fuel	Formal Agreement	Dept. of Public Safety
	Emergency Shelters	Formal Agreement	Dept. of Public Safety
Clay County School Board - Capital Improvements and Development	Review	Formal Agreement	Dept. of Economic and Development Services / BCC
	Concurrency Review	Formal Agreement	Dept. of Economic and Development Services / BCC
St. Johns River State College	Operational Funding – Performing Arts Complex	Formal Agreement	BCC

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Table 4 – Intergovernmental Coordination Matrix – Government Service Agencies

CLAY COUNTY INTERGOVERNMENTAL COORDINATION MATRIX			
GOVERNMENTAL SERVICE AGENCIES			
Government Function/Service		Nature of Relationship	Coordinating Office
Agricultural Extension Agency	Agricultural Productivity	Formal Agreement	BCC ¹
Clay County Chamber of Commerce	Economic Development	Formal Agreement	BCC
Council on Aging	Social Service	Formal Agreement	BCC and County Manager
	Transit Service	Formal / Informal Agreement	BCC
Health and Rehabilitative Services	Indigent Care	Formal Agreement	BCC and County Manager
	Septic Tanks	Formal Agreement	Dept. of Economic and Development Services

¹ Board of County Commissioners

² State Housing Initiative Partnership

Table 4 – Intergovernmental Coordination Matrix – Government Service Agencies continued

CLAY COUNTY INTERGOVERNMENTAL COORDINATION MATRIX GOVERNMENT SERVICE AGENCIES			
Government Function/Service		Nature of Relationship	Coordinating Office
Housing Finance	Housing	Formal Agreement	BCC and County Manager
	SHIP and NSP Administration	Formal Agreement	Dept. of Economic and Development Services
Natural Resources Conservation Areas	Education	Formal Agreement	BCC and County Manager
Veteran Affairs	Social Services	Formal Agreement	BCC and County Manager

Table 5 – Intergovernmental Coordination Matrix – Regional Agencies

CLAY COUNTY INTERGOVERNMENTAL COORDINATION MATRIX REGIONAL AGENCIES			
Government Function/Service		Nature of Relationship	Coordinating Office
Jacksonville Transportation Authority	Transportation Technical Assistance	Formal Agreement	BCC ¹
	Public Transportation – Commuter Bus Service	Formal Agreement	BCC
Northeast Florida Regional Council	Development Review	No Agreement	BCC
	Aviation	No Agreement	BCC
	Maintaining Local Mitigation Strategy	Formal Agreement	Dept. of Public Safety
	Transportation Disadvantaged	Formal Agreement	BCC
St. Johns River Water Management District	Water Management	Informal Agreement	BCC
	Development Review	Informal Agreement	Dept. of Economic and Development Services
	Land Management	Formal Agreement	BCC / Parks and Recreation Dept.
Transportation Planning Organization	Transportation	Formal Agreement	Dept. of Economic and Development Services
NE Florida Regional Transportation Commission	Transportation	Formal Agreement	BCC
First Coast Workforce Development Consortium	Career Source Oversight	Formal Agreement	BCC

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Table 6 – Intergovernmental Coordination Matrix – State Agencies

CLAY COUNTY INTERGOVERNMENTAL COORDINATION MATRIX			
STATE AGENCIES			
Government Function/Service		Nature of Relationship	Coordinating Office
Department of Economic Opportunity	Development Review	Informal Agreement	Dept. of Economic and Development Services
	Affordable Housing	Formal Agreement	SHIP ¹ Office
	Emergency Management	Formal Agreement	Dept. of Public Safety
Department of Corrections	Use of Inmate Labor	Formal Agreement	BCC ²
Department of Environmental Protection	Public Safety	Formal Agreement	Sheriff's Office
	Recreation	Formal Agreement	Dept. of Facilities and Maintenance
	Environmental Protection	Informal Agreement	County Manager
	Development Review	Informal Agreement	Dept. of Economic and Development Services
	Land and Water Conservation Fund (Moccasin Slough)	Formal Agreement	BCC
	Waste Reduction & Recycling	Formal Agreement	BCC / Dept. of Environmental Services
Department of Health	Operation of Clay County Health Department	Formal Agreement	BCC
Department of Revenue	Sheriff Service	Formal Agreement	BCC
Department of State	Historic Resources (Certified Local Government)	Formal Agreement	BCC
	Libraries Grant	Formal Agreement	BCC
Florida Department of Transportation	Transportation	Informal Agreement	BCC
	Development Review Committee	Formal Agreement	Dept. of Engineering and Public Works
	TRIP ³ Program	Formal Agreement	BCC
Division of Emergency Management, DEO	Repetitive Flood Claims Program	Formal Agreement	BCC
	Homeland Security Grant	Formal Agreement	BCC
	Emergency Management Preparedness	Formal Agreement	BCC

¹State Housing Initiative Partnership

²Board of County Commissioners

³Transportation Regional Incentive Program

Table 6 - Intergovernmental Coordination Matrix – State Agencies continued

CLAY COUNTY INTERGOVERNMENTAL COORDINATION MATRIX			
STATE AGENCIES			
State Armory Board	Camp Blanding	Formal Agreement	BCC
Fish and Wildlife Commission	Wildlife Management (including Manatee Protection)	Formal Agreement	BCC / Dept. of Economic and Development Services and Dept. of Facilities and Maintenance
US Department of Navy	Aviation	Informal Agreement	BCC
US FAA	Aviation	Informal Agreement	BCC
US Army Corps of Engineers	Environmental Protection	Formal Agreement	Dept. of Economic and Development Services
Florida National Guard	Land Use Compatibility Review	Informal Agreement	Dept. of Economic and Development Services

Table 7 – Intergovernmental Coordination Matrix – Utility Companies

CLAY COUNTY INTERGOVERNMENTAL COORDINATION MATRIX			
UTILITY COMPANIES			
Government Function/Service		Nature of Relationship	Coordinating Office
Clay Electric	Outdoor Lighting	Formal Agreement	BCC ¹ / Parks and Recreation Dept.
Clay County Utility Authority Services	Centralized Water and Sewer Service	Formal Agreement	Dept. of Economic and Development Services
Green Cove Springs Utility Service	Centralized Water and Sewer Service	Formal and Informal Agreements	BCC
Southern States Utilities Co.	Centralized Water	Informal Agreement	BCC
Melrose Water Association	Centralized Water	Informal Agreement	BCC
Advanced Disposal	Solid Waste	Formal Agreement	Dept. of Facilities and Maintenance
Southland Waste System	Solid Waste	Formal Agreement	BCC / Dept. of Public Safety and Dept. of Engineering and Public Works
Waste Management, Inc.	Solid Waste Transfer	Formal Agreement	BCC / Dept. of Environmental Services
Town of Orange Park	Central Wastewater	Informal Agreement	BCC

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Table 8 – Intergovernmental Coordination Matrix – CDDs

CLAY COUNTY INTERGOVERNMENTAL COORDINATION MATRIX COMMUNITY DEVELOPMENT DISTRICTS			
Government Function/Service		Nature of Relationship	Coordinating Office
The Crossings	Infrastructure	Formal Development Agreement (DRI)	BCC
Fleming Island Plantation	Infrastructure	Formal Development Agreement (DRI)	BCC
Double Branch	Infrastructure	Formal Development Agreement (DRI)	BCC
Middle Village	Infrastructure	Formal Development Agreement (DRI)	BCC
South Village	Infrastructure	Formal Development Agreement (DRI)	BCC
Magnolia West	Infrastructure	No Formal Agreement	
Ridgewood Trails	Infrastructure	No Formal Agreement	
Pine Ridge Plantation	Infrastructure	No Formal Agreement	
Rolling Hills	Infrastructure	No Formal Agreement	
Two Creeks	Infrastructure	No Formal Agreement	
Armstrong	Infrastructure	No Formal Agreement	
Wilford Preserve	Infrastructure	No Formal Agreement	

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C. Intergovernmental Coordination Analysis

The School District, the County and the Local Governments will address the provision of infrastructure necessary to support public schools, including water and sewer, roads, drainage, sidewalks, and bus stops. The compatibility and close integration of public school facilities with surrounding land uses is also reviewed.

This section identifies the effectiveness of existing intergovernmental coordination mechanisms in the County. It outlines specific problems and needs within each of the elements of the Comprehensive Plan if any that would benefit from improved or additional intergovernmental coordination. This section also compares growth and development proposed in the Comprehensive Plan with the Northeast Florida Strategic Regional Policy Plan to evaluate the needs for additional coordination to effectuate the Plan.

Effectiveness of Existing and Coordination Mechanisms

This section reviews the effectiveness of existing coordination mechanisms, including intergovernmental agreements, joint planning and service agreements, special legislation, and joint meetings or work groups, which are used to further intergovernmental coordination.

Fire Protection

A state mutual Aid Agreement Provides for the fire protection services upon demand (response). Bradford, Duval, Putnam, and St. Johns Counties as well as the City of Keystone Heights, the Town of Penney Farms, the Town of Orange Park, the City of Green Cove Springs and the City of Starke, are all parties to the agreement. This agreement allows the County to provide assistance in responding to fire and rescue needs, and is an effective coordination tool.

Police Protection

The existing informal agreements between the City of Green Cove Springs, the City of Keystone Heights, the Town of Penney Farms, the Town of Orange Park and Clay County Sheriff's Office allow for a cost-effective means of providing police protection.

Road Maintenance

Formal road maintenance agreements exist with the City of Keystone Heights and the City of Green Cove Springs. These agreements provide an effective mechanism to maintain County roads in these municipalities and to help maintaining local roads.

Informal road maintenance agreements exist between the County, the Town of Orange Park, and the Town of Penney Farms. These agreements have been effective on an individual road basis. As a first step, formalizing these agreements should be pursued to coordinate improvements to the transportation network in a more efficient manner.

The County has effective coordination with the Florida Department of Transportation (FDOT) concerning roadway improvements. The FDOT receives copies of development plans on State roads as part of the Clay County development review process. The FDOT also issue permits regarding the number and locations of curb cuts and access points which may impact County roadway levels of service on state roads within the County.

Mass Transit System

The Jacksonville Transportation Authority (JTA), completed a commuter rail feasibility study in 2009 finding that commuter rail could be a viable component to the transportation system in Northeast Florida. Following the feasibility study, candidate corridors were identified including the Southwest Corridor running along the CSX line from downtown Jacksonville to Green Cove Springs. This corridor is approximately 29 miles long and is anticipated to include 12 stations. It's anticipated that 3,000 riders would use this line to travel the 41 minute ride to downtown Jacksonville.

Bus service continues to expand through the coordinated efforts of JTA and the Council on Aging Clay County.

Aviation

An informal agreement exists between the City of Keystone Heights and the County with respect to the operation of the Keystone Heights Airpark. An informal agreement also exists between Bradford and Clay County. The surrounding land use and operation of the airport shall be effectively controlled through collaborative efforts of the County, local government, and other agencies.

Opportunities for civilian airport expansion in Clay County are limited due to the heavy presence of military aviation activity over the County. Future airport expansion south of Jacksonville is more likely to occur in St. Johns County.

Clay County has an informal agreement with the Federal Aviation Administration (FAA) and the Department of the Navy with respect to aviation facilities and their utilization. Coordination with these agencies is capably handled through the county's participation in the Northeast Florida Metropolitan Area Steering Committee.

Council on Aging

The Council on Aging Clay County (COACC) is the Community Transportation Coordinator for Clay Transit. Door to door service and seven public transportation routes are currently available. Five of the routes, the green, blue, red, purple and orange lines, provide a connection to the Jacksonville network of routes through JTA. The Black Creek Park and Ride located on CR 220 is served by the 201 Clay County Express, taking riders into downtown Jacksonville. The magenta line runs from Keystone Heights to the City of Gainesville and connects to RTS.

The County shall continue to work with the COACC regarding future mass transit planning.

School Board

Currently, the County and the School Board have formal and informal agreements regarding capital facility expansion and the use of certain facilities. An interlocal agreement between the School Board, the County, and the municipalities now provides an effective mechanism to plan for and expand capital facilities as well as coordinated planning, public education facilities siting and review, and school concurrency in Clay County.

Besides the above mentioned public education facility issues, recreation is an important issue relative to lease and interlocal agreements between the School Board and the County. The County has informal agreements with various individual schools to allow the use of school facilities athletic associations. However, school activities shall have first priority during and after

school hours, and the schools retain the authority to change use requirements as required. The biggest concern is that of liability insurance and its high cost. This arrangement works satisfactorily; the School Board defers to each school principal in this regard.

Agricultural Extension/Soil Conservation Service

An effective coordination mechanism exists between the Agricultural Extension office of the Florida Department of Agriculture, and the U.S. Natural Resources Conservation Service (NRCS), in providing information on soil conditions and agricultural practices to the County.

Housing Finance

The Housing Finance Authority coordinates with the County through required public hearings with the Board of County Commissioners on the issuance of bonds.

State Housing Initiatives Partnership (SHIP) Program is another source of housing finance. According to the SHIP program, all units constructed, rehabilitated, or otherwise assisted with local housing distribution funds provided from the local housing assistance trust fund must be occupied by eligible persons. At least 30 percent of the local housing distribution funds, which are deposited into the local housing assistance trust fund, must be reserved for awards to very low-income persons or eligible sponsors who will serve very low-income persons and at least an additional 30 percent of the local housing distribution funds deposited into the local housing assistance trust fund must be reserved for awards to low-income persons or eligible sponsors who will serve low-income persons. The remainder may be reserved for eligible persons or eligible sponsors that will serve eligible persons. (FS 420.9075(4)(d)).

Indigent Care

Effective coordination mechanisms exist between the County and the Department of Health and Rehabilitative Service in providing health services to the indigents of Clay County.

Social Services

Effective coordination mechanisms exist between the County and the Clay County Office of Veteran Affairs.

Development Review

- Northeast Florida Regional Council (NEFRC) – A formal agreement is not currently in effect between Clay County and the Regional Council. However, comprehensive plan amendments and amendments to Developments of Regional Impact (DRIs) are forwarded for review. The Regional Council provides dispute resolution services which Clay County would contract for if needed.
- Adjacent Local Government – Currently, formal agreements do not exist between Clay County and adjacent local governments for development review. Informal agreements with the abutting jurisdictions are effective in reducing land use conflicts along common boundaries by reviewing each other's comprehensive plan amendments. Compatibility of development with military installations should be reviewed and addressed by exchanging information between the County and military installations.
- State and Federal Environmental Permit Coordination - A number of formal and informal agreements exist between Clay County and environmental permitting agencies (e.g. Florida Department of Environmental Protection (FDEP), and the St. Johns River

Water Management District (SJRWMD)). These agreements are based upon the need to share information concerning development activity. These arrangements perform satisfactorily as coordination mechanisms.

Utility Coordination – Informal/Formal agreements exist between the County and providers of utility services to County residents. The County shall monitor and guide growth within the County's established urban service areas.

Community Development Districts

By ordinance, Clay County has established twelve (12) Community Development Districts (CDDs), which are local units of government established in accordance with Chapter 190 F.S. to provide improvements for the particular development. Improvements are financed by the Districts' assessing Non-ad Valorem taxes, benefit special assessments, maintenance special assessments and user fees. Depending on the nature of the improvement or service, the tax, assessment or fee will be assessed District-wide or upon that portion of the District which is benefited. Because of the long development horizon, development will take place in separate units of development or villages over a period of time.

Five of the twelve are DRIs: the Crossings, Fleming Island Plantation, Double Branch, Middle Village and South Village. As DRIs, the CDDs will provide basic infrastructure for water and sewer service, drainage and stormwater treatment, roads and internal mass transit infrastructure. The developers of DRIs have development agreements with the County for the donation of sites for schools, police and fire stations, and sites for solid waste disposal.

The remaining seven CDDs will be providing infrastructure improvements but are not under any formal agreement with the County.

Historical Element Plan Evaluation

Clay County currently has a formal agreement with the Department of State (Division of Historical Resources). Clay County maintains its status as a Certified Local Government and has an effective working relationship with the Department.

Public Safety

Coordination at Local Level - The Sheriff's Office and Public Safety Department coordinate with the County Planning and Building Divisions to obtain current development and population data by service area in order to accurately anticipate future demand for police and fire protection.

Coordination at County, State, and Federal Levels - The Sheriff's Office provides for continued coordination of crime control efforts with other law enforcement agencies including municipalities, surrounding counties, State Highway Patrol, military police, and the Federal Bureau of Investigation.

D. Policy Framework and Analysis

Future Land Use Element

Compatibility of Adjacent Uses

Coordination between Clay County and adjacent counties and municipalities in the review of proposed developments has been efficient and discouraged the development of incompatible land uses along common boundaries. The efforts shall be continued and maintained diligently.

Environmental Permit Review

The Engineering Department acts as the lead agency at the local level to coordinate these permitting procedures with the Department of Environmental Protection, St. Johns River Water Management District, the U.S. Army Corps of Engineers, and the Florida Department of Environmental Protection.

Coordination of Sewer and Water Extension Decisions with the Future Land Use Plan

Several major private sewer and water franchises exist in the County including the Green Cove Springs Utility Service, the Melrose Water Association, the Southern States Utilities and the Town of Orange Park. The Clay County Utility Authority has the primary right to serve the remainder of the unincorporated County. The Clay County Development Review process and Concurrency Management Systems serve as the coordination mechanisms. Collaborative efforts and work processes has been established and maintained between the County and utility providers to ensure that areas designated for development within the Urban Service Area are provided with sewer and water facilities.

Coordination of School Concurrency with Residential Developments

The School Board coordinates with the county pursuant to an interlocal agreement to ensure that school concurrency is met through coordinated planning, siting, and review.

Transportation Element

Location of Future Highway Corridors

The Florida Department of Transportation (FDOT) is currently constructing Clay County's portion of the first segment of the First Coast Expressway which extends from Duval County to SR 21. Construction of this phase began in 2013 and is anticipated to be completed by early 2018. The second segment, which extends south from SR 21 to the Shands Bridge is in the ROW acquisition phase with construction anticipated to begin in 2019. The final phase is planned outside of the current five year work program. The alignment of these corridors will have a significant impact on the future transportation network of Clay County. The three major issues that arise from the alignment of the corridors are their impact on land use, consideration of environmentally sensitive land, and the provision for access along the corridors.

Number and Spacing of Curb Cuts along State Maintained Highways

The number and location of curb cuts influence the design and intensity of development along State maintained highways. Several roadway links, including portions of Blanding Boulevard and U.S. Highway 17, have an excessive number of curb cuts. These cuts, combined with a proliferation of strip commercial development, have reduced the level of service along these corridors. The County shall work with FDOT regarding curb cuts on state roads, and control curb cuts on other roads through Plan policy and the Development Review process, especially by utilizing cross-access requirements for developments on State roads.

Mass Transit System

In addition to the First Coast Expressway construction, proposed mass transit systems that may include Commuter Rail, Bus, and Waterborne Transportation Systems will improve the County's transportation system and impact seriously on County Land Use activities. Collaboration with DEO, FDOT, NEFRC, TPO, JTA, COACC, and other related agencies and private service providers is critical in developing sound and sustainable transportation systems in the County.

Housing Element

Distribution of Low and Moderate Income Housing Subsidies

The need for a substantial amount of housing for low- and moderate-income families has been identified in the Housing Element. Currently, the DEO distributes funds to local governments from the U.S. Department of Housing and Urban Development through its Section 8 Program. As the need for additional low and moderate housing increases in Clay County, effective coordination mechanisms must be established between the DEO and the County to obtain funds from State and federal sources. This will allow the County to receive additional funding to provide rent subsidies to low and moderate income families.

Community Facilities Element

Aquifer Protection

Much of the far western portion of the County (Keystone Heights, Camp Blanding, and surrounding areas) is part of the high recharge area of the Floridan aquifer. This area extends into Putnam, Bradford and Alachua Counties. The County should coordinate land use decisions with these jurisdictions to ensure the protection of the Floridan aquifer.

Conservation Element

Controlled Burning

The forest products industry is an important component of the County's economic base. The best management practice for reducing the potential for major forest fires is controlled burning on a periodic basis. Clay County Fire Rescue officials coordinate closely with the Florida Division of Forestry to enhance the regulation of this practice. Consideration of adopting Firewise Development Standards would be one option.

Wildlife and Natural Vegetation Enhancement

Scientific information indicates that wildlife corridors between the Osceola and Ocala National Forests must be maintained to protect the viability of the animal populations that inhabit these

areas and migrate between them. In addition, there is also evidence that preservation of large tracts of land, as well as corridors, serve "to protect the integrity of ecological systems and to provide multiple benefits, including preservation of fish and wildlife habitat, recreation space and water recharge areas" (Ch. 259.101(c) F.S.). Clay County's cooperative efforts include an agreement to assist with maintenance of Black Creek Ravines Conservation Area, a St. Johns River Water Management District property. The County has also purchased the Camp Chowenwaw and Moccasin Slough properties totaling 405 acres with the aid of Florida Communities Trust, Land and Water Conservation Fund, and private funding. These properties contribute to a network of other agency conservation lands along the Black Creek and St. Johns River shorelines. Clay County should continue to cooperate with local governments, regional and state agencies to preserve and manage preservation lands and wildlife corridors.

Protection of Hydrologically Sensitive Areas

Hydrologically sensitive areas are lands that provide high recharge to the Floridan aquifer, severely flood, are subject to severe soil erosion, or are subject to surface water pollution due to unmanaged stormwater runoff. The Keystone Heights region is part of the high recharge area of the Floridan aquifer. Stretches of Black Creek are very prone to frequent and destructive flooding. Clay County cooperates with the SJRWMD, DEP, Nature Conservancy, and Trust for Public Land to identify and purchase hydrologically sensitive areas.

Recreation Element

Location of Neighborhood and Community Park Sites

The Recreation and Open Space Element of the Comprehensive Plan has identified location standards for siting neighborhood community parks. Design guidelines in the element suggest that neighborhood parks should be located adjacent to elementary or middle schools. Community parks should be located so as to conserve environmentally sensitive areas by incorporating significant valuable lands within these sites. The County maintains informal agreements with individual schools in the County for public access and use of recreational facilities at the respective locations, in accordance with Florida Statutes and Department of Education regulations. The County and the School Board also maintain informal communication regarding joint school/park facility development, maintenance, and programming. Clay County has an agreement with the SJRWMD to assist the Water Management District with maintenance of Black Creek Ravines Conservation Area.

Boat Ramp Funding

Boating and other water related recreational activities are a major recreation activity in Clay County. Florida Fish and Wildlife Conservation Commission (FFWCC) administers the Florida Boating Improvement Program, a grant program that provides local governments with funding for boat ramp site acquisition and development.

DEP administers the Florida Recreation Development Assistance Program, a grant program that provides local governments with funding for outdoor recreation site acquisition and development.

The County should coordinate with these and related agencies to obtain additional monies for the acquisition of land and the construction of boat ramps to provide additional sites for water oriented recreational activities.

Capital Improvement Element

Coordination of Capital Facilities Programming

The School Board prepares and adopts an annual and long-range plan for the maintenance and development of capital facilities. This plan includes the acquisition of land and the construction of several new schools that will have a significant impact on the County transportation system. The School Board coordinates with the County pursuant to an interlocal agreement and the Florida Department of Transportation (FDOT) to ensure that transportation improvements are in place prior to or simultaneously with the construction of these schools to minimize impacts on the transportation system.

Public School Facilities Element

The County entered into an Interlocal Agreement with the Clay County School Board to manage the concurrency system, the review process and the future plan effectively. The Public Facilities School Element was prepared accordingly.

The County and the Clay County School Board shall maintain an interlocal agreement, the Interlocal Agreement for Coordinated Planning, Public Educational Facilities Siting and Review and School Concurrency in Clay County, which establishes the process by which collaborative planning and decision making for public school siting, development review and school concurrency is made.

Historic Preservation Element

Rehabilitation of Historically Significant Structures

The Historical Element recommends that the County make application to all appropriate agencies and organizations for assistance in funding feasibility studies and rehabilitating historically significant structures. These agencies should include the National Park Service and the State Bureau of Historic Preservation.

E. Comprehensive Regional Policy Plan

A comparison of the Clay County Comprehensive Plan and the Northeast Florida Regional Council's Strategic Regional Policy Plan reveals no inconsistencies among their respective policies. The County's Comprehensive Plan Elements adequately address the Strategic Regional Policy Plan's policies relating to intergovernmental coordination.

F. Areas of Critical Concern

Clay County does not have any areas falling partially or wholly within areas designated by the State as Areas of Critical State Concern.

G. Major Local Issues

Five (5) major local issues regarding the future of Clay County were developed by consolidating public input gathered at ten community meetings held throughout the County and the results of an online survey of County residents:

Major Issue 1

Infrastructure (including roads, parks and recreation, libraries and fire stations) is lagging behind development

The public expressed their desire for no more residential development until supporting infrastructure (especially roadway capacity) catches up. They stressed new development should pay for impacts (impact fees) and asked the County to consider financing alternatives such as Tax Increment Financing and public/private partnerships. The public repeatedly commented on the need for more funding for the Library System to provide service to the entire county; the need for more fire stations; and a desire for community-scaled parks to include amenities such as athletic fields for baseball, soccer, lacrosse, Frisbee golf, pickle ball courts and fee based dog parks.

There are no Intergovernmental Coordination Element objectives or policies that directly relate to or otherwise impact this issue.

Major Issue 2

Transportation networks for auto, bicycle and pedestrian need better connectivity and improvements for safety and efficiency

The public commented on the need for addressing deteriorating roads, better street lighting, and signal synchronization; providing more connectivity of roads to offer relief to Blanding Boulevard traffic (Cheswick Oaks Drive, College Drive Extension and connection at Loch Rane); the need for bike lanes/paths and an interconnected system of pedestrian/bicycle trails that includes conservation areas.

There are no Intergovernmental Coordination Element objectives or policies that directly relate to or otherwise impact this issue.

Major Issue 3**Develop a balanced economic environment that focuses on the strengths of the County's resources (natural, built and human)**

The public commented on the need for employment opportunities in the fields of manufacturing, light (clean) industrial, logistics, and high tech. Comments included the need to refurbish/complete empty commercial to prevent blight and before new construction; provide incentives to keep agriculture industry active; and the need for small business retention and incentives. On more than one occasion the public stressed the need for a mix of job opportunities for professionals and for young adults, as well as more nightlife/family entertainment options.

There are no Intergovernmental Coordination Element objectives or policies that directly relate to or otherwise impact this issue.

Major Issue 4**Ensure the health and vitality of the natural environment**

The public commented on the need for water quality protection (spring and lakes) and aquifer protection pointing to negative impacts from the drawdown of lakes. The public expressed a need to maintain the rural character of the County's existing rural areas.

There are no Intergovernmental Coordination Element objectives or policies that directly relate to or otherwise impact this issue.

Major Issue 5**Provision of recreational opportunities for the entire County**

The public commented on the need for community-scaled parks to include amenities such as athletic fields for baseball, soccer, lacrosse, Frisbee golf, pickle ball courts and fee based dog parks. They also prefer recreational opportunities/activities for all ages with extended hours and sufficient lighting.

There are no Intergovernmental Coordination Element objectives or policies that directly relate to or otherwise impact this issue.

H. Matrix for Evaluating Plan Policies

As part of the evaluation of the 2025 Comprehensive Plan's Intergovernmental Coordination Element, the County evaluated of each goal, objective and policy against the following six criteria to determine if any modifications to them are necessary or recommended.

1. Does the objective or policy have a measurable target?
2. Are there definitions of the terms contained in the objective or policy?
3. Has the objective or policy been achieved?
4. Is the objective or policy related to one or more of the County-identified major issues?
5. Is the objective or policy required to be included in the Comp Plan by statute?
6. Does the objective or policy support other objectives or policies?

Intergovernmental Coordination	Measurable Target	Defined Terms	Achieved	Major Issue	Statute Requires	Supports Others	Observations
GOAL 1	No	No	Yes	Yes	Yes	No	Add definition for development
OBJ 1.1	No	No	Yes	No	Yes	No	
POLICY 1.1.1	No	No	Yes	Yes	Yes	No	
POLICY 1.1.2	No	No	Yes	No	Yes	No	Revise statutory reference, add definition for the Northeast Florida Regional Council
POLICY 1.1.3	Yes	No	Yes	No	Yes	No	
POLICY 1.1.4	Yes	No	Yes	No	Yes	No	Add definition for Certified Local Government
POLICY 1.1.5	Yes	No	No	No	Yes	No	
POLICY 1.1.6	No	No	Yes	No	Yes	No	Add definition for the Interlocal Agreement for Coordinated Planning, Public Educational Facility Siting and Review and School concurrency in Clay County; update ILA to include current statutory references
POLICY 1.1.7	No	No	Yes	No	Yes	No	The School District is part of the DRC and receives all residential development plans. The District cites BEBR projections in their EFP.
OBJ 1.2	Yes	No	Yes	No	Yes	No	Add definition for level of service
POLICY 1.2.1	No	No	Yes	No	Yes	No	Add definition for public (service) facilities
POLICY 1.2.2	No	No	Yes	No	Yes	No	
POLICY 1.2.3	No	No	Yes	No	Yes	No	
POLICY 1.2.4	No	No	No	No	Yes	No	Revise this policy. County does not prepare these plans but would support them.
POLICY 1.2.5	Yes	No	Yes	No	Yes	No	
OBJ 1.3	No	No	Yes	No	Yes	No	
POLICY 1.3.1	No	No	Yes	No	Yes	No	
POLICY 1.3.2	No	No	Yes	No	Yes	No	
POLICY 1.3.3	No	No	Yes	No	Yes	No	
POLICY 1.3.4	No	No	Partial	No	Yes	No	The County maps adjacent land uses but does not generate a "list" of inconsistencies
POLICY 1.3.5	No	No	Yes	No	Yes	No	
POLICY 1.3.6	No	No	Yes	No	Yes	No	Amend policy to include the City of Starke
POLICY 1.3.7	No	No	Yes	No	Yes	No	
POLICY 1.3.8	No	No	Yes	No	Yes	No	
POLICY 1.3.9	No	No	Yes	No	Yes	No	Informal agreements exist
POLICY 1.3.10	No	No	Yes	No	Yes	No	
POLICY 1.3.11	No	No	Yes	No	Yes	No	
POLICY 1.3.12	No	No	Yes	No	Yes	No	

I. Assessment of Changes to Florida Statutes

As part of the evaluation of the 2025 Comprehensive Plan's Intergovernmental Coordination Element, the County examined changes in state statutory requirements since 2009, the last update of the Comprehensive Plan.

2009 Legislation

- Requires the intergovernmental coordination element to recognize airport master plans. Chapter 2009-85, section 3, Laws of Florida. Policy deleted in 2011, no amendment necessary.
- Requires the intergovernmental coordination element to include a mandatory (rather than voluntary) dispute resolution process and requires use of the process prescribed in section 186.509, Florida Statutes, for this purpose. Chapter 2009-96, section 3, Laws of Florida. No amendment necessary.
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2011 Legislation ("Community Planning Act")

- Modifies areas of authority under this act with respect to joint agreements and intergovernmental coordination between cities and counties and planning in advance of jurisdictional changes. No amendment necessary.
- Deletes requirement for intergovernmental coordination element to provide for recognition of campus master plans and airport master plans. No amendment necessary.
- Modifies requirements for the intergovernmental coordination element to include portions of repealed Rule 9J-5.015, Florida Administrative Code, including coordinating and addressing impacts on adjacent municipalities and coordinating the establishment of level of service standards. No amendment necessary.
- Deletes requirements in intergovernmental coordination element for fostering coordination between special districts and local general purpose governments, submittal of public facilities report, execution of interlocal agreement with district school board, the county and nonexempt municipalities, and submittal of reports to the Florida Department of Community Affairs by counties with populations greater than 100,000. No amendment necessary.

J. Conclusions and Proposed Revisions

The Comprehensive Plan is substantively up-to-date and the County has done a good job of implementing this Element. Most necessary amendments are those as required by changes in State law, to improve clarity or to correct minor textual errors.

- Add the name of the Element to all GOPs to better differentiate among others in the Comprehensive Plan.

- Add a definitions section to the GOPs for easier reference.

The following offers easy identification of changes made to update the Intergovernmental Coordination Element. New (added) language is underlined and removed (deleted) language is ~~struck through~~.

Proposed Amendment to Policy 1.2 (ICE Policy 1.1.2)

Add acronym for the Northeast Florida Regional Council and delete reference to a repealed rule.

ICE POLICY 1.1.2

In cases where the resolution of issues requiring intergovernmental concurrence cannot be achieved, Clay County shall initiate informal mediation proceedings by filing a request for mediation assistance with the Northeast Florida Regional Council (NEFRC), pursuant to Chapter 29H-11, ~~Laws of Florida~~, and Chapter 186, FS.

Proposed Amendment to Policy 1.6 (ICE Policy 1.1.6)

Revision to reflect the correct name of the Interlocal Agreement.

ICE POLICY 1.1.6

The County and the Clay County School Board shall maintain an interlocal agreement, the Interlocal Agreement for Coordinated Planning, Public Educational Facilityies Siting and Review and School Concurrence in Clay County, which establishes the process by which collaborative planning and decision making for public school siting and school concurrency is made.

Proposed Amendment to Policy 2.3 (ICE Policy 1.2.3)

Revision to reflect the correct name and acronym for the Council on Aging Clay County.

ICE POLICY 1.2.3

The County shall work with the FDOT, TPO, Jacksonville Transportation Authority (JTA), Council on Aging Clay County (COACC), and other related agencies/private institutions to provide a sound and sustainable mass transit system to the general public.

Proposed Amendment to Policy 2.4 (ICE Policy 1.2.4)

The County does not prepare plans for port, aviation or related facilities but would support plans that are consistent with the Transportation Element.

ICE POLICY 1.2.4

The County shall ~~prepare and maintain support~~ plans for port, aviation, and related facilities coordinated with the transportation element.

Proposed Amendment to Policy 3.2 (ICE Policy 1.3.2)

Revision to reflect the correct reference.

ICE POLICY 1.3.2

Under the guidance of the ~~State Department of Community Affairs (DCA)~~ state land planning agency and to be consistent with Florida Statutes Chapter 163, the County shall establish and implement procedures for the review of comprehensive plans and comprehensive plan amendments of the County's municipalities, and adjacent counties.

Proposed Amendment to Policy 3.6 (ICE Policy 1.3.6)

The County has an ILA with the City of Starke for mutual aid. Policy revision is to reflect this.

ICE POLICY 1.3.6

The County shall maintain mutual said agreements with the ~~the City of Starke, the City of~~ Keystone Heights, the Town of Penney Farms, the Town of Orange Park, and the City of Green Cove Springs for the determination of responsibilities concerning fire protection.

Proposed Amendment to Policy 3.7 (ICE Policy 1.3.7)
Policy revised for clarity.

ICE POLICY 1.3.7

The County shall continue to coordinate with state and federal agencies ~~continue to coordinate~~ concerning environmental permitting procedures.

Proposed Amendment to Policy 3.8 (ICE Policy 1.3.8)
Revise policy to include the correct acronym for Florida Department of Transportation

ICE POLICY 1.3.8

The County shall establish an agreement with the Florida Department of Transportation (FDOT) to provide for review and comment of all FDOT plans in Clay County to analyze their impact on the Comprehensive Plan.

Proposed Amendment to Policy 3.10 (ICE Policy 1.3.10)
The Northeast Florida Metropolitan Area Steering Committee is no longer active. Revision is to delete a reference to this committee.

ICE POLICY 1.3.10

The County shall continue the existing communication program with the U.S. Department of the Navy and the FAA with regards to aviation and aviation facilities. The County shall continue the maintenance of informal agreements. ~~and continue participation in the Northeast Florida Metropolitan Area Steering Committee.~~